

## A Review of Cutting Plants and Cold Stores – Recommendations

### Report by Colin Sullivan and Ian McWatt

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## INTRODUCTION

1. On 1 February 2018 the Food Standards Agency (FSA) and Food Standards Scotland (FSS) (“the Agencies”) announced a UK-wide review of cutting plants and cold stores in the wake of non-compliance issues identified at a number of cutting plants during 2017 and early 2018. The terms of reference<sup>1</sup> were published on 26 February 18 outlining the scope, objectives, deliverables, approach and timescales for this review.<sup>2</sup>
2. The review was undertaken to improve levels of public confidence in the safety and authenticity of meat processed in the UK and identify potential improvements in the way in which this important sector operates and is regulated. Following a number of incidents over the last few years, the regulators and industry representative bodies all agreed that a step change is needed to retain and improve consumer trust. It was recognised that the actions of a few can damage the reputation of the whole sector.
3. Following the presentation of the emerging review findings to both Boards in May/June 2018, this paper sets out the proposed recommendations to address them and outlines the next steps towards implementation.
4. The Agencies’ Boards are asked to:
  - **Endorse** findings and conclusions set out in the review report;
  - **Discuss and agree** the proposed recommendations developed in Phase 2 to address the findings;
  - **Agree** the proposed implementation approach outlined for Phase 3 and areas for further research; and

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<sup>1</sup> The Terms of Reference can be found at the following link:

<https://www.food.gov.uk/sites/default/files/media/document/Cutting%20Plants%20and%20Cold%20Stores%20Review%20-%20FSA%2018-06-08.pdf#page=19>

<sup>2</sup> The review terms of reference were re-focused in April 2018 following consultation with the Project Board to initially focus on a detailed analysis of meat cutting plants and cold stores. Issues identified in other related parts of the sector have been raised as recommendations for further work.

- **Give direction** on any specific areas of interest the Boards would wish to see explored further over and above the activities covered in the recommendations.

## **BACKGROUND AND CONTEXT**

5. The UK meat industry is responsible for producing safe food both to the UK market and for export. It is a complex industry encompassing a domestic and international supply chain from farms, abattoirs, cutting plants, cold stores, processing plants through to food distributors, supermarkets, other retailers, and food service producers that provide end products to consumers.
6. Meat continues to be a key component of the UK diet with over 85% of the population consuming it. There are strong reasons why there are specific controls to protect public health and wider consumer interests including consumer confidence in the authenticity of meat placed on the market. The size, scale and complexity of meat production means there are a wide range of biological, chemical and physical hazards that have the potential to generate a risk to public health. That is why the production, processing, distribution, retail, packaging and labelling of meat products is governed by a comprehensive framework of legislation, codes of practice and guidance.
7. Meat Food Business Operators (FBOs) have a duty under law to provide their customers with products which are safe to consume. Their responsibilities include complying with legislation; good environmental and food hygiene practices; prevention of contamination; suitably trained and supervised staff; a food safety system based on Hazard Analysis at Critical Control Points (HACCP) Principles; and the appropriate control of waste products.
8. As the Competent Authorities, the Agencies and Local Authorities (LAs) are responsible for providing assurance to consumers that all food businesses in the sector are meeting their legal obligations to produce safe, authentic food that satisfies hygiene and welfare standards.

## **SCOPE**

9. The focus of this review has been on the 1,713<sup>3</sup> Approved cutting plants and cold stores following the recent high-profile incidents in several food businesses which identified some areas for concern, particularly in relation to industry practices on traceability, durability and authenticity. The scientific evidence underpinning the food safety risk assessment (including clostridium Botulinum) and delivery of Official Controls was explicitly excluded from the scope as this is being addressed through the Agencies' science and evidence programmes. The starting point of the review is to ensure FBOs meet their responsibilities and have the right approaches in place which will ensure compliance with their legal and regulatory requirements.

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<sup>3</sup> As at June 2018

## **REVIEW METHODOLOGY AND GOVERNANCE**

10. The review team was subject to formal governance comprising joint SROs reporting to a Project Board chaired by the Agencies' CEOs. This formal governance was complemented by an external Challenge Group, to provide an external perspective advising on review approach and emerging findings.
11. A detailed explanation of the review methodology is included in the full report but the key features were a:
  - Phased approach with Phase 1 gathering information and documenting the current position; Phase 2 validating issues and co-creating potential solutions with stakeholders, and analysing information from previous incidents, options appraisal and developing recommendations for change; and Phase 3 to develop an implementation approach and deliver improvements;
  - Programme approach with workstreams adopting a consistent approach, agreeing key deliverables and completing regular checkpoints against plan;
  - Comprehensive stakeholder engagement and user centred approach comprising LA and FBO surveys, user design workshops, presentations, and regular meetings with key stakeholder groups.

## **FINDINGS AND RECOMMENDATIONS**

12. The engagement exercises and the additional research has built on the findings from the initial phase of the review and raised a few additional areas for further consideration – most notably in relation to incidents management, export approvals, the role of agents and brokers trading meat products in cold stores and identified multiple descriptors used by the industry to define the durability of meat.
13. The review team developed an appraisal framework for evaluating recommendations, with the focus on tackling causes, not treating symptoms. This framework included reductions in the risk to public health as one of the key evaluation criteria. Further details of the evaluation criteria are included in the full report.
14. This fundamental review of the current arrangements has identified a number of ways to make the system more effective, whilst confirming that the current legislative and regulatory framework is largely fit for purpose. The review has identified actions and responses that industry and the regulatory authorities can take to:
  - Make the most of all sources of food business information to improve assurance;

- Modernise the delivery of Official Controls;
  - Deliver Official Controls more coherently and consistently across both central and local regulatory authorities;
  - Provide clearer, concise guidance in co-production with food businesses on their requirements to produce safe food; and
  - Deliver a consistent and uniform people competency model for all those delivering Official Controls.
15. The recommendations are described more fully in the report but are summarised below.
16. We expect the **industry and food businesses** to take the lead in:
- Demonstrating a more transparent management culture by making management and assurance information available to regulators, for example, information from DNA testing programmes in relation to authenticity;
  - Participating in the information sharing initiative, which 2 Sisters Food Group has trialled with the Agencies;
  - Introducing CCTV at critical points within cutting plants and cold stores even though there is currently no legislative requirement for them to do so;
  - Reviewing their current traceability records to ensure comprehensive supply chain information is available for audit on request by the Competent Authority;
  - Assuming responsibility for the Meat Industry Guide as set out in EU regulations and to further ensure it reflects requirements of the Manual for Official Controls; and
  - Ensuring at least one member of staff (directly employed or contracted) should be trained to HACCP Level 4 with all other food handlers trained to Level 2 as a minimum.
17. In addition, we would expect the **industry to respond positively and make any changes required** as a consequence of regulatory authorities' intention to:
- Test the value in mapping the British Retail Consortium (BRC) Directory open information to the Agencies' data on establishments and of the Agencies' officials making use of information in BRC Global Standards (GS) audit reports to inform official controls at cutting plants;

- Reassess the FSA’s Major Incident Plan to align with other elements of the Official Controls framework, in particular in relation to effective coordination and communication with LAs and responsibility for assuring delivery of incident follow-up actions<sup>4</sup>;
- Commission further work to assess the role of agents and brokers of meat and the controls applied at this part of the food distribution network;
- Update the Agencies’ Intervention approach to clarify roles and responsibilities and set standards for timely and adequate enforcement action; and
- Work with industry, Westminster Government and the devolved administrations to introduce a more standardised approach to the wording of durability on product labels and require food businesses throughout the meat supply chain to adopt that approach. If legislation is required we will work with industry and Defra to develop the legislation to mandate this requirement.

18. In parallel the **regulatory authorities** will:

- Integrate the current FSA approvals activity into a single, unified team within FSA Operations Group<sup>5</sup>;
- Digitally enable the Agencies’ approval processes to facilitate more customer interactions to be completed, submitted and tracked as part of a more on-line case management system;
- Integrate all cutting plant inspection and audit activity to improve coordination and consistency of delivery and provide improved level of assurance;
- Invite a small, representative number of LAs to participate in a trial to evaluate the use of a single organisation to deliver all Official Controls in a geographic location;
- Update procedures for Authorised Officers responsible for Approvals, enforcement, inspections and audit of cutting plants and cold stores;
- Update, organise and index guidance and legislation for hygiene and standards inspections using the Agencies’ repositories, prioritising any required updates to guidance on durability, labelling and traceability;

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<sup>4</sup> FSS reviewed their Major Incident Plan in May 2018

<sup>5</sup> FSS has this in place

- Develop a standard competency matrix for all job roles with responsibility for delivering Official Controls to underpin recruitment, performance management/internal monitoring, training, contract specifications and development of any future accreditation approach. As a minimum all such staff would be required to have HACCP Level 4 certification; and
- Develop centralised Agency databases to hold FSA/FSS Authorised Officer qualifications and training records, training materials and review and update existing training material to incorporate inspection and audit requirements for cutting plants and cold stores.

## **NEXT STEPS**

19. Successful implementation of these recommendations will strengthen the delivery of official controls and improve overall levels of compliance, which will reduce the overall risk to public health, increased consumer confidence and provide increased levels of assurance.
20. Both Agencies already have modernisation programmes in place for regulatory delivery and assurance and we will agree with those programmes the recommendations from this review that will be implemented by them. Any remaining recommendations will be delivered through operational delivery programmes of work in each country.
21. Our preliminary analysis of these recommendations suggests that their financial impact on businesses and regulators is minimal and can be absorbed within existing resource allocations and estimates, and through recycling savings from more cost-effective delivery. Subject to approval of these recommendations we will develop a more detailed implementation plan for their delivery as a priority for the next phase of work including a fuller assessment of any financial implications; and a benefits realisation plan which baselines and measures the improvements we expect from these recommendations.
22. The respective executive management teams of the Agencies will undertake joint progress reviews quarterly to provide assurance that implementation is on track and overall outcomes are being delivered. These assurance arrangements will be supplemented by an independent post-implementation review (PIR), to evaluate the effectiveness of the conduct of the review and the implementation approach. We will approach the Cabinet Office Infrastructure and Projects Authority (IPA) to undertake this PIR.

## **CONCLUSION**

23. Although this review was triggered by UK meat related incidents, the UK meat industry produces meat considered by many to be amongst the safest in the world. There is a comprehensive framework of legislation and guidance available to food businesses in supporting them in their obligation to produce

safe, hygienic, and authentic food which abides by high welfare standards. The industry bodies' commitment to work collaboratively with the regulator was evident from the levels of stakeholder engagement during this review, particularly through participation in User Design workshops and face-to-face meetings.

24. However, this commitment needs to translate into tangible improvements through the adoption of these recommendations. Consumers need to see visible evidence that food businesses are prioritising food safety as part of their overall management culture which will drive improvements in public confidence in the meat industry.
25. In addition, the review has highlighted areas for improvement by both the Central Competent Authorities (FSS and FSA) and LAs, which should be implemented to add further to the safety of meat produced for human consumption within the UK.
26. The Agencies' Boards are asked to:
  - **Endorse** the findings and conclusions set out in the review report;
  - **Discuss and agree** the proposed recommendations developed in Phase 2 to address the findings;
  - **Agree** the proposed implementation approach outlined for Phase 3 and areas for further research; and
  - **Give direction** on any specific areas of interest the Boards would wish to see explored further over and above the activities covered in the recommendations.

**ANNEX 1: Review Recommendations - Summary**

**Short Term (0-6 months)**

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
1	<i>Integrate the current FSA approvals activity into a single, unified team within FSA Operations Group.</i>	✓		Already in place	FSA
2	<i>Reassess the FSA's Major incident plan to align with other elements of the Official Controls framework, in particular in relation to effective coordination and communication with LAs and responsibility for assuring delivery of incident follow-up actions.</i>	✓	✓	New plan in place	FSA
3	<i>Updating the Agencies' Intervention approach to clarify roles and responsibilities and set standards for timely and adequate enforcement action.</i>	✓	✓	✓ Currently piloting	FSA/FSS
4	<i>Update procedures for Authorised Officers responsible for Approvals, enforcement, inspections and audit of cutting plants and cold stores;</i>	✓	✓	✓	FSA/FSS
5	<i>Industry should encourage Food Businesses to participate in the information sharing initiative, which 2 Sisters Food Group has trialled with the Agencies</i>	✓	✓	✓	Industry
6	<i>Commission further work to assess the role of agents and brokers of meat and the controls applied at this part of the food distribution network.</i>	✓	✓	✓	FSA/FSS
7	<i>Invite a small, representative number of LAs to participate in a trial to evaluate the use of single organisation to deliver all Official Controls in a geographic location</i>	✓	✓	✓	FSA/FSS/ LAs



## Medium Term (6-18 months)

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
8	<i>Test the value in mapping the British Retail Consortium (BRC) Directory open information to the Agencies' data on establishments and of the Agencies' officials making use of information in BRC Global Standards (GS) audit reports to inform official controls at cutting plants</i>	✓	✓		FSA
9	<i>Cold Store and Cutting Plant operators should review their current traceability records to ensure comprehensive supply chain information is available for audit on request by the Competent Authority</i>	✓	✓	✓	Industry
10	<i>Integrate cutting plant inspection and audit activity to improve coordination and consistency of delivery and provide improved level of assurance.</i>	✓	✓ Partially in place	✓	FSA/FSS
11	<i>Industry representative bodies to assume responsibility for the Meat Industry Guide as set out in EU regulations and to further ensure it reflects requirements of the Manual for Official Controls. Further work is required to clarify the regulatory input and oversight.</i>	✓	✓	✓	Industry
12	<i>Update, organise and index guidance and legislation for hygiene and standards inspections using the Agencies' repositories, prioritising any required updates to guidance on durability, labelling and traceability.</i>	✓	✓	✓	FSA/FSS
13	<i>Develop centralised Agency databases to hold FSA/FSS Authorised Officer qualifications and training records, training materials and review and update existing training material to incorporate inspection and audit requirements for Cutting Plants and Cold Stores.</i>	✓	✓	✓	FSA/FSS
14	<i>Demonstrating greater transparency by making management and assurance information available to regulators, for example, information from DNA testing programmes in relation to authenticity</i>	✓	✓	✓	Industry
15	<i>Ensuring at least one member of staff (directly employed or contracted) should be trained to HACCP Level 4 with all other food handlers trained to Level 2 as a minimum</i>	✓	✓	✓	Industry

Longer Term (+18 months)

Recommendations		Countries recommendation applies to			Responsible for delivery
		England & Wales	Northern Ireland	Scotland	
16	<i>Digitally enable the Agencies' approval process to facilitate more customer interactions to be completed, submitted and tracked as part of a more on-line case management system.</i>	✓	✓	✓	FSA/FSS
17	<i>Develop a standard competency matrix for all job roles with responsibility for delivering Official Controls to underpin recruitment, performance management/internal monitoring, training, contract specifications and development of any future accreditation approach. As a minimum all such staff would be required to have HACCP Level 4 certification.</i>	✓	✓	✓ Partially in place	FSA/FSS
18	<i>Introducing CCTV at critical points within cutting plants and cold stores even though there is currently no legislative requirement for them to do so</i>	✓	✓	✓	Industry
19	<i>Work with industry, Westminster Government and the devolved administrations to introduce a more standardised approach to the wording of durability on product labels and require food businesses throughout the meat supply chain to adopt that approach. If legislation is required we will work with industry and Defra to develop the legislation to mandate this requirement.</i>	✓	✓	✓	FSA/FSS/ Industry