

PENNINGTON GROUP RECOMMENDATIONS FOR RETAIL BUTCHERS' SHOPS AND OTHER MEAT HYGIENE ISSUES

(A paper in response to one by Panel member Eva Lewis [CP(98)35/1])

Introduction

1. Consumer Panel member Eva Lewis has provided a discussion paper on matters surrounding *E.coli* 0157 contamination of burgers and minced meat products following a "World in Action" programme broadcast on 24 August 1998. Her paper poses a number of questions about consumer information and retail outlets. This paper responds to the points Ms Lewis has raised and also takes the opportunity to update Panel members on a number of meat hygiene related issues, including action in respect of retail butchers' premises and the drive to further improve the hygiene standards in slaughterhouses and meat cutting plants.

Retail Butchers

Pennington Report

2. An expert group under the chairmanship of Professor Hugh Pennington was set up to examine the circumstances which led to the fatal outbreak of *E.coli* 0157 food poisoning in Lanarkshire in November 1996 and advise Government on the implications for food safety and the general lessons to be learned from the outbreak. The Group published its report in April 1997 and made 32 recommendations for a range of precautionary measures to aid the prevention and management of future outbreaks of *E.coli* 0157. The Government has accepted all 32 of the Group's recommendations and embarked on a comprehensive programme of action to address the full range of issues identified by the Group.

3. Two of the key recommendations of the Pennington Group were:

- licensing of butchers handling raw meat and cooked meat products and ready to eat foods;

- to accelerate the implementation of Hazard Analysis Critical Control Points (HACCP) in butchers' shops.

Licensing of Retail Butchers' Shops

5. Draft Regulations setting out proposals for the licensing of retail butchers' shops were issued for a three month public consultation period on 23 February this year. Provisions set out in the draft Regulations included:

- the proposal that retail butchers would be subject to annual licensing by Food Authorities;
- a prescribed licence application charge of £100;
- the following licensing conditions;
 - compliance with existing hygiene regulations, in particular the Food Safety (General Food Hygiene) Regulations 1995 and the Food Safety (Temperature Control) Regulations 1995;
 - that documented HACCP procedures are in place, and
 - enhanced staff hygiene training, including training in the HACCP system for at least one member of staff at supervisory level.

6. Across the UK, 240 organisations and individuals responded to the consultation, 176 from England alone. These replies have been considered in conjunction with the findings of the Fatal Accident Inquiry Determination into the Lanarkshire deaths, which was published in August. The next step in progressing the licensing proposals, following Ministerial agreement, is to notify the proposed Regulations to the European Commission for examination as required by EC law, a process which normally takes three months. Subject to the outcome of this process, we aim to have the Regulations on the statute book early next year with the licensing regime coming into effect by late summer/early autumn 1999 after a lead-in period, as envisaged in the consultation proposals.

Accelerated HACCP

7. The Pennington Group fully endorsed HACCP as the most effective way of minimising risk and protecting the consumer but judged that it could take 5 years or more to introduce effective arrangements in butchers' shops. The Government believes it can implement HACCP over a shorter timescale and, in England, is spending £4.5 million to

accelerate the introduction of HACCP into butchers' shops before the licensing Regulations come into force in the summer/autumn of 1999. Territorial Departments are taking parallel action to accelerate HACCP implementation in Scotland, Wales and Northern Ireland.

8. The key features of this initiative in England are:

- a centrally co-ordinated scheme managed by the Meat and Livestock Commission (MLC) overseen by the Department of Health/MAFF Joint Food Safety and Standards Group;
- retail butchers will receive free advice and formal hygiene training which will include instruction on how to devise and manage a HACCP system designed to improve hygiene controls in their shops;
- a generic HACCP system for use in retail butchers' shops - associated training materials have been specially developed for the initiative;
- the HACCP training syllabus will be delivered by accredited trainers - training courses scheduled to start in early November covering all parts of England;
- consultants will make follow-up visits at shop level to reinforce the training, ensure that effective HACCP arrangements are in place, and the necessary hygiene standards are being achieved;
- trainers and consultants will liaise closely with local authorities and keep them informed of work under way in their areas to ensure that follow up enforcement inspection visits can take place as appropriate.

9. To date nearly 6,000 butchers have registered for the scheme in England against a target of 8,000. This initiative will result in improved food safety management systems in butchers' shops and enhanced consumer protection. The aim is to complete the initiative in time for the coming into force of the licensing scheme in late summer/early autumn next year.

Local Authority Enforcement and Hygiene Awareness

10. Proper local authority enforcement is vital to ensuring that food businesses produce safe food. The Government has introduced measures aimed at strengthening enforcement in high risk premises, including butchers' shops, in particular,

- additional GB funding of £14.5 million for local authorities to increase the frequency of their inspections in high risk premises;
- a national programme of centrally funded training seminars, currently under way, on HACCP assessment and hazard analysis for local authority environmental health officers to ensure effective enforcement;
- in many cases, local authorities have undertaken their own local initiatives to increase awareness in butchers about the risks associated with *E.coli* 0157;
- the MLC have run hygiene road shows, supported and advised by DH, for butchers to raise hygiene awareness (road shows attended by over 3,000 butchers), and have ensured items on food safety appear regularly in trade journals;
- following publication of the Fatal Accident Inquiry Determination, the Chief Environmental Health Officer at DH wrote to all local authorities listing the key enforcement and inspection issues raised by the Inquiry and encouraging them to examine the adequacy of their local arrangements in the areas identified by the Inquiry.

General Awareness

11. Government policy is to reduce the prevalence of foodborne pathogens, including *E.coli* 0157, in the food chain wherever practical to do so. The Government is committed to providing factual and balanced advice to consumers and the food industry based on scientific research carried out mainly under the auspices of the Government's independent expert Advisory Committee on the Microbiological Safety of Food (ACMSF). For example, following advice from ACMSF, the Chief Medical Officer published revised guidance on the safe cooking of burgers on 31 July. Advice has focused on how food poisoning can be avoided by the application of good hygiene practices, in particular,

- the avoidance of cross contamination,
- the correct use of temperature control and
- thorough cooking.

12. The Government continues to promote good food hygiene practices in the home through publicity campaigns. For example, this summer the Government funded a £1 million food safety campaign consisting of press and radio advertising and local promotions. In addition, JFSSG, as part of a consortium representing a wide range of interest including consumers, has supported a successful Health Education Authority bid for around £370,000 of EU funding for a food safety campaign in schools. The aim is to develop a teaching resource to enable secondary school pupils in the first instance to learn the simple rules of food hygiene as part of their general education and to understand why these rules are so important in helping reduce the risk of food poisoning. It is hoped that funding will be available to extend the campaign into primary schools in 1999/2000.

Hygiene Standards in Slaughterhouses and Meat Cutting Plants

Eight Point Plan

13. In addition to the work under way for retail butchers' shops and with consumers, the Government has over the last 18 months been working to drive up hygiene standards in slaughterhouses and cutting plants. Action has concentrated on an 8 point plan. This has involved:

- the publication and enforcement of defining standards for clean livestock;
- the refusal to accept any carcase showing signs of faecal contamination for approval as fit for human consumption;
- the publication of Hygiene Assessment Scores (HAS) for every licensed slaughterhouse and cutting plant based on the standard of hygiene in the plant;

- giving Principal Official Veterinary Surgeons (POVS) the most experienced veterinary surgeons a larger role in managing Official Veterinary Surgeons (OVS) and meat inspectors;
- giving Meat Hygiene Service (MHS) staff additional training in hygiene standards;
- increasing the attendance of OVS in plants with poor hygiene scores;
- setting up a new Government/Industry Working Group to help drive up hygiene standards;
- intensifying the audit activity carried out by the Veterinary Public Health Unit (VPHU).

14. Action has been taken that affects all these areas:

- the MHS clean livestock policy has been introduced and has resulted in considerable advances in the cleanliness of livestock at slaughter;
- the management and training of OVS and meat inspectors has been improved;
- concentration on higher standards and plants with poor hygiene scores has resulted in improved standards in plants;
- since publication of HAS scores for all licensed plants the number of poorly performing plants has been much reduced;
- the new Government/Industry Working Group has started work and produced useful results;
- Ministers have authorised an increasing amount of legal action against those operators of plants contravening meat hygiene legislation which has resulted in the revocation of licenses for premises and large fines, and in one case imprisonment, for operators;
- the audit of the MHS by the VPHU is being strengthened.

Meat Hygiene Service

15. Ministers are continuing to intensify activity on meat hygiene. The MHS are increasing veterinary supervision of slaughterhouses, cutting plants and cold stores and the plan put to the EU Commission will eventually provide for full-time veterinary supervision during ante and post mortem inspection at all full throughput slaughterhouses, daily supervision at all full throughput cutting plants and weekly supervision of cold stores. The MHS have recently opened a drive to recruit veterinary officers both in the UK and abroad for work in British slaughterhouses, cutting plants and cold stores in order to achieve these targets. This follows a reasoned opinion from the Commission criticising the lack of veterinary supervision in red meat slaughterhouses and cutting plants.

HACCP in Meat Plants

16. Ministers are also seeking to increase the use of HACCP in all meat plants. The Pennington Report recommended that meat plants should be encouraged to adopt the HACCP approach on a voluntary basis and Ministers have fully endorsed this recommendation. All OVSs are receiving specialised training in HACCP.

17. The Government/Industry Working Group has drawn up Forward Programmes for both the Red Meat and the Poultry Industries that recommend:

- the implementation of HACCP in slaughterhouses and cutting plants on a voluntary basis;
- tightening up standards for cleanliness of cattle and sheep being slaughtered for human consumption;
- establishing an industry wide hygiene training and certification scheme, to be drawn up by the Meat Training Council;
- consideration of the potential use of end-process treatments to decontaminate meat.

Government/Industry Working Group Report

18. The Group issued a report in July recording:

- widespread promotion of the Meat Hygiene Service Clean Livestock Policy by both Government and industry organisations;
- work by the Meat and Livestock Commission on the development of a HACCP implementation document for use by red meat slaughterhouse operators;
- development by the Meat Training Council of a basic meat safety certificate and associated training programme.

19. Pathogenic bacteria such as *Salmonella* and *E coli*. 0157 may be carried in healthy animals which show no abnormalities at post-mortem inspection. During processing small numbers of these bacteria may contaminate carcasses. It is not possible to test the entire surface of all carcasses to ascertain if they are free of such bacteria, therefore processing controls are essential. HACCP plans for slaughterhouses require the processes which involve risk of contamination to be identified and specific controls to be put in place to reduce contamination to an accepted level. Microbiological testing can then be employed during processing and on a sample of carcasses to verify that contamination is being kept below the accepted level. We are seeking to develop slaughterhouse microbiological tests so as to put in place more meaningful testing regimes.

Conclusion

20. The Pennington Report has clearly been a stimulus to much of the activity reported in this paper. The proposals for licensing and the participation of retailers in hygiene training, accelerated HACCP and other awareness initiatives together with the recommendations of the Government/Industry Working Party show the willingness to achieve improved standards of hygiene in the industry. HACCP that includes microbiological testing should lead to a clear improvement in hygiene standards in the long run but HACCP is difficult to practise successfully and much more hard work remains to be done. However we should not underestimate the real improvements that are beginning to take place in meat hygiene in the industry.

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