

## Wide support for CFA produce safety guidance



The 2nd edition of CFA's "Microbiological Guidance for Produce Suppliers to Chilled Food Manufacturers" (MGG2) was published in December 2007. It aims to help minimise food safety risks by focusing on

the use of risk assessment and HACCP and provides clear guidance to all growers of produce on the main microbial food safety hazards and their controls, particularly in relation to produce that is to be minimally processed and eaten without being cooked. The excellent safety record of UK grown/retailed crops, particularly those used by the chilled food sector, is due, in no small measure, to the proactive approach taken by CFA and its members, to get the retail leafy produce supply chain to comply with high standards and best practice. MGG2 is part of this objective and has been sent to all CFA members, key contacts at FSA, HPA, EFSA, and UK and European trade organisations.

Commenting on the Guidance, the HPA has written to CFA stating: "We certainly do find them useful reference materials here. We would also be happy to support your key aims to extend the application of both the approach and standards set out MGG2 to all fresh produce suppliers, including the wholesale sector, given the issues encountered (particularly traceability) during salmonella outbreaks investigations over the past few years associated with wholesaled/imported produce."

A number of other trade organisations, including the British Leafy Salad Association, Fresh Produce Consortium, Horticulture Development Council and the National Farmers Union, have also given their support to MGG2 and are promoting the guidance to their members. A copy has also been provided to the British Herb Trade Association, with the request that they adopt the standards and approaches set out in MGG2.

CFA's commitment to improving standards continues with two related activities. CFA has been invited to participate in two Defra-funded reviews on usage of organic waste in agriculture. The first is an Open University project on attitudes towards organic waste-derived materials and the second, a Waste & Resources Action Programme (WRAP) project on composted

waste usage in agriculture which aims to define the appropriate use of different types of compost for different crops. CFA's aim is to ensure that appropriate technical standards are in place to prevent the safety of crops being compromised.

CFA's MGG2 is available, price £50 from CFA's online shop (<www.chilledfood.org>)

### Pre-washed salad is RTE says FSA

CFA has welcomed FSA's recommendation, endorsed by ACMSF at its meeting on 11 March 2008, to change its advice to consumers regarding the re-washing of pre-washed ready to eat (RTE) leafy salads before consumption. CFA has long argued that advice to consumers to rewash is unnecessary and introduces the possibility of cross-contamination in the kitchen. Research has also suggested that additional washing of fresh produce provides little additional benefit in reducing contamination.

Using published data and information provided by CFA, FSA and ACMSF reviewed the evidence and decided that its advice to consumers may not be appropriate. In coming to their decision FSA and ACMSF took into account:

- the excellent safety record of RTE leafy salads;
- industry's implementation of strict controls to assure safety;
- produce safety being primarily assured by using the correct field controls to prevent contamination at source;
- washing mainly removing soil which harbours microorganisms;
- re-washing professionally pre-washed leaf does not remove appreciably more microorganisms.

In their report to the ACMSF, the FSA acknowledged the role of CFA, in particular MGG2 and CFA's Best Practice Guidelines for the Production of Chilled Food. In welcoming the decision, Kaarin Goodburn, CFA's Secretary General said, "We are very pleased that FSA advice is to be changed. Safety is CFA members' first priority and our members operate to the highest standards as laid down in our Guidelines which are mandatory for all our members. We welcome the change in emphasis in FSA's approach recognising the key food safety role of field hygiene to minimise potential for contamination at source. We call on FSA to support the introduction of such standards throughout the fresh produce supply base, including herbs and wholesale."



#### **CFA** seeks enforcement

Lack of enforcement of regulations and a disregard by importers for non-statutory guidance is an issue of growing concern to CFA. In recent months there have been several examples of imported products not complying with local non-statutory guidance putting UK producers at a disadvantage and, in some cases, potentially presenting safety issues.

For example, CFA has drawn FSA's and LACORS' attention to apparent breaches of the revised VP/MAP guidance, agreed by the ACMSF in December 2007, which reinstates the 10 day rule for the shelf life of chilled vacuum packaged/modified atmosphere packaged foods (stored at 3–8°C). The products in question are long life chilled pizzas imported from Germany. LACORS have confirmed to CFA that they will investigate.

CFA has also made a formal complaint to the Advertising Standards Authority over use of the term "fresh" in relation to the advertising of an imported pasta which does not comply with FSA Guidance on the Use of Marketing Terms or LACORS advice to enforcers, both of which refer to a definition of fresh pasta which was agreed with CFA in 1996.

# CFA opposes product carbon footprint labelling

As an active and often leading player in environmental issues closely involved in numerous sustainability initiatives CFA believes that product carbon footprint labelling is misguided for chilled foods and will be potentially misleading to consumers. CFA favours carbon footprinting of a business which is more relevant to identifying and addressing areas for carbon reduction than product carbon footprint labelling. This is because the chilled food sector is very complex. For example:

1. A single site may produce up to 100 SKUs each day, each of which has numerous raw materials/ingredients, sourced globally and year-round;

- 2. the commercial life spans of chilled foods are very short, most being less than 1 year;
- 3. many chilled prepared foods are seasonal, with a short window of marketing opportunity;
- 4. the same raw material can be sourced from different countries dependent on seasonality and availability, e.g. produce;
- 5. some components, e.g. seasonings, may have a large number of subcomponents, e.g. spices and herbs;
- 6. the same product can be prepared using different cooking techniques at point of consumption, e.g. microwave, conventional oven (gas, electric or fan-assisted).

The calculation of the carbon density of any given chilled food, therefore, will be complicated, time-consuming, resource-hungry and expensive. It will also be confusing for consumers if the carbon footprint of a food changes because of ingredient and/or sourcing changes, or because of different point of consumption preparation methods.

CFA has written to the Carbon Trust, BSI, Defra and IGD stating that it is in favour of a streamlined approach and that there should be the opportunity for businesses that have made a commitment to reduce their carbon footprint to be recognised as opposed to each product carrying carbon footprint labelling.

### **New on CFA's website**

Visit <www.chilledfood.org> to see what's new. Our "Media" section contains the latest CFA news and information and new for 2008 is a "Campaigns" section, which outlines issues where CFA and its members are campaigning for change - e.g. the "10 day rule", carbon footprint labelling, and healthy eating. Also new, in the "Resources" section, check out our "Consumer Advice on the Handling of Chilled Foods" •

### **Coming soon**

Keep an eye out for CFA's newest publication, "Food Safety and Hygiene Training in a Multicultural Environment" which will be available soon from the CFA website.

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