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8 July 2016

Dear Heather

**ADVICE FROM THE WELSH FOOD ADVISORY COMMITTEE TO THE BOARD OF THE FOOD STANDARDS AGENCY ON ISSUES ADDRESSED BY THE COMMITTEE: JULY 2016**

As you will be aware, it was my pleasure pending finalisation of the appointment of a new Chair of the Welsh Food Advisory Committee (WFAC), to chair yesterday's meeting.

The key role of the Food Advisory Committees is to advise the Board of the Food Standards Agency. At yesterday's meeting, the WFAC discussed the following issues that will be discussed by the Board:-

- Update on Development of a Framework for Assessment of Foods Which May Present an Increased Likelihood of Harm
- An Update on Burgers Served Less Than Thoroughly Cooked in Food Service Outlets
- Antimicrobial Resistance
- Incidents and Resilience Annual Report 2015/16.

On behalf of the Committee, I am grateful to Steve Wearne, Paul Cook, Patrick Miller, Darren Holland, Jason Feeney and Richard Hoskin for joining us by videoconference to present their papers and for answering questions from members.

## Update on Development of a Framework for Assessment of Foods Which May Present an Increased Likelihood of Harm

WFAC members considered the paper which updates on progress in developing a framework for the assessment of foods which may present an increased likelihood of harm. In discussion, members made the following observations:-

- the need for the framework document to capture clear objectives along with monitoring and evaluation criteria; and
- that it welcomed that the development of the framework, and its application, would be informed by an ad hoc working group with members drawn from several FSA scientific advisory committees.

Overall, the WFAC supported the development of the approach detailed within the paper and, in particular, in developing the revised framework further, that *change* should be used as the key criterion to identify and to prioritise foods which might fall in scope for subsequent application under the framework.

## An Update on Burgers Served Less than Thoroughly Cooked in Food Service Outlets

Members considered the paper which gave an update on all aspects of the work completed and in progress to implement the FSA's position, as adopted by the Board in September 2015, that the service of burgers that are not thoroughly cooked is unacceptable unless there a range of controls is in place. Members commented positively on the detail of the paper and on the presentation of the status table reporting progress against actions Board decisions.

During a detailed discussion on the paper the WFAC made the following points:-

- continued concern about the ability of local authority enforcement officers to validate that appropriate controls are in place, in a climate where local authority resources are reducing yet the market for burgers served less than thoroughly cooked is increasing;
- that it noted that feedback from local authorities, including authorities in Wales, has indicated that the enforcement officers have welcomed the revised guidance issued in May 2016, although some still have some

outstanding concerns in relation to suppliers and consumer messaging which are indicated in paragraph 4.10 of the paper;

- the importance of clear consumer messaging in what is a complex area given the need to convey the messages on risks about burgers and the difference between cooking at home and eating out;
- that it welcomed the steps put in place to monitor incidence rates and foodborne outbreaks of STEC and the early intelligence being submitted by public health bodies of exceedances for gastrointestinal pathogens;
- continued concern that although it may be a personal choice to consume a food that might be considered to pose a risk, that, due to potential for secondary spread, that individual choice might have implications for other individuals, including those who may be vulnerable and might subsequently be affected; and
- concern about source control in the supply chain and in particular the low number of establishments which have indicated that they have appropriate controls in place which ensure that verification of those controls takes into account the microbiological criteria in EU legislation for meat that will not be cooked.

The WFAC enquired about, and was updated on, discussions held with the ACMSF on 30 June in relation to the development of advice on time/temperature combinations to achieve a 4-log reduction in STEC. It was noted that for risk assessment purposes, ACMSF guidance remained at a 6-log reduction.

A number of questions were raised on this paper by stakeholders who attended the meeting. The majority are reflected in the comments above and a separate note will be submitted to the FSA Executive to ensure that all are addressed.

### Antimicrobial Resistance

Members considered the paper which detailed the significant global threat of the emerging resistance of microbes to antimicrobial agents, including those critically important to for human therapy. The WFAC noted that countering the threat of antibiotic resistance is a priority for the UK Government and the devolved administrations, and noted the commitment to an integrated approach at national and international levels, through actions set out in the UK Five Year Antimicrobial Resistance Strategy. In its considerations of the paper the WFAC made the following points:-

- the importance of being able to measure progress being made against outcomes identified in the Antimicrobial Resistance Strategy and, in this context, it welcomed recommendation 3.4 of independent Review on Antimicrobial Resistance,<sup>1</sup> published on 19 May 2016, by Lord O'Neill; and
- that it recognised that the rise of antimicrobial resistance is considered to be a global crisis and, mindful of this, the WFAC highlighted the need to ensure that food imported from outside the EU including foods from 3<sup>rd</sup> countries, would need to be subject to a robust sampling regime.

The WFAC concluded its discussions in agreeing the principles set out in the paper in relation to clear roles and responsibilities in executing the FSA's contribution to the UK Strategy on Antimicrobial Resistance.

### Incidents and Resilience Annual Report 2015/16

The WFAC considered the report, which is the first annual report provided, detailing the work of the FSA's incidents and resilience functions for the period 2015/16. The WFAC was briefed on the four main aspects of the report including the number of incident notifications received and alerts raised, the incidents and resilience function in the FSA and in Food Standards Scotland, the ongoing programme of continuous improvement underway and preventative measures considered and work underway with industry partners to protect consumers.

In its discussions, the WFAC made the following observations:-

- that both the reactive and proactive work of the incidents and resilience function, and its robust procedures, plays an invaluable contribution to the FSA's strategic commitment to playing its part in achieving 'food we can trust';
- that it recognised that responsibility for consumer protection is shared between businesses, the FSA, public health bodies, parts of central and local government and consumers;
- that it is important that the incidents and resilience function continues to be informed by a lessons learnt approach, to ensure that robust procedures and standards of operation are in place;
- that it welcomed proposals to undertake a project to review and enhance the effectiveness of product traceability, withdrawal and recall

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<sup>1</sup> The Review on Antimicrobial Resistance (2016) Tackling drug-resistant infections globally: Final report and recommendations. Available at: <http://amr-review.org/>

- process and noted that a Stakeholder Reference Group was in the process of being established to support this work;
- that membership of the Stakeholder Reference Group would need to reflect a four nations approach, with appropriate representation and, in this respect, that it would be useful to have early discussions with the all Wales Food Safety Expert Panel with regard to Welsh representation; and
  - in noting proposals for Welsh Government to convene a food pilot incident exercise in 2016/17 that similarly, it would be useful to engage in early discussions with the all Wales Food Safety Expert Panel.

In its conclusions, the WFAC welcomed the report and commended the FSA's incidents and resilience function for delivering a number of key pieces of work against a backdrop of over 1,500 incident notifications and an increasing number of recalls and allergy alerts.

### Other Matters

In commenting on my written report, I provided further feedback on the recent positive meetings the Chair and I recently had with the newly elected Minister with responsibility for Social Services and Public Health in Wales (Rebecca Evans) and the newly elected Cabinet Secretary with responsibility for Environment and Rural Affairs in Wales (Lesley Griffiths). I informed that both Ministers had commented favourably on the FSA's proposals under the Regulating our Future programme in particular.

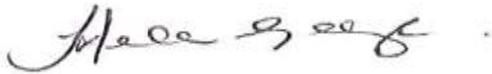
The WFAC was pleased to receive the regular report from the Director in Wales which informed on the outcome of the May elections held in Wales and of resulting changes in Ministerial responsibilities. The report reported on the next steps in relation to the Food Hygiene Rating Scheme in Wales including new regulations, due to come into force in November 2016, requiring takeaway food businesses in Wales to inform of their food hygiene rating. It also highlighted a number of recent successful prosecutions in Wales including a successful prosecution, the first use of the new sentencing guidelines in Wales for food offences, against Severnside Provisions brought about by Newport City Council. In commenting on the report, the Director in Wales also informed the Committee of her attendance at the June meeting of Welsh Government's Food and Drink Industry Board where she took the opportunity to update the Committee on the FSA's proposals under the Regulating our Future programme.

The Committee's discussions on the above issues were in open session and, in line with the views of the WFAC regarding the openness and transparency of its advice to the Board; it is my intention that this advice will be published.

Following the open meeting, the WFAC received two briefing sessions. The first was on GM issues and I would like to thank Keith Millar and Steven Johnson for bringing the Committee up to date with developments on GM issues. The second presentation, provided by Alice Teague, informed the WFAC on possible implications for the FSA arising from the Wellbeing of Future Generations Act.

I am copying this letter to the Board Secretariat and to the Chief Executive.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alice Teague'.

pp Tim Bennett – acting Chair of WFAC  
(authorised by and signed in his absence)