

## **Risk management decision update: Statement released by Food Standards Scotland on 11<sup>th</sup> February 2017 - status of the Food Alert for Action (FAFA) with regards to Errington Cheese Ltd's Corra Linn cheese**

### **1. Purpose of the FAFA as regards Corra Linn cheese**

The FAFA (dated 9 November 2016) was applied to Corra Linn cheese due to the identification, by South Lanarkshire Council (SLC) of serious deficiencies in the single food safety management system which was applied to all cheeses produced by Errington Cheese Limited (ECL). Alongside this, testing of different batches of Dunsyre Blue, Lanark Blue and Lanark White cheeses also produced by ECL had previously indicated the presence of potentially pathogenic *E. coli*, indicating that the food safety management system was not effective in preventing contamination.

Corra Linn is a hard cheese, with different characteristics to the semi hard and blue Dunsyre and Lanark varieties, batches of which had tested positive for potentially pathogenic *E. coli*. It is recognised that shiga toxin producing *E. coli* (STEC) would be expected to be less likely to survive and grow in a hard cheese like Corra Linn than in the softer cheese varieties. However, there is published evidence on the contamination of hard cheeses with STEC strains that have been implicated in human illness. Therefore it is appropriate that the FAFA applies to Corra Linn until ECL provides evidence that the STEC risk in this cheese has been eliminated or reduced to an acceptable level based on a validated and verified system of food safety management controls based on HACCP principles..

### **2. The nature of evidence that would be required to remove Corra Linn from the FAFA**

In order to determine whether it is appropriate to allow any products subject to the FAFA to be placed back on market FSS's position is that it would be necessary to undertake a full risk assessment taking account of evidence relating to the food safety management controls, and the monitoring of physicochemical characteristics and microbiological quality throughout the production of these particular cheeses. This would include reviewing data which indicates that the critical limits for the control points identified have been met for this type of cheese. These more empirical measurements provide greater assurance that effective systems have been consistently applied and a more accurate assessment of product safety than reliance on variable end product microbiological testing (see section 3 below). SLC did not provide FSS with assurances that such a risk assessment had been undertaken by ECL at the time certain batches of Corra Linn cheese were allowed to be placed on the market, nor provided FSS with any assessment of the efficacy of the control systems applied by the business, or an indication that records demonstrating that critical limits had been set and met.

### **3. The significance of microbiological testing results for different batches of Corra Linn**

The particular batches of Corra Linn that were permitted to be placed on the market were apparently considered safe by SLC on the basis of microbiological testing results for end product, coupled with theoretical modelling information showing the potential for STEC control in the physico-chemical conditions of end product, without fully demonstrating how this data relates to the production of the specific cheeses in question. FSS does not consider this approach to be sufficiently protective of public health. Businesses are required to demonstrate that they are applying robust food safety controls and the main purpose of testing is to verify that these are working effectively throughout the process. Relying on testing results for the end product cannot provide sufficient assurance that the cheese was produced safely as the characteristics of the cheese change throughout production and any *E. coli* allowed to enter the process will be unevenly spread throughout food. It is therefore possible to get positive and negative testing results for the same batch.

At the time of this risk management decision (11 February 2017), preliminary **presumptive** positive results obtained for other batches of Corra Linn served to support FSS's view that the decision to place this cheese on the market was premature, as confirmed positive results for these batches would call into question the safety of those placed on the market. Nonetheless, whether the confirmed results for these other batches are positive or negative, the absence of a full risk assessment means that this cheese was allowed to be placed on the market with incomplete evidence to assure its safety.

**In conclusion, whilst FSS has requested additional information and assurances from SLC regarding their revised assessment, this has not been forthcoming so far. Until such times this has been received and considered acceptable, there is insufficient evidence to support modification of the FAFA for these cheeses.**