

**To all Red Meat Slaughterhouses and other Interested Parties in Great Britain**

08 December 2014

Dear Sir/Madam

**INTRODUCTION OF A REVISED POLICY ON THE TRANSPORT OF WARM MEAT**

You may recall that your views were sought in August 2013 as part of a consultation on a revised policy on the transport of warm (above temperature) meat of domestic ungulates. I am writing to let you know the outcome of that consultation and to provide details of the revised policy that the FSA now proposes to introduce.

Full details of the consultation, together with a summary of the responses received by the FSA and the FSA's response to those comments is available on the website at the following link:

<http://www.food.gov.uk/news-updates/help-shape-our-policies-0/warm-meat>

The four main points of the revised policy on which the Agency invited comments and the responses to these points were discussed in January 2014 with a Warm Meat Task Group, which included industry representatives. These are shown in the attached Annex.

The revised policy will be reflected in an amendment to the Meat Industry Guide (MIG) and the Manual of Official Controls (MOC) and will be introduced with effect from **2 March 2015**. Details of the revised policy are as follows:

1. All existing authorisations which were reviewed earlier this year will be confirmed in writing before the revised policy takes effect. The food business operator (FBO) at the slaughterhouse should discuss with the Official Veterinarian (OV) all applications for new authorisations or changes to existing authorisations.

2. The authorisation will need to record the names and addresses of the establishments which will receive the warm meat and the species of animal and the estimated number of carcasses to be transported to each receiving establishment on any one occasion. A general description of the products to be produced when the warm meat is delivered will also be required, but this may be in general terms such as cuts of lamb, port, etc, or some other description of the intended end product.
3. Under the provision for the transport of warm meat, unchilled meat must leave the slaughterhouse immediately. As a guideline to interpretation of the word 'immediately', a 3 hour period from the completion of the post-mortem inspection of the first animal slaughtered to be transported warm to departure of the vehicle will be allowed.
4. All carcasses and meat that are transported warm from the slaughterhouse are subject to a maximum journey of no more than two hours' duration.
5. If the meat has been partially chilled but has not reached the required temperature of 7°C (carcase) or 3 °C (offal), there is no requirement for it to leave the slaughterhouse 'immediately'. However, the meat will still be subject to a maximum period of two hours transport from the slaughterhouse and this must take place in refrigerated transport so that the chill curve is maintained.
6. The chilling of meat to reach legally required temperatures for red meat and offal en route to places of destination of more than two hours' duration will no longer be permitted.

I hope that this information is clear, but if you need any clarification please contact me.

Yours sincerely

*Paul Stubbington*

**Paul Stubbington**  
**Meat Policy Branch**  
**Food Safety Policy Division**

## ANNEX

### RESPONSES TO THE CONSULTATION ON A REVISED POLICY ON THE TRANSPORT OF WARM MEAT OF DOMESTIC UNGULATES

- 1. The need for unchilled meat to leave the slaughterhouse immediately; the consultation had proposed a 3 hour guideline from the completion of the post-mortem inspection of the first animal slaughtered to be transported warm to departure of the vehicle;**

No specific comments were raised on this issue in the consultation responses. However, it was clear that some meat was being held unchilled for longer periods and that adherence to the 3 hour limit would impact on some businesses. The task group maintained its view that the proposal was reasonable but suggested that a short transition period should be allowed for slaughterhouses to adapt to the guideline, for example by increasing chilling capacity.

- 2. The legal requirement for a two hour transport limit for warm meat to reach its destination to be observed;**

It was clear that there were cases of warm meat transport taking longer than 2 hours, but consultation suggested that this did not introduce a risk to public health so long as the meat was chilled in transport and the chill curve was maintained. The task group nevertheless concluded that the legal requirement limiting warm meat transport to two hours was clear.

- 3. Chilling of meat to reach legally required temperatures en route to places of destination more than two hours away to cease;**

Again, consultation responses suggested that this did not introduce a risk to public health so long as the meat was chilled in transport and the chill curve was maintained. However, the task group noted that EU legislation is clear and requires that warm meat can only be transported to other establishments within two hours travelling distance. Whilst noting the legal requirement, the view of the task group was that, if there is an opportunity to review EU policy on warm meat transport following the EFSA Opinion that was expected later in 2014, this should be taken. In particular, the need to consider whether there should be some flexibility for chilling meat to comply with legal temperature requirements regardless of whether chilling is completed at the slaughterhouse, during transport or at the receiving establishment. The EFSA Scientific Opinion on the public health risks relating to the maintenance of the cold chain during storage and transport of meat of domestic ungulates was published in March, but did not cover the issue of risks arising from the transport of warm meat. The Agency will fully engage with stakeholders if any proposal emerges from the European Commission to amend the current legal requirements relating to the temperature requirements for the storage and transport of meat.

- 4. All authorisations to be reviewed to ensure they are fully documented and record consistent information as shown in an Annex to the consultation, including details relating to hygienic transport and the premises where the meat will be delivered.**

Consultation responses raised concerns that authorising each slaughterhouse to transport warm meat would:

#### **gold plate EU legislation**

The FSA view is that EU legislation left it open to MS to decide how to provide authorisations and provided for a level of specificity (i.e. transport from one given establishment to another) that could only be effectively be managed by authorising individual slaughterhouses. The FSA confirmed that this was not new as establishment level authorisations had been in place since the current hygiene package came into force on 1 January 2006.

#### **be bureaucratic, cause delays and restrict trade**

The task group agreed that it was important for decisions on authorisations (e.g. agreeing to new authorisations or adding new establishments of destination to authorisations) to be made with a minimum of delay and that decisions on such matters should normally be made by FSA staff at the slaughterhouse. However, it was acknowledged that the initial review of authorisations would involve other non-plant based FSA staff to ensure a consistency of approach. This initial review was completed earlier this year.

#### **lead to default enforcement action of revoking authorisations**

It was agreed that the hierarchy of enforcement should be followed in the normal way, that options other than revocation (e.g. Remedial Action Notices) should be considered, and that this should be made clear in the Manual of Official Controls (MOC). An appropriate entry has been produced for the MOC.

The other issues that were raised in responses to the consultation and the views of the Warm Meat Task Group are shown below:

#### **Concern that the proposed revised policy would prevent the supply of freshly slaughtered sheep and goats direct to the final consumer from the curtilage of the slaughterhouse, in particular during religious festivals**

The task group agreed that this issue falls outside the scope of the warm meat transport derogation which provides for transport between given establishments and not to the final consumer. It therefore raised the broader question of whether such sales direct to the consumer from the slaughterhouse were allowed under EU legislation. As the supply of meat for private domestic consumption is outside the scope of Regulation 853/2004, the FSA believes that such supply is at the discretion of the slaughterhouse FBO. However, the view of the FSA's Legal Services has recently been sought on this conclusion following a request for clarification about this practice at the time of the Eid festival on 6 October.

Legal Services concluded that the supply of meat for private domestic consumption is within the scope of the Regulation and that such meat must meet the temperature and other requirements before it can be supplied. The Agency therefore needs to provide this clarification and to consider whether a strictly limited exception can be made to the temperature requirements governing supply from the slaughterhouse at certain limited times of the year when religious festivals are held. This might be allowed, for example, if consumers who collect carcasses from the slaughterhouse are given clear instructions on the need for subsequent refrigeration and thorough cooking to minimise any potential risk. The FSA will consider this as a separate issue and provide clarification about supply of carcasses or meat from the slaughterhouse to the final consumer in due course.

**Concern that the use of temperature probes by Agency staff might transfer any contamination present on the surface of the carcass to the inside of the carcass;**

The FSA confirmed that there was no proposal to increase the use of temperature probes.

#### **Impact of the proposals.**

Consultation responses had provided very little information on impact, though it was clear that there would be some impact, e.g. where revised working arrangements or transport arrangements might need to be negotiated between the slaughterhouse and receiving establishments FBOs, and where the slaughterhouse may need to increase chilling capacity. The task group considered that allowing a short transition period would help with these issues.

Separate guidance will be produced on the requirements that apply to the supply of carcasses or meat directly to the final consumer from the slaughterhouse. This will cover supply all year round as well as at times of religious festivals.