

General Secretary's Report



Seminar

Great news to start this report. By popular demand, Seminar 2009 is going ahead and is taking place over the weekend of the 4th-6th September. It will be a slightly shorter event than in previous years, with the Sunday sessions being dropped to allow members to get away straight after breakfast. There has also been a change of venue, with this year's event taking place at the University of Nottingham. Sponsorship will be available to members as in previous years. I hope that we will see more members supporting the event this year. Feedback from members supported the running of a Seminar, so now is the time to back this up and return the completed application form included in this issue of Hygienist. It has been said before, but it is worth re-iterating; this is your seminar, use it or lose it.

Modular Training

It has come to the attention of the Association that certain of the powers that be have sought to legitimise the adoption of modular training (in line with government guidelines) in the proposed training of future meat inspectors, by claiming that the AMI were in attendance at the meetings. I would like to clarify at

the outset that the AMI have **ALWAYS** had concerns about modular training, and have voiced this concern from the first time that we were invited to the table. This point has particular relevance due to the fact that the first time we were invited to attend a meeting on training was in March 2008. The modules for the new course were written in 2007, so in no way can this be legitimised by saying that the AMI were in attendance.

I think that it might be useful to spell out at this point exactly why we have concerns; by their very nature, and the reason why we suspect a modular format is so desired is that the modules are able to be taken again and again, until an individual either passes or loses interest. Surely this can only lead to a drop in the calibre of the individuals who are able to take this course, an obvious cost saving for industry. I believe that the same charge has been levelled at so many of the various degree courses available today. Another reason is that we believe that it somewhat "devalues" the qualification that all MHI's/ PMI's currently hold. I certainly had to pass a series of examinations, with an option to re-sit once should I have failed (not necessary, I hasten to add). But in this new system, I have not seen one hint as to a limit to the number of times that any one individual can take to pass any given module. Note also that depending on the level, an exam may not actually be necessary, with on line assessment being the order of the day. I'm sure that we all remember the dreaded post-mortem room, with the specimen table, where our knowledge was tested by our peers in the trade?

In short, the Association feels that the way is being prepared for lesser individuals than ourselves to do the job that we all care so much about. At the time of writing, the entry level criteria has yet to be set.

E-Coli & HACCP

Having read the Pennington Report into the e-coli outbreak in South Wales, and the absolute hammering meted out to the various authorities, I feel that I have to voice my concerns about the importance being vested in the HACCP based principles, now required by legislation in all areas of food production. I have concerns that this system is being viewed as a "panacea" that will solve all ills. There is no doubt that a good HACCP system, fully supported from the top down, and diligently applied in the spirit in which it is intended, will go a very long way to ensuring that the stock will be clean at the point of intake, good manufacturing practices are employed, and a high standard of carcase is produced with the lowest level of pathogens possible on the meat. It will not produce a product that is absolutely devoid of these pathogens, therefore due diligence is still required all the way through the food chain. It is absolutely essential that all fresh meat is treated as though it has the potential for cross contamination and that every effort is made to remove the potential for this occurrence. I believe that this is called basic food hygiene, and that if this is wilfully ignored, then the full force of the law should be brought to bear.

I also believe that HACCP should be a pro-active system of improving standards. This should mean that any failures (exceeding of established critical limits) should be identified, dealt with and that this should then be verified, thus moving any problems down the line towards the lairage. This, in conjunction with a good policy towards the intake of clean, fasted livestock and good, ongoing training of

personnel should ensure a carcase that we are happy to health mark.

Surely then, if a plant is employing somebody to trim contamination immediately prior to the inspection point, this is indicative of a failure of that plant's HACCP system? I appreciate that "accidents" happen, and that intestines can burst at evisceration, pathologies such as peritonitis etc can occasionally cause contamination to occur, but this is where GMP's work to minimise the risk of cross contamination and the situation to be dealt with. But if contamination is occurring to the point where it is viable to employ a trimmer, then I contend that HACCP is failing. This is one area where I believe that the Meat Hygiene Inspector is so vitally important. God forbid any plant that still advocates the washing off of contamination; any MHI will insist that the contaminated carcase is detained separately, hygienically reworked via trimming, and represented for inspection. Only when the MHI is satisfied that the carcase is visually free from contamination will they apply the health mark. This, I truly believe to be the most powerful tool in the box, the carcase being worthless until the health mark is applied.

It is also essential that the incident of contamination is accurately and consistently recorded. Perhaps we should be recording contamination reaching the point of trimming rather than just the point of inspection? These results can then be used to flag up any deficiencies and used when the OV carries out their scheduled audit of the plant. It is then up to the OV to make moves towards enforcement where this is deemed to be necessary. This is one of the issues that was quite clearly lacking in the circumstances leading up to the unfortunate incident in Bridgend.

MHI's as Meat Policemen

There have been calls by Tim Smith, CEO of the Food Standards Agency for MHI's to act more like "meat policemen". This would appear to be somewhat contradictory to the current path that the FSA/MHS seem to be following, with their calls for a more risk based approach and their apparent readiness to move towards self-regulation. I have no problem with MHI's taking more of an active role in enforcement. I can't think of anyone better placed to do so, particularly when it comes to informal/verbal advice and enforcement. Who is better placed than the MHI working the line in identifying failures and problems as they occur?

The first step in re-elevating the MHI to this role is to stop the current diminution of the status of the Meat Hygiene Inspector, and to cease regarding them as merely "automatons" simply standing on line performing the actual mechanics of post-mortem inspection. Allow the MHI to utilize their experience and exercise their own judgement rather prescribing in chapter and verse what they should do.

Also, it makes no sense to me to disallow MHI's from carrying out post-mortem inspections on cases of special emergency slaughter. It is often the case that the MHI's have much more experience of SES than the OV in plant. I also believe it would also be beneficial to re-instate the Clean Livestock Policy and allow the MHI to assist in carrying out ante-mortem inspection, thus allowing MHI's to prevent the processing of excessively dirty livestock. It has worked before, and it can work again.

And why not re-instate the formal pre-operational hygiene checks? I appreciate that the FBO should have a system in place as part of their HACCP plan, but does this happen in every case? I know that many MHI's still carry out an informal check and flag up any issues as and when

they occur. So why not put this back to a more formal footing?

I can foresee the protests from industry now regarding "earned autonomy" and "certain plants and their teams being able to produce clean meat from varying degrees of dirty livestock", but I would contend that an experienced MHI who is a regular at any given plant would have the knowledge in that particular plants capabilities as to whether this is actually so. This all stems from the building of working relationships with plant staff and the earning of respect by demonstrating our knowledge in our field of expertise and an understanding of theirs.

This, coupled with the FBO's obligations to produce safe meat (i.e. HACCP) should provide a belt and braces approach to meat production. In my experience, it is often the slaughter staff that protest loudest at the intake of dirty livestock. It makes the task unpleasant and sometimes dangerous, not to mention the constant dulling of keen blades. As I have stated earlier, it has worked before and there is no reason why it cannot work again.

So I urge the FSA/MHS to listen to what the inspectors are telling you. We are prepared to step up to the plate, just give us the opportunity.

Keep up the good work.

Regards,

Ian Robinson