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Brexit Paperwork Headache for Short Shelf Life Composite Products

Given that the vast majority of foods represented by CFA comprise ingredients from animal origin (e.g. meat, dairy, fish) and plant materials, they are categorised as Composite Products in international trade, requiring Export Health Certificates (EHCs) signed off by Official Veterinarians (OVs).

Last autumn, CFA secured a member's involvement in live trials of exporting a composite food, which confirmed critical issues previously highlighted by CFA to Defra.

With the end of the Transition Period at 2301h on 31 December 2020 came the introduction of extensive Third Country veterinary certification requirements for export of foods containing animal origin ingredients, from Great Britain to the EU. The same requirements were due to have been required for GB-Northern Ireland goods movements from 1 April but have been paused by the UK Government to 1 October at the earliest, with composite products being phased in last. The chilled food sector primarily exports to the island of Ireland so although exports to the Continent have virtually ceased, impacts of the new paperwork, certification and administrative systems requirements have so far been limited to Ireland in practice.

Capacity issues

A CFA survey of chilled and frozen composite products estimated that some 30,000 EHCs would be required where none were before. According to Animal and Plant Health (APHA) data provided to the industry, there was 126-fold increase in the total number of EHCs for EU export issued in January/February 2021 compared with the same period last year – from 491 in that period in 2020 to 61,802 in 2021. Each composite product EHC needs to be supported by detailed supplementary information for each animal origin ingredient including the Approved source, processing details and dates of production, by batch being exported, and to be signed by an OV. This represents a huge new administrative burden – introducing new costs and delays in what was a highly efficient system facilitating rapid flow of chilled short shelf life complex foods made to order on the day of despatch. It also raises concerns over whether there are sufficient number of OVs to sign the certificates.

CFA has been working with the British Veterinary Association (BVA), the professional body for OVs, to identify such issues and find solutions. This CFA engagement with BVA, the UK's Chief Veterinary Officer, and the relevant Government department in Ireland (DAFM), has already simplified aspects of composites' EHC completion for exports to Ireland.

However, new EU Animal Health Law (2016/429) published in March 2016 when the UK was still an EU Member State, will on 21 April, according

to CFA data, bring an estimated one third more chilled composite foods within its scope, so requiring EHCs where they currently exempt. Even those few composite chilled foods which remain exempt will require Private Attestations running to several pages of required detailed information for them to be exportable to the EU, and at an unspecified date post 1 October, to Northern Ireland. The question is whether all this new administrative cost can be borne, given existing profit margins.

CFA not only alerted wider industry to these issues but has set up an EHCs Associations Group for food trade associations and the BVA, as a forum to engage with Government veterinary officials, identify and resolve problems.

Solutions to keep the nation fed

The Association has also developed a checklist with the BVA to assist food businesses in ensuring that OVs have appropriate professional status, the required specific training and adequate insurance cover for their food certification work for export, e.g. EHCs. Links are included to supporting information on specific Royal College of Veterinary Surgeons, APHA and Improve-OV requirements.

CFA is working with Defra on the development of its ambitious Digital Assistance Scheme (DAS) to facilitate the continued supply of food to Northern Ireland from 1 October through the digitisation of paperwork and its submission to existing export systems, e.g. TRACES NT, TSS. It is critical that any such system is easy to use, with the information requirement limited to only what is needed by law, and, importantly, be compatible with companies' existing systems.

CFA Director Karin Goodburn explains: "Leaving the EU has had a profound effect on the day to day working lives of vets, the free movement of our workforce, and of course on the exportation of Just in Time short shelf life food. When the UK from 1 October implements its own controls on imported foods we will open another chapter, with uncertainty about its impact on the flow of foods and ingredients from the Continent and Ireland at a time when the UK crops season has ended and we are most dependent on imports. CFA shall continue to work to find solutions to protect industry so it can export and import for the benefit of our economy and of course to keep the nation fed."



COVID hasn't cooled the chilled food market



CFA has released 2020 market data commissioned from Kantar, charting sales of chilled foods ranging from prepared produce to chilled cake. The market has not been immune to the effects of the pandemic with most consumers compelled to change their work and home life patterns. The statistics reflect the massive upheaval experienced by the UK, with fluctuations across almost all categories. However, the overall market remains strong and is now worth almost £13.5bn, up by 4.1 percent on 2019.

With many offices and workplaces closed, classic office lunchtime foods such as ready-made sandwiches, rolls, and baguettes predictably took the biggest hit – seeing sales drop by 38.6 per cent on the previous year. Wraps also saw a major drop – 42 per cent year-on-year, and there

was reduced appetite for mixed tray salads, down by 23 per cent on 2019. Chilled ready meals continued to be strong, going up by seven percent, perhaps due to people keen to enjoy easy to prepare meals with eating out options not possible. Vegetarian chilled food saw the largest increase – with sales up by 26 percent to £155m. Prepared fish was also up (by almost 14 percent) again reflecting a need for 'special occasion' meals cooked at home. And to round off a dine in at home experience chilled dessert sales were also up by 8 percent.

CFA director Karin Goodburn comments: "The market data acts as a barometer, showing us how food shopping habits have reacted to COVID over the last 12 months. With the industry facing unprecedented changes it's heartening to see that the market in chilled is still strong. Only cakes didn't have an appreciable change, presumably because not everyone started baking (i.e. buying flour, eggs, etc) but everyone still wanted to enjoy a sweet treat." Full market data can be found on the CFA website: chilledfood.org/our-market/

CFA continues to support members on COVID-19



The Association was quick to respond to the impact of the pandemic, with its first COVID-related message to members being on 27 January 2020. Because of the volume of information a dedicated confidential Emergencies WhatsApp group was created in early March 2020. The group now has some 85 members, exchanging information technical and regulatory developments and solving problems in real time. The group is active 24/7 and has hosted 2,000+ confidential messages to date. In addition to this CFA is lobbying for usage of Lateral Flow Testing in a targeted way ("Targeted Testing") focusing on high-risk staff and troubleshooting. CFA is also lobbying for clarity on pricing of kits provided by Government from July as the cost of twice-weekly tests for the sector's 80k staff add up to on-costs of ~£45m p.a., reflecting profit from ~£2bn sales of chilled foods. CFA is also seeking members' sites to be used as vaccination centres and for the prioritisation of vaccine rollout to include all food sector staff.

Chlorate and Hygiene Biocides

Years of ultimately successful lobbying of the European Commission by the Food & Biocides Industry Group (CFA News 54) around the regulation of maximum residue limits of chlorate in food materials have received further recognition and support from the Health & Safety Executive.



The Group, established and chaired by CFA's Karin Goodburn, has now issued various Chlorate MRL Best Practice Compliance Guidance Documents. They are all available as free downloads from the CFA website (www.chilledfood.org/FBIG) and include guidance on multicomponent food written by Karin.

Karin explains: "With HSE expecting companies to be ready for potential challenges on traces of chlorates, which arise from the required usage of hygiene biocides to assure food hygiene and safety, we believe these guidance documents will prove invaluable. They include details of how businesses can develop a statement of compliance, using practical examples such as the contributory factors to presence of traces from produce, grain, protein and water from the use of hygiene biocides. The multicomponent foods guidance works through the approach with the example of the components of a chicken salad sandwich"

The full range of FBIG guidance includes fresh and prepared produce, fruit juices and soft drinks, dairy products, and cured meats.

Vacuum Packed & MAP Guidance

CFA provided substantial input to FSA in its review of its 2017 Vacuum and Modified Atmosphere Packed Guidance regarding the inclusion of fresh meat (CFA News 54). As a result of this the guidance to limit shelf life to 10 days after the day of production no longer applies to vacuum or MAP chilled fresh beef, pork or lamb. However, food businesses will be responsible for identifying and applying a safe shelf-life in relation to non-proteolytic *C. botulinum* in line with their existing food safety management systems, in the same way they do for other types of food. In the absence of this approach businesses can apply a 13 day maximum shelf life. The general approach of the guidance continues to accommodate SUSSLE and other shelf lives justified via scientific data.

A wider review of the original ACMSF 1992 risk assessment on which the Guidance is based, will begin this year, with CFA a member of the Working Group.

Getting to Grips with Third Party Laboratories



CFA has published the latest in its influential guidance documents for the chilled industry. How to Get the Best from Third Party Laboratories is available free to download from the CFA website: chilledfood.org

Developed with Food Standards Scotland the guidance was produced in response to calls for guidance from members and agreed by other associations to be a priority issue for all sectors. This first edition focuses on food microbiology.

Industry has legal responsibilities to ensure that food is safe, accurately described and labelled, and does not mislead the consumer. Where industry uses laboratory testing to help it meet those responsibilities, for validation or verification, it must ensure that the testing is fit for purpose and able to withstand legal scrutiny in the case of challenge.

The new guidance aims to raise awareness of the need to use analytical laboratories with the right expertise and accreditations. It provides practical advice on issues such as selecting the right laboratory, providing samples and dealing with complaints.

Hitting Health & Safety Targets



CFA is a signatory to the "Common Strategy" of the Food and Drink Manufacturing Forum (FDMF), an HSE initiative to engage with trade bodies and unions in the food manufacturing sector to enhance worker safety. That strategy is reaching the end of its five-year period and is about to be reviewed.

In preparation for the review, CFA members have been assessing their performance against the main planks of the strategy including injury reduction; strategies to reduce muscular skeletal disorders, slips and trips, and occupational health.

CFA's Dr Ken Johnston has been feeding back to the FDMF, saying: "Pleasingly, the chilled food sector has a low accident rate in comparison to the official "Code 10 Food Manufacturing" sector and is not only able to show a decrease in reportable accidents but that it has met the target of a 10% year on year reduction in these accidents over the five years of the Common Strategy."

Sustainable Development Group



CFA's Sustainable Development Group has been reviewing its priorities for the future. The timing of policy and other development will determine when particular work will be required, but the extensive list

includes issues such as: achieving net zero carbon; mitigating climate related risks; content of the Courtald Commitment 2030; details of extended producer responsibility on packaging; minimising waste and resources enhancing natural capital; ethical sourcing and sourcing to minimise deforestation, building on the sector's success in sourcing sustainable palm oil.

Connecting through the virtual world



Restrictions on travel over the last twelve months have led to meetings, conferences and presentations on virtual platforms becoming the norm. In November CFA Director Karin Goodburn presented at the Food Focus South Africa Food Safety Summit.

The conference attracted over 800 participants and Karin joined international high profile colleagues including Bill Marler (MarlerClark), Richard Swannell (WRAP), and Prof Lucia Anelich. Issues covered included emerging pathogens, biocides and antimicrobial resistance.

In February, Karin opened the National Biofilms Innovation Centre webinar on Microbes and Biofilms in the Food Industry with a presentation on Food Hygiene Biocides – Regulation and Reality and later that month she was invited by the British Herb Trade Association to kickstart their new food safety group. She presented on 25 years of CFA fresh produce safety assurance work.



A decade of Chilled Education!



September marks the tenth anniversary of CFA's award-winning Chilled Education initiative. The project was launched on 12 September 2011 and aimed to: 'inform, educate and inspire children in all areas of the dynamic and diverse chilled food sector.'

Since then thousands of teachers and students have benefitted from innovative resources, industry insights and practical support from the CEEd team. Many students have chosen to study food science-related subjects and have secured not only placements, but full-time posts in CFA member companies as a result.

The CEEd website continues to evolve and develop with new career case study insights planned for the year. And there'll be updates on how the profiled industry professionals are getting on in their chosen careers. There'll be more on the success of the project in the next issue of CFA News.



Raiding the store cupboard for science!

Lockdown restrictions continue to limit the face-to-face work of the CEEd team – but not its imagination and ingenuity! With home schooling continuing into 2021, the store cupboard science experiments continued to offer alternative, fun ways to explore science. CEEd's Charlotte and her girls Morgan and Tilly took Halloween, Christmas and Food Waste Action Week as inspiration for their experiments.

Social media platforms have played a key role in getting the ideas circulated, as well as supporting national themes such as Food Waste Action Week, British Science Week, Apprenticeships Week and Careers Week – attracting many reactions and helping the website to record a good number of click-throughs. The ideas can all be found on the Chilled Education website www.chillededucation.org/news/



STEM partnership

The new T level Science qualification, with its food science module, offers another route into the food industry. CEEd has been contacted by the team at the STEM Network to help them support the new qualification by sharing real life experiences of industry colleagues. This approach works very well on the CEEd website, with the career paths and case studies amongst the most visited on the site. STEM Network is a long-time partner of CEEd and will host video interviews with CFA colleagues. CEEd is currently co-ordinating colleagues' involvement and investigating other ways to support the initiative.

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