

HM Government

## Review into the Integrity and Assurance of Food Supply Networks

# Note of meeting with Chartered Institute of Environmental Health (CIEH)

**Location:** Defra, Nobel House

**Date:** 23 July 2013

**Attendees:**

Jenny Morris - Principal Policy Officer - CIEH

Professor Chris Elliott – Independent Reviewer – Review into the Integrity and Assurance of Food Supply Networks

Mary Newman – Secretary - Review into the Integrity and Assurance of Food Supply Networks

Nick Hughes – Review into the Integrity and Assurance of Food Supply Networks

NB – Comments belong to Jenny Morris unless stated

## 1. About the CIEH

The CIEH has charitable status. Its mission is to promote high standards of environmental and public health. It has 10,000 members around 60% of whom work in the public sector and many of those will work in the area of food safety. It also has a trading arm which offers training within the traditional environmental health domain. It is probably the largest trainer in food safety in the UK.

Jenny Morris has the food policy lead at CIEH and as such works very closely with FSA, DEFRA and DH. She has also sat on a number of committees most notably the Food Fraud Taskforce established by the FSA in 2006.

## 2. Information sharing and intelligence

Depending on how national investigative bodies are set up there can be an issue with information sharing. Across Europe around half of countries' enforcement of fraud is police-led. Italy, for instance, has a food police on account of its desire to protect high

value products such as extra virgin olive oil. Jenny Morris believes a dedicated force is best placed to deal with food fraud.

Following the Food Fraud Taskforce's recommendations, the FSA looked at building up intelligence on fraud but at the same time they recognised that industry holds a huge store of knowledge and that it's vital to tap into that knowledge.

There is an upward system of reporting whereby information goes into the FSA food fraud unit who in turn look for evidence that the fraud is not isolated. The system can work but it is dependent both on people feeding into the system and being properly resourced

Risk is considered as premises based but fraud is supply chain based and looks at future opportunities rather than past weaknesses. It's difficult to predict and uncover fraud when you don't know what you're looking for. The FSA doesn't just need information it needs meaningful information.

### **3. Prioritising food fraud**

In recent years food safety has been prioritised over food fraud, however, the two are interrelated. There needs to be some kind of reconsideration about the impact of fraud. HACCP tends to be focused on safety rather than standards. Do we need another HACCP that looks at authenticity?

### **4. Funding**

If you really want to tackle food fraud there is a cost to it so you have to decide do I want to resource it and if so how am I going to fund it? Budget cuts are hitting local authorities (LAs) really hard. A lot of them are looking at privatising their environmental health services as a consequence.

The Health Protection Agency provides a budget for microbiological testing. If it's analytical then the LA itself pays unless the FSA has made funding available for local sampling. The price LAs pay depends on the level of testing and what they are testing for. If they're testing for a number of different species, for example, it can quickly become expensive.

Sampling falls during times of austerity. Sampling rates have fallen by 20% over the last three years and of the remaining tests around 3/4s is microbiological testing.

### **5. Enforcement**

The question was posed of whether universities have a role to play in tackling fraud? In the Netherlands the authorities do a lot of work with universities into what sectors offer the greatest opportunities for fraud.

Criminals will base their decisions on where they are going to make money, where they are least likely to get caught and what will happen to them if they do get caught. If you reduce enforcement the opportunity to commit fraud goes up.

Just because an offence has taken place there is no guarantee the law will be enforced. Every LA has to make a judgement call on what to prioritise based on resource constraints. It's getting to the point where LAs are only prosecuting in the most extreme cases. The FSA might say something should have been done but the reality is they can't force the LA to take action. Penalties need to dissuade people from trying to commit fraud.

Trading standards officers are more used to prosecuting than environmental health officers who are less comfortable dealing with criminal proceedings.

There needs to be clarity over what the consumer expectation of tolerance is. If the expectation is zero when enforcement is not capable of delivering zero then there is a problem.

## **6. Further action**

Jenny Morris said she would send Chris Elliott a recent paper written by Glenn Taylor on the future of food control and would also try to find an EU-led report on food fraud led by the French. She also promised to put Chris in touch with Steve Haslam who led the Operation Aberdeen investigation into unfit chicken being sold back into the human food chain.

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