



**STANDING COMMITTEE
OF
TYNWALD COURT
OFFICIAL REPORT**

**RECORTYS OIKOIL
BING VEAYN TINVAAL**

**PROCEEDINGS
DAALTYN**

**ENVIRONMENT AND INFRASTRUCTURE
POLICY REVIEW COMMITTEE**

Meat Plant

HANSARD

Douglas, Monday, 26th April 2021

PP2021/0130

ENVI-MP, No. 1/2021

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Members Present:

Chairman: Mrs C L Barber MHK
Mr C R Robertshaw MHK
Mr R J Mercer MLC

Clerk:
Miss F Gale

Assistant Clerk:
Mr K Skehan

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Standing Committee of Tynwald on Environment and Infrastructure

Meat Plant

*The Committee sat in public at 2.30 p.m.
in the Legislative Council Chamber,
Legislative Buildings, Douglas*

[MRS BARBER *in the Chair*]

Procedural

The Chairman (Mrs Barber): Welcome to this public meeting of the Environment and Infrastructure Policy Review Committee, a Standing Committee of Tynwald.

I am Clare Barber MHK and I chair the Committee and with me today are the other members of the Committee, Mr Chris Robertshaw MHK and Mr Rob Mercer MLC, along with our Clerks.

5 If we can all ensure our mobile phones are either off or on silent and for the purposes of *Hansard*, I will be ensuring we do not have two people speaking at once.

Today we are taking evidence for our inquiry into the Meat Plant. We will be finding out more about how the abattoirs are regulated, in particular in terms of food hygiene and health and safety.

EVIDENCE OF

**Mr Ian Mansell, Director of Regulation, and
Mr Glenn Blacker, Head of Environmental Health,
Department of Environment, Food and Agriculture**

10 **Q1. The Chairman:** So just to start with, I would be grateful if you could both please state your name and title, how long you have been in the role and what role you play in regulating the Meat Plant.

15 **Mr Mansell:** Hello, my name is Ian Mansell. I am Director of Regulation with DEFA. I have been Director of Regulation for just coming up to two years now, and I have a team of inspectors working in the Meat Plant for me to ensure public safety from products that go through the Meat Plant.

20 **The Chairman:** Thank you.

25 **Mr Blacker:** Hello, my name is Glenn Blacker. I am Head of Environmental Health at DEFA. I have been in position for around two years now. I manage the team of environmental health officers (EHO), the pest control service and also manage the meat inspectors within the Isle of Man Meats. We also enforce a lot of the food safety legislation that relates to the Meat Plant and other food premises. The majority of the regulation of the Meat Plant is done by official vets (OVs),

rather than environmental health officers, like you would in a lot of the other establishments, and the official vet is managed by the Chief Veterinary Officer.

Q2. The Chairman: Thank you.

30 Just to start off, I wonder if you could outline how DEFA's hygiene policy works specifically to meat and meat production.

Mr Blacker: DEFA's own hygiene policy?

35 **The Chairman:** Yes.

Mr Blacker: Okay. The Department regulate food safety, so we provide official controls within the Meat Plant and make sure official controls are followed. We also ensure that the Plant is regularly audited to make sure that any official controls that the food business operator (FBO) should have in place are in place. The Department also – the Environmental Health team do not deal with this, but the official vet also looks at welfare as well as food safety.

40 So there are two very different functions which are required within the Meat Plant. There is the animal welfare side, which is very much a veterinary responsibility and that is the ante-mortem side of looking after the animals, so it is checks on animals as they are coming in off the farm, making sure that animals are stunned in a humane way which there is as little pain as possible, and if there are any diseases identified making sure that the appropriate action is taken.

45 The meat inspection team deal with the post-mortem side of the meat, the food safety side. So every animal that goes through the Meat Plant that is killed they will inspect the carcass, the offal – and when I say inspect, they will do a pathological inspection of the animal for the evidence of parasites or disease, and also the evidence of any potential welfare issues. So if they see excessive bruising in a number of animals from one farm, they will bring that up with the vet and the vet then will take the appropriate action to deal with those issues.

Q3. The Chairman: Thanks. I think that is helpful.

55 With the training for the meat inspectors, how does that work? What is the training process for them?

Mr Blacker: The training process: the Royal Society for Public Health do a course in food hygiene in meat inspection. There are only a couple of places now that actually do that training. To train now to become a meat inspector you have to do 600 hours practical training, you have to do various on-the-job assessments as well as provide a practical log.

60 The meat inspectors that we have, they have all gone through equivalent training like that and they will have done their training in the UK many years ago. Certainly when I trained as a meat inspector – it was not that long ago but many years ago – you had a lot of smaller abattoirs around the UK and meat hygiene and meat inspection was, believe it or not, quite a popular thing to go into, so there were a lot of colleges and universities that actually did meat inspection qualifications. But now they are very few and far between.

65 So training courses now, the Food Standards Agency in the UK provide training and also various contractors that provide meat inspection services in the UK. There is a big contractor called Eville & Jones that provides veterinary cover and meat inspections. Training at the moment we have got three full-time meat inspectors who are working there all the time. We have also got a couple of inspectors that cover and there is a couple of EHOs, including myself, that if need be we would go in there and cover the Plant – but we are a bit rusty because we are not in that role as much.

70 As for future training, very recently – well just before COVID arrived – we were over in the UK, it was actually early March last year, where we went to one of the biggest plants in the UK, a multi-species plant that is killing thousands of animals a day, and we met with the FSA there to look at

options of utilising their training courses and maybe utilising them to help us train future meat inspectors so we have got some resilience into the future.

80 **The Chairman:** Okay.

Q4. Mr Robertshaw: Thank you, Chairman.

I am trying to understand a little bit more about where the vet's role finishes and the meat inspector's starts. If you can go into that in a bit more detail, because reading the 1995 Act which the Isle of Man sort of comes under, the UK one, it seems to indicate at paragraph 12 that the
85 veterinary surgeon designated as the OVS is responsible for hygiene regs. So can you expand more on that and with particular regard to who the Chief Vet is answerable to? It seems to me everything ends up with DEFA.

90 **Mr Blacker:** The European legislation requires an OV to manage the food hygiene standards in the plant, to regulate the food hygiene standards in the Meat Plant. The food business operator is ultimately responsible to make sure that regulation is in place. The OV in the plant at the moment is responsible to make sure that the food hygiene standards and welfare standards are all in place. The meat inspectors have a very specific role in that they are carrying out the post-mortem inspection of the animal, the actual carcass, and they report up to the vet.

So if they find there is a particular parasite, say cysticercus ovis which you find in lambs, if they find that there are five or six in a row that have this, then they bring it up with the OV who will then bring it up with the farmer because there might be an issue with dogs on the land or they might need worming or something along those lines. The OV would report to our chief vet, who
100 is the main veterinary officer for the Island, so if there were any issues that they had to raise I guess they would raise them to Ian and above.

Q5. Mr Robertshaw: Okay, so if I was running a business that was falling foul of food hygiene ranks I would expect to be brought to task for it and ultimately if I fail to act in a proper fashion there would be a matter of looking at offences and penalties, so when it gets to the position that,
105 imagine you found yourself in those circumstances looking at something in the abattoir, how would you take yourself to task as a Department, because ultimately you are both the sort of judge and the jury really? I mean DEFA own the business, effectively, so how does all that work?

110 **Mr Blacker:** Well from a regulatory side that does not really affect anything that I do with my team that are in there. That, as far as I am aware, does not affect any decisions that the OV makes while they are in the Plant. If the OV identifies any food safety or welfare issues they will address them. I do not think there are any –

115 **Q6. Mr Robertshaw:** No, but I mean in the private sector there is a point at which the authority, the responsible authority for overseeing these things, would start considering penalties. How would, if that circumstance arrived in the abattoir, how would you deal with it?

120 **Mr Mansell:** We would deal with it (**Mr Robertshaw:** How?) the same as anywhere else. We would do it by serving notice.

Q7. Mr Robertshaw: On yourself?

125 **Mr Mansell:** Effectively, if that was necessary but it is –

Q8. Mr Robertshaw: Have you ever served notice on yourselves?

Mr Mansell: Yes, we have.

130 **Q9. Mr Robertshaw:** Tell us about it. Why?

Mr Mansell: We served a notice fairly recently in a case of health and safety. There was an accident at one of the Isle of Man Food Festivals and that resulted in prosecution being taken against our own Department by the Health and Safety Inspectorate who are in our Department.

135 That is just one example. There will be other issues where informal and formal notices would be served requiring improvements to take place. That is the way we run our business. I am not so sure that you could say that the Meat Plant is operated by ourselves because it is not.

Mr Robertshaw: No, I did not say that.

140 **Mr Mansell:** So we would be taking action against the operator of the Meat Plant, likely working with the operator to make sure that he complies with the law.

Q10. Mr Robertshaw: Okay. So, however, you would understand as an outsider perception matters and the matter of being clearly in an uncompromised position in any shape or form might
145 very well be much more understood by an outside body and the lack of it does automatically create a certain degree of concern.

Mr Mansell: I get what you are saying and I think that is why, certainly since Glenn has been involved, we have operated a number of audits and these audits are done by external contractors.
150 Glenn mentioned the Food Standards Agency earlier; we are working with them to provide an audit for us in the future.

Q11. Mr Robertshaw: That has not started yet though, has it?

155 **Mr Mansell:** That work started. We were actually in discussions and then, unfortunately, due to COVID it all had to stop.

Q12. Mr Robertshaw: Would that – sorry to talk over you, if I did – would that include unannounced inspections of the Plant, Glenn?
160

Mr Blacker: Okay, so with the Plant what we have at the moment is an OV that comes over, that works for an external contractor.

Q13. Mr Robertshaw: Sorry, comes over?
165

Mr Blacker: We have an OV that is in the Plant all the time, but when we do the audits we have the company in the UK, Eville & Jones, that provides veterinary services for the vast majority of UK plants, they send over one of their auditors who will come and have a look at the Plant for us and audit in the same way that the Food Standards Agency would audit their plants in the UK.

170 Currently that is annually, so the last audit was, I think it was December 2019. Now we are in negotiations with them at the moment because they cannot come over just to come and do an audit because of the COVID restrictions. What they have been doing in the UK is virtual part audits until we get to a point where they can come over and do the full audit.

175 Those audits are announced because you need the technical experience there, so you need the technical manager and the supervisors in place so that they can go through all the management systems and look at the documentation. Partial checks are done by the OV, he will go round and have a look at parts of the Plant and unannounced audits, we are looking at having some of our inspectors potentially getting trained up to do them. Again, we will look at the FSA to help us with that, to provide that training so that they can go in and just maybe do a part audit of
180 the cutting plant or a part audit of one of the three species on the line, and that sort of thing.

Q14. Mr Robertshaw: This seems to be a process that you are developing rather than one that has matured.

185 **Mr Blacker:** The process has been maturing over the last few years. Up to about four years ago the audits were done by the Department vet, so now we have gone down the line of bringing somebody in that is fresh to the Plant so that they can see the Plant as it is, and they are not tarnished by previous experience.

190 **Mr Mansell:** These auditors are experienced auditors and they see plants all over the country.

Q15. Mr Robertshaw: The reason I ask this is because, obviously you would have actually expected the Committee to have tried and done its homework on these things, but we arrived at a position where we understood that a well-run abattoir would have what we understood is called the daybook, a pretty comprehensive list of issues appertaining to swabbing tests, animal welfare, 195 health and safety. All these things that we are talking about here. When we eventually got the daybook we found it absent an awful lot of stuff. So how could that possibly be currently enjoying satisfactory audit?

200 **Mr Blacker:** That is not the audit. The daybook is a diary of events that might take place –

Q16. Mr Robertshaw: Might or did take place? There is a difference.

Mr Blacker: That would have taken place in the Plant –

205 **Q17. Mr Robertshaw:** So it should be a pretty comprehensive list, should it not?

Mr Mansell: Of concerns.

210 **Mr Blacker:** Of concerns. (**Mr Robertshaw:** Correct.)

The management system, which is the HACCP based system, so all approved premises need to have a food safety management system based on HACCP principles – and that is Hazard Analysis Critical Control Points. That is the food businesses documented system and as part of that system they will have different checks that they will be doing to make sure that system is working and the OV can look at that any time, and they would look at that any time. In fact, they have been working 215 recently with them to put in a mince line. There have been teething problems with that, and they have worked with the Plant and they have assessed the Plant to make sure it is complying with the law and identified things that they need to put in place.

The daybook acts as a diary so that if they find a contamination issue or if there is an animal that comes through that is badly bruised or it has got a specific disease they will make a note of that in the daybook; and when the independent OV comes in to do an audit they can go through that with the Plant OV to see if there are any issues that they need to address within the management system. 220

225 **Q18. Mr Robertshaw:** Doesn't HACCP require the daybook to be comprehensive?

Mr Blacker: The daybook is not part of the HACCP system. The daybook is a book that the vet keeps of events, it is not –

230 **Q19. Mr Robertshaw:** Is it only for the ...? That is strange. Maybe we have been misadvised. So it is only the vet that puts entries in the daybook?

Mr Blacker: No, the Meat Plant can put entries in the daybook as well.

Q20. Mr Robertshaw: Can or should? I am sorry, let's get to this issue.

235 **Mr Blacker:** Can.

Mr Mansell: Can.

240 **Mr Robertshaw:** Can, but does not have to.

Mr Mansell: As can the meat inspectors as well. (**Mr Blacker:** Yes.) And anything urgent that is in that daybook is dealt with fairly urgently, as you can well imagine. I think you saw some entries last time we discussed the daybook. (**Mr Robertshaw:** Yes.)

245 Other matters, there are monthly meetings that are held by the food business operator and the meat inspectors and the vet.

Q21. Mr Robertshaw: Okay, but you would expect then issues of concern – whatever phrase we want to use, but I think you are with me on that – would appear either in the daybook or in the management team meetings which at that point it should be raised. But again, we could not correlate the two and sometimes could not find elements in the management area that indicated that there was a knowledge of a problem nor that it was reported up to the board. It looked, well, bluntly, it looked deficit, the sort of information.

255 **Mr Mansell:** I think the records that you got were not probably representative of what normally happens because –

Q22. Mr Robertshaw: Then why did we get them?

260 **Mr Mansell:** Because you asked for them, but we only had three or four food business operator meetings last year because of COVID so –

Q23. Mr Robertshaw: But the Plant still ran here.

265 **Mr Mansell:** The Plant still ran.

Q24. Mr Robertshaw: So the process of care and control should also have been –

270 **Mr Blacker:** The process of care and control did carry on. The team have worked all the way through COVID and they have been absolutely fantastic. To go into the Plant every day during the pandemic and carry on inspecting and advising the FBO so that we can carry on having meat, it has been an absolutely fantastic effort by the team.

275 We have been supporting the FBO over the year to make sure that there is social distancing in place, to make sure if there are any issues that they get them sorted out as fast as possible to keep food safety to the highest standard possible and also the welfare checks. The vets worked with the Plant to make sure that the welfare –

Q25. Mr Robertshaw: We have not spoken to them but we have asked a number of times to speak to the vet and there seems to be a silent response. We are on the verge of issuing a precept to speak to a vet. We *will* speak to the vet.

280 **Mr Mansell:** I am pretty certain there is an appointment for this Thursday.

Q26. Mr Robertshaw: Is it? This Thursday?

285 **The Clerk:** We have not had a response.

Mr Robertshaw: No, okay.

The Chairman: It would be helpful if we know about it.

290

Mr Mansell: I think I responded to Karen.

The Clerk: Okay, we will check that.

295

Mr Mansell: Our CVO is currently off.

Mr Robertshaw: Sorry, what, Ian?

Mr Mansell: Our chief veterinary officer is currently absent.

300

Mr Robertshaw: Well, no, we wanted to speak to the one who actually is concerned with the Plant.

Mr Mansell: The OVI is scheduled to appear before you on Thursday.

305

Mr Robertshaw: Gosh, we are all surprised. We are agog here.

The Chairman: I am just looking at my diary and thinking, well that is good. I do not know who we should speak to!

310

Mr Mansell: My diary says 1.30 p.m. on Thursday. I will come along just to make sure.

Mr Robertshaw: I have not got that.

315

The Chairman: Okay, I have got a meeting, but it is not that. So okay.

Mr Robertshaw: One way or the other –

320

Mr Mansell: Well, I will go back and check, but there has been some to and fro with the Clerk's Office.

Q27. Mr Robertshaw: Okay, so just coming back for a minute on to the teething troubles, I think you called it, Glenn, over the mince facility.

325

Is it your side or is it the vet's side that would be concerned with the installation and Assembly of that system up to appropriate standards so that they passed, because obviously there are particular risks associated with mince that we have become familiar with in our read ups?

Mr Blacker: Ultimately, the OV, (**Mr Robertshaw:** Alright.) to do the checks.

330

Q28. Mr Robertshaw: So he would record his concerns about the mince process in the daybook then, wouldn't he?

Mr Mansell: Or he could speak to the plant operators actually there.

335

Q29. Mr Robertshaw: So what is the point ...? I am really confused about the importance of the daybook. In our inquiries we are given to understand the daybook is an important process. I

340 sound terribly pedantic here because we have seen the daybook and we cannot see the things
that we think we are also aware of from other directions. So it is a little bit like, there is a game,
isn't there, where you are banging stuff down? We cannot quite get our minds around clarity and
lines of reporting. You are saying things are happening, but they seem to be all verbal and
interactive between individuals, rather than documented.

345 **Mr Mansell:** I suppose it is the level of whatever is going on. If it is something that can be fixed
there and then, then you would expect it to be fixed there and then just by a simple conversation
with the manager on site.

350 **Q30. The Chairman:** Just to get straight in my head, sorry, just before, Glenn, you said that the
OVS was involved in the ante-mortem so that is before they die, but mince would seem, unless I
am really missing something, to be pretty well post-mortem. So am I missing something or ...? I
mean we are not mincing live animals!

Mr Robertshaw: Don't mince your words, Chairman, that is what I would say! (*Laughter*)

355 **The Chairman:** So I would have thought –

Mr Blacker: I think if you look at the minutes there is a section on the lairage; that is ante-
mortem. So the lairage is where the live animals are so the vets –

360 **Q31. The Chairman:** So when a beast comes in we decide if we are going to mince it or chop it
before we have ...?

Mr Blacker: When ...? Sorry, say that again.

365 **Q32. The Chairman:** I am just trying to work out how we know if it is an animal for mince – this
sounds terrible!

Mr Blacker: That is not how it works.

370 **Q33. The Chairman:** So surely the issues with the lairage would stand whether it was minced
or anything else happened to it, it would be the same? So why is that specifically coming up as a
result of mince? Would that not be a problem across all meat production as an example?

375 **Mr Blacker:** Sorry, I am a bit confused. Did you say that the minutes do not reflect ante-
mortem?

The Chairman: No, sorry, I have not said the minutes. So anything that sounded like minutes is
probably mince!

380 **Mr Blacker:** Mince. Right, okay, sorry.

385 **Q34. The Chairman:** No, what I am trying to ascertain is you said that the mince, the
responsibility would fall on the OV, but I am saying the mince would seem, to the naive people we
are here, to be post-mortem and lairage, obviously, as you say is ante-mortem – I get that, but
lairage would be the same depending whether it went for mince or chopped or selling as a whole
side.

Mr Blacker: Yes, I will explain it. The OV looks after the ante-mortem, the post-mortem, the
overall hygiene and animal welfare. The OV, the main day-to-day responsibilities he will check

390 animal welfare because our officers cannot check animal welfare, we are not vets. We will check
post-mortem and then we will report to the OV.

So if you can imagine the production line – I do not know if you have been in the Plant –
(**The Chairman:** Yes.) but the carcasses will come along, they will systematically be dressed, have
the skin removed, they will put bungs on to make sure no gut content will come out, they will take
the guts out. They will get to the meat inspector and the carcass of the animal will be presented
395 in front of them, along with all the various offal. Then the meat inspector will check the various
lymph nodes, check the predilection sites for various pathogens, check for any arthritis, check for
any contamination and things like that. Then they will take action that might be to detain a
carcass – it will go to a detained room; if an animal has got pleurisy they will remove the pleura
and remove the bits that are infected and follow that infection down; they will report to the vet
400 what they have found so the vet can then make a decision if they need to take any further action.

Q35. The Chairman: So at what point does the vet no longer retain the overall responsibility
for the meat?

405 **Mr Blacker:** When it leaves the building.

Q36. The Chairman: Right, okay. So there is just the OV; does he have a team?

Mr Blacker: No, just the OV but the overall –

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Q37. The Chairman: It is a huge amount of oversight for him to have. He has to have absolute
confidence, in that case, in the meat inspectors to be –?

Mr Blacker: Oh, yes. He is not overall responsible for making sure that food goes out the door
415 that is safe, it is the food business operator that is ultimately responsible. The OV oversees that
operation. So the food business operator follows their food safety management system and the
OV will verify bits are working and talk to the Meat Plant and will check parts of it and will address
any issues that they identify.

420 **Q38. Mr Robertshaw:** So it is an interesting sort of issue to look at, to understand the process,
and that is this introduction of the mince. The vet appears to be responsible for it, but it would
seem to me an area of interest for you to make sure that it happens. So did you say just before
that you would be involved in that process and report to him or did I misunderstand that?

425 **Mr Blacker:** No, this is the complexity with meat plants, with abattoirs, because of European
law most food businesses it would be an environmental health officer, myself, going in and doing
an inspection and taking the appropriate action. Within establishments where animals are killed,
the OV would be that person.

430 **Q39. Mr Robertshaw:** So, sorry, that is a distortion of normal process then really, isn't it?

Mr Blacker: It is yes, but that is to meet European standards, what European law says that we
need to do. So the OV takes responsibility to look at the food safety management system, to look
at the ante-mortem, to look at the post-mortem and to make sure that the food business operator
435 is complying with the law.

The meat industry is one of those where it is so regulated – there is no other industry where
you would have four or five members of a Department regulating day in, day out. You have to
have an OV there every day that animals are being killed; every single animal that is killed has to
be inspected by a meat inspector. So you have always got the regulator there, so they are always
440 identifying things that need addressing. Every food business, every establishment has issues that

they need to address, so with our regulators being there all the time they find the main thing is that the food business operator has a management system where if they have issues they put controls in place or they modify the system; and that is what happens when we find issues.

445 **Q40. Mr Robertshaw:** I am relieved to hear what you say, because it does seem very complex to us. In fact, in a sense, the breadth of the regulation almost seems to be tripping itself up from a simplistic standpoint, management standpoint.

Okay, so we are back to the mince plant again. Who does the swabbing? Where does it go? Where does the information come back? Who is responsible for it?

450

Mr Blacker: That is the food business operator that is doing all that because they are following the law, we just check it. So the food business operator would be the ones that are responsible for doing the swabbing and for arranging for an analyst to check those swabs.

455 **Q41. Mr Robertshaw:** So it is a sensitive area. I mean, by definition, an abattoir, you have kindly indicated that yourself, has a significant amount of regulation because it is particularly sensitive. So you would expect sensitivity to embrace the concept of the swabbing process, and here we are sticking, just for the ease of it all, with the mince process. The swabbing goes off to the lab, it comes back to the food business operator. If it fails that test he does not put that in the daybook, he puts it somewhere else, does he?

460

Mr Blacker: Yes, it would be part of his management system. So if there was a failure, he may make a note to say 'Failure identified' and then he would have a look at what controls can be modified or adjusted.

465

Q42. Mr Robertshaw: To look at that – because we will – where do we go and look for it?

Mr Blacker: You would have to talk to the food business operator to look at their food safety management system and any of their records that they have.

470

Q43. Mr Robertshaw: Yes, it will probably require an on-site visit.

Okay. So with it being sensitive, do you rely entirely upon the FBO to manage and respond to these issues, or do you periodically have an interest in the results being achieved – or not, as the case may be?

475

Mr Blacker: Yes, the OV should check the results.

Q44. Mr Robertshaw: Should or does? Sorry. These words matter.

480

Mr Blacker: Should check the results on occasions.

Q45. Mr Robertshaw: What would he or she do then at that point? If there was a regular, persistent, unexpected level of poor responses, what would happen then?

485

Mr Blacker: They would check to see what verification, what amendments the FBO would put into the system. If the FBO had not then initially they may give a verbal warning or require them to do something and request –

Q46. Mr Robertshaw: Would a verbal warning be registered as it would be with us?

490

Mr Blacker: If they had to give a verbal warning – I am not saying they have given a verbal warning, but if they had to – they would make note of it and they would follow an enforcement

495 pattern; and if things were not getting done then they might take formal action, they may serve an improvement notice, they may serve a remedial action notice. They could even prohibit an operation.

Q47. Mr Mercer: Can we dig into how would the OV take appropriate action if there is non-compliance? Could you spell out for us the various levels?

500 **Mr Blacker:** Yes, it really depends on the non-compliance that you are looking at. If there are minor non-conformities they may just verbally request the Plant to do something to amend something. What you have got to understand is that we find minor issues fairly frequently and that is not unusual for any meat plant when you have got that much regulation of a process and
505 when those issues are identified they are brought to the attention of the food business operator straightaway, whether that is the supervisor ... So if you are on a line that is constantly going and you are a meat inspector at the end and you find an issue on a shoulder or something, where they might get contamination on a shoulder, then because you know the line, you would go to that point in the line and tell the supervisor, 'I think at this point there might be an issue,' and that can be addressed straightaway. It is when it continues then they can start taking a more formal
510 approach if needed.

Q48. Mr Mercer: So would you expect to see that documented in a daybook? These minor ones? I am interested to see how many times does it have to be in the daybook before it ... and in order to escalate that is that on the OV to say, 'You know what, we have seen too many of these
515 minors'? Does he then escalate that through some path?

Mr Blacker: He would escalate it if he thought it was appropriate, but what you can find is a fluctuation: some days there might be nothing at all, it might be fantastic; other days there can be an issue and the issue could be as simple as it has been chucking it down and the sheep have come
520 in and they are soaking wet and then you have got an issue where there might be mud on the underside of the belly, so you end up with more risk of contamination. You might have a farmer that has fed the animals too soon before slaughter so they will have a full stomach, so there are more chances of their stomachs bursting when they are – I am sorry to be graphic, but this is a graphic subject, isn't it? The stomach may burst when they are eviscerating – no fault of the
525 Plant's, no fault of the processor, but because maybe the farmer has not followed the process. So if you get issues like that then they are not always an enforcement issue, but they are an issue where you say, 'Okay, well, we think this is why it is happening and we will bring it up with the farmer.'

530 **Q49. Mr Mercer:** So that is on the post-mortem side, the vet's responsibilities? (**Mr Blacker:** Yes.) In that particular instance they would record that in the daybook, that stomachs were full (**Mr Blacker:** They may do.) and they may then go and talk to a farmer?

535 **Mr Blacker:** They may record it in the daybook. They do not always record it in the daybook.

Mr Mansell: Sorry, I did mention the FBO meetings that do take place monthly and I think you had last years, which gives you a good idea of how the discussions go. So that is with the Plant management team, as well as the OV and the meat inspectors and that was set up – and I must admit it was Glenn's idea that we did that. So that is a monthly meeting that will address problems
540 that occur and anything that is recurring, that would aid them to say, 'Well, we need to step this up, what is the next step.' And as Mr Robertshaw alluded to before, it could be a letter that has gone to the business operator. We would always do that as keeping us informed as we possibly can, unless it was an absolutely serious breach before escalating it then to the formal route which,

545 as Glenn has mentioned before, could be a notice, whether it is a prohibition notice or an improvement notice.

Q50. Mr Robertshaw: Glenn, when did you introduce this system; the FBO reporting process, when was that started?

550 **Mr Blacker:** The FBO meetings?

Q51. Mr Robertshaw: As Ian has indicated there, the way of using that as a means of monitoring issues.

555 **Mr Blacker:** It has been a few years now.

Mr Mansell: Four or five years.

560 **Mr Blacker:** Yes, and it is not unusual, it happens in plants all over Great Britain. I have not invented something. It is just a meeting to look at various issues around the Plant, good and bad, that need addressing.

565 **Q52. Mr Robertshaw:** You talked earlier on about external audits, but as lay people, as obviously we are, we had huge difficulty grasping the processes. Now, if we did on a documentary basis, is it not the case that an external auditor looking for process being followed would be in the same position as we found ourselves in?

570 **Mr Blacker:** No, because the auditor would be looking at the food safety management system of the food business operator. The daybook is not part of the audit, the daybook would just be something that the vet would go through with the auditor if there were issues with the food safety management system.

575 **Q53. Mr Robertshaw:** So if it is not in the daybook and there are problems occurring ... we have run away from the mince issue a little bit; let's go back there because it was the issue that you said there were teething problems over. How would one be able to see these issues and see them being resolved? I am stuck as to where you come into all of this, frankly. I mean you seem to be setting systems up but at the same time not directly involved in lines management issues. Forgive my confusion. I know you have said it is complex, but for the uninitiated would you like to try again?

580 **Mr Blacker:** Yes, so in DEFA it all falls within regulation, the vet, Environmental Health, meat inspection. So it all falls under regulation, rather than just falling under the Environmental Health team. The functions of the Environmental Health team have historically been to provide the meat inspection service and the function of the Animal Health team have been to provide the vet service. So now that the Regulation Directorate is there it all falls under the Regulation Directorate.

585 So from my part, I make sure that we have got the meat inspectors and from Ian's part and Animal Health is to make sure that we have got an OV. Then the whole of regulation falls under the Regulation Directorate. If that makes any sense whatsoever.

590 **Mr Robertshaw:** A bit. I am still stuck on this issue about lab tests coming back and disappearing into the ionosphere sort of thing. I mean you just cannot follow it through. Trying to get a handle on stuff that is effectively a hiccup or an issue, it sort of appears and then just goes. I am lost, frankly.

595

Q54. The Chairman: So the swabs are taken at various points, and we know from our reading, depending on what the product is there appears to be different levels of samples taken. So mince has a higher number of swabs, you have to take representative samples. There are certain things that seem to happen. Then obviously those results are coming back to the FBO, as you have highlighted. I suppose what we want to understand is at what point would there almost be an obligation on them to notify the meat inspectors that there has been something that would be perceived as potentially a risk? We have received a number of papers through – really helpful, the problem we have got is that there does not appear to be with it the, ‘Actually as long as it is under this it is fine.’ It is just lots of numbers which is brilliant and we are now trawling through regulations and we have asked the question, ‘What are we assessing against?’

So how can you be confident, if there is an issue that has come up and comes up time and again on a certain element, what is the action taken, because that does not appear to feature in the daybook? Maybe it is that all the results are perfect. We will find out when we see the scores on the doors, as it were, against a clearer framework of what is permitted, but how does that feed in to making sure that the product that comes out at the end everyone has complete confidence in?

Mr Blacker: The food business operator keeps those results as part of his food safety management system, and those results are there to verify the process. So they will do a HACCP flow chart of the process, so they will go from the raw material to the mince product, and they will look at every step and see where they need to put controls in place. So the controls with mince will be temperature controls, making sure there is no contamination, and there might be metal detection as well, so there will be various stages. So they will make sure that the trim that they use for the mince is not contaminated, they will make sure that it is kept at a low temperature so that it does not raise above a certain temperature and increase the number of bacteria. Because with mince what you are doing is, say, you have got a whole carcass, you have got one surface, you have not got contamination issues with the internal services; with mince you are mincing something, increasing the surface area, so the more likelihood you are going to dissipate the bacteria throughout the product.

So there are legal criteria for microbiological standards for mince and for carcass swabbing. I cannot tell you exactly what those figures are off the top of my head, but I know that the mince line that they have got in operation they have been testing significantly more than the legal limits at the moment because they are tweaking their system and verifying their system. They are also doing a lot of shelf-life testing, so some results that look significantly high it is because they have done shelf-life testing to see how long the products would last. What we have seen is as they have tweaked the system the results are coming back cleaner and cleaner.

The carcass swabbing is another point where it is to verify that their food safety management system that they have got in place is working and that food safety management system starts at the farm. There are pre-requisites, so they will talk to the farmer and make sure they do certain things. They will clip the bellies of sheep when it is wet – that is a prerequisite to the food safety management system because where they are going to open up that animal if they have shaved that area, they are going to reduce the risk of contamination.

So the surface swabbing at the end is to verify that the processes the food business operator has put in place are working and from the results that I have seen they look like it is working. The vet can check those results at any time and can go and look at their records and the auditor who comes in and does the audit will look at those results, because the food business operator will keep those results as verification that their system works.

Q55. The Chairman: So to your knowledge, you have said that they take swabs at various points to improve the processes, which I think we all understand, but there has not been any point at which there is meat that would be above the legally allowed limits?

650 **Mr Blacker:** There has but the limits are not food safety critical, they are to show that there is an issue that needs to be checked in the system. They are a hygiene issue rather than a safety issue.

Q56. The Chairman: So are there any limits that hit food safety?

655 **Mr Blacker:** There are limits on salmonella. (**The Chairman:** Okay.) But we have not found any salmonella.

Q57. The Chairman: But everything else is just for interest more than ...?

660 **Mr Blacker:** They are levels to show food hygiene rather than food safety. In ready-to-eat products there is lots of food safety micro-criteria that you have to meet, but in the raw meat it is mainly to show if there is an issue with hygiene in the process.

Q58. The Chairman: So that is based on the assumption that it would be cooked?

665 **Mr Blacker:** Yes.

Q59. The Chairman: Okay, so are there then different standards if you are selling, say, steak tartare?

670 **Mr Blacker:** Yes.

Q60. The Chairman: Okay. So the mince on the Island, do they do it to those standards?

675 **Mr Blacker:** They do it to cooking meat – to mince.

Q61. The Chairman: So it is not to be eaten raw?

Mr Blacker: No.

680 **The Chairman:** Okay.

Mr Blacker: I would not recommend eating mince raw for anyone.

685 **Q62. Mr Robertshaw:** So there is the written HACCP process, but then there are the daily reporting results following those processes, that we could read somewhere when we go to the office. For example, temperature of mince going in and coming out? Back to mince, my favourite subject!

690 **Mr Blacker:** Yes, well they are the records that the food business operator holds as part of their food safety management system and they are records that are available for regulators to go and have a look at.

695 **Q63. Mr Robertshaw:** Okay. The records they keep with regard to the swab testing, they obviously have to correlate or does the – I was going to say – the operator do their own tests and put them down themselves? Does the lab do it every day, every operating day?

Mr Blacker: I am not sure what arrangements the lab has got in place with the Meat Plant. It is a private contract between the two. It is not our Department providing that service, the Meat Plant have a contract with the lab.

700 **Q64. Mr Robertshaw:** I am sure you understand our concerns. It is understanding all the
processes, the interaction between the various components, and the interaction that then takes
place between the operator, which is effectively very close to the Department. You could almost
innocently use the word, it looks incestuous, *potentially*, if not in practice. And as politicians,
705 perception really matters a great deal. In a much bigger jurisdiction the components will be much
further apart, I would put it to you, and I suggest you would not disagree with that: that the
elements would not be so close together? The ownership: for example, the Government does not
own the abattoirs, for a start. There are much greater degrees of separation, and it is us
understanding the complexity of the regulation and relationship to the closeness of the ownership
that is, frankly disconcerting when you cannot see absolute clarity of process which you can
710 follow.

Ian, do you want to comment on that one?

Mr Mansell: Not really.

715 **Q65. Mr Robertshaw:** You must have a professional opinion.

Mr Mansell: I believe this is why we have got the regulatory directorate: to keep that
separation and I know that the –

720 **Q66. Mr Robertshaw:** So, obviously the Minister would not be particularly interested directly
with this Committee, would he? I mean it is not for you to say but presumably he would want to
keep his distance from us, I would put it that way.

Mr Mansell: It is purely a regulatory function and that is what we are here to present, what we
725 do as a regulator.

Mr Robertshaw: You would understand that somebody like me might very well say that it
would be very helpful if the regulator was moved even further from the Department and you
would understand it if you did not necessarily agree with that concept.

730 **Q67. Mr Mercer:** Just going back to audit on the ante-mortem side, reading through one of
those audit reports, there is obviously a large list of checks that take place. One of them was
welfare of animals at time of kill, (**Mr Blacker:** Yes.) which we do not use here. Could we dig into
that a little bit? Do we have something equivalent?

735 **Mr Blacker:** We have just brought WATK with alignment with all the European regulations. We
have got slaughterman licensing in place and we have for many years, which is a fairly robust
system, to be honest. I mean there is a requirement with that to, I think it is every two or three
years, renew the licence. With WATK you get the licence and then that is it, you have got the
740 licence.

But we recognise that we have got to align with the rest of Europe, so that came in at the
beginning of January this year. So we have still got to set up some systems there, but the majority
of the slaughtermen at the Plant have already got the WATK licensing because of their Red Tractor
requirements, because they get audited by Red Tractor, British Retail Consortium (BRC); they will
745 get audited by other customers as well. So they are highly sought audited.

Q68. Mr Mercer: Is that a commercial benefit to adhere to WATK?

Mr Blacker: It is a legal requirement to comply with WATK, to have slaughtermen registered. I
750 believe WATK also covers the hauliers as well and that side of things, but I am not sure if it will

here. But they did training, I think it was last year, the Plant, where they brought someone over to do WATK training with all the slaughtermen, so there was a dual process in place.

Here as well we have got slaughtermen that have been slaughtermen for a long time. We have not got people coming in that do not really know what they are doing or they are not monitored. 755 The OV that is in the Plant will regularly check on a daily basis and talk to the slaughtermen that are there and monitor what is going on.

So from a slaughter welfare perspective, we have got really quite tight systems compared to some of your bigger places across Europe, I would say.

760 **Q69. Mr Robertshaw:** Okay. Back to the mince, obsessed as I am: was the HACCP structure around the mince operation in place before it went live – if that is the right phrase?

Mr Blacker: I believe that the HACCP system has been written and that the OV has commented on it and assisted the food business operator. 765

Q70. Mr Robertshaw: Was it in place before? I mean when we go in to have a look, was it in place before the mince operation went live?

Mr Blacker: I believe, so, yes. 770

Mr Robertshaw: Okay, so who would have checked that? The food business operator themselves was responsible, but when did it start, Glenn? When did the mince ...?

Mr Blacker: I could not tell you the exact date? 775

Q71. Mr Robertshaw: Does anybody know here?

Mr Blacker: It was last year – mid-last year, I believe. It might have been earlier. This year has been a complete blur for us because we have all been doing contact tracing. 780

Q72. Mr Robertshaw: Okay. Right, so what I am trying to get at – maybe it is something to do with the hiccups around the system – is that if it came in during COVID and as fully external audited processes only occur very infrequently, it might be the case that if the HACCP processes and procedures were not all in place it might not have been noticed? 785

Mr Blacker: No, that is not the case. The system was checked by the OV and one of our meat inspectors. One of our meat inspectors that has been with us a couple of years who used to work for the FSA assisted the OV to look at the mince line before it was –

790 **Q73. Mr Robertshaw:** But he is on your side of things.

Mr Blacker: He is on my side of things, yes.

Q74. Mr Robertshaw: So he reported to the OV. 795

Mr Blacker: He worked with the OV to look at the system. (*Interjection by Mr Robertshaw*)

Yes, because one of the things that I did not explain is our Meat Plant is called a dual plant; it has got a slaughter line and a cutting plant. In the UK you might have local authorities looking at cutting plants, along with the FSA. It depends on their size and what they are doing. So you have got a dual plant there: you have got the abattoir where every animal is inspected, stamped, fit for human consumption or not; then once the meat is chilled and ready either the carcasses go on the back of a wagon and go to the butchers or they will go to the cutting plant element of the 800

805 Plant, which again is regulated by the vet because it is a dual plant. But we have got people, highly experienced meat inspectors – and one of them had moved over from the UK and worked for the FSA doing audits of cutting plants and mince processing and that sort of thing, so he has worked with the OV to look at the mince line before it was operational and identified a number of points that they need to look at, and they have worked on that.

810 **Q75. Mr Robertshaw:** So who set that arrangement up? Was it on the OV's initiative, Ian's initiative, yours? How did that process set itself up to deliver what ultimately was subject to a degree of teething problems?

815 **Mr Blacker:** It will have been arranged between the food business operator, the OV and the meat inspector in question. One of our environmental health officers also supervises the meat inspectors; he is also a qualified meat inspector, so he goes to the food business operator meetings, he talks to the FBO. So if the FBO is going to make any changes they will talk to each other and then they will support the food business to get the regulation in place and then we will monitor it to make sure it is working.

820 **Mr Robertshaw:** I think I better understand now. Sorry, I wasn't quite getting that. I get it now.

Q76. The Chairman: So with the audits, is there a schedule of audits: certain timeframes that certain audits have to happen and then the unplanned audits slot in? How does that work?

825 **Mr Blacker:** What we are going to look at is risk-based audits. At the moment what we have got is we are having annual audits from an independent and the OV in the Plant just does the day-to-day monitoring. What we intend to do is have the annual audits still, but also some regular unannounced audits throughout the year of process steps rather than the whole Plant. So we may go in and just go, 'We are just going to have a look at the cutting room today. We are just going to have a look at the lamb line,' and split up the process like that.

Mr Mansell: The last audit we commissioned, how long did that take, Glenn?

835 **Mr Blacker:** When they came over? (**Mr Mansell:** Yes.) It is a full day audit when they come over. Four years ago it was the Department that were doing the audit, but now we have changed that, so we have got that independent coming in, like I said earlier, who is not aware of everything that goes around a small meat plant. We have got a brilliant team down there, a brilliant team of slaughtermen, a brilliant team of meat inspectors, but they all work very closely, so they all see the same things day in, day out, so we get someone who is independent that has not been to the Plant to come and have a look, who has got lots of experience at meat plants, so that they can pick up different things. That is what we have put in place.

845 To try and make it even more ... (**Mr Robertshaw:** Transparent.) transparent, we went to meet the FSA at a plant last March and talked about meat inspection training and also the possibility of having some of their inspectors come in and audit the Plant. So then you have not got the situation where we have got the contractor auditing his vet and our meat inspectors; you have got someone completely independent that can come in and have a look at the whole process.

850 **Q77. Mr Robertshaw:** So for absolute clarity, because it was encouraged by the concept of unannounced, how often would unannounced inspections looking at particular elements ...? How often might you hope that would occur in the future?

Mr Blacker: At least a couple of times in between audit periods. So if, for example, we start a more risk-based audit approach in the Plant, which could be challenging because if you do a risk-based inspection and it says, 'Oh, it needs to be inspected every six months,' then we have got to

855 get a contractor from the UK over every six months, but if we have an annual audit from an
external then we may do a couple of unannounced throughout the year. But if we found
elements ...

860 The thing is we are investigators so if we go in and we find problems we will dig deeper, just
like anyone. So if we went and did two unannounced audits and we found problems we may do
more.

Mr Robertshaw: Okay, thanks.

865 **Q78. The Chairman:** This is just going back. Are you able to provide the place where the
regulations in terms of the swab results and what you would ...?

Mr Blacker: Whereabouts are the regulations?

870 **Q79. The Chairman:** Yes, as in which ones are worked to in terms of swab results?

Mr Blacker: It is EC2073/2005. (**The Chairman:** Yes.) They are all in there.

Q80. The Chairman: Okay, so it is just there? That will make our life easier.

875 **Mr Blacker:** I cannot remember the number of the other one, but I will find that for you and
bring it back to you.

The Chairman: That would be great. I think that would point us in the right direction.

880 **Mr Mansell:** That does set the parameters. You will be surprised at, as Glenn said before – or
you will not be surprised, I hope – that the Meat Plant have gone above and beyond their sampling
parameters in this area.

885 **Q81. Mr Mercer:** I think it might be useful also, just for the sake of completeness, if we could
have a list of which animal welfare and transportation Acts and Orders apply to livestock being
processed at the Meat Plant.

890 **Q82. The Chairman:** Yes, because it is interesting, one of the things on some of the audits that
we have seen is it will have a specific thing you have to meet, as you would expect, and then the
assessment, but the assessment is just, 'We have done it', it does not specify. So, for example, it
says you must survey at least 40 animals and you must comply with 80% ... say the stun-stick time,
for example, it does not specify how many animals were surveyed, what the average was, which
is what I would have expected to see; it just says, 'We are fine,' which feels like there is something
missing. So I wonder if it is just that we are not seeing that or if that is not happening. But I am
895 assuming that is conducted by the FBO, as opposed to by your team.

Mr Blacker: Swabbing? Sorry.

900 **The Chairman:** Sorry, this was with one of the audits that we have seen.

Mr Mansell: Was it a welfare audit?

Q83. The Chairman: It must be a welfare. So would that fall under the vet?

905 **Mr Mansell:** That would be the OV.

The Chairman: Okay, so it does fall under you, in fact! As with everything does!

910 **Q84. Mr Robertshaw:** In a different life if something started to go wrong as a provider, you would quite quickly stick your hand up and say, 'I have got a problem here,' and get inspectors in quickly to assist the process of identifying as fast as possible what was going wrong if you could not immediately find it yourself.

915 Is there any requirement in these circumstances, bearing in mind you have got these two separate elements – the abattoir and the meat cutting ... (**Mr Blacker:** Cutting plant.) cutting plant, thank you – in close proximity and the mince, are there some trip points that the FBO would be required to stick his hand up and say, 'I have got an issue here on ...' and encourage a process to start? Does that exist?

920 **Mr Blacker:** Absolutely. I mean if any of the food safety criteria were not met – say, they found salmonella in the mince or something and the batch had gone out then they would have to have a recall process.

925 But if they fail from a hygiene point of view, then they do not have to have a recall. There is no need to recall the product; what they need to do is look back and see where they can improve the process.

Q85. Mr Robertshaw: Okay, so the stand up to be counted only happens when there is a recall. So it is the recall of the trip point, is that right?

930 **Mr Blacker:** No, the food business operator is responsible. They take control of their business so if they get a poor result that does not meet the legal criteria it is for them to then put that corrective action in place.

935 The part of the audit is you would look at the yearly reports, so you would have folders and folders of records and wade through them and if you see that there is a failure then you would go back and say, 'Right, okay, we have got a failure here, a failure here, a failure here. What corrective action did you put in place?' So they would have to record what corrective action they put in place and also record any changes that they may have made as a result of that, and that is all part of their verification.

940 **Q86. Mr Robertshaw:** Yes, I fully appreciate that and acknowledge the fact that you are referring to the food business operator here as a separate entity – and to some extent I am repeating myself but this is a very important point. On the one hand, you have the inspection processes and regulation processes sitting in a Department where effectively at the end of the day the reporting process goes up to a board which in turn has a number of non-execs who have very close relationships with the Department. That is an area that would trouble anybody really, because it almost looks like a closed circuit.

Mr Mansell: Well, we certainly do not operate like that.

950 **The Chairman:** Sorry, just trying to get a bit more detail around –

Q87. Mr Robertshaw: 'We' from the regulators side?

Mr Mansell: Yes.

955 **Mr Robertshaw:** Yes, thank you.

Q88. The Chairman: Sorry, just with the food safety and food hygiene, I think we are clear: the food safety is the stuff that is absolutely, 'If you pass this it cannot be sold or if you have sold it

960 you need to be getting it back in pronto'; and then food hygiene is very much about learning and improving?

Mr Mansell: Yes, the product is still safe.

965 **Q89. The Chairman:** Okay, so in terms of then, if there is the maximum level at which it can sit based on food hygiene regulations, if it was persistently over that level, at what point would you say ... or would that not fill your role at all?

Mr Blacker: If we see that there is persistent failure –

970 **Q90. The Chairman:** Yes, and how would you see it because the results do not come to you, presumably? I am just trying to understand. If there was persistent failure on food hygiene levels, so we have got all sorts of results, I do not know which ones, apart from salmonella which you have made clear is a safety one, but we have got all sorts, bacteria counts, enterobacteriaceae, which I still cannot say, listeria, there are all sorts. So on the food hygiene ones, which are not a
975 definite no, if it just persistently is above, what happens?

Mr Blacker: If it is persistently above, like I said earlier on, the OV can check results at any time and have a look at the process. The auditor would check that as well. So if the auditor identified that there were persistent problems, they would recommend enforcement action. So if there
980 were persistent failures we could serve a remedial action notice, which is a notice that is specific for approved premises, where you could potentially stop a process or make them change a process. You can actually stop a whole kill line and say, 'This stops until you have put different systems in place.' You could just go down the line of a verbal warning or you could go all the way up to a prohibition if you thought it was necessary. But to go prohibition there would have to be
985 a food safety criteria. There are elements that can be taken if there is that persistent failure.

Mr Mansell: It acts as a regulator, but of course you have to remember that the Meat Plant are trying to produce a high quality product and they have their own customers who will want to see results. (**The Chairman:** Yes.) (**Mr Robertshaw:** Absolutely.) They will want to be assured that
990 whatever they are selling on to their customers is a safe and hygienic product with a reasonable shelf-life.

The Chairman: Again, just to tie it back in, I suppose, to where I came from before about the whole idea of steak tartare because it is the only thing I know that you might eat and not cook –
995

Mr Robertshaw: Do you like it or something?

Q91. The Chairman: No, I have never tried it!

1000 The food hygiene elements of the test are the ones that would be eliminated by the cooking process (**Mr Mansell and Mr Blacker:** Yes.) and the food safety ones are the ones that even if you cooked it, you have still got a problem? That is the sort of split, in a very simplistic ...?

1005 **Mr Blacker:** With red meat they are called process hygiene criteria rather than food safety criteria because you are cooking it. If it is a meat that is a cured meat or it is a meat product, a pie, if it is ready to eat, there is going to be more of that food safety criteria.

So in the regulations in EC2073/2005 it puts in levels of enterobacteria, which you are aware of, anaerobic colony count, which is the number of organisms in total. It also says E. coli, which in a ready-to-eat product would be a serious concern, but there is a certain amount of E. coli that can be in mince. They are all process hygiene criteria. If levels go above there is no need to recall
1010 that product, but there is a need to have a look at why that has happened. That could be as simple

as the temperature rose one degree too high so the bacteria multiplied faster. It could be that people have handled it too much while it is being trimmed.

1015 So those results are there to help the food business operator identify if they need to make improvements and, like Ian was saying, customers like Marks and Spencer – I do not think the Meat Plant supply to Marks and Spencer, but customers like Marks and Spencer – and Tesco and all the other big suppliers will have much higher standards for their micro results and there are plants in the UK producing tonnes and tonnes, hundreds of tonnes a day, of mincemeat with very low counts because they have to have more stringent process in place or the customer will not buy the product.

1020 The Plant have also done a lot of shelf-life products as well, so that is a really good thing because that is part of their quality control as well. So it just shows that they are taking production lines seriously.

1025 **Q92. Mr Robertshaw:** In the UK, where you have got an abattoir completely separate to another business which I think we are calling a cutting room or (**Mr Blacker:** Cutting plant.) cutting plant, in the UK your role would be much more directly concerned with the cutting plant than is the case because we are a hybrid, is that right?

1030 **Mr Blacker:** Yes.

Q93. Mr Robertshaw: Okay, so how would your role in your profession differ from the way the OV conducts him or herself in a hybrid plant like ours? Is there a difference in processes?

1035 **Mr Blacker:** It depends on the size of the plant and the processes that are in place. In the UK obviously there are lots of different hybrids of plants, but if there is a plant that is a cutting plant, a dual plant, and there is a vet in there, the vet will ultimately –

1040 **Q94. Mr Robertshaw:** No, I am talking about a non-dual, where the cutting plant is a business in its own right. It is a limited company receiving carcasses and meat products from abattoirs completely separately. In that circumstance, your profession would oversee the FBO there. Do their processes in those circumstances differ much from the way an OV operates here?

1045 **Mr Blacker:** No, they would still have the same level of regulation. I think the difference here is there is a vet in the Plant all the time when animals are killed; the vet does not have to be on site all the time when the cutting plant is operating, but they do have to be on site all the time while animals are being killed.

1050 So in the UK, depending on the size of the cutting plant, you might have vets going in for a certain amount of time every month and you would not have meat inspectors there all the time, but you might have them going in and doing spot checks and audits throughout the year.

Q95. Mr Robertshaw: So when the lab results come back to the FBO for the cutting plant side does the OV automatically see those and have opportunity to comment on them, or does it go to the FBO?

1055 **Mr Blacker:** It goes to the FBO.

Q96. Mr Robertshaw: Does the FBO then report it to the OV if there is a discrepancy or deviation from acceptable or normal?

1060 **Mr Blacker:** They would not need to do that on every occasion because what they –

Q97. Mr Robertshaw: You use a word – it keeps coming up – ‘can’ as rather ‘does’ or ‘must’.

1065 **Mr Blacker:** They *can*. The food business operator is ultimately responsible to make sure their food safety management system is in place, so the vet that is on-site could check any element of that food safety management system at any point. There is not a legal requirement for them to raise every single result that might fall outside of some of the criteria, but there is a requirement to look at those results and then if they need to take action to put action in place and record that action.

1070 **Mr Robertshaw:** I might come back.

1075 **Q98. Mr Mercer:** I just want to check I heard something correctly before. So if food safety criteria are hit then the food business operator must raise that with yourselves and Environmental Health, is that correct?

Mr Blacker: They have to raise it with the OV on site.

1080 **Q99. Mr Mercer:** Right, okay.
So how would it then proceed if there was a recall, for example?

1085 **Mr Blacker:** That would be the FBO that would put their own recall procedures in place, so they may have to put out a press release, they may tell our Department. Back in the UK we will get food safety alerts from the Food Standards Agency quite frequently, because obviously they have got many more approved premises. They will send food alerts, that we sign up for as well, that might say, 'A product in this supermarket contains an allergen or has failed a salmonella test.'

Mr Mansell: I think it is fair to say that in this case it would be the supermarket that has been supplied that would actually raise the alert.

1090 **Q100. Mr Mercer:** Right, with their own testing of products?

Mr Mansell: Yes, so they would handle the product recall. It is in their best interests to.

1095 **Mr Blacker:** But the FBO would make –

Mr Mansell: Instigate it, yes.

Mr Blacker: – make the customers aware.

1100 **Q101. Mr Mercer:** So once they have raised it with the OV is it just a courtesy thing to raise it with the OV and then they deal with their customers?

Mr Blacker: Yes, they raise it with the OV; 'We are instigating this process.'

1105 **Q102. Mr Mercer:** Right, okay, so it is just a notification step, the OV then does not do anything specifically with ...?

1110 **Mr Blacker:** I am sure they would record it in the daybook. I do not recall any of this actually having to happen as yet – touch wood. Hopefully, it will not happen at all.

Q103. The Chairman: The only final thing really for me is just going back to the daybook again, which obviously we have had a chance to look through, which we are very grateful for you sharing with us, because I think it does give a bit of insight.

1115 So the vet puts in on the kill days there are a number of questions or points that he seems to – he or she, whoever is doing it – put in consistently these things, ‘Checked this, checked that, checked the other, checked that, this is okay’. Then intermittently there is the number of different beasts and what they were, noted in just for reference, I assume. And then there are odd bits put in by the meat inspectors.

1120 But then there are on occasion things that are put in there that you think it just sounds like it is not how it should be, by the way it is written, concerns raised; what does not ever happen is there is nothing that ever closes it off in the daybook to confirm that there is an action taken or that it has been forwarded on and so I just feel that there is an opportunity within the governance framework and the processes for something to inadvertently be missed and what I cannot see is the automatic referral of that on to the next stage up, I suppose.

1125 I just wonder if you have any comment on whether there is a way that could be improved, maybe.

1130 **Mr Blacker:** My understanding is they take the daybook with them to the food business operator meetings and go through that process so that they are made aware of anything. But we can certainly –

1135 **The Chairman:** Which stands to reason, and they could put a note in to confirm it has been discussed. I am just thinking to the untrained eye, obviously, we look at it and think, ‘Oh, that has happened again and again and again.’

Mr Mansell: An actions column.

The Chairman: Yes, absolutely.

1140 **Mr Blacker:** We can take it away.

The Chairman: Maybe there is something helpful there.

1145 **Mr Blacker:** Yes, absolutely.

The Chairman: Anyone else got any questions or anything they want to raise at this point?

Mr Robertshaw: My brain is minced now! *(Laughter)*

1150 **The Chairman:** We will do a test on it shortly!

In that case, thank you very much for your time and I am sure we will e-mail you more questions. So thank you very much and the Committee will now sit in private.

The Committee sat in private at 3.52 p.m.