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Food
Standards
Agency

E.coli O157

Control of cross contamination

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E. coli O157

Control of Cross-contamination

- Public Inquiry Recommendation 6
- “The Food Standards Agency should remove the confusion that exists among food business operators about what solution(s) should be used to prevent cross-contamination from surfaces and equipment.”

What was the confusion?

- Previous advice re dual use
- Expert witness. Reluctant to say that vac packers could never be cleaned effectively but described it as “a bit like playing Russian roulette”

E.coli O157

Control of Cross Contamination

- A fundamental principle underlying the prevention of food poisoning by *E.coli* O157 is the establishment and implementation of defences in depth. The essential issue is how to stop the bacteria from cattle and sheep getting onto food and surviving in infectious form.

FHDP

- The Agency is looking at all major causes of foodborne illness, not just E.coli; looking at all foods, not just at meat; and taking actions across the UK, not just in Wales. It has established a Food Hygiene Delivery Programme, the purpose of which is to minimise the level of foodborne disease
- What to consult on?

The Consultation

6 Key questions, including

In particular, is achieving separation to the highest degree physically possible, including dedicated (single purpose) use of complex, hard to clean, equipment such as vacuum packers, mincers and slicers a proportionate response to the risk? If not, what alternative would you suggest?

Consultation responses

- Largest ever response to an FSA consultation
- 988 UK wide, 544 from Wales
- Of the 544, 6 from business, 15 from enforcement authorities / officers, 532 from Welsh consumers [mostly based on CFW template]

The guidance

Not just for butchers- applies to all food businesses that handle raw and ready to eat foods

Key Control Measures

- Separation of equipment and staff involved in handling raw food from staff that handle ready to eat food
- Effective Cleaning and Disinfection
- Personal Hygiene and Hand washing

Separation

- Storage and Display
- Equipment
- Utensils and Chopping Boards
- Packaging and Wrapping Materials
- Cleaning Materials

Cleaning and Disinfection

- Chemical Cleaning
 - Detergents
 - Disinfectants
 - Sanitisers

Effective cleaning requires the correct chemical at the correct dilution for the required contact time

- Non Chemical Cleaning- Application of heat

Effective at the correct temperature for a sufficient amount of time.

Personal Hygiene and Hand Washing

Before handling ready to eat food

Technique

Facilities and materials

But you can't enforce guidance!

- Indeed, However the guidance clarifies what food business operators need to do in order to comply with
- Article 5 of EC regulation 852 / 2004 and, importantly,
- Annex II, Chapter IX 3. of EC regulation 852/2004

3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.

HACCP in butchers

- Recommendation 4
- The principles underpinning the Butchers' Licensing Scheme, which was introduced in response to the 1996 *E.coli* O157 outbreak, should guide food hygiene measures in businesses processing raw meat and unwrapped ready-to-eat foods.

HACCP in butchers

What should it look like?

We have concluded that the requirement for butchers' establishments processing raw meat and ready to eat foods to implement documented food safety management procedures remains unaltered by the change in legislation.

HACCP in butchers

- However, the consequences of the loss of licensing should not be underestimated. Licensing was a very effective method of achieving compliance.
- Our view is that the types of businesses referred to in recommendation 4 continue to need a more detailed and bespoke food safety management procedure than those selling or preparing food where there is less associated risk.

HACCP in butchers

- There are measures that the Agency needs to take in order to address specifically recommendation 4. These measures should be taken in supplement to the Guidance that will be issued following the current consultation - **Reducing the Risk from E. coli O157 – controlling cross contamination**, and should follow soon afterwards.

HACCP in butchers

- What's needed?
- Getting it in place
- Ensuring compliance

Remedial Action Notices

- Current consultation on extending their use ends 23rd May
- ***The Food Standards Agency in Wales would be interested in whether you agree with the proposal to extend RANs to establishments not subject to approval. Please provide evidence to support your views where appropriate.***
- We need responses

