

Assessment of certain UK Farm Assurance schemes against the requirements of the EC Food Hygiene Legislation.

Introduction

1. This paper assesses the coverage of the requirements of the new food hygiene legislation by a number of farm assurance schemes. The schemes initially reviewed here have been selected, as they are participants in a memorandum of understanding between LACORs and Assured Food Standards (AFS). Consideration has not been given to schemes in the dairy and egg sectors where existing hygiene enforcement arrangements have been maintained.

Background

2. The legislative requirements concerning the enforcement and inspection arrangements for food hygiene controls are, like the hygiene rules, expressed in general terms with high level objectives. This flexible, less prescriptive approach provides an opportunity to develop an inspection regime that combines risk based factors and makes best use of available evidence. This approach will enable enforcement action to be more accurately targeted while providing earned recognition for those businesses with a sound track record of food safety awareness.
3. A UK Technical group comprising enforcement, industry and Agency representatives has helped inform the Agency's decisions on the new primary production food hygiene enforcement regime for those farm sectors where the hygiene rules apply for the first time. The group recognised the potential that membership of a robust and transparent farm assurance schemes could provide as part of the evidence base used to determine inspection frequency.
4. The UK technical group has considered an initial assessment of the match between the food hygiene elements of a number of existing farm assurance schemes and the requirements of the new legislation. This is summarised in tables 1 & 2 below. It was noted that assurance schemes are not limited to food safety requirements and they include some elements of environmental protection, while livestock schemes also have detailed requirements for animal welfare conditions. Variations do exist between schemes in their approach to food hygiene regulations but the overall overlap with the legislation has generally been comprehensive, and indeed goes beyond the legislative requirements in many instances.
5. The similarities between a number of the schemes reviewed reflects that many UK farm assurance schemes have collaborative arrangements within the framework of Assured Food Standards. This includes mechanisms to ensure equivalence or consistency so the products of producers certified by any of these schemes can be labelled with the Red Tractor assurance mark that appears on retail packs. AFS and its

schemes have a Memorandum of Understanding (MoU) with LACORS to facilitate communication. LACORS & AFS are at present reviewing the MoU to ensure that it is fit for purpose in light of these developments of a food hygiene enforcement regime.

Participants in the AFS / LACORS memorandum of understanding include:

- Assured British Pigs (ABP);
- Assured British Meat (ABM);
- Assured Chicken Production (ACP);
- Assured Combinable Crops Scheme (ACCS);
- Assured Produce (AP);
- Genesis Quality Assurance (GQA);
- Quality Meat Scotland (QMS);
- Farm Assured Welsh Livestock (FAWL); and
- Northern Ireland Beef/Lamb Farm Quality Assured Scheme (NIBLFQAS).

Scottish Quality Cereals (SQC) has also been assessed as meeting the requirements of the legislation and an information exchange mechanism developed to enable enforcers operating at a local level to make inform judgements about inspection frequencies.

Inspection and Certification

6. The above schemes are operated as product certification schemes and certification bodies and are formally accredited by United Kingdom Accreditation Service (UKAS) to the international standard for product certification, EN 45011. Independent, third party certification bodies conduct the inspection and certification of the individual scheme members. Four certification bodies operate in farm assurance in England and there are a further three certification bodies dedicated to work in the devolved regions.

Other Schemes

7. The schemes considered above address the requirements of the legislation in a credible and transparent way. They also have arrangements in place for enforcers and assurance schemes to share information, which will enable enforcers to utilise the evidence to help inform their judgements. Other schemes that meet these requirements may also be considered which will allow the list of “recognised” schemes to be extended as appropriate.

Assurance Scheme links to EC 852/2004 annex 1¹

Table 1 Livestock schemes

		Livestock Schemes ²			
		ABM	ABP	ACP	Genesis
Sector		Beef & Lamb	Pigs	Broiler Chicken	Beef, Lamb, Pigs
Art ³					
3.a	Control contamination	2.17, 3.8, 4.11, 5.7, 5.9, 7.3, 7.4, 7.5, 7.7, 7.8	(472)	1.1, 2.17, 5.1, 5.1.1, 5.2, 5.3, 5.5, 5.16, 5.17	2.5.2, 2.5.3, 2.10.11, 2.10.15, 2.11.2, 2.11.4,
3.b	Zoonosis and zoonotic agents	3.8, 3.11	7.0	2.3,	2.5.1, 6.1.16, 6.12, 6.13
4.a	Clean & disinfect facilities	4.10, 5.1, 5.7, 7.1	4.1.1	2.25,	2.7.1.1, 2.7.1.4, 4.2.5.0 etc., 6.6
4.b	Clean & disinfect equipment	4.9, 6.7	3.19, 4.1.4	2.25,	2.9.0, 4.2.5.5, 6.2.4
4.c	Clean animals	3.14	3.18i)	5.16	2.10.22, 2.10.27, 4.2.3.6
4.d	Potable or clean water	2.2	4.4.1	4, 4.6, 7.3	2.10.5, 6.5.1
4.e	Staff health & training	2.3	3.7	3.1	2.1.1, 2.1.2, 2.3.1, 2.3.4
4.f	Pest & animal prevention	4.11, 4.12	4.1.14	2.14	2.5.4, 2.10.21, 2.7.1.3, 6.11.8
4.g	Waste & hazardous material handling / storage	3.12, 7.5, 7.6, 7.8	3.1 i)	1.6	2.1.1, 2.5.2, 2.10 etc, 2.11 etc, 2.12 etc.
4.h	Spread of contagious disease	2.3, (3.0), 3.5	7.0	2.7	2.5.1, 2.11.2, 2.5.5, 2.10.7, 6.1.4, 6.1.16, 6.2.9, 6.9.3
4.i	Relevant analysis	3.0	6.1, 7.0, 7.1, 7.2, 7.3	2.26, 7.3, 7.4	6.12.1, 6.13 etc. (pig)
4.j	Feed additives & V&M products	4.2, 4.5	4.5.11, 4.5.13, 4.5.14	2.20	2.6.2.1, 2.6.2.2, 2.7.1.5, 2.7.4.2
6	Remedial action when informed of problem	8.2	6.1	7.6.2	2.2.4, 6.9.5
7	General record keeping	1.1, 1.2, 2.4, 3.9, 4.7	3.3, 3.4, 4.1.4, 4.1.12	7.3, 7.4	2.3.2, 2.4.3, 2.5.1, 2.5.2, 2.5.4, 2.9 etc
8.a	Origin of feed	(4.4), 4.6	4.5.12	4.12, 7.3, 7.4	2.6.4, 2.7.1, 2.8.0, 4.2.4.0, 6.6 etc
8.b	V&M product use & withdrawal	3.8, 3.9	4.7.1 etc	7.3, 2.18, 2.22 etc	2.6.2.1, 2.6.2.2, 2.10.9, 2.7.4 etc
8.c	Occurrence of disease that could affect POAO		4.8.1, 4.8.2, 4.8.3	(2.3), 2.7	6.13
8.d	Analysis results		4.8.5, 4.8.1	(2.25)	6.12, 6.13
8.e	Products analysis		7.0		6.13
10	Assistance from others	(3.4)	4.8.1	2.1	2.4.1, 2.4.2, 2.4.2.1, 6.1.6, 6.1.9
Geographic Coverage		England	England, Wales, N. Ireland	UK	England
Version		V5 1/10/06	(V14/06/04)	Rev Sept 05 2006-2007	1/10/06

¹ Initial desk top identification of links made by Agency and considered by UK technical group. Links are indicative and do not necessarily provide exact match with legislative wording.

² Relevant paragraph in scheme standards, brackets indicate partial match with requirement

³ Requirement from Annex I Regulation (EC) 852/2004

Table 1 cont.

		Livestock Schemes ⁴			
		QMSFA	QMSFA	FAWL	NIBL FQAS
Sector		Cattle & Sheep	Pigs	Beef & Lamb	Beef & Lamb
Art ⁵					
3.a	Control contamination	3.2, 3.3	1.2, 6.5	3.0, 4.0, 6.0	5.11, 7.1
3.b	Zoonosis and zoonotic agents	3.2, 3.3	2.8	2.1 4, 7.11	2.4, 2.15
4.a	Clean &disinfect facilities	4.1, 4.2	6.6	6.03, 6.08, 9.08, 9.09	5.2, 5.8, A3c
4.b	Clean &disinfect equipment	3.2, 6.5	6.6, 7.4	4.04, 5.06, 6.09, 9.00	6.11
4.c	Clean animals	2.6	2.7	2.07, 6.03, 9.08	5.8, 6.8
4.d	Potable or clean water	5.3	5.10	2.05	3.2
4.e	Staff health & training	2.1	2.2, 2.3, 2.4, 2.5	(2.04)	1.3, 2.2
4.f	Pest & animal prevention	5.6	6.3	2.03, 4.06, 4.07	3.18
4.g	Waste & hazardous material handling / storage	4.6, 4.7	6.1, 6.2	3.02, 3.06, 3.07	5.13, 7.2
4.h	Spread of contagious disease	3.3	3.1	2.14	2.4, 4.3
4.i	Relevant analysis				
4.j	Feed additives & V&M products	5.1, 5.2	3.2	4.01, 4.02, 7.01, 7.02, 7.03	3.11, 2.13
6	Remedial action when informed of problem	Scheme regulations	Scheme regulations	8.0	Scheme regulations
7	General record keeping				
8.a	Origin of feed	5.4	5.1	4.03, 4.10	3.17
8.b	V&M product use & withdrawal	3.6	3.2	7.03, 7.05, 7.06	2.14
8.c	Occurrence of disease that could affect POAO		(2.8)		(2.15)
8.d	Analysis results		(2.8)		
8.e	Products analysis		(2.8)		
10	Assistance from others	3.1	3.1	7.04	
Geographical coverage		Scotland	Scotland	Wales	N Ireland
Version		Issue 5 09/05	Issue 7 01/05	Issue 2.1 04/05	April 03

⁴ Relevant paragraph in scheme standards, brackets indicate partial match with requirement

⁵ Requirement from Annex I Regulation (EC) 852/2004

Table 2

Crop Schemes

		Crop Schemes ⁶			
		ACCS	AP	Genesis	SQC
Sector		Combinable crops	Horticulture	Combinable crops	Cereals
Art ⁷					
3.a	Control contamination	2.17 6.1, 6.2, 7.0,13.0	2.8.1, 3.1.2, 9.1, 9.1.4, 9.1.5, etc	2.5.2, 2.5.3, 2.12, 3.2.8, 3.3.2, 3.3.3, 3.6.3	1.0 2.0, 4.2, 4.5, 4.9
3.b	Zoonosis and zoonotic agents	1.4, 7.1, 13.0	(2.8.1, 3.1.2, 3.1.3)	3.4.1	4.9, 4.12
5.a	Clean &disinfect facilities	6.0, 7.0, 7.1	9.50 etc	2.9.0, 3.5 etc,	4.6, 4.11
5.b	Clean &disinfect equipment	6.6, 6.7, 7.0	915, 916, etc	2.9.0, 3.5, 3.9, 3.10	4.6, 4.11
5.c	Potable or clean water	N/A	7.3.1, 7.3.2, 7.3.3, 9.3.2	N/A	N/A
5.d	Staff health & training	2.1, 1.5	8.4.2a, 9.1.1a, 9.1.1b,	2.1.1, 2.1.2, 2.3.1, 2.3.4, 2.2.3, 2.3.2, 3.2.1,	2.14, Appendix B
5.e	Pest & animal prevention	6.4, 6.5, 6.7, 6.15	9.1.3	2.5.4, 3.5.2, 3.5.7, 3.5.13	4.2, 4.3, 4.4, 4.12
5.f	Waste & hazardous material handling / storage	7.0, 7.1, 7.4, 2.15	6.7.3, 6.7.4, 9.1.2, 9.5.3, 10etc	2.5.2, 2.11 etc, 2.12 etc	2.11
5.g	Relevant analysis	11.0, 13.0	8.9.1	2.2.4, 3.11	4.12
5.h	Plant protection and biocides products	2.16, 2.6, 6.9	8.2.4, 8.4.8, 8.4.1a etc	2.1.1, 2.1.2, 2.5.3, 3.2 etc, 2.2.1.1, 2.2.2 2.11.2,	2.0, 2.5, 2.8, 4.10
6	Remedial action when informed of problem	11.0	2.4.1, 8.9.3	2.2.4	4.13, 6.3
7	General record keeping	6.7, 7.0	2.2.1	2.3.2, 2.5.2, 2.5.3, 2.5.4, 3.2.16, 3.3.4, 3.5 etc	2.2, 2.9, 2.12
9.a	Use of plant protection products	5.6	8.5.1, 8.5.2, 8.5.3	3.2.16, 3.3.4, 3.4.1, 3.5.9, 3.6.1, 3.6.2	3.2, 4.10
9.b	Pests or diseases that could affect POPO	6.5, 6.7, 13.0	(5.1.2)	2.5.4, 3.5.7, 3.5.13	4.7, 4.8, 4.9, 4.12
9.c	Results of relevant analysis	11.0	7.3.2	2.2.4	2.6
10	Assistance from others			2.4.2, 2.4.2.1, 3.8	1.11, 2.15
Geographical Coverage		England & Wales	UK	England	Mainly Scotland
Version		00001/06 (Jul 06)	00001/04 (Rev Feb05)	1/10/06	1/10/06

⁶ Relevant paragraph in scheme standards, brackets indicate partial match with requirement

⁷ Requirement from Annex I Regulation (EC) 852/2004

