

General Secretary's Report



Hello to you all,

It has been a fairly busy last quarter, the Association having submitted opinion on the proposal to utilise lactic acid washing in the production of beef, and on the review to consider the future delivery of the food standards regime in Scotland. We have also represented our membership at stakeholder meetings.

Lactic Acid – the AMI response;

Draft Commission proposal on the use of Lactic Acid to reduce microbiological contamination from bovine carcasses, cuts and trimmings;

This proposal has provoked much comment from our membership and we propose to answer in two parts and a final summary.

1) The Association believes that this proposal is hugely problematic for a number of reasons;

a) It is perceived by our members that this proposal is an acknowledgment that HACCP as it stands is not working in many approved premises, and that faecal

contamination on carcasses has in fact increased since the removal of the Clean Livestock Policy in 2006. With this in mind, to include this further process into a system that relies on a HACCP plan that is already dysfunctional would appear to be untenable.

We believe that if the requirements of 852/2004 and 853/2004 are fulfilled, then any further decontamination should prove to be un-necessary.

b) Our main concern is that the use of Lactic Acid washes would simply serve to mask poor hygienic practice and in doing so will encourage increased line speeds, thus exacerbating an already existing problem.

It is the experience of our members that operatives are often obliged to “cut corners” to cope with high line speeds and that this is rarely if ever recorded in the way that an effective HACCP plan would require. It is our belief that if a Lactic Acid wash is put in place then it would quickly become the norm to present carcasses with faecal contamination as “it is going to be washed anyway”.

Professor Pennington alluded to this sort of situation in comments on his own 2009 report into the 2005 outbreak of e-coli 0157 in South Wales, where he referred to a “normalisation of deviance”. It is our opinion that the utilisation of any form of anti-microbial wash would lead to further

“normalisation of deviance”, and for this reason alone, should not be considered.

c) The FSA is an organisation that bases its decisions on science and evidence. We acknowledge the science behind this proposal but would seek to draw the attention of the FSA to statistical evidence coming out of the USA where Lactic acid washes are already in use. This evidence indicates massive recalls of ground beef/ground beef products for contamination by e-coli, the very situation that we seek to avoid;

- Ohio, July/August 2011; 60,424 lbs ground beef products recalled due to contamination with e-coli 0157:H7
- Kansas, July/August 2011; 60,000lbs ground beef recalled due to contamination with e-coli.
- Texas, September 2011; 40,000 lbs ground beef recalled due to contamination with e-coli 0157:H7
- Ohio, September 2011; 131,300 lbs ground beef recalled due to contamination with e-coli 0157:H7

We surmise that the cost of such recalls would be borne by the food producers concerned and that there would be no direct cost to the taxpayer, but would respectfully suggest that such costs are not the issue and that food safety should be the only consideration.

2) Should the adoption of Lactic Acid washing actually come to pass, the AMI believe that it should only be done so with some very stringent stipulations in place, above and beyond parameters already laid down in legislation;

a) Further to legislative requirements that lactic acid washing should not be applied to any carcass with visible faecal contamination, we believe that such a process should not be utilised until after the health mark has been applied. I.e. carcasses will have already been subjected to post mortem inspection thus ensuring that it is free from visible faecal contamination.

It should be further borne in mind at this point that there is a requirement for the health mark to be legible and the problems in applying a health mark to a freshly washed carcass should be plainly apparent.

b) It is the opinion of the Association that any product subjected to any form of anti-microbial washing should be clearly stated on labelling subsequently applied to that product, thus allowing the consumer to have the final choice.

Summary

1) The Association of Meat Inspectors oppose the introduction of Lactic Acid washing of beef carcasses, cuts and trimmings in the belief that this proposal will put the general public at greater risk.

2) If adopted, anti-microbial washing should only take place post health marking.

3) Any meat produced in this manner must be clearly labelled as such.

FEASIBILITY STUDY: FOOD STANDARDS AGENCY – REVIEW OF FUNCTIONS IN SCOTLAND

TERMS OF REFERENCE

Feasibility study to assess the benefits and cost implications of establishing an independent Food Standards Agency for Scotland including a Scottish meat inspection delivery body, maintaining the statutory objective of the Food Standards Agency to “protect public health from risk which may arise in connection with the consumption of food, and otherwise to protect the interests of consumers in relation to food”.

Upon receipt of this consultation the Association disseminated it to its executive and requested comment, particularly from our Scottish members.

The following opinion is a direct result of these comments.

- *Describe the relevance and implications on Scotland of the recent changes to the UK-wide FSA;*

It is widely acknowledged by our members that the meat industry is not as well regulated as it was prior to the introduction of the current legislative package introduced in January 2006, which sought to make Food Business Operators take direct responsibility for the food they produce. As a consequence, it is widely believed amongst our members that the standards of production have

regressed, particularly on the issue of faecal contamination being presented for post mortem inspection. This is believed largely to be as a direct consequence of the revocation of the Clean Livestock Policy, itself having been acknowledged to have been the biggest step forward in the production of clean carcasses for many years.

It is also believed by many that HACCP as it is currently being implemented is not working in the manner originally envisaged, lacking the necessary commitment from the top down and day to day implementation. HACCP is supposed to be a pro-active system of production that identifies and quantifies risk, identifies, rectifies and verifies as having been rectified, situations that are contrary to the production of clean carcasses. Industry’s “solution” to the production of faecally contaminated carcasses would appear to be to place one or more “trimmers” immediately prior to the Meat Hygiene Inspector.

The latest proposal to incorporate lactic acid washing in the production of beef is therefore, in our view, untenable whilst this situation persists and in any case, undesirable

Any review of the delivery of official controls should focus on the enhancement of the protection of public health and it is imperative that the compliance history of Food Business Operators over the past five years, i.e. since the adoption of the “new” regulatory package, is taken into account.

- *Consider the implications of establishing a new public body and the nature of that body, having regard to the Government's continuing commitment to streamline the public bodies landscape in Scotland;*

The Association has for a very long time advocated the utilisation of a single, centralised competent authority to facilitate a standardisation of meat inspection that was not always evident prior to 1995, when we

saw the introduction of the Meat Hygiene Service, and see no reason why this should change.

- *Include a financial appraisal of options; and;*

Specifically on explorations of Meat Inspection Services:

- *The report should identify and evaluate alternative delivery options which would allow the meat inspection function to be undertaken in Scottish meat plants in a more efficient and cost effective manner than the current GB wide model, and maintains the current levels of compliance with public and animal health statutory controls, whilst being risk based and proportionate.*

It has been noticeable in the responses received that political desirability's have been put aside and the overriding consideration is that meat control functions should remain independent from industry and preferably under the one centralised competent authority. The Association does not favour the use of contracted "control bodies" and believe this to have been discounted in the Tierney report of 2007.

- *The study should also consider the case for merging meat inspection delivery in Scotland with other food inspection services (e.g. egg production/processing and hygiene controls in retail premises).*

The Association would welcome the merging of meat control delivery with other roles as this would open up the opportunity for MHI's to expand their individual roles as recommended at the 2008 conference in Lyon, later ratified by the CVO's in Europe.

This could be of great significance financially as it would cut down on expensive OV time while maintaining their overall supervision in plants.

It is well known to the Association that its members would welcome such developments and with trials such as the adoption of TB sampling in plant being carried out by the inspection teams in those plants being so successful, MHI's have demonstrated their capability and willingness to meet such challenges.

Another example of our members demonstrating willingness to go the extra mile is the fact that many have completed CPD modules that the AMI created with the then Meat Hygiene Service. Some members completed all four modules that were ratified and some even piloted/completed the fifth module, although this one was never made available for general take-up, the funding then being withdrawn thus bringing the exercise to a premature close.

Scotland presents significant opportunity to deploy inspection staff utilising efficient deployment solutions, in particular with shellfish sampling, depuration plant approvals, and the auditing of food premises. It is felt that any review should now assess the broad range of food controls and not merely focus on the delivery of meat controls.

Other areas that we feel could be considered are;

- fish inspection.
- border controls with regards to food.
- and the inspection and auditing of non approved food premises.

The Association of Meat Inspectors have welcomed the opportunity to get involved

with this review and would further request that we are granted the opportunity to meet the study group across the table as we feel that the experience and breadth of knowledge within our membership would be of invaluable use.

Post Mortem Collection Data

The Association were invited to sit in on this series of meetings and as it transpired we were the only representative of MHI's present.

I have heard many grumbles from MHI's about the apparent dumbing down of inspection on the back of the description of lesions recorded at PM inspection and I feel that it is important that you are given an insight into what is happening;

The data collected is of no real relevance if it is not able to be further utilised, and this is why the descriptions of some conditions have been altered; purely and simply to suit the needs of other organisations who do actually make use of it.

The data submitted on a weekly basis needs to be standardised and consistent to achieve its purpose and these meetings have been working towards this objective.

The Association has made the point that there should be options to specify various conditions that might be felt necessary at the point of collection, both for the benefit of clarity to the FBO/producer and for the benefit of the MHI, who could be called upon to justify their decision at a later date and might need to use the data for reference.

This project will be continual and reviewed annually to make sure it is fit for purpose and relevant, so if members have any constructive comments please let your divisional secretaries know so that they can bring this to

council. This information will be taken forward to subsequent meetings.

Annual General Meeting

The AGM 2012 is to be held at the Aztec West Hotel, Bristol on Saturday 21st April and will be the meeting where the name, code of conduct and post nominal letters will be formally adopted. This means that it will be an important meeting and I would encourage as many of you as are able to attend and make your vote count.

This being my last report of 2011, I would like to take this opportunity to wish you all a very merry Christmas and a happy and prosperous New Year.

Keep up the good work.

Regards,

Ian Robinson