

## Summary Of Comments Received From The Consultation On The Proposal to Consolidate EU Hygiene Legislation By The Final Response Deadline of 20/10/00 (Wales) [Inclusive of initial summary of comments ]

Name and/or Organisation	Summary
<p>Sion Aron Commodities Officer, Farmers Union of Wales</p>	<p>Proposals which accelerate adoption of HACCP by small and medium-sized enterprises (SMEs) should be funded from the public health budget.</p> <p>HACCP is advocated as a modern technique based on current best scientific advice, capable of enhancing consumer confidence.</p> <p>The union continues to call for a government announcement on meat inspection charges.</p> <p>Concept of a farm-to-fork strategy for food safety is supported by the union. The union strongly believes that primary producers should be afforded adequate protection and freedom from liability for products beyond the farm gate.</p> <p><b>Union is concerned at lack of detail regarding implications of the consolidated and simplified proposed legislation for the industry and, in particular, for SMEs which are vital to the vibrancy of rural communities.</b></p>
<p>Brendan Cullinane Director of Housing, Environmental Health + Trading Standards, Powys</p>	<p>Welcomed proposals to alleviate the inconsistencies and confusions which currently exist.</p> <p>Concerned that placing responsibility on food businesses including HACCP procedures will have financial impact on small businesses.</p> <p>As an alternative to the proposal for registration, they advocate a licensing system.</p>

County Council	Concern that the proposal to place the responsibilities on the food business as opposed to official supervision may result in a lowering of hygiene standards and a subsequent impact on public health.
M W Evans Head of Regulatory Services, Cardiff County Council	<p>Agree that EU food hygiene legislation is in need of amendment, particularly the “vertical” directives relating to products of animal origin.</p> <p>Unclear on assertion that the proposals will result in “a transfer of emphasis for the responsibility to produce safe food, away from enforcement authorities, clearly onto food producers”. States that responsibility has always rested with business proprietors. Some of the proposals need further clarification. What is meant by the introduction of HACCP principles to all food premises in the food chain; does this mean over and above that which is already contained within Regulation 4 (3</p> <p>Agree that full HACCP would be appropriate for large and medium sized food manufacturing business. However not appropriate for food business who employ fewer than 20 people. The imposition of HACCP on businesses who have no enthusiasm for it will be counter-productive. Many will not have the technical expertise or support required and it may result in concentration being deflected from food safety issues to dealing with the paperwork necessary to operate the system and “keep the enforcing authority satisfied”. The cost of implementing HACCP for food businesses will be vast both for those businesses and enforcement authorities and will not necessarily result in safer food.</p> <p>The experience of establishing HACCP in butchers premises should be borne in mind ..</p> <p>Agree that any new or amended legislation should be risk based – like that which we have in the Food Safety (General Food Hygiene) Regulation 1995 and Code of Practice No. 9.</p>
Society of Directors of Public Protection Wales	Same comments as those received from M W Evans Cardiff County Council..

<p>National Gamekeepers Organisation</p>	<p>The trade in wild game meat is essential to the continuation of sporting shooting in the UK. Given the significance of the wild game meat trade for the UK rural economy need to be ensure that we are not abandoning an approach that has worked.</p> <p>Current proposals for wild game meat depart significantly from the existing directive (Council Directive 92/45/EEC) and they include new requirements which, left unchanged, would have grave consequences for the UK game meat trade and the significant rural economy built upon it.</p> <p>The definition of a “food business” is unsatisfactory. Suggest it be re-defined to exclude game shoots and game rearing establishments. The definition of “primary production” should also be changed to exclude the rearing of gamebirds prior to their release into the wild.</p> <p>If shoots are not excluded from the definition of food businesses, it follows that every item of shot game destined for sale will have to be identified with a tag. For small game there would be serious labour and cost implications.</p> <p>If game rearing establishments are to be included too, then every bird leaving a game farm for release into the wild would have to be tagged as well. Paragraph 9.2 would, in the context of our industry, effectively give officials the power to close down, <i>without appeal</i>, any shoot they said was not reaching food hygiene standards. This is unacceptable.</p> <p><u>Re: Proposal for a Regulation on the Hygiene of Foods of Animal Origin</u> Concerned that Article 1 of this regulation contains no exemption for private domestic consumption. Annex II Section IV differs significantly from the current laws and needs considerable amendment if the UK game industry is not to be significantly harmed. It does not include the exemption for “small quantities” of wild game which have been essential in making (Council Directive 92/45/EEC) workable in the UK. The new proposals must include an exemption for small numbers or the game meat trade in the UK will be in real difficulties.</p>
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	<p>All references to training and qualifications in Chapters I and II should be deleted.</p> <p>Concerned that “Hunters.....shall be held responsible for any decision taken by them with regard to the examination of wild game for the possible presence of a health risk”.</p> <p>Welcome an opportunity to discuss further conditions in game larders, chilling, transport and transfer times.</p> <p>Would like clarification on a general point regarding “Proposal for a Regulation on the Import of Products of Animal Origin”</p>
<p>W D Shannon Head of Corporate Affairs, CWS</p>	<p><u>Re: HACCP Registration</u></p> <p>We do not see that registration is necessary for traceability purposes as traceability back to the producer can be achieved by other means, and notably currently through the lot marking directive.</p> <p>Health Marking system not necessary and should be dispensed with.</p> <p>Use of automatic equipment for temperature monitoring would create difficulties for retailers, particularly small stores.</p>
<p>Michael Fogden Food Law Adviser, Meat and Livestock Commission</p>	<p>There is no provision to reduce the prescriptive requirements once a food business has demonstrated its ability to introduce and maintain a HACCP system.</p> <p>Concerned that many smaller catering premises may continue to avoid HACCP as happens now, and based on our experience in training some thousands of butchers that there is anyway insufficient training and consultancy expertise available to assist these and other food businesses adequately. Enforcement in this area will be difficult.</p>
<p>Michelle Philpott</p>	<p>The introduction of traceability systems should be viewed with some caution as such systems could be</p>

<p>Managing Director, Tillery Valley Foods Ltd</p>	<p>difficult to implement and maintain and could lead to considerable costs for industry. Any such system would need to be simple to operate and be meaningful.</p>
<p>Ffion Wyn Roberts Public Protection Manager, Gwynedd Council</p>	<p>Clear protocol and guidelines must be established with regard to how enforcement officers should respond and precisely what they are expected to achieve.</p> <p>Small companies, embryo companies, or companies and individuals who are encouraged to diversify their businesses into the food sector, would need guidelines and practical aid to meet the new requirements. This should be secured in Wales via agencies providing aid to businesses and that promote the food production industry.</p>
<p>Rachel A Rowlands Gareth and Rachel Rowlands</p>	<p>HACCP totally dependant on staff and adequate training for success.</p>
<p>Rachael Kenningham, British Retail Consortium</p>	<p>Concerned that the lack of a consistent approach and commitment to enforcement of legislation across the EU will undermine the objectives of this initiative. Arguably, enforcement of existing law across all operators within the EU would bring us closer to public policy goals than patchy compliance with a tougher regime.</p> <p>Welcome the general regulatory approach as a goal based approach to food safety will deliver the highest possible standard. However, concerned that in parts, the Commission reverts to a more prescriptive approach and this undermines the principle of risk based controls and legislation.</p> <p><b>Hazard Analysis Systems</b> Would like clarification of the nature and depth of documentation and verification systems envisaged by the Commission.</p> <p><b>Registration and Traceability</b> Registration and traceability would be more properly addressed in a General Food Law Directive.</p>

	<p><b>Licensing of Food Premises</b> Urge the FSA to maintain the policy to severely limit licensing given that it will not per se enhance standards of safety.</p> <p><b>Industry Guides</b> Welcome the development of further sectoral guides, but believe central efforts should be made to ensure that their contents are not contradictory. Unlikely that Community Guides could be developed within helpful time-scales. National guides should be the building blocks for Community Guides.</p> <p><b>Withdrawal of Products</b> Legal requirements relating to withdrawal of products would be more properly dealt with in the planned General Food Law Directive. Within this framework, it needs to be made clear how serious a risk must be before a withdrawal is triggered.</p> <p><b>Temperature Monitoring</b> If there is to be a legal requirement to monitor temperature, it is important that there be some flexibility in approach so as to allow the use of either automatic or manual checks. The use of automatic equipment would create difficulties particularly for small retailers.</p> <p><b>Labelling</b> Strongly of the view that it is inappropriate to set labelling requirements through a hygiene regime as these should be introduced within a coherent food labelling policy through the EU framework legislation for labelling.</p> <p><b>Committee Procedure</b> Concerned that many aspects of this Regulation can be changed by the Commission's committee procedure. Any changes to the regime should be subject to full consultation with all relevant stakeholders. This is important not only in view of the need for transparency and openness in food safety regulation, but to ensure that the regulatory framework keeps pace with technological advance.</p>
<p>R M Hughes, Vale of Glamorgan Council</p>	<p>Surprised by the assertion that the proposals will result in “a transfer of emphasis for the responsibility to produce safe food, away from enforcement authorities, clearly onto food producers”.</p> <p>Feel that some of the proposals need further clarification particularly as to what is meant by the</p>

	<p>introduction of HACCP principals to all food premises in the food chain; does this mean over and above that which is already contained within Regulation 4(3) which as it stands in our view, is appropriate and adequate for dealing with the vast majority of food premises. The majority of food business which local authorities deal with employ fewer than 10 employees. As many of these are also low risk it is not appropriate or necessarily beneficial for these premises to be subject to fully documented HACCP systems.</p>
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