Brexit – Border Target Operating Model published setting rules for imports

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).

As reported in CFA News #59, CFA continues to lead the SPS (Sanitary and Phytosanitary) Certification WG in Government engagement on the future of trade between GB, NI, the EU and the ROW.

The UK’s Border Target Operating Model (BTOM) for imports has now been published, introducing new SPS certification requirements starting from 31 January 2024 for certain medium risk foods such as products of animal origin (POAO) from the EU. This represents a three-month delay to the fourth delayed original implementation date.

There is also a three-month delay to the introduction of identity and documentation checks on medium risk POAO, plants and plant products, to 30 April 2024. The original 31 October 2024 date for the introduction of Safety & Security declarations for goods imported from the EU or other waivered territories remains unchanged.

The aim of the BTOM is to balance the need for imports for food security with the need to protect animal and human health from imported disease. From October, the Windsor Framework (WF) agreed in March will result in POAO imported into GB from ROW not being able to be included in foods sent to NI unless they have been ‘processed’ in GB. The ‘Not for EU’ label starts to be required in October for UK SPS-subject foods not having been certificated with an Export Health Certificate (EHC).

There remain a number of key issues to be resolved, including unclear definitions of ‘consignment’, ‘processing’ and ‘FBO number’ and the lack of a consolidated BTOM and WF timeline of milestones for FBOs to work to.

CFA Director Karin Goodburn: “The lack of detail and clarity of terms and repeated delays to publication of the BTOM puts at risk the ability of GB industry to feed NI and how to advise EU ingredient suppliers of new requirements.”

“EHCs needed for exportation to the EU are costing GB food industry about £4m a month and are to be required for sending SPS foods from GB to NI through the ‘green lane’ starting in October. EHCs will also be imposed by GB onto EU suppliers in January, potentially resulting in reluctance to supply GB with food. Given that more than half of all food comes from or through the EU, this again creates extra pressure on food supply.”

Listeria environmental monitoring guidance welcomed

CFA’s highly regarded guidance documents remain central to its work and the industry is already welcoming the latest of these: ‘Principles of an Environmental Monitoring Program for the Management of Listeria monocytogenes’. This guidance is part of a package of work led by CFA in preparation for potential changes to EU legislated Listeria monocytogenes criteria (CFA News #59). That work has now largely been published at www.chilledfood.org/listeria.

The guidance sets out effective environmental hygiene management using monitoring and preventative and corrective actions and how to interpret this data and relate it to other results from raw materials, components and product. This gives much-needed detail to support good hygiene practice, particularly for SMEs and for enforcement not only by Competent Authorities but also commercially, e.g. by FBOs buying ready-to-eat ingredients from suppliers and for final product retail customers.

Hours after making the guidance freely available, industry colleagues were sharing and cascading it to their teams. They hailed the document as: ‘an excellent guide’, ‘a great document’, ‘extremely useful’ and commenting ‘bravo to those who put this together.’ Within a month there had been more than 200 downloads of the guidance. The free guidance can be downloaded here: https://bit.ly/3PBlu5P. Please see over for more Listeria news.
CFA welcomes new Botulinum report - but there’s more work to be done

UK Government’s Advisory Committee on the Microbiological Safety of Food (ACMSF), has been reviewing the risk basis of FSA’s guidance on the control of non-proteolytic Clostridium botulinum in vacuum-packed and modified atmosphere packed (VP/MAP) chilled foods. In June 2022, CFA Director Karin Goodburn presented evidence to the group (CFA News #58 & #59). ACMSF has now published its report on Botulinum Neurotoxin-Producing Clostridia.

The report is available on on the ACMSF website: https://bit.ly/4SYBXPW.

It reviews botulism incidents globally, noting there is no correlation between the major growth in the chilled prepared food market and botulism, and any outbreaks have only occurred in very rare occasions in chilled foods only when not sold or stored chilled. The report also refers to CFA’s SUSSLE projects as a positive example of how collaborative research should tackle major food safety topics. CFA is pleased to see that the report also includes a number of its recommendations:

- ‘at the first opportunity’ to correct thermal process z values for temperatures below 90°C
- Toxin testing as a minimum requirement in challenge testing

Outstanding issues include current FSA guidance not specifically covering product storage at less than 3°C (although CFA’s SUSSLE work found that such storage time can be added onto the shelf life), the unique nature of the ‘10-day rule’, and exclusion of fresh meat considerations from the review.

Once comments received have been reviewed by FSA, CFA is hoping to be involved in the next phase, which will be drafting revised guidance. Further details will follow in the next CFA News.

A full list of CFA recommendations included in the report can be found on the CFA website at: https://bit.ly/3sS5FPV

New Listeria detection guidance

CFA has published new free to download guidance outlining the action to be taken following the detection and/or enumeration of Listeria monocytogenes (Lm) or Listeria species (L spp) in food and information on the relevance of Uncertainty of Measurement to results. It’s available from the Shopify site https://bit.ly/3EABDSL

Listeria on the agenda

The control of Listeria monocytogenes continues to be at the top of the agenda, with CFA Director General Karin Goodburn speaking at webinars and conferences over the summer months.

Royal Society of Public Health

June saw more than 75 representatives from enforcement, food production and government attend a Royal Society of Public Health conference to hear Karin, and other industry experts, discuss a range of issues from the EU’s potential changes to Listeria regulations to consumer food safety messages.

BRCGS

In July Karin spoke at a ‘very insightful’ BRCGS ‘Ask the Experts’ webinar. She joined Peter Littleton, Technical Director of Christeins Food Hygiene to discuss Listeria management and field a live Q&A with questions from around the globe. The session also included an update on CFA’s lobbying work surrounding the potential changes to EU Listeria regulation.

Highfield webinar

Leading global work-based learning organisation Highfield recently (23 August) invited Karin to present on ‘Listeria: the law and best practice’ to food professionals in the UK, Middle East and further afield. The diverse audience working in food service and manufacture included restaurant managers, regulators and trainers. The presentation attracted the highest number of bookings since Highfield began the webinars in 2020, with more than 1,000 people registering and 660 attendees at the event. Karin’s presentation was warmly welcomed – one attendee later saying: “Bravo! Karin’s knowledge, enthusiasm for the subject matter is admirable. What a fantastic and engaging session! I feel motivated to take on a world of Listeria.”
Managing impacts of extreme weather on fresh produce crops

The summer’s massive fluctuations in temperatures and rainfall, both in the UK and further afield, have underlined the importance of CFA’s new ‘Extreme Weather Protocol Guidance’.

The document, which is currently being trialled by CFA Members, addresses issues posed by the extreme weather events which are increasing in frequency. Such weather can disrupt supply of fresh produce, affecting its availability, supply and quality, and increasing the risk of microbial contamination.

Both informative and practical, the guidance outlines procedures that can be followed, such as growers setting critical limits to trigger documented actions in response to extreme weather events. Monitoring of rainfall, for example, must be used to trigger additional controls post-extreme weather, when crops may be heavily soiled or sitting in standing water that may contain run-off from fields of livestock.

Dry periods demand increased frequency of microbiological testing and visual monitoring of water sources and storage facilities when water levels are low after prolonged dry periods.

As well as best practice examples, the guidance also has a sample risk assessment and lists of hazard microorganisms and common control failures.

PDM is one of the CFA members trialling the guidance. Its Technical Director Tariq Shaikh said: “Extreme weather conditions are becoming more regular, and working with outdoor grown crops presents a real risk. The guidance is designed to bring a consistent approach which I believe it delivers in a practical way.”

“This year at PDM we have focused heavily on setting triggers for extreme weather events, specifically around temperature and rainfall. The guidance really helped to identify the key triggers for our business. This has resulted in quarterly reviews of raw material risk assessments and increased visual assessment and micro testing when the trigger points have been reached. The increased sampling brings an awareness to all teams and the confidence in knowing that the controls that we have in place are working.”

How to do a Risk Assessment

Work is underway on a new CFA guidance document that will map out the steps needed to carry out a risk assessment from a chilled food focus. While each business has its own approach to risk assessment, with particular emphasis on growers of produce intended to be RTE.

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Specified Injuries’ recorded by CFA members are on a long-term downward trend and their incidence is much lower after prolonged dry periods.

RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) accidents resulting in more than 7 days of absence have shown an undesirable increase in the last reporting year after a gradual downward trend from 2016-2021. While the incidence of RIDDORs in the sector remains far below the food manufacturing sector in general, the reasons for this trend need to be explored and ways found to reduce these accidents. After analysing the data CFA has identified several possible reasons for the adverse trend. One is the turnover of the workforce seen in recent years and the challenge of recruiting and training new operators. To address this, CFA is sharing company approaches to induction and training and drawing upon the experience of members in different sectors to learn from others and from what has been tried in the past when similar challenges have been encountered.

Phil Kelly, Group Head of Safety, Health and Environment at 2 Sisters Food Group and Chair of the CFA H&S Working Group: “The H&S Working Group was set up for members to share experiences and best practice. It is a forum where support and advice could be sought and is populated by like-minded individuals who strive to improve H&S performance within the sector and have a positive impact on the wider industry”

Health & Safety update

CFA’s H&S Working Group shares factory floor experiences and best practice in managing the health and safety of the workforce. Using its data to compare accidents in the chilled sector and the wider food manufacturing industry (as defined in HSE annual statistics) it can be seen that, regarding health and safety, the chilled food sector is doing well, as the chart below shows:

Accident rates per 100,000 employees

<table>
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<th>Year</th>
<th>HSE Food Manufacturing &gt;7 Days RIDDOR</th>
<th>CFA &gt;7 Days RIDDOR</th>
<th>HSE Food Manufacturing Specified Injury</th>
<th>CFA Specified Injury</th>
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<td>2015-16</td>
<td>307</td>
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<td>2021-22</td>
<td>250</td>
<td>80</td>
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</table>

‘Specified Injuries’ recorded by CFA members are on a long-term downward trend and their incidence is much lower than recorded by the HSE for the food manufacturing sector. This is good news and reflects the continuing attention health and safety receives in CFA member companies.

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Waste reduction SUCCESS

Each year CFA members redistribute millions of food items, including chilled ready meals, sandwiches, desserts, pies and soups. In 2022 nine million meals went to those in need through partners such as Company Shop and FareShare. This means a total of almost 38.5 million meals have been redistributed by CFA members since 2017.

Dr Rachel Hackett, Chair of CFA’s Sustainable Development Working Group explains: “Our members are proud of the fact that for we continue to send no food waste to landfill, instead redistributing wherever possible. It is just one of a range of initiatives we have to reduce our impact on resources – from minimising waste from our factories to following responsible recycling practices. While we are pleased with what we’ve achieved we are not complacent. We will continue to innovate and improve towards meeting the needs of both people and planet.”

How to do a Risk Assessment

Work is underway on a new CFA guidance document that will map out the steps needed to carry out a risk assessment from a chilled food focus. While each business has its own approach to risk assessment this guidance will identify key hazard microorganisms and basic principles of risk assessment, with particular emphasis on growers of produce intended to be RTE.

The guidance is planned to be published in 2024.

CFA NEWSLETTER SEPTEMBER 2023
In June, Chilled Education enjoyed its latest face-to-face event at the University of Northampton’s STEAM event. CFA’s Charlotte Patrick represented the CEd team and met with students and teachers to demonstrate the inspiring resources. Organisers counted more than 2,500 school students and teaching and schools’ staff from more than 45 schools and colleges visiting the event, which is the biggest county ‘careers expo’ for 10 to 18 year olds.

Charlotte says: “We were delighted with the response from everyone who visited our stand. We demonstrated gas pressure, challenged young minds with MicroTrumps and, of course, tested hand washing skills with the Glo Germ kits. And seeing our banner used in the official photos from the event reinforced the importance of food science the STEAM portfolio.”

And the organisers, summing up the day, said: “The whole point of STEAM Northants is to inspire young people, opening their eyes about the possibilities in Northants and beyond and to let them explore and ‘have a go’ at some of the vast array of careers and professional areas available to them. To see them have ‘lightbulb moments’ and hear their whoops of delight just demonstrates what a success the event has been.” CEd’s inspiring resources can be found at https://bit.ly/44Cy9Kz

Forensics in food science under examination

CEd has begun working with Northampton College on its Level 3 Applied Science and Level 4 Forensic and Criminal Investigation Courses. The latter requires many of the skills needed by food scientists and microbiologists. With crime-fighting CSI-style posts limited, there are many alternative opportunities for forensic minds in chilled food production. CEd will talk to students about careers in the food sector – something not normally considered by those on forensic science courses.

It’s a timely intervention as the students will be making their decisions on universities, apprenticeships and employment over the next six months. Meanwhile, talks continue with Blisworth Community Primary School to develop a pilot to showcase CEd sustainability resources and experiments with the aim of offering it out more widely to schools.

Raising the profile of chilled food job roles

When it comes to offering careers advice, CEd’s links with the chilled food industry remain one of its strongest advantages. The relationship works because the industry needs more young scientists and young scientists need fulfilling, varied, opportunity-filled roles. With this in mind, Karin Goodburn recently met with M&B managers to discuss ways of promoting career opportunities in hygiene, which is critical to safe and hygienic food production. Revised job descriptions and communications are now being planned for the CEd website.

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