

5th December 2007

Directors of Public Protection in Wales

Reference: ENF/W/07/063

Dear Director,

Labelling of minced lamb containing excess water

Following routine sampling and testing of frozen lamb mince on sale within the UK it has been identified that certain products imported from New Zealand contained excessive extraneous water and did not comply with the current agreement that stands between the UK and New Zealand.

This issue has been previously raised with the New Zealand Food Safety Authority in 2003 and they subsequently issued advice to relevant suppliers and trade associations in New Zealand¹. A recent sampling and surveillance exercise carried out as part of the Agency's Imported Food Sampling Programme found that some New Zealand minced lamb samples contained extraneous water ranging from between 11 and 21%.

We have been advised that the practice of fluming lamb skirts in water in order to transport them around meat plants, and the subsequent immersion chilling prior to freezing results in the water uptake in the lamb. This process is rarely carried out in red meat plants in Europe, where, most of the transport and chilling is of dry meat. We have been assured that by using good manufacturing practice, the presence of extraneous water using the method employed in New Zealand can be kept to below 5%. We have contacted the New Zealand Food Safety Authority and advised that under EU food labelling legislation any added water above the 5% allowance should be declared in a list of ingredients on prepacked products supplied to catering establishments and the final consumer. We have asked that future supplies of meat which contains water in excess of 5% from New Zealand suppliers' be appropriately labelled.

¹ NZFSA advice can be downloaded from <http://www.nzfsa.govt.nz/animalproducts/publications/for-your-info/f13-03.htm>



As you are aware, although moisture level in red meat is not currently regulated, the Food Labelling Regulation requires that extraneous water in meat must be declared in the ingredients list of foods. It is therefore essential that all food manufacturers in your area that import New Zealand minced lamb or lamb to make mince will need to declare any extraneous water. Compliance checks at the laboratory on minced lamb should allow a 2% tolerance, due to analytical uncertainty, and any enforcement action should be taken when undeclared water levels are detected above 7%.

I have written to the New Zealand Food Safety Authority drawing this issue to their attention and asking them to re-issue advice to relevant suppliers and trade associations in New Zealand about providing appropriate information on product supplied to UK companies. I would anticipate that any orders of product from the date of this letter should contain the relevant information required for the processor in the UK to comply with the relevant food safety legislation.

In addition UK importers and buyers can have a significant impact and should write to their New Zealand suppliers to ensure that commercial specifications for the supply of lamb and mutton skirts for manufacture into lamb mince in the UK contain clear information about excess water in the raw product.

If you wish further advice do not hesitate in contacting me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rob Wilkins', followed by a long, thin horizontal line extending to the right.

Rob Wilkins

Head of General Enforcement Branch
Food Standards Agency Wales