

# August 2020 Board Meeting - Questions



## Question 1

Dear Sir or Madam

I hope that all is well today.

There is a link to our website below which may be helpful background. We are involved pathogen risk management. SARS-CoV-2 is the current focus.

### **Proposed Question:**

“Given,

- *the weekly outbreak of infection incidents at UK Food Factories despite the favourable backdrop of summer being “low period” for SARS-CoV-2 and UK infection rates amongst the greater population being low,*
- *the report earlier this month from the German Centre for Infectious Diseases in respect of the 1500 people infected at the Gütersloh meat factory revealed that food factories with their damp and chilled environments “turbo-charge” Covid-19’s ability to breed, spread, was found to travel 8 metres and had discovered several new variants of this coronavirus ( I can send you a copy but you’ve probably had it since published)*
- *germicidal UV-C irradiation has for over a century been used for destroying harmful pathogens and has been proven to inactivate and destroy coronavirus ( we can supply 4000+ research papers, indeed, as a defence against biological weapons such as anthrax)*
- *infection in food factories is via airborne contamination, in the main and one can significantly reduce the hazard by treating the air so it is clean, uncontaminated( as is a legal requirement under Workplace Regulation 6, etc, etc) by fitting UV-C to the Chiller System cooling coils and within the ductwork of HVAC systems within the factories and amenities areas where people and hence bio load hazards, greater.*
- *this requires scientifically engineered modelling to ensure Lethal Dose LD99 + is achieved for the appropriate humidity, temperature, air flow, bio load etc and then, from our 80 years experience and have generated a data base of 35,000 microbes under UV-C testing and model developed with a number of Swiss academic and mathematical institutions.*
- *we are currently in discussion with a number of progressive clients in the Food sector in regard to covid-secure food factories but also, have been surprised that so many in the sector are unaware of UV-C, it’s application, and it’s effectiveness when engineered into the systems and processes correctly.*

- *BBC, this weekend : Coronavirus will be present "forever in some form or another", a member of the government's Scientific Advisory Group for Emergencies (Sage), Sir Mark Walport said people would need to be vaccinated at regular intervals because it would not be a disease like smallpox "which could be eradicated by vaccination".*

***Should the FSA be raising awareness to the Food Sector about the use of properly engineered germicidal UV-C systems to reduce the airborne Covid-19 infection hazard or indeed, in advance of what will come this winter and perhaps for years ahead, make such UV-C deployment mandatory as part of the covid-secure management processes, and what will now always be the new normal for the industry to deal with this new hazard?***

Thank you for considering the question. I am happy to take questions myself in advance, or meet representatives of the FSA at any time before or after the Board meeting this week to discuss this subject matter further to see how we can work together to help the sector reduce the risk.

I would be really grateful please if you would kindly acknowledge receipt.

**PAUL WALDECK**

**PP—L**

**Health Technology Solutions**

Our response was:

It is the responsibility of food businesses to ensure that the food they produce is safe. However, there is no documented evidence that food is a significant source and/or vehicle for transmission of SARS-CoV-2, the causative agent of COVID-19.

The provision of advice, information and guidance to help manage coronavirus risks to workers within food businesses, including systems such as UV-C, therefore remains primarily the remit of the Health and Safety Executive rather than the FSA. However, the FSA will continue to work with OGDs, including the HSE and the food industry to monitor developments of this and other emerging technologies that might help control SARS-CoV-2 infection among workers within food businesses and will also continue to actively monitor the science around the risk of COVID-19 on food and feed. If information becomes available to influence our advice and indicate that further measures or advice is needed, we will take action to do so.

## **Question 2**

Dear Sirs

Please see our 3-part question below for tomorrow's board meeting.

Paul Hiscoe  
Founder and Managing Director  
[www.scoresonthedoors.org.uk](http://www.scoresonthedoors.org.uk)

During the lockdown, programmed Food Hygiene inspections were suspended yet many businesses have now changed their use to include takeaway and delivery. Coupled with an explosion of home catering registrations, every LA is now carrying a huge backlog. Add

Track & Trace, together with the need to respond to Covid complaints, and current Local Authority resources are stretched to unprecedented levels.

The FSA is nevertheless still requiring Local Authorities to conduct a physical inspection before they can be rated, which is further increasing carbon footprint and PPE costs.

Aspects of an inspection such as pest control, fridge seals and temperature checks indeed can easily be undertaken remotely and digital inspection technology is certainly ideal for revisits. However, it is true that the fine nuances of a physical visit, including the sense of smell, could be lost. Collection of certain evidence, such as temperature checks and cross-contamination might possibly be slightly more difficult under certain circumstances with a remote inspection.

We therefore agree that there is a debate to be had, and support the formal evaluation which is planned to start with a survey sometime in the Autumn.

However, it appears that the quest for perfection is overriding an IMMEDIATE AND URGENT NEED FOR ACTION with the majority.

Today over 80% of rated businesses already achieve a FHRIS score of 5 stars. According to the latest published LAEMS data, 93% of inspected businesses in England and Wales are classified as low risk category C and D.

### **Question 1**

Given the widespread requirements for social distancing measures, does the Board believe insistence on physical inspections (even if only confirmatory) could be placing both Inspectors and Food Business Operators at unnecessary risk?

### **Question 2**

Whilst evidence-gathering and considerations regarding longer-term changes to the FHRIS Brand Standard and/or Code of Practice are on-going, will the Agency urgently consider a temporary relaxation of the physical visit requirement? Even if this is only for *low risk* businesses?

### **Question 3**

Or finally a compromise. Would the agency consider a temporary 'sticker-only' remote rating, similar to those which already apply to re-scoring visits?

P Hiscoe

### Our response was:

- 1. Given the widespread requirements for social distancing measures, does the Board believe insistence on physical inspections (even if only confirmatory) could be placing both Inspectors and Food Business Operators at unnecessary risk?**

Our guidance and advice on the response to the pandemic takes account of central government advice on COVID-19 and aims to ensure food safety and the protection of public health during this time.

The advice enables local authorities to focus available resources on addressing new and emerging risks in the food system that have arisen as a result of COVID-19. This will help ensure public health protection and provide consumer confidence in the food sector as restrictions are lifted. It facilitates effective use of available resources and minimises the time required onsite.

In undertaking their food safety responsibilities, we have advised local authorities to take account of any direction or expectations set in relation to measures required to control the spread of COVID-19 by their own local authority and, as appropriate, Public Health England, Public Health Wales or the Public Health Agency in Northern Ireland. This includes undertaking a risk assessment to determine what controls are required. This may include PPE that officers will require. It also includes the need to consider individual business's food safety policy and COVID-19 hygiene requirements for visitors.

**2. Whilst evidence-gathering and considerations regarding longer-term changes to the FHS Brand Standard and/or Code of Practice are on-going, will the Agency urgently consider a temporary relaxation of the physical visit requirement? Even if this is only for *low risk* businesses?**

It will be important for us to have a robust evaluation of the current use of remote assessments by local authorities as part of the response to COVID-19 to help inform our thinking on when and where this approach might be used more routinely in the future, including whether remote assessment might be used as an alternative to an onsite inspection in some cases, such as low risk businesses.

Work to progress this is already in train and is a priority for us.

**3. Or finally a compromise. Would the agency consider a temporary 'sticker-only' remote rating, similar to those which already apply to re-scoring visits?**

We assume that this relates to remote interventions being used to re-assess the food hygiene rating without changing the underlying risk rating scores so that the intervention frequency remains unchanged.

The evaluation mentioned above will help inform any decisions on such an approach.

**Question 3**

Good afternoon,

I would like to raise a question at the forthcoming FSA Board meeting on the 26<sup>th</sup> August.

With the end of the transition fast approaching and with further negotiations planned between the UK Government and the EU over the coming weeks the food industry is preparing for two possible outcomes. The immediate challenge is in relation to label

changes that come into force at 11pm on the 31<sup>st</sup> December 2020 for the UK and EU27 markets. For businesses that export products of animal origin into the EU27 (+NI) market there will be the requirement to change packaging from a UK health mark to a GB health mark. This will require businesses to consider their existing packaging stocks and to ensure adequate timelines for artwork redesign and the production of new packaging at the busiest time of the year for the food industry. Where capacity is an issue this will lead to considerable cost and waste where existing UK packaging cannot be segregated for the UK market. In order to cut down on packaging waste and increasing manufacturing complexity are the FSA working with the UK Government to allow the early introduction of the GB health mark up to one, two or three months before the end of the transition period? This is something that needs addressing as a matter of urgency.

Regards

Peter

Head of Product Integrity and Governance

Samworth Brothers Quality Food

Our response was:

The FSA are currently considering what can be done to mitigate the challenges facing the food industry as regards the change from the current UK/EC marks to the new marks at 2300hrs on 31 December 2020. We have been working closely with industry to understand the challenges and we will be publishing guidance on the application of health and identification marks shortly.

#### **Question 4**

Hello,

I was attending the FSA Board Meeting and the discussion around Healthmarks.

It was mentioned that there are 5 different healthmarks and there are legal implications regarding which ones could be used and FSA Guidance is to be issued to clarify the position.

I have read the Information on the FSA website and noted 6 different marks (3 health marks and 3 Identification Marks). Is there a change on its way regarding the number of options?

<https://www.food.gov.uk/business-guidance/guidance-on-health-and-identification-marks-that-applies-from-1-january-2021>

I understand that revised guidance is to be issued because of the NI Protocol.

What are the legal issues that were mentioned?

It was also highlighted that use of the healthmarks

16 September 2020

Could you clarify this for me please?

Thank you

Tessa Anderson Bsc (Hons)

**Company Director PACK COPY SENT Ltd**

Our response was:

***I was attending the FSA Board Meeting and the discussion around Healthmarks. It was mentioned that there are 5 different healthmarks and there are legal implications regarding which ones could be used and FSA Guidance is to be issued to clarify the position.***

***I have read the Information on the FSA website and noted 6 different marks (3 health marks and 3 Identification Marks). Is there a change on its way regarding the number of options?***

**<https://www.food.gov.uk/business-guidance/guidance-on-health-and-identification-marks-that-applies-from-1-january-2021>**

Response: The FSA are currently considering what can be done to mitigate the challenges facing the food industry as regards the change from the current UK/EC marks to the new marks at 2300hrs on 31 December 2020. We have been working closely with industry to understand the challenges and we will be publishing guidance shortly.

The revised guidance will focus on three markings. The abbreviated forms of these are GB, UK and UK(NI). In respect of UK and UK(NI) full country names can also be used, hence the reference to five markings.

***Question***

***I understand that revised guidance is to be issued because of the NI Protocol.***

Response: Yes, the revised guidance takes account of the Withdrawal Agreement and the Ireland/NI protocol

***Question***

***What are the legal issues that were mentioned?***

Response: The Withdrawal Agreement supersedes previous legislation that the FSA put forward which allowed a for 21 month period of adjustment in respect of the current UK/EC mark on a UK wide basis. In considering options for a similar period of adjustment after 1 January 2021, it is important that the legal position in relation to the Withdrawal Agreement and the Northern Ireland Protocol is taken into account. This includes the status of products already on the market and products not yet on the market.

The revised guidance will set out the requirements after 1 January 2021, and what arrangements will be in place to mitigate the challenges facing the food industry regarding the changeover and will take into account the requirements of the Withdrawal Agreement and the Ireland / Northern Ireland Protocol