



## **Contamination of Beef Products**

### **Written Evidence Submitted by the Northern Ireland Retail Consortium (NIRC)**

**11 March 2013**

#### **1.0 Introduction**

- 1.1 The Northern Ireland Retail Consortium (NIRC) is the trade association of the retail sector. It is the sister organisation of the British Retail Consortium (BRC) which coordinates discussions with the Food Standards Agency (FSA) on its behalf. The NIRC 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 over 70% of the NI's grocery sales.
- 1.3 We are aware that some of our members are submitting evidence to the Committee on the operation of their own supply chain. This submission gives an overview of retailers' supply chain controls and actions following the discovery of horsemeat as well as details of the collective action taken by the Consortium.
- 1.4 The NIRC fully appreciates the seriousness of this incident and its impact on the Northern Ireland economy and on consumer confidence. Since the beginning of this crisis, we have met with stakeholders including the Minister for Agriculture, NIIRTA, the UFU, the Consumer Council and the LMC. We continue to do all that we can to provide clarity of information and restore consumer confidence.
- 1.5 Our members have carried out an extensive testing programme of processed beef products to establish the scope of horsemeat contamination. Reassuringly, the results have shown that only 6 product lines were contaminated out of the 1,889 DNA tests (less than 0.3%). However, we will only accept 100% compliance and this submission sets out both how existing controls operate and our next steps for preventing future failure.

#### **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, 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' 3<sup>rd</sup> Party Audits**

- 4.1 In addition to regular liaison with supplier companies and statutory inspections, retailers use 3<sup>rd</sup> 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 Global 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 6 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 2 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 NIRC and with the Food Standards Agency (FSA) to understand the issue, implement extensive testing and review their supply chains..
- 5.2 In terms of the incident itself the first indication was the publication of the results in mid January by the by the Food Safety Authority of Ireland (FSAI). Along with every other food business in Northern Ireland, our members were not testing for horsemeat as part of their surveillance programmes. However as soon as the problem was identified they put in place an extensive programme of testing to determine precisely the scope of contamination and to identify affected product and take the appropriate action.
- 5.3 Our members acted quickly whenever problems were identified. Where there was clear evidence of contamination products were quickly removed from sale, the FSA notified and consumers given clear information. Products were also removed temporarily on occasions when there was a concern and only put back on sale once tests had confirmed they were clear of horsemeat.
- 5.4 Taking immediate action to set up a comprehensive testing programme meant our members were best placed to respond to the FSA and consumers on the scope of the incident. As soon as we had confirmation of a sufficient number of tests our members and the BRC have been clear with consumers explaining the number of tests, number of affected product lines and progress we were making to meet the FSA request. The tests took a little time to complete but they have confirmed that the controls listed above were sufficient to prevent contamination in the vast majority of products (99.7%) but also confirmed more work was required to prevent fraudulent activity

## **6.0 Testing Programme**

- 6.1 Retailers routinely use testing to ensure the authenticity and safety of the products they sell. However this is based on intelligence and is intended to supplement not replace the



other supply chain controls such as audits. They, alongside every other food business, were not testing for horsemeat as there was no intelligence to suggest this was a risk.

- 6.2 As soon as a problem was identified all retailers instigated an extensive testing programme for horsemeat. They used either a polymerase chain reaction (PCR) or enzyme linked immunosorbant assay (ELISA) test. They tested to a 1% threshold level, which the FSA advised is appropriate for accurate testing and a pragmatic level for determining whether there has been a gross contamination or adulteration
- 6.3 The latest set of results was published by the BRC on behalf of members on 1 March. All major food retailers had completed their testing for processed beef products and the results based on 1,889 tests were only 6 products affected by horsemeat, all of which had been removed immediately a problem was identified.
- 6.4 One issue DNA testing has highlighted is the crossover of meat species where more than one meat is processed; for example, pork in beef products. We are working closely with the FSA who have commissioned research on what could be considered reasonable separation of meats best on hygienic manufacturing practices.

## 7.0 Next Steps

- 7.1 The fact existing controls ensured the vast majority of products were unaffected (99.7%) is reassuring, However we will only accept 100% compliance and are reviewing our supply chains to ensure this is achieved. We need to demonstrate to consumers that we have learnt the lessons from this incident and are implementing them practically.
- 7.2 As a first step members are reviewing their supply chains to examine if it is possible to remove any complexity.
- 7.3 They are also reviewing how they oversee their supply chain in terms of liaison with suppliers, inspections and the use of 3<sup>rd</sup> party auditors.
- 7.4 The BRC is also reviewing its Food Standard to consider any lessons from the incident and whether it could be improved to deal with deliberate adulteration.
- 7.5 We will continue testing and have agreed with FSA to report results quarterly. However, testing is best used when targeted based on intelligence. We have, therefore, encouraged FSA and Defra to raise this in Europe with other Member States where there is clearly a need for improved intelligence.
- 7.6 Finally, we will continue to work with the FSA as it establishes what is a reasonable threshold for crossover of meats, such as pork into beef. We understand this could have significance for our suppliers in Northern Ireland and are keen to strike the appropriate balance between what consumers would consider reasonable and the implications for the processing sector. Having said that we should emphasise our members are taking a zero tolerance approach to any presence of horsemeat and fully appreciate the views of faith groups