

HM Government

Review into the Integrity and Assurance of Food Supply Networks

Note of meeting with the UK Renderers' Association

Location: Defra, Nobel House, London

Date: 14 February 2014

Attendees:

David Green - Technical Director - UKRA

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

Mike Steel – Subject Matter Expert - Review into the Integrity and Assurance of Food Supply Networks

Sarah Appleby – Secretary - Review into the Integrity and Assurance of Food Supply Networks

David Foot – Assistant Secretary - Review into the Integrity and Assurance of Food Supply Networks

1. Introduction

Professor Chris Elliott (CE) provided brief background to the Review process. A Call for Evidence had been issued in July 2013 and that had been supplemented by over 100 meetings with stakeholder organisations. An interim report had been issued in December 2013 containing 48 detailed recommendations. The second stage of the Review involved further engagement with stakeholders to discuss the practicalities of implementing the recommendations. CE said that some concerns had been raised about the comments in the interim report about the risks posed by animal by-products (ABP). Those comments had however reflected information the Review had received from a number of sources. It was likely that there would be further revelations about ABP entering the food supply chain. CE acknowledged that the interim report had focussed on potential risks from ABP to the food supply chain. The meeting with UKRA provided an opportunity to learn more about controls within the industry to deter food crime.

2. Discussion

David Green (DG) explained his role as UKRA's Technical Director. He had his own environmental consultancy but had been retained by UKRA for two days a week since 2006. He explained that UKRA and the Foodchain & Biomass Renewables Association (FABRA) were the two trade bodies for the industry. Each represented around 50% of the industry. UKRA and FABRA tried to work together at a technical level. UKRA members handled both Category 1 and Category 3 ABP. DG pointed out that modern Category 3

processing plants were high specification manufacturing facilities and reminded him very much of the sites he used to work on in the chemical industry. DG said that restrictions on the use of Category 3 ABP had been relaxed in 2013 and that non-ruminant processed protein could now be used for food in the aquaculture industry. There were already robust controls on Category 3 ABP including DNA and PCR testing which were very sensitive. The controls ensured there was little chance of fraud. Mike Steel (MS) queried the handling of poorly stained Category 1 ABP. DG said it would be treated as Category 1. Even if staining had not taken place, operatives would have sufficient expertise to identify Category 1 ABP. CE said that in his view the first Critical Control Point (CCP) for handling ABP was at the slaughterhouse. Staining was required before ABP material was dispatched but that there was evidence that that was not always happening. DG agreed it was a potential risk point and that UKRA would support any initiatives to improve staining. CE identified transport and bulking up centres where loads are mixed as a further CCP. What codes of practice did UKRA have in place to support its members to ensure proper handling? DG said that based on previous legal opinion regarding liability issues UKRA issued "members guidance" rather than formal Codes of Practice. There was guidance for members to identify materials at all stages of handling. UKRA was promoting improved movement documents. These would have four rather than three elements. It would include a mass balance check element so that the receiving business could confirm to the originating business the amount of material received. DG said that bulking up of Category 3 ABP was less likely than for Category 1 because Category 3 had to be handled more quickly. DG said that because Category 1 and 3 material had to be physically separated at all times there was little chance of substitution unless it was done so deliberately. Such illegal activity would be hard to stop where an operator was determined to break the law.

CE said that the industry needed to understand the potential for food crime and it was essential that the industry identified any weaknesses in their controls and addressed them. DG acknowledged there was a need for greater oversight and UKRA was considering whether renderers should undertake more detailed audits of their suppliers which, amongst other things, could look at proper separation of materials and training of Food Business Operator staff in slaughterhouses. Audits would be undertaken by the renderer's own technical personnel who would have the relevant experience. The intention would be to help prevent inadvertent mishandling of Category 1 ABP. The frequency of audit would depend on the level of trade the renderer had with a particular business. DG confirmed that he currently checked UKRA member plants. His checks were in addition to inspection by AHVLA. UKRA had a Technical Liaison Group where issues could be discussed. There had been limited engagement by AHVLA with UKRA as a full body, although liaison between DG and individual officers was ongoing. DG's view was that resource cuts to AHVLA had restricted its ability to engage more than once every 18 months. AHVLA also only inspected plants 1-2 times a year. Inspections normally lasted around half a day. There was an element of mass balance checks by checking records, but UKRA and FABRA both wanted to see improved mass balance checks, along with better checks to ensure proper storage, processing and record keeping, including dispatch information.

CE said that the culture around audits was already changing within the food industry to focus much more on identifying fraud. His intention was to engage with AHVLA to discuss more robust arrangements for mass balance checks in plants handling ABP and for forensic analysis of company accounts. DG said that UKRA members would not welcome forensic analysis of their company accounts but could probably be persuaded that improved inspections would bring benefits to the industry. CE said that the Agricultural Industries Confederation (AIC) which represented animal feed companies would have a key role to play to improve ABP controls. His aim would be to get them to support an

accreditation scheme for businesses handling ABP and to only accept products from accredited companies. A scheme could perhaps sit within the Red Tractor arrangements. CE said that he was content for that message about the direction of travel to be passed back to UKRA members.

CE invited DG to consider what further information UKRA could feed into the Review, including information of CCPs and action to detect food crime. DG said that UKRA had produced guidance on transport documentation advising that consignments should be rejected where mistakes had been identified unless corrected in writing by the originating business. UKRA had identified poor quality of staff in slaughterhouses as a cause of problems. Guidance had also been produced on the labelling of transport vehicles and controls on split trailers for different species and different ABP categories. He noted that renderers either had their own hauliers or contracted with specific companies. Controls on transporters were however limited. They had to be registered but did not have to be approved.

DG noted that the amount of Category 3 ABP produced had probably reached its upper limit. Future changes to reduce restrictions on the use of category 3 ABP in animal feed could lead to more demand which could mean there was greater potential for Category 1 material to be re-directed and continued vigilance was required.

3. Conclusion

CE thanked UKRA for engaging with the Review.

7 March 2014