Consultation on EU’s proposed changes to Listeria criteria open until 8 May

The EU is consulting only until 8 May on proposed changes to L. monocytogenes (Lm) legislation. This would require Lm to be Not Detected (ND) throughout life in 25g if the Competent Authority is not satisfied with a product’s shelf life basis (criterion 1.2b). This criterion applies to ready to eat foods supporting the growth of Lm but currently states ND at the point of last control by the producer.

The industry position, substantiated by epidemiological evidence, is that the current law is effective when it is enforced including commercially, that ND is not based on science, will lead to reduced FBO monitoring of end product potentially leading to undetected loss of control, may require unpalatable reformulation or technological treatments not accepted by consumers, and that much more emphasis is required in law on production environment hygiene control, since it is the primary cause of contamination leading to outbreaks according to the UN FAO.

CFA is leading on the industry response to the consultation. The Industry Listeria Group was established by CFA in May 2021 to share intelligence on UK, EU and other international developments (e.g. CODEX/WTO) in relation to Lm legislation and standards and prepare for, communicate to industry, the trade and respond to Government and agencies on any proposed changes to requirements with a view to protecting food safety best practice. ILG’s Technical Lobbying Document is available at: www.chilledfood.org/listeria

It is also the subject of meetings and webinars presented by CFA’s DG. These include European Federations (chilled, meat products, sprouted seeds, fresh produce, smoked salmon, dairy products), BRC’s Microbiology Working Group, Dairy UK and an online international conference titled ‘Listeria: Where are we?’, attended by over 250 people from around the globe.

Companies are urged to respond to the consultation, which is at: https://bit.ly/43YqEui

Listeria – improved enumeration method developed by CFA

A paper has recently been published in the peer-reviewed journal ‘Food Control’ by Dr Nicola Wilson, Karin Goodburn and Dr Ken Johnston describing a method of membrane filtration to enumerate low levels of Listeria spp including Lm on salad leaf. The paper is described in the abstract and is an enhancement of the legally recognised reference method (BS EN ISO 11290-2:2017), which is insufficiently sensitive to enumerate the low numbers of Lm in most commercially prepared leaf salads. Results obtained by the new technique are reported showing enumeration of 5 CFU/g added Lm. For the full paper please see: https://bit.ly/3TAcZcq

Brexit – First Phase of BTOM implemented, Second Phase arrives 30 April

The first phase of the Government’s Border Target Operating Model (BTOM) finally started to come into effect on 31 January. Uncertainties and concerns over BTOM’s implementation for EU-GB trade were the catalyst for a letter sent to Steve Barclay, EFRA Secretary of State from the SPS Certification Working Group. In the letter the Group, which comprises some 30 trade and professional organisations (representing £100bn of the UK’s food supply, production and distribution chain, enforcers and port health), detailed 16 different concerns, and proposed solutions around four issues: BCPs, groupage, EHCs and Authorised Operator Schemes. Concerns included the lack of details regarding awareness of EU suppliers of the new rules, detail on customs charges, BCP locations, fees, product scopes and opening hours – despite their starting operation of physical checks at the end of April. The letter sparked national and international media interest with journalists from the UK print and broadcast media, and internationally, all covering the story in some detail.

CFA DG Karin Goodburn chairs the Group and explains: “The major issues are lack of EU supply chain and system readiness for and flexibility of the new EU-GB requirements, which largely mirror those that have been required for GB-EU since 2021. The system is not designed for fast moving short shelf life just-in-time foods and needs to be redesigned to facilitate trade.

“Government colleagues are doing their best to work through the issues. However, time is not on our side and we are frustrated by the lack of attention being given to major faults in the system that could be corrected, e.g. lack of EU Member State 24/7/365 certifier provision, EHCs (and their translations) available for EU suppliers, tightening of the target APHA enquiry turnaround time and of prenotification windows, wider scope of groupage arrangements taking account of sophisticated electronic traceability from EU source to GB end product. Sadly, it points to a lack of understanding of our industry which will, if not addressed, put even greater pressure on food supply and food price inflation, which affects us all.”

The SPS Working Group is in regular contact with relevant Government departments to seek solutions and clarity however, at the time of, writing it has received no response from the Secretary of State.

The full letter, and background, can be found on the CFA website: http://www.chilledfood.org/brexit/
35 Years of CFA

For a certain generation 1989 is simply the title of a Taylor Swift album. While for others it’s a year of milestones: the fall of the Berlin Wall being most notable. It also marked the beginning of another era with the beginning of CFA: ‘A New Association for a New Generation of Food’.

CFA LAUNCHED IN MAY 1989 AT THE CHILLED FOOD FAIR.
The busy first 25 years were celebrated in CFA News 41, and the intervening decade has been equally event-filled. The Association continues with its policy work, science and research (with a focus on food safety and the monitoring and control of Lm amongst other organisms), as well as its education activities. New topics, such as Brexit, demand attention whilst ongoing projects continue to evolve, as revealed here:

CFA BEST PRACTICE PRODUCTION STANDARDS
The bedrock of CFA’s work

1989 – Started with best practices in manufacturing guidance, focusing on Listeria, and launched simultaneously with its accreditation scheme. Accreditation taken up by BRC and now BRCGS covering 22,000+ sites around the world. The standards have been revised numerous times. A raft of other CFA best practice guidance has been issued including: ‘Microbiological Testing & Interpretation Guidance’ (2016) and ‘Getting the Best from Third Party Laboratories’ (2021).


• 2016 – Consultation on revising FSA guidance – CFA-led consortium of industry and researchers in concerted lobbying for science-based guidance.
• 2018 – CFA-led international industry consortium in developing shelf-life guidance regarding non-proteolytic C. botulinum (npcb).
• 2022 – Karin Goodburn gave evidence to ACMSF subgroup review.

BREXIT (www.chilledfood.org/brexit)
• 2016 to date – CFA chairs and is a member of the SPS Certification Working Group (30+ trade associations and business representatives from across the UK food sector)
• 2023 – Submission made to TBC inquiry into challenges businesses are facing.
• 2024 – (Jan) leads letter from SPS to Secretary of State for Environment, Food and Rural Affairs outlining issues posed by BTOM and suggesting solutions. Continued regular engagement with Government, other associations and members to resolve issues.

SUSSLE
Hundreds of SUSSLEd foods on the market and all major retailers have signed confidentiality agreements enabling them to use it with eligible CFA members.
• 2023 – CFA brought the SUSSLE software and the Listeria and B. cereus databases together into one system, designed to better enable members to manage colleagues’ use of it, and improve functionality.

BIOCIDES (www.chilledfood.org/FBIG)
• 2012 – Set up Food and Biocides Industry Group. Successfully challenged EC chlorate MRLs approach and secured recognition by EC of the need to protect food safety when regulating biocides.
**2018-19** – Karin Goodburn appointed to Global Food Safety Initiative’s (GFSI) ‘Chemicals in Food Hygiene’ Tech WG  

**2020** – Issued raft of guidance to FBOs for different sectors as to how to minimise chlorate traces in food, supported by HSE.

**SUSTAINABILITY** ([www.chilledfood.org/sustainability](http://www.chilledfood.org/sustainability))

- **2003** – Initiated gathering of production sites’ food waste (and other) data. Formalisation of Sustainable Development WG.
- **2005** – Defra Waste Champions Group
- **2009** – Sustainability Aims first agreed focussing on energy, waste and water.
- **2016** – CFA is a founding signatory focussing on waste reduction and sustainability charity WRAP’s Courtauld 2025 (C2025) Commitment.

Input into design of international SDG 12.3 waste data collection.

- **2023** – CFA Members redistributed 38.5 million meals since 2017.
- **2024** – Continues to support the evolved Courtauld 2030 Commitments

**FRESH PRODUCE**


- **1995** – Established Ready to Eat fresh produce Good Agricultural Practice
- **2005-2008** – LINK Project AFM234: Defra-funded research on the attachment of pathogens to cut fresh produce
- **2020-2022** – Microbiological safety elements taken up by GFSI in its benchmarking requirements for GAP standards.

**LISTERIA AND DATA COLLECTION** ([www.chilledfood.org/listeria](http://www.chilledfood.org/listeria))

- **2004** – Food data for 2003 began being submitted by members
- **2006** – Data collection expanded to include environmental
- **2010** – CFA/BRC/FSA Listeria and shelf-life guidance issued
- **2021** – Industry Listeria Group established to prepare for changes to 2073/2005 and global regulatory developments in Listeria
- **2023** – Environmental sampling programme management guidance issued
- **2024** – Dataset comprises some five million food and production environment datapoints entered by CFA members, providing valuable benchmarking information for members and, when appropriate, the wider food industry

**HEALTH AND SAFETY**

- **2016** – Signatory to HSE Common Strategy for Improving Health and Safety in the Food and Drink Manufacturing Industry.
- **2023** – Signatory to revised Common Strategy

**CHILLED EDUCATION**

- **2011 and ongoing** – Initiated multi-award-winning Chilled Education programme with development of range of resources to inspire and inform next generation of chilled food scientists.
- **2020** – New range of resources tailored to be delivered at home during and post the COVID-19 pandemic. A themed list is free to download: [https://bit.ly/3ifdf1U](https://bit.ly/3ifdf1U)

**ONGOING SITE VISITS**

- **2000** – Began programme of chilled food production site familiarisation visits for civil servants. >300 people on 60 visits to date.

A fuller history can be found on the CFA website: [https://bit.ly/49gh0c7](https://bit.ly/49gh0c7)

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CFA is celebrating its anniversary by offering a 35 per cent discount for documents on its Shopify website. Just enter 35CFA at the checkout.
Sharing knowledge and support online

CED continues to take advantage of the many opportunities to connect in the virtual world with recent sessions organised in partnership with STEM Learning. More sessions are planned following interest from schools.

British Science Week – Making time for science

British Science Week in March gave CEd the opportunity to share its many popular resources. This included an online event for teachers in the East Midlands which was hosted by CEd at the invitation of the STEM Network.

The session was designed to support teachers with STEM activities, experiments and resources to help with science in the classroom. CEd’s Charlotte Patrick said: “We focussed on ideas that work well both in the classroom or a science club. Together with our young scientist Morgan, I demonstrated scientific principles using food, such as using marshmallows to explain pressure. And we encouraged everyone to think about careers in the cool world of food science.”

STEM Platform: Online career talks

The STEM Learning Ambassadors network asked CEd to work with them on a series of virtual talks for schools and colleges. CEd’s Charlotte developed a presentation to: ‘Inspire young people about food science and raise awareness of careers in chilled food industry’ She offered a 30-minute exploration of careers in the chilled food sector, covering subjects ranging from the roles needed to make a chicken salad to the various routes into the industry.

Charlotte’s first session, one of the City of Liverpool College’s ‘Meet the Professionals’ talks, was well-received and declared ‘very informative’. She also talked to Birmingham’s Secret Garden School, where the pupils were especially engaged and curious about careers in chilled food.

The bliss of food science comes to Blisworth School!

Young scientists at Northants’ Blisworth Community Primary School enthusiastically accepted the Glo Germ hand washing challenge when Charlotte visited in March. Head teacher Miss Jenkins reported the ‘awe and wonder’ of the Year 3 pupils when the ‘magic light’ revealed the success, or otherwise, of their handwashing techniques. Charlotte also shared the science behind the experiment and has already been invited back to share more practical and fun science ideas.
More fun food experiments!

CED’s library of themed experiments and activities continues to expand. There are now more than 70 free ideas available on the CEd website and on Shopify (https://bit.ly/3IfdF1U). Originally developed in 2020 to keep young scientists engaged when schools were closed due to COVID-19, the experiments continue to make learning fun and to inspire young minds.

As before, young CEd team members Morgan and Tilly tried, tested and demonstrated the experiments which investigate scientific principles including diffusion, dissolving and osmosis. All the materials needed to making giant gummy bears, green eggs and window clings are easy to find, either at home or in most food shops.

The new experiments can be found on the CEd website: https://bit.ly/43lRLDD

Science Club resources developed

CED is always happy to respond to requests and suggestions so the team was delighted to launch its resources to support science clubs during this year’s British Science Week.

A specially tailored pack of ideas explores five themes with activities listed online and free to download from the CEd website and Shopify. The majority use easy-to-access items, with instructions and science principles included for each experiment. Short experiments are also included to be set up at the end of the session, ready to pick up in the next one.

As CEd’s Charlotte Patrick explains: “We want to support teachers in their science teaching, both formal and informal. These ideas use easy to find materials and make learning fun – an important factor when it’s an informal club rather than a formal lesson. We look forward to sharing them more widely in the coming months.”

The resources can be easily downloaded from the Shopify website https://bit.ly/3TmyP3h

Crossed fingers!

The awards theme continues as the team at CEd holds its breath waiting for the results of this year’s FDF Awards. With two previous wins in the Education Initiative category under its belt, CEd is hoping for a hat trick with an entry that outlined the ways the project is evolving to meet the needs of teachers, students and everyone with an interest in science. The judges’ decision will be announced later this summer.
Health and Safety – the risks posed by flooring, footwear and frost

Information from CFA Members, and the experience of H&S managers, show slips and trips to be the most frequent cause of accidents in the chilled food sector. A recent CFA H&S WG meeting included a session described as ‘share and steal’ focusing on the issue. Covering everything from whole company campaigns to targeted improvement, subjects included:

- **Flooring** – while companies are instigating tighter specifications existing floors should be regularly measured or monitored as poor cleaning practice can lead to loss of anti-slip performance.
- **Footwear** – one company reported a reduction in slips and trips after enforcing limited specifications for Wellington boots. If boots were not warm and comfortable, colleagues would wear several pairs of socks causing their foothold to be insecure.
- **Leisure and office areas** are also sites of accidents, and identifying these separately is helpful as they require different approaches to reducing the risk of slips and trips.
- **Frosty and wet weather** can increase the risk of accidents when colleagues are coming to work or taking breaks. These areas may come under a different management line from production areas.

The group continues to share its findings across the membership as part of CFA’s commitment to Health and Safety matters.

Sustainability: New recycling regime should exclude laminated board says CFA

CFA has endorsed a letter signed by various interested organisations on the current inclusion of laminated packaging in Defra’s Simpler Packaging Proposals (launched in October 2023 to simplify the ways people can recycle their waste at home). Packaging used by CFA Members for the hundreds of millions of sandwiches etc consists of laminated board. This packaging is currently declared as recyclable. Dr Rachel Hackett, Chair of CFA’s Sustainable Development Working Group commented: “The laminated board components can be easily separated by the consumer for recycling purposes. The proposed changes to legislation in this area will negatively affect the position on recyclability. CFA therefore strongly supports the exclusion of such packaging from the scope of the Simpler Recycling regime.”

Climate Change Agreements

CFA has joined industry colleagues to contribute to the Food and Drink Federation’s submission to the Government consultation on Climate Change Agreements (CCAs). These voluntary agreements, which have been running for 20+ years, are intended to reduce energy use and carbon dioxide emissions. Participants receive a discount on their Climate Change Levy if they meet their targets. The current scheme’s targets end on 31 December 2024 and Government is proposing a new six-year scheme with targets to the end of 2030.

Putting rapid environmental testing to the test

In January 2024 food hygiene companies Christeyns, Kersia UK and Neogen presented in a CFA Members’ workshop on their rapid environment test methods for Lm. The technologies explored offered benefits including user-friendly analysis, micro-organism specific tests and, results being available rapidly, but not instantaneously. Nemis also presented to Members in November 2023.

The session was well attended and a summary of key features of each system provided to members. CFA Technical Chair Dr Nicola Wilson said: “The presentations were really informative and it was useful to have an update and overview of new technologies available to support the industry with their Listeria Management Programmes”

Making our (International Women’s) day - CFA’s Inspirational Women

International Women’s Day 2024 brought good news for CFA with not one but two of the team honoured by the Women in Trade Association awards.

CFA Director General Karin Goodburn was selected to be on the 2024 Women in Trade Associations Power List. The Trade Association Forum told Karin that her: “contribution and excellent leadership in your association and your sector over the last 12 months has been truly inspiring”. Meanwhile CFA’s Technical Chair Dr Nicola Wilson was chosen for the Outstanding Member Contribution list.

Julia Garvey, Vice Chair of the Trade Association Forum said: “It was an honour to judge this year’s WITA list and to discover more about the outstanding women leaders within our industry. I hope this list shines a light on their achievements and provides the next generation with the inspiration and aspiration to follow in their footsteps.”

PHOTO CREDITS: CFA is grateful to Greencore, Samworth and Blisworth School for the use of some images in this newsletter.

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