



House of Commons
Environment, Food and Rural
Affairs Committee

Contamination of Beef Products

Eighth Report of Session 2012–13

Volume III

Additional written evidence

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(published in Volume III on the Committee's website www.parliament.uk/efracom)

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Written evidence

Written evidence submitted by Which?

1. Which? is grateful for this opportunity to submit evidence on issues relating to the recent discovery of horse meat and traces of pig in burgers sold in UK supermarkets. The cause of the contamination is still under investigation, but we would like to highlight the following implications that have already come to light relating to enforcement and surveillance, effective regulation and the fragmentation of food responsibilities across government.

CONSUMER CONFIDENCE IN FOOD STANDARDS

2. The incident highlights the importance of consumers knowing exactly what is in their food. People should be able to have confidence that food labels are accurate and provide all of the information that they need to make informed choices. This does not appear to be a food safety issue, based on the advice of the Food Safety Authority of Ireland (FSAI) and Food Standards Agency (FSA), although the source of the horse meat is not yet known. It has, however, highlighted that food standards issues can be just as abhorrent to some consumers who do not wish to eat certain foods for cultural and religious reasons.

3. It is therefore essential that these issues are taken very seriously by regulators and that adequate resources are given to surveillance and enforcement. FSA data shows that food fraud incidents are on the increase in the current economic climate.¹ Our research shows that many people are concerned about rising food prices and are therefore trading down on their food shopping as a result. Being able to judge the quality and value of products is therefore more important than ever.

4. A recent Which? survey² found that taste, quality, price and the ingredients used in food were the most important factors for people when choosing food in the supermarket. The aspect that most people said they needed more information about when shopping for food was the quality of the ingredients used. Two thirds (65%) said that the price of food had become more important to them due to the economic climate, but over a third (35%) said that quality had become more important.

5. The FSAI uncovered this breach in controls through a routine survey it was conducting which looked at salamis, beef meals and burgers. Although enforcement cannot rely solely on end product testing, this incident has highlighted that this is an important tool for regulators and local authorities who have responsibility for enforcement in order to ensure compliance. This type of surveillance has, however, been cut in the UK. Trading Standards Departments within local authorities have been doing less sampling and Defra, which now has responsibility for food authenticity work, is doing less surveys. Given the long-term costs of an incident such as this in terms of consumer confidence, industry losses and enforcement resources, it is important that this area is seen as a priority and sufficiently resourced. We are pleased that the FSA will be working with Defra to conduct a survey looking at the authenticity of meat products, but it is also important that surveys continue into other areas of potential fraud, guided by the available intelligence.

INVESTIGATION AND POTENTIAL FOOD SAFETY IMPLICATIONS

6. It is essential that the FSA investigation uncovers the cause of this incident as soon as possible, addresses any wider ramifications and takes effective enforcement action, including prosecutions where there have been failures to comply with legislation. This incident has reinforced just how complex and integrated the food supply chain can be. If something goes wrong, as we also saw a few years ago with the contamination of foods with the illegal dye Sudan I, a wide range of products can be affected.

7. The EU General Food Law Regulation³ puts the responsibility for food safety on food business operators and also requires traceability. This incident has brought into question the reliability of these traceability systems. Once the cause is fully understood, the systems that are in place need to be reviewed. We agree that this should primarily be the responsibility of food businesses, but it is also essential that there is sufficient independent oversight. People assume that there are checks in place across supply chains and regular testing.

8. While in this case, the FSAI and FSA have said that there is not a food safety issue, the weaknesses that enabled this contamination to take place need to be dealt with so that similar incidents involving food safety hazards are avoided. It also needs to be ascertained whether the unlabelled meat content of the products came via a legal slaughtering and processing route and therefore whether or not it was considered fit for human consumption.

ENSURING ROBUST FOOD LABELLING PROVISIONS ARE IN PLACE

9. At the same time that this incident has come to light, Defra is consulting on proposals to remove requirements to display a clear description of meat products that are sold loose in supermarkets and other

¹ Annual report of incidents, Food Standards Agency, 2011.

² An on-line survey of 2114 UK adults between 5–7 October 2012. Data was weighted to be representative of UK adults.

³ Regulation (EC) 178/2002 laying down the general principles and requirements of food law.

shops.⁴ The consultation on the implementation of the EU's Regulation on Provision of Food Information to Consumers⁵ also proposes to change what is considered to be an offence under the legislation.

10. Under the existing Food Labelling Regulations 1996, misleading labelling on foods in general is considered to be an offence. Under the new proposals, only a failure to label an allergen in a food would be considered to be an offence. The reason given for this is the need to reduce regulatory burdens. The Government is therefore suggesting that only omitting information which has a health consequence should be considered an offence. Allowance is made for use of improvement notices for failure to comply with other provisions. We are very concerned that this down-grading of what is considered an offence at a time when food fraud is rising is very short-sighted. It sends a signal that mis-describing food is no longer seen as such a serious issue. There will therefore be less of a disincentive for unscrupulous practices in the food chain and less incentive for local authorities to give resources to this area of work.

11. The new EU Regulations will, in general, improve the labelling of meat products. Origin rules will be extended to all meat (although not yet meat products) and the name of the food, ie. the legal name which gives the full description will be improved. The addition of added water will, for example, be clearer. Labelling on non-packaged food is generally left to national provisions. The English proposals for implementation propose, however, to use the opportunity of the implementation of the Regulations to drop current national provisions which require the name of the food to be given on meat products sold loose and also for the quantitative ingredient declaration (QUID) to be given. Food Standards Agency consultations on the same proposals in Scotland, Wales and Northern Ireland, propose to keep these national provisions. Scotland is also proposing to maintain the current approach to what is considered to be an offence under the new Food Information Regulations.

12. We are concerned that a very short term view of what is considered to be a regulatory burden has been taken by Defra. It is essential that people have clear, reliable information about the ingredients that are used in food products, including meat products and that there are effective penalties in place if the requirements are breached. We therefore hope that Defra will reconsider its approach in view of the recent incident and make consumer interests a greater priority.

FRAGMENTATION OF FOOD RESPONSIBILITIES ACROSS GOVERNMENT

13. This incident has also highlighted the problems that have been caused by splitting up food responsibilities between different government departments and, in particular, narrowing the areas of responsibility that fall to the FSA.

14. It was another meat scandal that was largely responsible for the setting up of the FSA. Following the Bovine Spongiform Encephalopathy (BSE) crisis, it was acknowledged that an independent, transparent, joined up approach to food issues that put the consumer first was needed. The FSA was therefore set up with a clear objective to put consumers first and responsibility for food safety, food labelling, composition and standards and nutrition issues. It is still required to put the consumer first, but the areas that it covers have been diminished. In England, food labelling, composition and standards policy is now the responsibility of Defra which also has a responsibility for promoting the food and farming industries.

15. Enforcement responsibility is, however, still the responsibility of the FSA. Nutrition has also moved from the FSA in England to the Department of Health. In Scotland, the FSA still has responsibility for all three areas (safety, labelling and standards and nutrition) although the Scottish Government is in the process of setting up a separate Scottish food agency. The FSA also has policy responsibility for all three areas in Northern Ireland and has responsibility for safety and labelling and standards in Wales, but not nutrition.

16. We are concerned that this has led to a very confused approach. Food issues in practice do not break down into the simple delineations that are made between government departments. Something that is initially a labelling issue could easily become a food safety issue, for example. There needs to be a close link between on-the ground enforcement and policy. It is important that different departments co-operate and work collaboratively, but there aren't clear mechanisms in place for this across government. It is also much more straightforward to do this if all of the issues are within a single agency. This is also particularly important when many issues, as this incident has illustrated, are global in nature and so EU and global networks and points of contact are also extremely important.

17. The changes that have been made to responsibilities have also meant that consumer interests have become less of a priority in the way that these issues are now handled. The Defra consultation referred to above seems to be an illustration of this. We therefore think it is essential that a coherent approach is re-instated and responsibilities for food labelling, composition and standards, as well as nutrition, should be given back to the FSA.

⁴ Consultation on the Food Information Regulations 2013, Defra.

⁵ EU regulation 1169/2011 on the Provision of Food Information to Consumers.

CONCLUSION

18. In summary, therefore, we consider that this incident has so far highlighted that:

- The FSA needs to urgently complete its investigation into the cause of this incident, assess any wider implications, act on any need to strengthen controls and traceability systems and take any prosecutions where there have been breaches of the legislation.
- Greater priority should be given to enforcement and pro-active surveillance of food labelling and standards issues given the increase in food fraud.
- Meat products should be clearly labelled, whether prepacked or sold loose, and therefore current Defra proposals to deregulate should be abandoned.
- Breaches in food labelling requirements should be taken very seriously and therefore proposals that they should no longer be an offence under the new Food Information Regulations, unless there is a health risk, should be dropped.
- The complex way that food issues are now spread around different government departments with different priorities causes confusion.
- Responsibilities for food labelling and standards policy (as well as nutrition) should be returned to the FSA which has a clear responsibility to put the consumer first.

January 2013

Written evidence submitted by RSPCA
SUMMARY

The RSPCA is concerned that the recent traceability problems with horse meat from slaughterhouses masks a greater problem of horses going into the food chain due to over population, recent changes in the horse passport database system and the lack of effectiveness of horse passports. It also has concerns that changes to the new slaughter regulation involving a more risk based approach could increase these difficulties, and believes that a number of solutions such as mandatory CCTV in slaughterhouses, better labelling and an overhaul of the horse passport system is required. The RSPCA's monitored assurance scheme, Freedom Food, undertakes traceability audits back to the farm in two different ways.

1. The RSPCA is pleased to submit evidence to the enquiry on traceability and labelling in the food chain following the recent discovery of horse meat in beef products. The RSPCA believes that horses going into the slaughter chain are particularly vulnerable to mis-labelling and poor traceability due to a number of issues but the problems appear to be wider ranging and could be exacerbated by recent changes in slaughterhouse legislation and the failure of the horse passport system.
2. In 2012 the RSPCA, along with all the other major equine charities, released a report "*On the verge*" which showed an increasing number of horses being bred and imported, resulting in increasing numbers being abandoned, fly grazed or having their welfare generally compromised. We estimate that 6,000 horses in England and Wales fall into this category, and are the result of the unregulated and undocumented trade in horses under the Tripartite Agreement between the UK, Ireland and France, unregulated breeding under the assumption that horses can be sold and an increase in dealers obtaining horses but not finding an available market for them. The RSPCA itself has seen a doubling of horses it took in during 2011–12 compared to the previous year and a 133% increase in charges being brought for Animal Welfare Act offences to horses between 2010 and 2012.
3. One of the biggest problems facing RSPCA investigations into horse complaints is establishing ownership of the animals, as many do not have the necessary microchips or passports. The horse passport system brought in three years ago has never been fit for purpose in our view. There are 32 passport issuing offices, but since the Defra decision in 2012 not to further fund the National Equine Database (NED), there is no central database to check horse passports and microchips. Any checking of a microchipped horse without a passport would have to be done through each of the 32 offices. There are no accurate data on numbers of the horse population with microchips and passports, and the RSPCA is concerned that many of the horses it deals with do not have passports and are not microchipped. Even if a horse is microchipped, establishing ownership is difficult now without a central database.
4. A horse is not permitted to go into the food chain unless it has a passport. Section X1 of the passport shows if the horse is permitted to enter the food chain, and that the horse has not been treated with any medication that would stop it going into the food chain. It is unclear how well this system operates, as it can be circumvented by an application for a further passport by the owner of the horse through one of the 32 issuing offices. Due to the over population of horses in England and Wales the price of horses has plummeted and horses can be bought at auction for £10. Putting horses into the slaughter market brings a guaranteed price of around £230 per

horse, providing that the horse has the right conformation for slaughter. The meat is then exported to Belgium, France and Italy.

5. The RSPCA also has concerns on the traceability of meat from the abattoir through the supply chain. For example, Defra have been looking at a method to identify meat from animals that have not been stunned at the time of slaughter. The RSPCA would also like to see compulsory labelling of meat from non-stunned animals because much of the meat goes into the conventional market, and we believe that the consumer should have a choice when buying meat and a coherent labelling system would allow them to choose whether to buy pre-stunned or non-stunned meat. However, the traceability system currently operating in abattoirs has the ability to trace whole carcasses through the supply chain, but appears unable to cope with tracing the destination of carcasses once they have been butchered, making it largely unfit for purpose. Recent proposals for such a labelling system have now been dropped due to these problems of tracing butchered meat through the food chain.
6. The changes in slaughter legislation provides the opportunity to introduce mandatory CCTV in slaughter houses. The RSPCA monitored Freedom Food scheme has required this in abattoirs certified under the scheme since 2011, as have the majority of retailers. However, the Government has been resistant to introducing it as part of the implementation of Regulation 1099/2009. The RSPCA believe that introducing mandatory CCTV could improve the welfare of animals in the slaughterhouse and may prevent traceability problems.

The RSPCA monitored Freedom Food scheme has standards from birth to slaughter so traceability back to the farm is essential. Traceability is audited in two different ways by external auditors. Firstly there is an annual audit of process/packers and abattoirs that reconciles the delivery notes to the packed product which bears the Freedom Food label. The delivery note could be from a producer in the case of eggs or from an abattoir/cutting plant for animals. In the case of the abattoir/cutting plant they have the details from their process records that denote the delivery batch. During this assessment of the process/packer the auditor also checks the location to ensure segregation of Freedom Food product from standard production. The delivery note to the process/packer has the information that allows the product to be traced back through the abattoir to the farm. Secondly we have random product label checks that track the Freedom Food labelled product back to the producing farm by checking the delivery notes to the batch production, reconciling the batch to the delivery notes from either the producer in the case of eggs, or the abattoir in the case animals. These audit checks follow the guidelines of the British Retail Consortium.

January 2013

Written evidence submitted by the Chartered Institute of Environmental Health

1. The emergence of reports that suggest the detection of tissue in “beef-burgers” not from the animal to which it was purported to derive has clearly offended the sensibilities of the population at the large. Whilst one can appreciate the implications for religious observance, the general consumer has a common law right to expect that the food they eat is not harmful, and this is supported by a statutory duty to expect what they eat to be of the “nature” demanded. In addition, the manufacturer is charged with ensuring that the food is “safe” and there is a general requirement on all who receive or distribute food or food ingredients to maintain records for the purpose of “traceability”.

2. Such is the current regulatory set-up that responsibility for arriving at this simple aim is shared between two government regulators and two local government enforcers. In some respects the distinction between the role performed by Defra and the FSA is unimportant as there should be a common purpose in their discourse with all of those that have a part to play in the food chain—from “farm to fork” or “stable to table”. If the problem experienced in Ireland is to serve any beneficial purpose in the UK it will be to focus attention on the weakest points in this chain, since margins are traditionally very low in this sector and the temptation to cut costs can be great. This is not an excuse for misconduct but an explanation.

3. Equally, the distinction between the role of Trading Standards Officers to protect the consumer’s interests, and the Environmental Health Practitioner’s role in protecting their health, might reasonably be lost on the consumer since in this case they add up to the same thing—tissue derived from a horse or pig is not the same as tissue derived from a bovine and so purporting to be beef. In practice, were some of the constituents of beef products at the cheaper end of the market made better known to consumers they would likely be more concerned still for their long-term health and welfare, but provenance remains an important factor in its own right. One senses that this will be something that the larger retailers who commission the manufacture of “own label” products will be considering, and hopefully this will focus general attention on meat products that incorporate tissues of more than one animal species.

4. At this point the CIEH, as the body with a professional interest in the training of EHPs and the delivery of environmental health services in the UK, would wish to add only to the debate by saying that an inability to properly account for the ingredients of any foodstuff might reasonably be suggestive of other shortcomings, any of which might endanger health. If it transpires, as one would suspect, that this problem extends this side of the Irish Sea and elsewhere in Europe, it might be that the regulator needs to consider whether the “Hazard

Analysis Critical Control Points” (HACCP) system (used extensively in the food manufacture to identify hazards and control risks) needs to place greater focus on the nature and origin of ingredients. Beyond this, and given our wider public health remit, we deplore the actions of those unscrupulous people that would disregard the welfare of the poorest in our society, and would wish all with an influence to bring to bear on this situation to rejoin their efforts in protecting the most vulnerable who rely, more than others, on regulators and enforcers to protect them.

January 2013

Written Evidence Submitted by the British Retail Consortium

1.0 INTRODUCTION

1.1 The British Retail Consortium (BRC) is the trade association of the retail sector. The BRC brings together the whole range of retailers across the UK, from independents to large multiples and department stores, selling a wide selection of products through centre of town, out of town, rural and online stores.

1.2 Our membership includes all the major food retailers, who between them account for a large proportion of the UK’s grocery sales.

1.3 It is difficult for us to comment in detail on the current incident as investigations are still ongoing with the authorities in Ireland and the UK but are able to give more information on how our supply chains operate and early conclusions from the incident.

2.0 RETAILERS MEAT SUPPLY CHAIN

2.1 As with other produce, our members’ supply chain is based predominantly on UK farmers and UK processors. They do source some meat and meat products from outside the UK and that is primarily from within the EU. The Republic of Ireland (ROI) is our largest exporter.

2.2 Our members offer a range of products and different price points to meet consumer demand. This means products prepared using different percentages of meat, different cuts of meat and from different production systems. All the products are labelled in accordance with appropriate legislation and voluntary initiatives such as the industry agreement on country of origin.

2.3 The key issue for retailers is the controls on production. The process in terms of retailers clearly setting out the product specifications that processors need to follow and the hygiene and food safety inspections will be similar for all meat products regardless of the type of product or where it is manufactured.

3.0 CONTROLS ON PRODUCTION

3.1 There are a number of controls on meat production within our members’ supply chains. These operate consistently regardless of the product or location of processor.

3.2 Firstly, it is worth remembering that our suppliers are predominantly large manufacturers, often with a European if not global presence. These companies, regardless of their legal obligations, recognise that ensuring traceability and food safety are non-negotiable issues. The relationship that our members have with these suppliers has been built up over many years and both retailer and supplier recognise the importance of consumer confidence.

3.3 Secondly, these processing plants are all approved plants within European food legislation, subject to the same official controls to ensure traceability and hygiene whether they are based in the UK or the ROI. These plants are subject to inspection and enforcement by the relevant food authority in each country.

3.4 Thirdly, the retailers specify clearly and in minute detail to the supplier what should be in the final product. This includes the type of meat, its origin and source, its cut, percentage of fat and production requirements such as welfare standards. Any breach of that specification by the processor is a critical contractual issue.

3.4 Fourthly, the retailers operate their own audit procedures above and beyond those carried out by food enforcement agencies. This will consist of regular inspections by the company’s food technologists, other independent experts employed to carry out inspections as well as third party audits which are explained in more detail below.

3.5 All of these measures, from the specification to the supplier to the regular audits are designed to ensure compliance above and beyond the statutory inspections by food enforcers. However, as well as regular routine checks retailers will also act on intelligence to horizon scan and verify suspicion. Retailers and their suppliers test their own products on a risk basis as part of this process. Our members also meet regularly at the BRC to discuss horizon scanning and we regularly meet the FSA as part of their Emerging Risks Consultative Forum to share information on emerging issues.

4.0 RETAILERS' 3RD PARTY AUDITS

4.1 In addition to regular liaison with supplier companies and statutory inspections, retailers use 3rd party audit systems to inspect factories to ensure compliance. A typical system used by the majority of our members is the BRC Global Standard for Food Safety.

4.2 The BRC standard is accredited and used around the world by a number of retailers and manufacturers. It is used in 15,000 audited sites and reviewed regularly in consultation with retailers and manufacturers.

4.3 The Standard is designed to provide certification for food manufacturers who implement good manufacturing practices and have the supporting quality management systems to produce safe, legal product meeting their customer's requirements.

4.4 To gain certification the factory is subject to intensive six or 12 monthly audits, dependent on the risk of the product and its previous compliance record. The audits cover the management of the factory and compliance with all food safety and hygiene requirements. The auditors are experts in the particular sector they are auditing.

4.5 The audit normally takes about two days, of which about half is spent reviewing hygiene and control systems throughout the factory and the remaining time is spent reviewing quality systems, records and completing a detailed traceability audit at the site.

4.6 A detailed report is produced at the end of the audit and uploaded to a directory which allows all users of a particular factory can see it. If there are issues raised in the audit these must be addressed before certification is granted.

4.7 We believe the audit system provides a regular and thorough test of a food processor's competence and compliance. This is in addition to routine inspections carried out by regulators. There is also the possibility to use unannounced audits as necessary.

5.0 CURRENT INCIDENT

5.1 We fully recognise how damaging incidents such as these are to consumer confidence. Nobody understands consumers better than retailers who recognise the trust consumers place in them. As a result retailers have been working together through the BRC and with the Food Standards Agency (FSA) to understand the issue and implement any improvements to their supply chain.

5.2 In terms of the incident itself we were disappointed with the initial information supplied by the Food Safety Authority of Ireland (FSAI). Our members were given little notice of the publication of their report and it was difficult to get more detail from the FSAI in terms of the likely source of the horsemeat and the testing regime that was used to identify equine DNA.

5.3 We believe there are two distinct elements to this incident. The first, concerns the one product that contained a significant percentage of horsemeat and suggests adulteration of the product. That would appear to be either negligence or fraud and we won't know that until the investigation is completed. Retailers will want to understand the case in more detail to learn from it and reflect on current surveillance and intelligence gathering.

5.4 The second element where traces of equine and porcine DNA at very low levels have been found raises further questions. The fact that these products have tested positive for equine DNA and porcine DNA raises a serious issue for the whole of the meat supply chain.

5.5 It should be stressed these are trace levels. The method used by the FSAI is capable of detecting extremely low levels of "unlabelled" DNA. It is relevant the FSAI have stated that where results are expressed as less than the limit of quantification (<LOQ) the level of DNA in a sample is present at such low levels that is not quantifiable, and for all practical purposes can be considered as negligible.

5.6 Such low levels of contamination of DNA level may well be indicative that the beef in question may have originated from a plant where horsemeat was also processed for sale in other countries but does not indicate the physical presence of meat as was reported in the media and as understood by consumers. At this extremely low level it is comparable to grains of sand on a beach.

5.7 Testing at a DNA level is very different to discovering chunks of meat of another species in a product. This could be at the forensic trace level, a level which it may not be possible to remove in normal hygienic cleaning between processing of different species. The implications of dealing with this issue could have much wider consequences for all meat processors including those in the UK.

5.8 The majority of food manufacturing plants in the UK will process meat from more than one species. Good manufacturing practices require hygienic cleaning between processing of different products which may not remove all trace levels of DNA before the next batch is processed.

5.9 We believe this requires further discussion at a European level to discuss what pragmatically can be done to ensure segregation of meats. The alternative is totally segregated supply chains, which, even if feasible would be extremely expensive.

6.0 NEXT STEPS

6.1 Our members are taking the incident extremely seriously and will be following the investigations carried out in Ireland and the UK to learn any lessons about surveillance and intelligence gathering. Obviously where our members have affected product they are co-operating with both FSA and FSAI to help their investigations.

6.2 We believe there is more that could be done to improve intelligence gathering and horizon scanning at a European level. We are already members of the FSA's Emerging Risks Consultative Group which is a useful forum for exchanging information on future risks in the supply chain. However, we feel the FSA needs to ensure there is more sharing of information between regulators at a European level.

6.3 We will pursue the issue of cross contamination of meat (at the molecular DNA level) with the meat industry and the FSA. We believe this issue needs further discussion as a pragmatic approach is required to avoid future problems which would affect the UK meat industry alongside other producers.

6.4 Whilst we will act on all the findings from the incident once finalised we would urge a proportionate and measured response that allows for a full examination of it and considers it within the context of an already highly supervised supply chain. Our primary concern is consumer confidence based on robust standards. We will work with meat producers in this country and abroad to ensure consumers best interests are maintained.

January 2013

Written evidence submitted by World Horse Welfare

WORLD HORSE WELFARE—BACKGROUND AND CREDENTIALS

1. World Horse Welfare is a leading equine welfare charity dedicated to promoting and protecting the welfare of horses in the UK and worldwide. In addition being the largest equine rescue and rehoming charity in Britain, and a provider of a range of programmes to help working horses and their owners overseas, we lead an influential campaign to end the long-distance transportation of horses across Europe for slaughter. As part of this campaign we conduct regular field investigations and research into the slaughter trade. We also regularly monitor the trade in horses into, out of and within the UK and provide information, intelligence and training to British enforcement agencies.

2. It should be noted that World Horse Welfare is *NOT* calling for an end to the humane slaughter of horses in the UK or further afield. We believe humane slaughter has a role to play in protecting the welfare of British horses. The costs of euthanasia and carcase disposal can be very high (and in some parts of the EU, the option of euthanasia by a veterinary surgeon is completely unavailable), meaning that for some owners slaughter is the only viable option at the end of their horse's life. If slaughter were not available, these horses could end up suffering long painful deaths through neglect or abandonment. We do however support the package of laws in place in Britain that protect our horses from indiscriminate live export abroad for slaughter, given the terrible welfare problems inherent in live transport of horses over long distances as acknowledged in scientific research and opinion.

CONCERNS OVER WELFARE AND HEALTH OF HORSES IN FOOD CHAIN

3. We have a number of concerns about the welfare and health of horses entering the food chain. Namely:
- The proper identification of horses as safe to eat due to deficiencies in enforcement and implementation of the passport system and following the loss of funding for the National Equine Database.
 - The suffering caused by the long-distance transportation of horses across Europe to slaughter.
 - Conditions at slaughter.

PROBLEMS WITH IDENTIFICATION OF HORSES RISK THE SAFETY OF THE FOOD CHAIN

4. Inconsistent compliance with passport legislation and a lack of enforcement also increases the risk that horses may enter the food chain which should not do so: horses which have been treated with drugs unsuitable for human consumption, or horses that have no passport, or inaccurate passports, and therefore no record of any drugs they may have been treated with during their lifetimes. There are problems with the consistency of passports between Passport Issuing Organisations (PIOs), and of the quality of the documents, and some PIOs have been implicated in the production of fraudulent passports.

5. We also have real concerns that the loss of the National Equine Database may allow unsuitable animals to enter the human food chain. It is now no longer possible to check passport details quickly and easily: instead, it is necessary to write to Defra, who in turn must contact every Passport Issuing Organisation (there are more than 70 of these). Unsurprisingly, delays of many days or even weeks are now commonplace since funding was withdrawn in September 2012. This poses great difficulties to equine welfare organisations and enforcement bodies trying to check passport details quickly and accurately. In practice checks which used to take minutes now take at least a week—if not weeks, when in practice identification is often required immediately by local authorities, the (Animal Health and Veterinary Laboratories Agency (AHVLA), the police,

the Vehicle and Operator Services Agency (VOSA) and the Food Standards Agency (FSA) when they are undertaking enforcement activity on the roads, at ports, markets or abattoirs.

LONG-DISTANCE TRANSPORTATION TO SLAUGHTER

6. Every year, 65,000 horses are transported across Europe for slaughter or further fattening. The majority of these horses are transported to Italy from countries including Poland, Spain, and other Eastern European Member States. They may legally be transported for up to 24 hours, before being unloaded for 24 hours, then reloaded to repeat this cycle an unlimited number of times. The conditions under which they travel cause them great suffering from exhaustion, dehydration, injury, stress and disease. According to the accepted scientific research, horses become immuno-compromised after 9–12 hours of transport, so many of the horses, which are destined to enter the human food chain, show signs of disease such as nasal and ocular discharge. In one shipment inspected by World Horse Welfare in 2010, 93% of the horses showed clinical signs of disease. A summary of our Dossier of Evidence, which outlines these problems in greater detail and gives our proposed solutions, is attached. We are calling for the introduction of a 9–12 hour maximum journey limit, and improvements to other aspects of the practice, such as vehicle design standards. The European Food Safety Authority has also called for a 12 hour journey limit for horses based on the scientific evidence.

CONDITIONS AT SLAUGHTER

7. Footage aired by Sky News on 19 January and collected as recently as late 2012 (on which we were asked to comment in our expert capacity, revealed a catalogue of welfare abuses at one of the two main English slaughterhouses that take horses. World Horse Welfare saw what could only be described as systemic failings at the premises where laws should have been enforced by three full-time employees of the FSA. Evident in the footage were many breaches of the Welfare of Animals (Slaughter or Killing) Regulation 1995 from the treatment of horses in lairage all the way to incomplete stunning and delayed killing. Breaches included:

- *Shooting in groups of two or three—the law requires that animals are pithed or bled without delay after stunning.* This requirement cannot be met when animals are stunned in groups. Bleeding horses one at a time after being stunned in a group causes totally unnecessary delay for some of the animals in the group. Some horses in the footage appear to be regaining consciousness before being bled. In some cases the footage showed that the first horse to be stunned was the last to be bled, increasing the likelihood that the horse would regain consciousness before they were killed.
- *Horses were permitted to be within sight of another horse being stunned or killed—this is specifically prohibited by the regulations as witnessing such an event can cause significant distress to horses—as is evident in the footage. Even when shot singly, horses should not be shot in the sight of other horses, but in the footage another horse or horses are often present and can even see inside the “stun box”.*
- *Animals were not pithed or bled without delay after stunning; in some cases the delay was considerable—the Regulation clearly states that horses should be pithed or bled without delay to prevent them gaining consciousness.* In all of the footage viewed, World Horse Welfare did not see any animals being pithed and therefore they should have been bled without delay—but in many instances this did not happen. In many cases the delays in bleeding the animal were lengthy and completely unacceptable.
- *Animals were not restrained in an appropriate manner prior to stunning/killing so as to spare them any avoidable pain, suffering or agitation—World Horse Welfare saw many botched stuns in the footage.* It appears that three different types of equipment were being used to stun or shoot the animals and in a number of cases the stun was not effective and had to be repeated. In addition the slaughter men had difficulty in raising the head of the animals in order to apply the guns.
- *Animals were not moved with care; blows were inflicted on some animals with staves or ropes—this abuse of horses is clearly not allowed under law. Nor is it necessary.*

8. As an exception to this catalogue of breaches, World Horse Welfare did witness at least one slaughter man who demonstrated competence in both handling and killing.

9. We welcome the FSA’s decision to suspend the licenses of two individuals in this footage, but believe given the systemic nature of the breaches all operations at this facility must cease and new procedures put in place (and training conducted) to ensure that such scenes cannot be repeated. We are calling for the introduction of mandatory CCTV into slaughterhouses to assist the FSA with enforcement, motivate slaughtermen to obey the law and reassure the public and consumers that animals in Britain are being slaughtered humanely.

10. CCTV cameras:

- Can be installed into spaces where an inspector cannot safely be present—such as in the “stun box”;
- Will always be present, unlike inspectors;
- Cannot be intimidated, unlike an inspector;

- Produce a permanent record, allowing both good and bad practice to be identified and used in training for slaughterhouse employees;
- Will help counter any malicious accusations against the proprietors or employees of licenced premises and permit proprietors to demonstrate that they treat horses humanely;
- Can be viewed securely from any location, offering more flexibility for the FSA and could even save money if they replace some on-site monitors;
- Will help improve public confidence that animals will be slaughtered humanely;
- Will allow the British public to feel confident that British meat, which has a reputation as a high welfare product, is the result of humane slaughter procedures;
- Suitable CCTV systems can be purchased for less than £500, so the costs to business are not, in our opinion, unreasonable.

January 2013

Written evidence submitted by the British Meat Processors Association

1. EXECUTIVE SUMMARY

1.1 At the time of writing, investigations are continuing to establish the facts and circumstances surrounding the findings by the Food Safety Authority of Ireland regarding the presence of horse and pig DNA in a range of meat products, mainly burgers. It is important that these investigations are fully completed in order to identify the issues raised and the appropriate responses. Modern food supply chains are complex, and the nature of many modern food products means that principal raw materials and ingredients may derive from a range of supply sources according to availability, quality and cost. Nonetheless, all Food Business Operators have a legal responsibility to produce safe food, and to correctly describe and label the products they sell or supply to other customers. Food manufacturers have extensive and well-established traceability, production process and quality control procedures to meet their legal and other responsibilities. This incident, including the highly sensitive nature of DNA testing, raises a wide range number of issues and questions that need to be considered carefully. The incident has undermined consumer confidence and trust. But it is important to bear in mind that the great bulk of food sold in this country, including meat and meat products, is safe, produced to good quality standards, and correctly and accurately described and labelled by food manufacturers and retailers. UK consumers can trust the food they buy. All food businesses must remain vigilant in making every effort to meet their legal and moral responsibilities.

2. THE BMPA

2.1 The British Meat Processors Association (BMPA) is the leading trade association in the British meat industry, representing abattoirs slaughtering cattle, sheep and pigs, meat processors and meat manufacturers across the UK. Our membership ranges from small, regional and local family businesses to large international multi-site businesses, from specialist businesses to companies covering a wide range of activities and products. Our members supply branded and retailer own-label meat and meat products across a range of different meat species and foods. This diversity serves to enrich our organisation and allows us to be truly representative of our industry.

3. CURRENT SITUATION

3.1 At the time of writing, investigations are continuing to establish the facts and circumstances surrounding the discovery by the Food Safety Authority of Ireland (FSAI) of traces of horse and pig DNA in some burger products, as well as the presence of a significant amount of horse DNA in a specific burger product. It is important that these investigations are fully completed in order to get to the bottom of what occurred and how, and how such an incident can be prevented in the future.

3.2 There are two separate sets of findings by the FSAI. In nine of the 10, mainly frozen, beef burger samples, horse DNA was found at very low levels through PCR testing procedures. The FSAI has stated that “these results indicate some cross contamination along the food ingredient supply chain, rather than adulteration”. It has also highlighted the sophistication and sensitivity of the tests applied, and has stated that “the very low levels that were detected in the beef burger products are more indicative of inadvertent rather than deliberate presence and as such, would not be declared [on labels]”. Investigations are now focussing on the ingredients supplied, and the procedures followed by the suppliers(s) involved, some of whom are believed to be based in continental Europe.

3.3 In one burger sample, however, a significant amount of horse DNA was found. This case is very perplexing, and has, rightly, been the cause of greater concern. Again, investigations continue to establish the facts surrounding this case.

3.4 The food safety authorities in Ireland and in this country have stated that there are no public health risks involved in this episode; this is not a food safety issue.

3.5 This is an unusual incident. It is therefore important to understand the facts and identify the key issues raised as the basis for considered and proportionate responses to the issues raised, and to avoid knee-jerk responses that may not necessarily be sensible or appropriate in the longer term.

4. PREVAILING PRACTICE IN THE MEAT SUPPLY CHAIN

4.1 Modern food supply chains can be complex, particularly in the case of more highly processed products, and raw materials, ingredients and final products are increasingly traded internationally. Whatever the food product, all Food Business Operators (FBOs) have a legal responsibility to produce safe food, to meet any legal stipulations (eg minimum meat content for certain meat products), and to correctly describe and label the products they sell or supply to other customers. Food manufacturers have extensive and well-established procedures to establish and document their sources of raw material, the food manufacturing process and the compositional content of the food they produce. They have internal quality control procedures (eg traceability documentation, raw material intake procedures, microbiological testing, testing of fat levels, temperature controls, control of foreign bodies, cleaning down of machinery and equipment). While DNA testing is not extensively used by food manufacturers (or, indeed, retailers or the regulatory authorities), it is used to some extent by some manufacturers, for example to verify the animal breed from which some meat derives. In addition, food manufacturers are extensively audited by their customers and under other industry assurance schemes by independent certification bodies, and they are also subject to other approvals and inspections by the regulatory authorities.

4.2 In order to achieve the quality specifications stipulated by customers, to minimise waste, to maximise the technical performance of the product and to meet production cost and sale price targets, while meeting other legal requirements (eg minimum meat contents), manufacturers may source raw materials, both the principal ingredient(s) and other added ingredients, from a range of sources according to availability, quality and price. Within legal requirements and definitions, any single food product category, in this instance burgers, may range from the highest quality and higher priced product with high meat content and high quality cuts with few additional ingredients, to “value” products with lower meat content, cheaper cuts and other legal ingredients to achieve a lower-price product.

4.3 In a previous inquiry, the Committee considered the issue of desinewed meat and accepted the UK authorities’ recognition of DSM as meat that, before the imposition of the moratorium, counted towards the meat content of products without having to be labelled. The Committee recognised that DSM was a valuable and useful ingredient in a wide range of food products, particularly value products, and it also pointed out that the moratorium would lead to food waste and would have an impact on lower-income households.

5. ISSUES RAISED

5.1 This incident raises a number of issues and questions and takes us all into new or unfamiliar areas that need to be considered carefully and soberly in order to reach sensible decisions on how to proceed. These questions include the following:

- Is this incident unusual, or does the use of DNA testing bring to light a long-standing or more widespread situation?
- What, if any, food safety concerns does this incident raise?
- What additional traceability requirements are necessary or desirable?
- Should DNA testing be used more widely and on a more regular basis, bearing in mind that, in general, such tests are carried out to answer a specific inquiry?
- If so, given the sensitivity of these tests, is it inevitable that traces of unintended (if safe) ingredients would be found, or can unintended traces be reasonably eliminated in some way?
- If there were to be more extensive DNA testing, are additional labelling requirements necessary or desirable?
- Given the sensitivity of these tests, should tolerances be established for the possible adventitious presence of unintended DNA?
- What are the cost implications of wider DNA testing or any additional controls—for farmers, food manufacturers, retailers and consumers? Who should bear these costs, at a time of food inflation concerns, low food processor margins and pressures on consumers’ budgets?
- What would be the implications for food prices?
- Is it feasible, realistic or sensible to require or expect food manufacturers to establish separate lines for the processing of the wide range of ingredients used in the manufacture of today’s food products?
- If there is pressure in some quarters for greater use or separation of British product, given the under-supply of some British raw materials (eg meat), how can increased sustainable domestic livestock and meat production be encouraged?

The BMPA does not have the answers to these and other questions at this stage. It is important that the key parties sit down to work through them in a considered manner.

5.2 This incident undermines consumer confidence and trust in the meat industry, and causes reputational damage to it. But it is important to bear in mind that the great bulk of food sold in this country, including meat and meat products, is safe, produced to good quality standards and correctly and accurately described and labelled by food manufacturers and retailers. UK consumers can trust the food they buy. All food businesses must remain vigilant to ensure that they meet their legal and moral responsibilities. We all need to address the issues raised by this incident. We should also be careful not to make blanket judgements, impose inappropriate and costly additional regulation, or talk down the image of the British food industry in the eyes of our own consumers or the rest of the world.

January 2013

Written evidence submitted by Sainsbury's

EXECUTIVE SUMMARY

1. As a leading food retailer, Sainsbury's is committed to providing customers with safe, high quality products that they can enjoy and trust. We take all matters of food quality, safety and authenticity extremely seriously and work hard to ensure we have the necessary processes and controls in place—from detailed product specifications through to independent audits and product testing—to ensure our high standards are upheld.

2. We are also committed to providing our customers with the information they need to make informed choices and to be confident in the products they buy. All our products are labelled in accordance with appropriate legislation and in line with relevant voluntary initiatives such as the industry agreement on country of origin. The ingredients used in Sainsbury's products are always clearly stated on the label.

3. All of Sainsbury's own brand beef burgers are made using 100% British beef and we do not use "protein powders" or any other such fillers in our burgers.

4. No Sainsbury's products have been implicated in the current investigation on contamination of beef products.

ABOUT SAINSBURY'S

5. Sainsbury's was founded in 1869 and today operates over 1,000 stores, about half of which are supermarkets and half are smaller convenience stores. We employ 150,000 colleagues, have over 2,000 direct food suppliers, serve almost 22 million customers a week and have a market share of about 16%—making us the 3rd largest supermarket in the UK.

SAINSBURY'S SOURCING

6. Sainsbury's sourcing strategy is built on our strong heritage of developing long-term relationships with our supplier, farmers and growers. We also act on behalf of our customers to provide great products at fair prices, in a way that is also fair for animals, farmers, growers and our suppliers.

7. As with other produce, Sainsbury's supply chain is based predominantly on UK farmers and UK processors. We sell over 1,900 British products in our own brand range and aim to double the amount of British food we sell by 2020.

8. One of the key ways in which we are making progress towards this target is through our Livestock Development Groups and Crop Sustainability Groups. These Groups which bring together 2,500 farmers and producers from across the UK in 10 producers groups across the main agricultural commodities (dairy, beef, pork, lamb, veal, eggs, chicken, cheese, wheat, and produce).

9. In line with our commitment to British sourcing all of Sainsbury's own brand beef burgers are made using 100% British beef.

CONTROLS ON PRODUCTION

10. There are a number of controls in place to ensure Sainsbury's products are produced to consistently high quality and safety standards. Firstly, our product specifications set out clearly, and in detail, the ingredients, processes and standards we expect our products to be produced to. This includes for example, the type of meat, its origin or source, the cuts of meat to be used, percentage of fat and production requirements, such as welfare standards. These specifications are applied to all of our products and are crucial in order to ensure that we produce consistent, high quality products for our customers. Any breach of these specifications by the processor is a critical contractual issue.

11. Secondly, all of the processing plants we use are approved within European food legislation and are subject to inspection and enforcement by the relevant food authority in each country to ensure compliance with appropriate traceability, hygiene and food safety controls. The processing plants we use are also approved under the BRC Global Standard for Food Safety, or for smaller plants, with the Safe and Legal Supplier

Approval (SALSA) standard which are accredited standards to ensure food manufacturers produce safe, legal products for retailers. These standards include regular and possible unannounced audits.

12. Thirdly, we have an extensive programme of product testing to ensure our high quality standards are being maintained. This includes tests that we require all of our suppliers to conduct on raw materials, during the making of products and on finished products. We also have a separate programme of analysis that we conduct ourselves through independent accredited laboratories. They visit our stores on a daily basis and purchase products (as customers) and then their food safety experts analyse them to ensure they meet our quality and safety standards. This includes ingredient authenticity and covers species and country of origin along with a number of other factors.

13. Like most retailers, we have a team of Product Technologists who conduct routine visits and audits to our suppliers. In addition, Sainsbury's also has a team of inspectors that have extensive experience in the meat industry who are dedicated to conducting unannounced audits of our meat, fish and poultry supply base. These inspections are conducted at any time of the day and on any day of the week and provide additional assurance of the controls in place at these specific suppliers.

14. All of these measures, from the detailed product specification to the audits and sampling are designed to ensure compliance over and above the statutory requirements. We also meet regularly with the BRC to horizon scan for any emerging issues and we have a rapid response unit within the business which allows us to respond quickly to any issues or concerns which arise. This allows us to work with our supply chain to identify and trace the source of any potential issue and take the necessary steps to resolve the issue and maintain customer confidence. For example, in the recent beef burger contamination case, even though no Sainsbury's products were implicated, we took the early decision to withdraw the own brand burgers we source from the implicated sites, purely as a precautionary measure. All the removed products were disposed off via Anaerobic Digestion under our *zero food waste to landfill* policy. We also increased our auditing and testing of frozen burger products, all of which have subsequently tested negative for equine DNA.

CUSTOMER INFORMATION

15. We recognise the trust that our customers place in us and are committed to providing them with the information to make informed choices. The ingredients used in Sainsbury's products, including our frozen beef burgers, are always clearly stated on the label. Our frozen burgers are made using 100% British beef. We do not use "protein powders or any other such filler" in any of our burgers. The other ingredients used are things you would expect in a burger such as onions and breadcrumbs and are clearly labelled on the pack.

GOING FORWARD

16. Although Sainsbury's has not been implicated in the beef contamination issue, we are following the current investigation via the BRC in order to learn any lessons about wider supply chain surveillance and intelligence gathering.

January 2013

Written evidence submitted by ABP Food Group

The ABP Food Group would like to provide the committee with some evidence for consideration in the inquiry into the issue of Equine DNA in frozen beef burgers.

The ABP Food Group, via its Convenience Foods Division, is the parent company of Silvercrest Foods in County Monaghan, Ireland and Dalepak in North Yorkshire. Our evidence covers the work we have carried out as part of our investigations at Dalepak and Silvercrest and some wider views on the implications for the industry in relation to species specific DNA testing.

THE INVESTIGATION

The ABP Food Group was alerted to the Food Safety Authority of Ireland (FSAI) surveillance results on the afternoon of Monday 14 January 2013. We began an immediate investigation at both the Silvercrest and Dalepak sites. All meat bought by Silvercrest and Dalepak comes from approved EU facilities and as a company the ABP Food Group has never knowingly bought any horse meat.

The investigations included:

- Sampling of raw material (ingredients) and finished products (burgers and grills) by ABP, FSAI, the Department of Agriculture and the Marine in Ireland (DAFM) and testing by a variety of third party independent laboratories.
- Interviewing staff working at the processing sites concerned.
- Interrogation of traceability systems (both IT and Paper) to determine commonality between batches that test positive and negative for equine DNA.
- Audit of suppliers.

Separate investigations to the ABP investigation are being carried out by the Competent Authorities in Ireland (FSAI and DAFM) and the UK and by a wide range of ABP customers. As at Friday 25 January the investigations are continuing but set out below is the current status in relation to the two sites concerned.

DALEPAK

As part of our investigations in Ireland and the UK we carried out a comprehensive DNA sampling regime. To date (Friday 25 January 2013) in relation to Dalepak we have received the following results (carried out by an independent UKAS accredited laboratory):

- Sixty-four finished products tested by ITS Testing Services Ltd.⁶ All 64 samples have tested negative for equine DNA.
- Two finished products tested by Reading Scientific Services Ltd.⁷ Both results have tested negative for equine DNA.
- Seven ingredients tested by ITS Testing Services Ltd.⁸ All seven samples have tested negative for equine DNA.

In addition we have also received confirmation from North Yorkshire Trading Standards that they have taken seven samples of ingredients which have also tested negative for equine DNA.

Tests in relation to Dalepak product have also been taken by North Yorkshire Trading Standards and a number of Dalepak Customers. At the time of writing this evidence we believe from all our testing that the source of the trace DNA contamination in relation to the FSAI survey results for Dalepak was a third party supply from continental Europe. The ingredient has not been used in Dalepak products after September 2012 and given all the test results we have carried out we believe that the source of cross contamination has been found and dealt with effectively.

On 18 January 2013 the Dalepak site had its independent BRC certification suspended. Following a two day third party audit on 23 and 24 January 2013 we received confirmation that the integrity of systems at Dalepak had been independently verified and our BRC certification was reinstated on Thursday 24 January 2013.

SILVERCREST

Our investigation at Silvercrest started as soon as we were informed of the Food Safety Authority of Ireland results. The investigation has incorporated scientists, cleaning specialists, managers, accountants, security specialists etc. The main focus of the investigation have been:

- Document/product tracing investigation. This work has focused on tracing all batches of meat and ingredients which have been used at the site to determine where there is commonality between those burgers that have tested positive for equine DNA.
- A sampling programme has been undertaken which has so far summated almost 300 samples for DNA analysis.
- Management reviews and interviews with key members of staff involved in the Silvercrest site.
- A complete clean down of the lines by a third party expert.

At this stage we have received a number of test results for both ingredients and finished product. Our investigations are still centred on third party continental suppliers.

Until our investigations are complete production at the site will continue to be suspended.

WIDER IMPLICATIONS FOR THE FOOD INDUSTRY IN RELATION TO SPECIES SPECIFIC DNA TESTING

We suggest the committee may also wish to consider how the food industry in general should deal with issues of low level cross-contamination and in particular how this should be labelled. Current science has made detection at ultra low levels a relatively easy process but the policy environment within which the food industry operates has arguably failed to keep pace with the detection technology. We feel that the committee might wish to consider the following issues:

- The accuracy of the testing methods and how appropriate they are to use in complex multiple ingredient foodstuffs.
- Whether there should be a threshold which distinguishes between deliberate adulteration and trace cross contamination in the same way as GM cross contamination is handled (0.9% threshold).

⁶ ITS Testing Services Ltd used the ELISA testing method. This is a scientific test method which uses enzymes and colour change to identify a substance.

⁷ Reading Scientific Service Ltd was the PCR testing method. This is a biochemical technology in molecular biology to amplify a single or a few copies of a piece of DNA.

⁸ ITS Testing Services Ltd used the ELISA testing method. This is a scientific test method which uses enzymes and color change to identify a substance.

- The Committee may also wish to consider whether such a threshold should be the same for those products that are produced, approved and labelled specifically for particular religious markets.

January 2013

Written evidence submitted by the NFU

The NFU has over 55,000 farmer and grower members in England and Wales. In addition we have over 40,000 countryside members with an interest in food, farming and the countryside. The NFU welcomes the opportunity to make a submission to the Environment, Food and Rural Affairs Committee's inquiry on the contamination of beef products. We have endeavoured to put together as much information as possible on the views of our members, although due to the short notice of the call for evidence, this submission is accordingly brief.

1. THE INITIAL REACTION OF THE FARMING COMMUNITY

1.1 *Compromised integrity:* The NFU believes that the events of the past few days have severely undermined consumer confidence in the UK food industry. Our members are rightly concerned that the integrity of beef products has been compromised by using cheaper imported sources of meat.

1.2 Our farmers are angry that the high standards and robust traceability requirements they have to satisfy through legislation and farm assurance are seemingly not being upheld throughout the supply chain and that this has negatively impacted on consumer confidence.⁹

1.3 There is a concern that the effects arising for this incident within the onward supply chain may devalue the market for primary farmer producers, at the bottom of the supply chain. Farmers may suffer from this incident with no clear recourse. There is currently no clear system to rectify damage to their market place.

1.4 *Excessive pressures with the supply chain:* This incident has highlighted the potential implications from the incessant drive by corporations to produce low cost food. UK farmers and other members of the food supply chain are under increasing amounts of pressure from large companies, in particular, retailers to produce food ever cheaper. It is vital that this drive towards "more for less" does not compromise consumer health, the need for transparency, and ultimately consumer confidence.

2. THE NEED FOR TRANSPARENCY AND CLARITY IN LABELLING

2.1 *Clarity of labelling:* Immediate action needs to be taken to address both the integrity of all their suppliers and, at the same time, ensure that UK products are easily distinguishable and clearly labelled.

2.2 Government and regulators must send out very strong signals in cases where food has been misleadingly or fraudulently labelled. The NFU has numerous examples of photos taken by members as part of our "Flag It" campaign¹⁰ which shows food labelled or displayed in a way that, while not always illegal, is misleading. The NFU is interested in future surveillance planned by the FSA in response to the findings.

2.3 The NFU believes that there must be clearer labelling of ingredients in products to ensure consumers can make a conscious buying decision, as long as any extra costs are proportionate. As a start, we would suggest that processed meat products should display the species that the meat and meat derived ingredients have come from and the country of origin of the meat products.

2.4 *Labelling costs:* As processed products become more complex and use meat based ingredients from around the world, it is important to ensure that any costs from the labelling of these foods are not passed back down the chain to the primary producer. Farmers have no control and are not responsible for this process. Abattoir charges must become more transparent to minimise the opportunity for the retail and food processing business to pass these costs down to primary producers.

3. THE COMMODITISATION OF MEAT

3.1 Our members are rightly proud of the meat they produce and wish to see an end to the practice of comingled products which mix UK meat with imported meat and meat products. Examples of this are UK and Ireland beef burgers and UK and New Zealand lamb mince, and mixing fresh and frozen meat from different hemispheres and selling it as a chilled product. These products generally carry no information as to the proportions of each type of meat contained within. This has the potential to undermine the integrity of UK farmed products.

⁹ EBLEX commissioned YouGov survey of 2,021 consumers reported that 91% of people surveyed had heard about the investigation into traces of horse meat found in selected beef products. Over half of those who had heard the horse meat story reported a fall in trust of their retailers with 19% stating that they "trust them a lot less" and 36% saying that "I trust them slightly less now".

¹⁰ <https://www.nfuonline.com/Our-work/Food-chain/News/Flag-it—labelling-campaign/>

3.2 *Tracking meat derivatives:* We have been alerted to the apparent difficulties in tracking down the source of the horse DNA in burgers. We believe there is scope for a review into how the origin, integrity and authenticity of meat is maintained throughout the trade and between different countries (including meat derived products and the species of animals from which they are produced).

3.3 There are difficulties in tracking any commodity product around the world and we note similar issues with the global trade in cereals and oilseeds. The commodity trade in meat however, raises important questions not only on hygiene and health standards, but also on welfare standards which are impossible to verify from product testing. *UK consumers rightly expect that the meat that they purchase is from animals that have been bred, reared and slaughtered humanely.* This applies to all lines of meat, regardless of price.

4. THE NEED FOR ASSURANCE AND INDEPENDENT GUARANTEES AT THE POINT OF SALE

4.1 *Re-establishing confidence:* This incident highlights the need to re-establish the credibility of the UK food chain. We believe this can be achieved if all retailers engaged better with *independent* auditing and control systems. Red Tractor assurance is the principle tool available to the whole chain for this, and it is well recognised by consumers 61% of UK primary shoppers (YouGov, 2012). Retailers must increase the presence of the logo on pack.

4.2 The Red Tractor logo would bolster consumer confidence by giving them an independently audited declaration on pack that their meat has not only been produced to sound standards of welfare, traceability and meat hygiene, but also a clear indication of origin from birth to slaughter through processing and packing. No other marque on pack can offer this.

4.3 *Clarity of origin:* The use of the Union Flag on products is governed by legislation and voluntary guidelines but this appears not to be subjected to regular independent auditing and be used in a way that reduces transparency. It also offers no guarantees as to the trading practices that the product has been produced to.

5. RESPONSIBILITY FOR FOOD SAFETY AND PORT ENTRY CONTROLS OF MEAT IMPORTS

5.1 Our farmer members believe that government has a pivotal role in safeguarding farmed animals against the risk of exotic disease incursion from meat imports. We saw the damage that occurred to the economy in 2001 from Foot and Mouth disease, and it is vitally important that we maintain rigorous safeguards on sub-standard meat imports.

5.2 The food supply chain has a duty of care to ensure food is safe but also meets consumer expectations on sourcing, welfare and environmental standards. Government has a role to play through its various agencies in ensuring that the necessary controls and checks are in place.

6. THE IMPLICATIONS, IF ANY, OF INCREASED DNA TESTING ON FOOD PRODUCTS FOR FARMERS

6.1 Our members would welcome further investigations to ensure the integrity of the supply chain is maintained, including the transparency of origin of food products to ensure that products claiming UK origin are verified. We note that this type of study has been untaken in the pig industry in the past.

7. THE SLAUGHTER OF HORSES IN THE UK AND THE EXPORT OF HORSES FOR SLAUGHTER ABROAD

7.1 *Slaughter in the UK:* The NFU has no objection to the slaughter of horses in the UK or abroad providing that animal welfare legislation at slaughter is upheld. If the meat is destined for consumption it is imperative that appropriate hygiene standards are followed, and that the meat is properly labelled as horse meat whether it goes into the human or pet food chain. Of course, if it does go into the food chain appropriate safeguards must be in place to ensure that the meat is safe for human consumption and that the animal has not received medication which would preclude this.

7.2 *Transport:* The NFU also has no objection to animal transport to other countries providing these animals are transported under the right conditions and that legislation is respected in order that they arrive at their destination fit and healthy. Exports make up a very small but important minority of all movements and, due to journey lengths; these must take place using specially designed vehicles and a subject to comprehensive legislative controls.

Written evidence submitted by Paul Smith

I am a retired inspector with 43 years experience in the meat industry. I have a widely-held reputation in the food industry, particularly the meat industry, as an effective auditor. I wish to assist the Committee in its efforts to effect appropriate changes so as to ensure the horsemeat incident and related incidents do not re-occur. To that end, the reason(s) why it happened need to be clearly understood. The following may assist in explaining this.

1. There is a massive failure of multiple retailers themselves to monitor their suppliers through appropriate inspections at appropriate intervals.
2. Instead, they put a Food Supply Standard together entitled "The Global Standard for Food Safety" and farmed out the inspection responsibility to 3rd party inspection bodies that the BRC and UKAS approved.
3. The suppliers (the auditees) can select which "approved inspection body" they use. They also pay for the audit. Yes, they can pick which audit company, the alleged policeman, they wish. In practice, they also pick which auditor by heaping praise on them followed by request for same individual next visit.
4. The inspection is a "graded result" type of exercise with Grade A being the target of all suppliers, To achieve this, only a small number of non-conformances can be identified and none can be major.
5. The consequence of 3. above has been that the senior management in the inspection bodies can readily bend to any suggestion by the supplier that they are "unhappy" with the inspector/ inspection outcome, the implied threat being that they will move their business to another audit body.
6. The audit companies are private, profit-driven, companies and compete with each other to secure supplier nomination as the preferred audit company.
7. One such audit company dominates in the meat sector because its origin was the Meat & Livestock Commission which sold the business, then known as EFSIS, to SAI Global. This happened in 2003.
8. The Managing Director then and many years after was Mark Proctor and Operations Director, Carole Payne.
9. Under their stewardship, two specific meat groups was never audited by their Irish-based auditor following initial audits by this inspector at these sites. Both such groups were/are major suppliers of meat to Tesco. Instead, UK-based inspectors went over to undertake this work.
10. The Irish auditor was a highly respected individual in terms of his knowledge and audit skills.
11. It is for Messrs Proctor and Payne to explain why the person they based there was not used.
12. The Irish based inspector retired in 2008. In 2011, he requested to audit for Tesco as an independent auditor as Tesco were seeking such personnel to undertake additional audits of their supplier base. It was a widely held view that Tesco no longer had any confidence in the 3rd party BRC audit process despite this being their representative body standard. If they had confidence in it, why else would they embark on a return to auditing against their own standard.
13. The message that came back verbally and very indirectly was that although he had great admirers, he had upset very influential people in the meat industry.
14. Why Tesco senior personnel did not challenge this is something for them to answer also asking was it senior Tesco personnel who did not want this inspector involved.
15. Curiously, Tesco gave a substantial amount of this supplementary audit business to SAI Global.
16. Significant social relationships were developed by the above-named individuals with senior personnel in meat companies and with senior retailer personnel and that remains to this day.
17. Mark Proctor left SAI Global in 2009 is now working for Exova, a UK company also selling BRC inspections.
18. Carole Payne left SAI Global in 2009 and now works for Tesco in a senior role.
19. It is also noteworthy that a David Fleetwood was, for a time, a Director of EFSIS/SAI Global whilst also being a Director of ABP. Also, the SAI Global auditor of Silvercrest Foods, an ABP company, used work for ABP.

It is the writer's view that the whole system is a disgrace and in need of total review.

It is reasonable to want to avoid repeat audits of suppliers by each retail multiple. However, it is the BRC, the multiple retailer representative body, who should employ the inspectors and not commercial companies who are profit-driven and that can be selected at will by suppliers depending on their perceived weakness/toughness. The winners under these arrangements are the senior management of audit companies that build successful careers for themselves but at the expense of both the consumer and farmer.

There is much I could add in relation to the damage to the British farmer through poor standards of traceability auditing by these 3rd party companies. Further, to get an indication of the incestuous relationships

and inappropriate relationships that exist between the meat industry, multiple retailers and audit bodies, just demand the names of all individuals who have routinely attended the annual 1,000+ people dinner held by the Butchers & Drovers Charitable Trust and who is a guest of whom. It is a telling read.

I encourage the Committee to insist on a total reform of the inspection approach with ownership of the approach placed firmly where it belongs, with the multiple retailers and its representative body, the BRC—and most certainly not with 3rd party commercial companies, the regulation of which has never worked and cannot work.

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