

Association of Independent Meat Suppliers  
British Frozen Food Federation  
British Meat Processors Association  
British Poultry Council  
British Retail Consortium  
Chilled Food Association  
Food and Drink Federation  
Food Storage and Distribution Federation  
National Association of Catering Butchers  
National Federation of Meat and Food Traders  
Provision Trade Federation

18<sup>th</sup> June 2015

Dear Sir or Madam,

### **STORAGE TIMES FOR CHILLED MEAT FOR MINCING AND MEAT PREPARATIONS – ENGLAND AND WALES**

1. I am writing following a recent proposal from the European Commission to amend Chapter III, Section V of Annex III to EU Regulation No 853/2004 in respect of the storage periods permitted for chilled meat intended for mincing. The Commission has for the present **withdrawn** the proposal while it seeks additional assurances from the European Food Safety Authority (EFSA) to inform its proposal. If EFSA does not raise concerns, the Commission may proceed with its proposal.
2. I am writing to request information on the possible impact to the meat industry of the Commission's original proposal concerning minced meat. This information will help to prepare for future discussions with the European Commission should it proceed with its original amendment.
3. Also, the Commission has in recent days issued a questionnaire. This requests views not only on applying the EFSA opinion to chilled meat intended for mincing, but also to chilled meat intended for production of meat preparations. Currently paragraph 2(b) of Chapter III, Section V of Annex III to EU Regulation 853/2004 does not specify a storage period for

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chilled meat for meat preparations in. Information is therefore also needed as regards meat preparations.

### **Background**

4. The chilled storage periods for meat intended for mincing, set down in paragraph 2(b) of Chapter III, Section V of Annex III to EU Regulation No 853/2004, are currently as follows:

*“When prepared from chilled meat, minced meat must be prepared:*

- (i) in the case of poultry, within no more than three days of their slaughter;*
- (ii) in the case of animal other than poultry, within no more than six days of their slaughter; or*
- (iii) within no more than 15 days from the slaughter of the animals in the case of boned, vacuum-packed beef and veal.”*

### Commission proposal on chilled meat intended for mincing

5. The Commission requested research from the EFSA into whether longer storage periods could be provided without additional risk to health. Following the publication of the EFSA report, the Commission brought forward a draft proposal for a derogation from the current storage periods under Regulation (EC) No 853/2004. The proposed amendment (withdrawn at the present time) to 2(b) of Chapter III, Section V of Annex III to European Regulation No 853/2004 is as follows –

*“(b) When prepared from chilled meat, minced meat must be prepared:*

- i. In the case of poultry, within no more than three days of their slaughter;*
- ii. In the case of animals other than poultry, within no more than 6 days of their slaughter; or,*
- iii. Within no more than 15 days from the slaughter of the animals in case of boned, vacuum-packed meat from cattle, pigs and small ruminants.*

*By way of derogation from this paragraph, minced meat may be allowed to be prepared from chilled meat, continuously stored at a temperature of no more and for a period no longer than indicated below if information can be provided to the satisfaction of the competent authority, demonstrating that the temperature was verified at least on a daily basis:*

Maximum Temperature	Maximum storage time (days)		
	Poultry meat	Meat from cattle, pigs and small ruminants	Vacuum-packed meat from cattle, pigs and small ruminants
1° C	5	12	48

2° C	4	11	39
3° C	3	9	31
4° C	3	8	25
5° C	<i>Not applicable</i>	7	20
6° C	<i>Not applicable</i>	6	17

“

6. The UK view is that factors affecting minced meat safety and quality such as growth of spoilage and pathogenic micro-organisms can be controlled by good practice within an effective HACCP-based food safety management system.
7. To help inform future discussion on this matter, I would be grateful if you would provide the information requested below on the possible impact to the industry if the Commission's proposal on meat for mincing was to proceed.
8. No proposal has been issued for chilled meat intended for production of meat preparations yet. However, the Commission's questionnaire suggests that, if a future proposal is issued, it might be based on EFSA opinion recommendations and might be parallel to a proposal for meat intended for mincing. I would be grateful if you would provide the information requested below on this matter, in case a future proposal is issued.
9. Please provide the information requested by **14 August 2015** to Nasreen Shah at the following email address:  
[Nasreen.Shah@foodstandards.gsi.gov.uk](mailto:Nasreen.Shah@foodstandards.gsi.gov.uk)

### Information requested

#### **A. Options on the Commission proposal, at paragraph 5, (which has for the present been withdrawn pending further scientific research) on storage of meat intended for mincing**

10. Your comments are requested on whether it would be reasonable to support the Commission proposal on meat for mincing at paragraph 5 or not, if the Commission decide to proceed with it. Four options follow, please advise which seems appropriate.

(a) Support the Commission proposal for meat for mincing at paragraph 5

11. The Commission proposal would allow meat for mincing to be stored for longer periods than are currently permitted under Regulation 853/2004 and is a regulatory measure. This option would recognise that the Commission's proposed storage times follow those set out in the EFSA report and that there may not be wider EU support to extend the storage times for the temperature given beyond the position in the EFSA report. Also, if the proposal is not supported the Commission might withdraw the proposal fully and the current storage times under Regulation 853/2004 would be left unchanged.

(b) Support the proposal on meat for mincing but look for a further extension to the proposed time periods

12. If the Commission proposal is supported, this would allow a longer period for storage of meat for mincing. It could open the possibility of further extensions being considered as the Commission would seem to have accepted that in principle that the storage times could be extended if justified by the scientific evidence. A positive response to the Commission proposal might encourage them to respond more positively if there is further evidence to extend the storage periods. Also, if a position not to support the proposal were taken, the Commission may withdraw the proposal fully leaving the current storage periods under Regulation 853/2004, and they may be unwilling to revisit the issue.

(c) Do not support the proposal for meat for mincing and look for a further extension to the proposed time periods

13. If the Commission's proposal would not allow sufficient storage time for meat such as beef to mature, supporting the proposal may be of limited benefit. Opposing the proposal might give a clear message that the storage times provided in the proposal are not sufficiently flexible and that traditional practices can be carried out safely. Also, if the proposal is supported, the Commission is likely to expect that all Member States will comply with the measures. If the proposed extension provides no practical improvement on the current storage periods for meat for mincing in Regulation 853/2004, it might be considered that it will make little difference if the Commission fully withdraws the proposal.

(d) Do not support the proposal and look for the current time periods in Regulation 853/2004 for meat for mincing to be retained

14. This option might be taken if there were concerns that an extension to the current storage times for meat for mincing might be a risk to health. However, the EFSA report and research previously undertaken by the UK shows that the current time periods under Regulation 853/2004 can be

extended without an increased risk. With good hygiene practice retaining the current periods under Regulation 853/2004 does not seem justifiable in terms of risk.

**B. Impact of the Commission proposal at paragraph 5 on meat intended for mincing (if it proceeds)**

15. Please provide information so that the potential impact of the Commission proposal on meat for mincing can be assessed, if the Commission proceed with it. Impact information is important and could help demonstrate to the Commission the implications of the proposal.

- 1) Any information on whether storage of chilled meat for mincing in other EU Member States does not complying with current EU storage time requirements, and what time / temperature periods are being used.
- 2) Details of the current storage times (in days) and chill temperatures applied between slaughter and mincing, and volumes of meat stored for mincing (in tonnes) per annum in the UK for each of the following:
  - (i) poultry meat,
  - (ii) meat from cattle,
  - (iii) meat from pigs,
  - (iv) meat from small ruminants,
  - (v) vacuum-packed meat from cattle,
  - (vi) vacuum-packed meat from pigs,
  - (vii) vacuum-packed meat from small ruminants.
- 3) In the information for 2), please indicate what amount of meat for mincing (in tonnes) currently produced would meet:
  - (i) the current storage times under Regulation 853/2004,
  - (ii) the Commission's proposed changes to the storage time / temperatures, and
  - (iii) what amount of matured meat for mincing would exceed the proposed periods for each species.
- 4) Please advise as to typical retail price for matured and non-matured mince, and what premium is commanded for matured mince.
- 5) Details of the likely financial impact of moving from current storage times in the UK to those in the proposed derogation above. Please provide these details in terms of increased costs, or reduced costs, of the complying with the derogation as follows.

- a) **One-off Costs/Benefits\*** such as familiarisation costs (i.e. time required by a manager to read and familiarise themselves with the changes) and staff training requirements.
  - b) **Ongoing Cost/Benefits\*** such as extra (or less) staff time required to fulfil duties and their respective seniority/ wage rate, storage costs/savings, or energy cost/savings.
- 6) Please provide this information for each of the following:
- (i) poultry meat,
  - (ii) meat from cattle,
  - (iii) meat from pigs,
  - (iv) meat from small ruminants,
  - (v) vacuum-packed meat from cattle,
  - (vi) vacuum-packed meat from pigs,
  - (vii) vacuum-packed meat from small ruminants.

*\*The costs and benefits should be provided as 'gross' figures and not as net.*

- 7) Please add any information about what impact the proposal will have on small and micro-sized businesses.
- 8) Please advise if there may be any sustainability or environmental impact as a result of the proposal.
- 9) Details of other impacts on the industry of moving from current storage times in UK to those in the proposed derogation above, for example, difficulties in meeting the proposed time / temperatures, any effect on the supply of meat for mincing, any evidence of possible hygiene concerns.

### **C. Options on a possible future Commission proposal on storage of chilled meat intended for meat preparations**

16. Your comments are also requested on whether in principle it would be reasonable to support a future Commission proposal to set down in Annex III to Regulation 853/2004 specific time periods for storage of chilled meat intended for production of meat preparations, if the Commission proceeds with it. Three options follow, please advise which seems appropriate:

- (a) *Support in principle setting down in Regulation 853/2004 storage periods for chilled meat intended for meat preparations.*

*(b) Support in principle setting down in Regulation 853/2004 storage periods for chilled meat intended for meat preparations similar to those proposed for meat intended for mincing.*

*(c) Do not support in principle setting down in Regulation 853/2004 storage periods for chilled meat intended for meat preparations.*

**D. Current production of meat intended for meat preparations**

17. No Commission proposal has been issued at this time for storage periods for chilled meat intended for meat preparations. Information is requested on details of the current storage times (in days) and chill temperatures applied between slaughter and production of meat preparations, and volumes of meat stored for meat preparations (in tonnes) per annum in the UK for each of the following, will help with assessing any future proposals:

- (i) poultry meat,
- (ii) meat from cattle,
- (iii) meat from pigs,
- (iv) meat from small ruminants,
- (v) vacuum-packed meat from cattle,
- (vi) vacuum-packed meat from pigs,
- (vii) vacuum-packed meat from small ruminants.

18. Please advise as to typical retail price for meat for meat preparations, and what premium is commanded for matured meat for meat preparations.

19. Thank you on behalf of the Food Standards Agency for your assistance with this request.

Yours faithfully,

Nasreen Shah  
Regulatory Officer  
Directorate Support Unit  
Food Standards Agency