

The Importance of Hygiene

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Appetite for Engineering, 29/4/10

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Content

- The unique UK chilled prepared food sector and CFA
- Hygiene enforcement:
 - What's going on
 - What we want
- The importance of hygiene





UK Retail Chilled Prepared Food

- Dressed salads
- Leafy salads
- Prepared Vegetables
- Prepared fruit
- Stir fry kits
- Sandwiches
- Sandwich fillings
- Quiche/flans
- Pizza
- Recipe dishes/kits
- Meal Accompaniments
- Sushi
- Filled/plain fresh pasta
- Soups
- Sauces
- Desserts

2009 retail value ~£8.7bn, equating to ~3.5Mte

Consumer confidence & trust: safety, quality

UK Retail Chilled Prepared Food Industry

Year	Market (£m)
1989	550
1999	4550
2005	7357
2009	8708

Unique position of chilled foods

- Retail brand dominance, although brands now emerging
- No manufacturer contracts
- Short shelf life, unpreserved
- Just in time
- HACCP from the outset
- Exacting microbiological standards
- Significant annual churn



UK Chilled Prepared Food Characteristics

- Very few finished product imports
- Multicomponent products
 - Complex ingredients streams
 - Animal derivatives content 0-100%, but large proportion of foods 5%-25%
 - Remainder: carbohydrate, e.g. bread, pasta, produce
 - Potential for re-working generally low
 - Much is handmade
- Short shelf life ingredients and final products
 - Ingredient replenishment in line with projected orders
 - Rapid distribution for sale
 - Perishable waste requires efficient disposal routes
- Specified suppliers, own/contract growers
 - Integrated control
- Largely ready to eat
 - Hygiene is critical



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Chilled Food Association

- Who are we?
 - Represent manufacturers supplying UK retail market
- What is our Mission?
 - To promote and defend the reputation and value of the professional chilled food industry through the development and communication of standards of excellence in the production and distribution of chilled food
- With whom do we work?



CFA - Influential Through Partnership



What CFA has achieved

1989	2010
Small niche association, 11 founder members with £100m turnover	Voice of the industry, 22 members with >£3,000m turnover
Minimal industry contact with Government	Primary stakeholder
Question mark over acceptability of industry practice	Recognition as best in class Accreditation taken up internationally
Viewed with suspicion by Government	Confidence and communication
No common standards	Common audit standards and CFA Guidelines
Incident management - no co-ordination and over-reaction	The first to bring news and solutions to members – and Government. Risk-based.
Food safety expertise	Industry expertise across core areas
Local	International recognition & activity
QC and testing	QA and HACCP
Sole approach = enforcement	Self regulation



UK Chilled Prepared Food

- Dressed salads
- *Leafy salads
- Prepared Vegetables
- Prepared fruit
- Stir fry kits
- Sandwiches
- Sandwich fillings
- Quiche/flans
- Pizza
- Recipe dishes/kits
- Meal Accompaniments
- Sushi
- Filled fresh Pasta
- Soups (some RTE)
- Sauces (some RTE)
- Desserts

Items in green include ready to eat variants

*Leafy salads (1990+): UK: 2.7×10^9 packs, Worldwide: 2×10^{10} packs

What makes food ready to eat?

- Manufacturer's risk assessment and product design, i.e. HACCP plan
- Appropriate controls
 - Minimise potential for contamination by zoonotic organisms
 - CFA's Micro Guidance for Growers (2nd ed) [produce]
 - CFA Best Practice Guidelines for the Production of Chilled Food (4th ed)
- Hygienic preparation and packing
 - Prevent re-/cross-contamination – segregated areas, equipment, people
 - Process
- Limited shelf life
 - Ensure peak quality
 - Minimise opportunity for microbial growth



Hygienic Manufacture

- Self regulation – CFA HACCP-driven guidance
 - Micro Guidance for Growers (produce)
 - CFA Best Practice Production Guidelines
 - FSA-endorsed guidance on setting shelf life
 - Hygienic Design Guidelines
 - *L. monocytogenes* Management Guidance
 - Microbiological testing: application & interpretation guidance
 - CFA/BRC EU Microbiological Criteria Regulation guidance



Enforcement Layers: Own Label Chilled Food

1. Food safety management system internal audit
 - And day to day management
2. Customer (retailer) audit
 - And interim visits
3. Third party audit
 - e.g. BRC (corrective action within 28d)
4. Environmental Health visit
 - Frequency based on scoring

Net result

- Enhanced microbiological quality
 - Corroborated by LACORS/HPA survey outputs
 - e.g. Retail v other sandwiches
 - Consumer protection
- Market founded on standards
- Growth driven by NPD

However #1

- Public procurement standards
 - e.g. hospitals, schools, care homes – vulnerable groups

Probable & Possible Listeriosis cases/clusters (England, Wales: 1999-2007)

Year	Region	Cases	Vehicle
1999	NE England	4	Hospital sandwiches
2003	NE England	17	Butter
2003	NE England	18	None identified
2003	S Wales	2	Hospital sandwiches
2003	SW England	5	Hospital sandwiches
2004	E Mids	6	None identified
2004	SE England	2	Hospital sandwiches
2005	NW England	1	Sliced meat
2006	London	1	Sliced meat
2007	London	1	Hospital sandwiches

Source: ACM 847a (ACMSF) 2007

However #2

- Light touch enforcement
 - *E coli* O157 outbreaks (1996, 2005, 2009)
 - No food safety management system (Wrexham)
 - No handwash facilities (Wrexham)
 - Same vacuum packing equipment for raw and cooked (South Wales)
 - Cleaning and disinfection not understood (Lanarkshire + South Wales)



Steven Green, Infected,
Scotland, 1996



Mason Jones, Died,
South Wales, 2005



Karen Morrisroe-Clutton,
Infected, Wrexham, 2009

However #3

- Scores on the Doors rating
 - Foodservice
 - 6 tier system – 5 stars maximum
 - Zero stars
 -but allowed to remain open



Zero stars

Last update:	13-08-2008	
<u>Star Rating:</u>	No Stars	Poor Hygiene conditions found. Some major non-compliance with food legislation.
<u>Food Hygiene and Safety:</u>	15 Some major non-compliance with statutory obligations – more effort required to prevent fall in standards.	
<u>Structural:</u>	10 Some non-compliance with statutory obligations and industry codes of recommended practice. Standards are being maintained or improved.	
<u>Confidence in Management:</u>	20 Varying record of compliance, Poor appreciation of hazards and control measures, no food safety management system.	
<u>Risk Rating:</u>	B, Min inspection frequency: At least every 12 months	

Scores on the Doors (SOTD)

<u>Award</u>	<u>Score</u>	<u>Description</u>
5 Stars	0	Excellent standards of hygiene. High standard of compliance with food hygiene legislation. Highly confident in management.
4 Stars	1-10	Very high standards of hygiene. Very good level of compliance. Confident in management.
3 Stars	11-19	Good standards of hygiene. Some minor contraventions.
2 Stars	20-30	Satisfactory confidence in management. Some non-compliance. Standards being maintained.
1 Stars	31-40	More effort required. Poor appreciation of hazards.
0 Stars	Over 40	Poor hygiene conditions found. Significant improvements required. No evidence of an imminent risk to health.

Inspection Frequency

<u>Category</u>	<u>Score</u>	<u>Minimum Inspection Frequency</u>
A	92 to 196	At least every 6 months
B	72 to 91	At least every 12 months
C	42 to 71	At least every 18 months
D	31 to 41	At least every 2 years
E	0 to 30	Alternative enforcement strategy

An Alternative Approach

Enforcement Prioritisation

- Aim: stronger levels of RTE FBO hygiene enforcement
- Highest enforcement priority
 - RTE FBOs without relevant 3rd party hygiene certification
 - Publicly procured foods for vulnerable people, e.g. hospitals
- EHPs to use powers, e.g. Remedial Action Notices, where prerequisites are not in place
 - Move away from 'light touch'
 - Assist EHPs by providing targeted enforcement tools/guidance

CFA RTE Prerequisites

- Prerequisites:
 - handwash facilities on all premises
 - hygienic and functioning refrigeration
 - implemented and functioning hygiene schedules
 - all staff handling food and the business owner able to demonstrate they have received hygiene training
- Clearly link standards with SOTD
 - No stars for premises not complying with prerequisites
 - Enforcement action to ensure speedy compliance with prerequisites
 - Pass/fail/excellent approach instead?



食品安全监督公示

FOOD SAFETY INSPECTION NOTIFICATION



良好

EXCELLENT



一般

PASS



较差

FAIL

· 监督检查结果 ·
Inspection Results



食品安全投诉电话:

Food Safety Complaint Hotline

962727



上海市食品药品监督管理局黄浦分局

Shanghai Food and Drug Administration Huangpu Branch

Hygiene: What Do We Want?

1. Make best use of enforcement resource

- Recognise best practice & relevant certifications in inspection frequency
- Target highest risk premises:
 - Ready to eat food
 - Food supplied to vulnerable groups, e.g. hospitals

2. Make enforcement count

- CFA RTE prerequisites implemented as a minimum
- EHPs confident enough to use available powers, provide new powers if necessary
- EHPs to avoid 'light touch' approach
- Provide EHPs with enforcement tools, e.g. hand washing, cleaning/disinfection, shelf life

3. Scores on the Doors

- Only rate premises if they comply with the prerequisites
- Short timescale for corrective action
- Clearly communicate ratings meanings to the public

4. Help Consumers

- Improve consumer understanding of date marking
- Improve domestic fridge temperature performance

The Importance of Hygiene

1. Protect the consumer
2. Protect the customer
3. Protect the market
4. Protect your business



*The centre of excellence for the chilled
food industry*

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