

IN THIS ISSUE: Brexit, Vac Pack/MAP, Listeria, Market, fresh produce, teaching resources

Brexit latest: New arrangements are clarity light but (potentially) burden heavy

Brexit continues to sit high on CFA's agenda, with the Association leading in Government engagement on the future of trade between Great Britain, Northern Ireland (NI), the EU and Rest of the World (ROW).

The Windsor Framework (WF) was agreed in March by the UK and EU Parliaments, and the draft Border Target Operating Model (BTOM) published on 5 April. Both set out new intended reduced bureaucracy approaches on GB-NI (WF) and ROW-GB (BTOM) trade in sanitary and phytosanitary (SPS) food and feed.

Measures will start to come into effect in October. However, as with many post-Brexit trade arrangements, the announcements leave little time not only to establish and address missing necessary detail of mechanics but also for preparation and potential systems and supplier changes by businesses. There is continuing uncertainty concerning how any new currently unspecified arrangements will operate and doubts as to how practicable, affordable, and therefore successful, finalised requirements will be. *The Grocer* reports several GB-based food businesses have already stopped trading with NI under previous rules and inconsistency of messages regarding required paperwork for the new WF system. Whilst recognising the need to protect GB biosecurity there are concerns that new BTOM barriers to EU-GB trade may negatively affect food security. **Companies are advised to sign up for Government briefings at: <http://bit.ly/3nP1v93>**

Meanwhile CFA, as the lead for the SPS Certification Working Group

(*CFA News 58*), continues to engage with Defra, FSA and the Cabinet Office – including regular sessions on the WF, the BTOM, the Ecosystem of Trust and Assured Trusted Trader Scheme and eCertification – on the resolution of issues with Export Health Certificates (EHCs) and triangular trade.

Additionally, CFA and the SPS Cert WG have submitted evidence* to the latest inquiry by the UK Trade and Business Commission into the main challenges facing businesses post Brexit. The Commission is developing a blueprint for how the UK should be negotiating trade deals to boost economic growth for a better future for the UK. The submissions set out challenges currently faced by the food industry including staff shortages, bureaucratic barriers and uncertainty around a timetable of action.

The SPS Certification WG is also finalising analysis of data from the UK Animal and Plant Health Agency for certification of GB-EU export of Products of Animal Origin from December 2020 to January 2023. Current figures suggest that in that period, 611,852 EHCs were issued at an estimated certification cost to food producers of £123m, representing profit from sales of £6.1m of food, and requiring 607 years of certifier time. This bureaucratic and financial liability did not exist before the UK left the EU and increased exports have not manifested to cover these new trading costs.

* CFA's evidence can be seen on the CFA website: www.chilledfood.org/BREXIT/

FSA Vacuum Packing/MAP Guidance – more questions asked

In June 2022 CFA Director General Karin Goodburn MBE gave evidence to the Advisory Committee on the Microbiological Safety of Food (ACMSF) Subgroup conducting the review of the entire risk basis of the FSA Guidelines on the control of non-proteolytic *Clostridium botulinum* in the vacuum and modified atmosphere packaging of chilled food (*CFA News 58*) and looking more widely at botulism risks.

The subgroup was not authorised by FSA to review the guidance in relation to fresh meat although industry maintains that it does not reflect internationally-established risk. CFA is seeking correction of technical errors and removal of UK-only technical barriers to businesses. Instead, as is standard for other pathogens, information required for the use of HACCP should be provided by FSA including continuing to allow the use of risk-based data for the use of novel thermal and other processes.

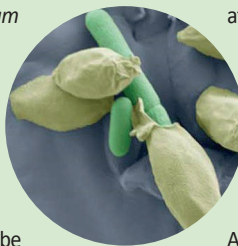
Critical corrections needed include testing methodology to focus on toxin testing, and amendment of FSA's lethal rates table, which CFA has advised FSA for more than a decade does not deliver the stated 6-log process below 90°C. At least one consulting laboratory is using the

incorrect data in reviewing companies' thermal processes, potentially compromising food safety.

The Subgroup Chair gave a verbal update on the subgroup's Report at the 9 February ACMSF meeting, but the Report was not circulated. Karin Goodburn put further questions/comments at that meeting and explains: "Although the Report has not been circulated we welcome the indication of the long-awaited amendment of the lethal rate table and inclusion of toxin testing, but need reassurance from FSA that incorrect content of its documents will be corrected swiftly."

"The urgency of this cannot be underestimated and we remind ACMSF that this has been stated by industry to FSA for many years but not acted on. Our final question surrounds timing; apart from the immediate actions needed to safeguard consumers, we call on FSA to tell us when the work on revision of the current guidance will start, whether CFA will be involved and how enforcers will be advised to act in the meantime."

The subgroup's report was expected in Q1 2023, with ACMSF next meeting on 22 June.





CFA’s dataset central to preparing response to awaited changes in EU *Listeria* regulations – but more involvement needed from other sections of industry

Work continues on building a consortium of European and international industry and the industry Response to the EU’s awaited but undefined proposed changes to *Listeria monocytogenes* (*Lm*) legislation (EU Microbiological Criteria for Foodstuffs Regulation 2073/2005) (CFA News #56 and #57).

Potential changes to the regulation include:

- loss of 100 cfu/g as an upper limit and introduction of zero tolerance/not detected in 25g
- requirements to set shelf life by challenge testing and not durability testing.

This is the most important policy matter for the UK industry, which can demonstrate through hard data (epidemiology, food and environmental sampling) that its approach is much more effective from a public health perspective than that in other major European countries and across Europe, the UK listeriosis rate consistently being half that of Europe as a whole.

The latest version of the draft Response summarises how shelf life should be set (knowledge of foods’ physicochemical properties combined with durability studies and a stream of food and environmental data and Supplier Quality Assurance, particularly of RTE components) and how environmental data should be collected and used proactively to identify issues and demonstrate control. It has received support from the food industry in the UK and across Europe, including retailers, food producers and associations. It is vital that not only UK businesses/associations make submissions to the EC, once proposals are consulted on.

As the UK is no longer an EU Member State it has few routes to influence the EU. Despite CFA engagement over nearly two years, FSA has not yet given any firm

indication as to how it will respond to the expected EU consultation on changes to current legal requirements.

CFA is rare in having to hand a wealth of data from its members collected over nearly 20 years – its four million datapoints in the last 12 years alone on prevalence and (for foods) counts of *Listeria* – the largest data set of its type in the world. The dataset is a powerful tool to help demonstrate efficacy of controls in place in the UK industry for RTE chilled prepared foods.

Karin Goodburn explains further: “The UK chilled food sector’s effective implementation of the regulations demonstrates that enforcement, not a change to the law, is required to improve food safety.

“For example if there were mandatory challenge testing this could cost the UK chilled food industry ~£150-£225 million without any food safety benefit where UK industry best practice established over 30 years as set out in the Response, nor the current EU legal position is in place.

“We will continue to challenge promotion of unnecessary expensive testing diverting limited funds from actual food safety controls, and encourage our industry colleagues to do the same. Only by working together with one voice can we stop these unnecessary and potentially dangerous changes to a piece of legislation that when applied as designed has worked well for almost two decades.”



Ursula Lavery MBE

CFA was delighted that Ursula Lavery, Technical and R&D Director Europe, at Member company Moy Park was awarded an MBE in His Majesty The King’s New Year Honours List for services to the Agri-Food Industry and to the Economy in Northern Ireland. “Congratulations to a great person doing great work!” is how CFA welcomed the news.



New activities on fresh produce intended to be eaten raw

CFA is developing a new online *E.coli* data collection system for its member companies. Data collected will focus on raw material and on irrigation water used to grow fresh produce to be eaten raw. Many thousands of samples are taken by CFA members each year, so the new system will facilitate benchmarking and potential identification of issues by members and CFA.

Market data: hot summer helps salads...and we’re going to work on a wrap!

The legacy of the COVID-19 pandemic continues to resonate across the chilled food sector and is reflected in the latest market data compiled for CFA. While the rise in sales has slowed compared to pre-COVID years, there is still a 3.9 per cent year-on-year increase.

In 2022 consumers spent almost £10.5bn on chilled food with chilled ready meals continuing to grow in popularity – 7.1 per cent in 2022 and 40 per cent above pre-COVID – with a hot summer boosting sales of chilled prepared salad trays by 14 per cent more than pre-COVID. The gradual return to offices reveals some interesting preferences – sales of ‘out of home’ sandwiches, rolls, baps and baguettes increased by 12.7 per cent, but it’s wraps that are proving popular – up by 16.1 per cent and 33 per cent above pre-COVID market sales. This figure reflects the growing trend (reported in the UK Food To Go Market Report 2023) for so-called ‘snack to go’ purchases, which includes smaller, lower cost food items such as wraps.

A full breakdown of the market data, commissioned from Kantar, is available on the CFA website chilledfood.org/our-market/

Image courtesy of Greencore



On the road to net zero



CFA is on the advisory board of the new Transport, Industrial and Commercial Refrigeration (TICR) project, an initiative to investigate energy use and CO2 emissions from UK transport, industrial and commercial refrigeration sectors.

These sectors are major users of energy and will play a critical part in the UK's net zero agenda. By focussing on specific sectors, including food and drink manufacturing sites and transport refrigeration units, TICR will produce roadmaps, benchmarks, sector-specific guidance and training events to help direct the sectors to net zero.

A website has been launched, www.netzerorefrigeration.uk, containing news, background information and guidance, as well as details of how companies can contribute to the research.

The project is being led by London South Bank University with partners Carbon Limiting Technologies, the Carbon Trust, Carbon 3 IT, the Centre for Sustainable Cooling at the University of Birmingham, the Institute of Refrigeration and Star Technical Solutions. It also has the support of the Department for Energy Security and Net Zero.

See www.chilledfood.org/sustainability for information on CFA's sustainability activities.

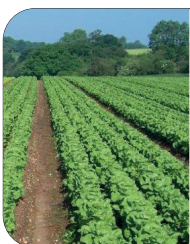


FSA visits PDM's Shropshire site

Blue skies and green crops welcomed a team from the Food Standards Agency to PDM's site in Shropshire last October. PDM's Technical Director Tariq Shaikh explains: "This was a proactive visit and it was great to meet the team behind the FSA. The aim of the visit was for the FSA to understand the activities and processes involved in being a 'grower packer'.

"I think the FSA team were surprised with the scale of the farming operation and enjoyed watching the harvesting and packing of whole head iceberg lettuces.

"From speaking with the FSA, I learned that a lot of their team are office based and had not seen a manufacturing site before. They were very interested in the end-to-end process of prepared salad and appreciated the investment, process and controls in practice to manage food safety."



Spot buying protocol

Fluctuations in food supplies can lead to use of spot buying. This needs working to pre-agreed protocols and careful monitoring to ensure compliance with agreed standards of food safety and quality. CFA's new Spot Buying Protocol is now available as a free download from the CFA website (www.chilledfood.org/cfa-spot-buying-protocol/) and is applicable to all purchasers of fresh produce that is intended to be RTE.



Image courtesy of Greencore

CFA signs up to HSE Common Strategy

CFA Members' commitment to health and safety is again evidenced by the Association's influential involvement in a revised food industry worker safety strategy.

The Health and Safety Executive's Food and Drink Manufacturing Forum's (FDMF), 'Common Strategy for Improving Health and Safety in the Food and Drink Manufacturing Industry 2021-26' is an HSE initiative to engage with trade bodies and unions in the food manufacturing sector to enhance worker safety. This latest version contains revisions suggested by CFA, including specific details that help implementation. It also includes a call for greater leadership involvement in H&S issues and monitoring the legacy of the COVID-19 pandemic.

Dr Ken Johnston, Secretary to the CFA H&S Working Group, explains: "Our Members have a duty of care to over 100,000 colleagues and their health and safety is a high priority. We are pleased not only to be a signatory to the strategy but also to have been involved in its development. It provides an invaluable road map to improve health and safety and we commend it for adoption by member companies."

CFA hits a sweet spot!

The CFA logo appeared in the sweetest of places recently – on top of cupcakes specially made by Samworth Brothers for a two-day senior leadership conference. More than 100 delegates in departments ranging from Group Technical to Group IT Group gathered to celebrate 2022's achievements and explore future plans. During breaks, Group Functions had 'expo' stands to present case studies and Samworth's ways of working with its internal and external stakeholders. The breaktime treats were decorated with logos of the organisations they work with. CFA supplied the Group Technical team with MicroTrumps, fridge thermometers and Nanobugs temporary tattoos which made its stand informative and interesting and "went down a treat".

MicroTrumps and other resources are available from <https://chilledfoodassociation.myshopify.com/collections/our-top-items>



Shining new light on the UV torch



One of CEd's most popular resources is the Glo Germ Handwash Training Kit. The kits include a UV torch to highlight good (or bad) handwash technique. But the torch has more uses and can make more than just hands glow – as the CEd team have been discovering. The UV torch picks up the fluorescent qualities of tonic water, security marks on bank notes, unwelcome fluids in the bathroom and much more. The CEd website (www.chillededucation.org) has many more ideas as well as Glo Germ Handwash Training Kits, and the individual UV torches, to buy. The kits cost £54 and UV torches are £10.



Resources now available on



CFA and Chilled Education are making it even easier for people to get resources ranging from technical guidance to lesson plans and MicroTrumps sets. They can all be found via the online buying portal Shopify. As CFA's Charlotte Patrick explains: "The Shopify system means a quicker response time for anyone ordering resources from us, and streamlined payment processes help keep costs down. All the items can still be found on the Chilled Education and CFA websites with no need for extra clicks – the system takes you seamlessly through." It is already proving successful, with monthly orders more than doubling as the year progresses.

The Shopify resources pages can be found at www.chilledfoodassociation.myshopify.com

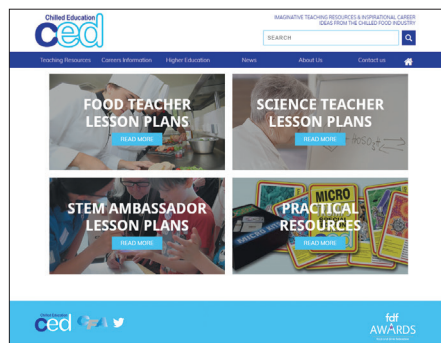
We've got food science covered

In the 11+ years since Chilled Education began, it has continually evolved to meet the changing needs of teachers, students and anyone involved in getting more young people interested in food science and careers in the chilled food industry.

In the early years it was about the free lesson plans. Designed by science and food science teachers for fellow teachers, they cover everything from hygiene and taste to microorganisms, for Key Stages 1-4. Alongside this, CEd developed innovative resources including the MicroTrumps top trumps game which have also proved useful and informative to other colleagues, including Environmental Health Officers and Government scientists.

Chilled Education also took its resources, and its experts, on the road. The team were joined by colleagues from CFA member companies, happily sharing their knowledge and first-hand industry experience with curious young scientists and interested teachers at science and careers fairs. Those experiences are also shared on the Chilled Education website which has many real-life career path insights and case studies for people at all stages of their chilled food careers.

For a while, COVID-19 brought face-to-face events to a halt and closed schools. So, like many organisations, CEd pivoted! CFA Operations Manager Charlotte Patrick picks up the story: "We wanted to continue to support science teaching in a fun and accessible way that could be done at home. So we developed our Store Cupboard Science experiments. I enlisted my two



young scientists to demonstrate our ideas in photos and videos which helped make them understandable and relatable. The girls had fun and were inspired to do more. We realised we had a winning formula, using everyday items and ingredients to explore the science of food – from DNA in strawberries to exploding cola. **Now we have more than 70 experiments on our website – and we're developing more all the time."**

A full list of all the Chilled Education lesson plans and Store Cupboard Science experiments, with their links, can be found on the Chilled Education website www.chillededucation.org



Food Teacher's Centre events

Chilled Education has a long-standing successful association with the Food Teacher's Centre, a UK group of more than 7,500 secondary teachers. In March they turned to CEd for support for 25 face-to-face teachers' events and the team were happy to help – supplying bespoke packs of resources, including MicroTrumps and lesson plan ideas.

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