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Northern Ireland Assembly – Horse meat and pork DNA in Beef Products

Written Evidence Submission by Iceland Foods Ltd

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Background

1. Iceland Foods Limited (Iceland) is a privately owned company established in 1970 with 786 stores, in mainly high street locations throughout the UK; and 32 stores specifically within Northern Ireland. Iceland has 130 approved Own Label suppliers producing approximately 950 Iceland Own Label products
2. All Iceland Own Label products are sourced from manufacturing sites which are independently approved against the British Retail Consortium Global Standard for Food Safety. All Iceland Own Label products have a detailed specification to ensure products are safe, legal and of the quality demanded by Iceland and its customers.
3. Iceland has developed and implemented stringent processes to ensure that safety and quality procedures including traceability, labelling and hygiene are in place throughout the supply chain, to help ensure products supplied meet the legal and contractual specifications.

Please explain the Food Supply chain in place for Processed Beef Products supplied to Iceland foods Ltd.

4. All Iceland Own Label suppliers are required to manufacture food from British Retail Consortium (BRC) sites, which have been independently approved in accordance with the Global Standard for Food Safety. As an approved meat premises within the EU, the operations and processes at the site will have been audited for compliance with EU legislation on safety, hygiene and traceability. This Standard has been developed to specify the safety, quality and operational criteria required to be in place within a food manufacturing organisation to fulfil obligations with regard to legal compliance and protection of the consumer.

5. Iceland Own Label suppliers are contractually bound to produce products for Iceland in accordance with the agreed Iceland product technical specification, which details the cuts of beef to be used within the product recipe. The Iceland specifications are checked against EU legislation and Iceland Technical Policies, by an independent company, prior to the launch of all products.
6. The manufacturing facilities retain full traceability records for all the sources of the raw material utilised within batches. If based in the EU, the meat premises will also have been audited by the official authorities of that member state.
7. An Iceland Product Technologist attends all first production runs of Iceland Own Label products. This visit includes a review of the Iceland technical specification to ensure it is representative of the product being produced.

If fraud or criminal Activity is happening, where, in the opinion of Iceland Foods Ltd is it most likely to have happened?

8. As no Iceland Own Label product has been found to contain horsemeat (at a threshold level accepted by the Food Standards Agency at 1%); we have no direct experience of fraudulent activities. We think it is the role of the FSA, DEFRA, EC Commission, Interpol and the Police to determine where this fraud has happened and instigate legal actions.

What can be done to protect the food supply chain – given the complexity, where is the best place for testing to ensure the produce authenticity – that the label and product match?

9. The legal framework within which meat products are produced is extensive and addresses safety and compositional issues, including traceability across the EU "from farm to fork". This is supplemented for industry and manufacturers under national legislation and guidance produced by the FSA, which has retained responsibility for the regulation of meat processing plants, through the Meat Hygiene Service. Legal controls within abattoirs and meat processing plants are key to ensuring the source of the meat is as per specification.
10. A key point of EU legislation is that all business operators are required to implement food safety activities within their area of control and responsibility. The principal tool by which this occurs is Hazard Analysis Critical Control Points (HACCP). This is an internationally recognised way of managing food safety in which manufacturers are required to consider in advance of any incident the risks associated with the production process and to introduce control measures to prevent food incidents. The focus of all food law is therefore on prevention of incidents rather than discovery and remedial measures after the event. All meat

processors in Europe must have HACCP in place and compliance must be enforced by Regulators. This is intended to give a high level of protection to consumers.

11. Raw material and finished product testing, will also re-affirm that controls are being met and complete the due diligence chain.

Does this complexity not allow that each part of the chain manages to make money, except the farmer at the beginning of the chain and also pushes up prices for the consumer?

12. Iceland is striving to regain consumer confidence in beef products, to ensure that sales of beef products are restored and the volume of beef supply for farmers is also regained. We are supporting positive marketing messages such as "half price beef burgers – we're so proud of our Iceland Beef Burgers, we'd like to invite you to try them at half price", a recent promotion in order to regain customer loyalty. As such controls need to be robust throughout the food chain, every batch of Iceland beef burgers since September 2012 has been tested for equine, pork, sheep and poultry presence (sensitivity1%); so customers could be satisfied that they were "100% tested" and we could guarantee their quality.

What is Iceland Foods Ltd doing to ensure the interests of the farmer at the one end of the food supply chain and the consumer at the other are protected?

13. We continue to have the interest of farmers in mind and in particular we will be making public announcements on our beef procurement policy in the near future. We can confirm within the past few weeks all Iceland Own Label beef burgers are now being made with 100% British Beef.
14. As detailed within our earlier responses, Iceland will continue to ensure we have a robust due diligence in place to ensure the safety, legality and quality of our Own Label products are not compromised and we, like our customer, "are protected".

What checks and balances are Iceland Foods Ltd putting into place to ensure that this type of food fraud does not happen again? Please provide reassurances that costs associated with protecting against food fraud are not passed down the food supply chain to farmers or upwards to consumers?

15. All the due diligence checks as mentioned in previous responses will continue to take place.
16. No Iceland product has tested positive for Equine at 1% or greater (the threshold level of sensitivity accepted by the Food Standards Agency).
17. Analysing products for equine DNA has not been a standard industry test in the UK. Since information relating to beef being contaminated with horse came to light in January 2013, Iceland has arranged for over 60 Iceland Own Label Beef Products, which are deemed "high risk" e.g. minced products, to be independently tested for equine, pork, sheep and poultry.

This ongoing testing programme, covering all Iceland “high risk” beef products has now been completed twice. All other Iceland products containing beef (35 products) have also been tested and our testing programme is ongoing. These results will continue to be supplied to the BRC, who have provided and will continue to co-ordinate results, for submission to the FSA England.

18. All Iceland Own Label suppliers of beef products have been contacted. They are required for the current timeframe to meet our revised policy in that “all Iceland Own Label products that contain any beef, each batch of beef raw material must be tested to ensure it is free from equine (<1% threshold), prior to use in production. Additionally, all Iceland Own Label products containing beef, each date code of finished product must also be tested to verify no equine, (<1% presence), prior to despatch to Iceland.”

Regarding the food authenticity tests being carried out on behalf of the FSA, can you clarify what testing methodology you used and if this methodology was approved by the FSA. Was the testing done in house or externally?

19. All Iceland Own Label beef products have been independently tested by an external laboratory Intertek Ltd; an accredited laboratory using an Enzyme-linked Immunosorbent Assay tests (**ELISA**). This method of detection is approved by the FSA and works to a threshold level of 1% species presence.

While the focus has been on horse meat in beef products, what is Iceland Foods Ltd doing to ensure that pig DNA does not appear in beef products?

20. In addition to the due diligence measures already highlighted, all Iceland Own Label products continue to be tested by an independent laboratory, for beef, sheep, pork, equine and poultry, to ensure compliance with the Iceland product specification.
21. We are closely monitoring developments on a DEFRA lead industry project which is looking to understand the reliability of the current determination methods; and to understand what is practically achievable in relation to control of DNA carry over in manufacturing facilities. The Laboratory of Government Chemists (LGC) has been commissioned to work on both projects.

We trust that we have answered your questions. Please do not hesitate to contact me should you require any further information.

Yours sincerely

Trish Twohig

Technical Manager – Iceland Foods Ltd.