



Food Standards Agency Funded Interventions at Food Businesses on Smithfield Market

Summary Report of Findings

March 2015

CONTENTS

1. Introduction	3
2. Terms of Reference	3
3. Findings	4
4. Financial Implications	6
5. Conclusion	6
6. Follow-Up Action	7
Annex 1 FIR Guidelines for Traders	8

1. Introduction

- 1.1 In 2014/15 the Food Standards Agency (FSA) funded the City of London Corporation to carry out project work at Smithfield Market focusing on food standards and traceability. Work on other areas of specific concern to the City of London was also agreed, including continuation of the joint initiative assessing compliance with food law by food delivery vehicle operators, food labelling under the new Food Information Regulations 2014 and animal by-product controls.

The work was carried out between October 2014 and March 2015. In 12 cases, visits to food establishments were carried out jointly with the FSA's contracted Official Veterinarians.

2. Terms of Reference

- 2.1 Proposals for the project were developed by the City of London Smithfield Enforcement Team for consideration by the FSA. The terms of reference and costs of £26,620 were agreed by the FSA. The terms of reference included several work streams providing targeted work to assess the level of food business operator compliance with legal requirements. Food sampling was included within the original proposal but was not carried as it would have duplicated work subsequently agreed towards the FSAs 2014/15 National Coordinated Food Sampling Programme which was funded separately.

2.1.1 Traceability - Article 18 of Regulation (EC) No. 178/2002

Arrangements in place to comply with Article 18 of Regulation (EC) No. 178/2002 with respect to traceability were assessed. The aim of the assessment was to determine whether there were systems in place to ensure that food can be identified, traced and recalled.

Products targeted:

- Carcases (imported and home produced)
- Manufactured meat products such as sausages, minced meat, faggots, pies etc:
- Boxed vacuum packed cuts of meat
- Boxed poultry and poultry products

Identification of suppliers - supplier details were ascertained through examination of paperwork e.g. supplier lists, delivery notes, invoices.

Identification of customers - most traders supplied both final consumers and other businesses. Where business to business trade was carried out customer lists and sales invoices were examined.

Product recall arrangements - an assessment of traders' products recall procedures were carried out.

2.1.2 Food Labelling Requirements including production of FIR guidance and training specific to the needs of Smithfield market traders

Compliance with labelling legislation was considered during inspections where pre-packed products were offered for sale –approximately 30 establishments. Further, Campden BRI was commissioned to produce documented guidance for market traders and deliver face to face training.

2.1.3 Animal By-Product Controls

Compliance checks were carried out at all 44 stalls on Smithfield Market to verify that animal by-product is being appropriately controlled.

2.1.4 Delivery Vehicles (food business registration and hygiene controls)

Eighty one vehicles were inspected to assess compliance with food hygiene legislation.

3. Findings

3.1 Traceability

3.1.1 All 44 food establishments on Smithfield market were visited for the purpose of carrying out traceability exercises. Trace ability checks were carried out on three products at each establishment.

3.1.2 The suppliers of all products selected for traceability checks could be identified from the records available. Further, systems were in place to identify customers who had been supplied with products.

3.1.3 Product recall procedures were in place at all of the 44 establishments. During the traceability exercise one of these establishments was involved in a product recall following notification of *Salmonella* in raw chicken breasts originating from Belgium. This had been via the Rapid Alert System for Food and Feed (RASFF) notified by the FSA. The business dealt the incident in accordance with their procedure to effect the withdrawal of the product.

3.2 Food Labelling

- 3.2.1 Food labelling contraventions were identified at a total of 33 establishments. Some contraventions (26 cases) had occurred as a consequence of traders splitting large boxes of product where boxes had been labelled but the inner packs had not been. The inner packs were being sold without the mandatory labelling information required under the Food Information Regulations 2014.
- 3.2.2 Other labelling contraventions included labelling in foreign languages (3 cases), date of freezing or date of first freezing not being applied to product (7 cases) and product being offered for sale beyond its indicated durability date/use by date (11 cases). In one case product was being offered for sale with no durability date.
- 3.2.3 Sampling was not carried out as part of the project as originally planned as officers were involved in sampling in connection with the FSA's 2014/15 National Coordinated Food Sampling Programme. All analytical results for this programme are entered onto the UKFSS database.
- 3.2.4 As part of the project Campden BRI was commissioned to produce guidance on the new food information/labelling legislation for traders. This guidance has been provided to all 44 establishments on Smithfield Market and is included for information at Annex 1.
- 3.2.5 Campden BRI has also been commissioned to provide face to face training for traders on the new food information requirements. Following feedback from traders, the initial proposal to run one training session has been increased to three to enable as many traders as possible to benefit. The FSA was notified of this change and has provided approval for it. It is anticipated the training will be delivered in April/May 2015.

3.3 Animal By-Product (ABP) Controls

- 3.3.1 Compliance checks were carried out at all 44 stalls to verify that animal by-product is being appropriately controlled.
- 3.3.2 Three establishments were found to have ABP on the premises which had not been identified as ABP by the food business operators or segregated from other food products. The first had 1,559 kilos of ABP, some of which was unfit for human consumption; the remainder was past its use by date. Another establishment had 1,417 kilos of ABP on the premises which was unfit for human consumption. The third establishment had 5 kilos of unfit product displayed for sale.
- 3.3.3 ABP non compliances were identified at a further three establishments. In two of these, category 2 ABP had been stored in health marked bags indicating that the food was fit for human consumption. In the other establishment,

category 2 material was being disposed of as category 3 material contrary to the Animal By Product (Enforcement) (England) Regulations 2013.

3.4 Delivery Vehicles (food hygiene controls)

3.4.1 Eighty one vehicles were checked during the exercise. All were found to be compliant with food hygiene legislation.

4. Financial Implications

4.1 Total expenditure on the project was £13,604 broken down as follows:-

Officer time for interventions £4,734

Officer time (management) £1,000

Production FIR Guidance (Camden BRI) £3,210

FIR Training for market traders (estimate) £4,660

5. Conclusion

5.1 The project was a success in that it identified some areas where levels of compliance with food law were high and other areas where food business operators require further advice and support to enable them to meet the required statutory standards.

5.2 In respect of traceability, levels of compliance with Article 18 of Regulation (EC) No. 178/2002 were found to be high. Further the hygiene of delivery vehicles was found overall to be satisfactory.

5.3 Compliance with the Food Information Regulations 2014 was identified as an area for improvement. It is anticipated that the training planned for April/ May 2015 will assist businesses to comply with the legislation. The project has raised awareness of the requirements with food business operators.

5.4 Compliance with ABP legislation was variable and due to the risks of this product entering the human food chain this should be closely monitored.

6. Follow - Up Action

- 5.1 Appropriate follow-up action has been taken in respect of all contraventions identified where the City of London Corporation is the enforcing authority. Follow-up has included letters to food business operators detailing the non-compliances, and liaison with food producers and Home Authorities as appropriate. Revisits will be undertaken as necessary to check progress on compliance.
- 5.2 In respect of ABP controls the significant contraventions identified were either referred to the FSA as the enforcing authority via its contractor or, where joint visits were carried out, appropriate action was taken by Official Veterinarians at the time of the visits.
- 5.3 As significant labelling contraventions were identified during the project and training for food business operators on labelling requirement is scheduled, it is recommended that further work is undertaken in approximately six months' time to evaluate the effectiveness of the training and information provided in securing the necessary improvements.