

To All Red Meat Slaughterhouses & Interested Parties in Great Britain

16 August 2013

Dear Sir/Madam

**FOOD STANDARDS AGENCY (FSA) AUTHORISATION TO TRANSPORT WARM  
(ABOVE TEMPERATURE) MEAT FROM DOMESTIC UNGULATES**

My purpose in writing to you is to:

- explain the restrictions under EU hygiene legislation that apply to the transport of warm meat from the slaughterhouse or co-located cutting plant;
- explain the changes that need to be made to current business practices to ensure that all businesses operate within these restrictions; and
- seek your views on the proposed changes and, in particular, quantify their impact on businesses that will be affected.

It is the Agency's intention, subject to comments received to this letter, to require FBOs to introduce the necessary changes by **25 November 2013** following a consultation period of six weeks ending on **27 September 2013**. The FSA's Official Veterinarian (OV) or Lead Veterinarian (LV) will be able to discuss with you any changes that may be necessary at your establishment if you are currently authorised to transport warm

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meat. The OV or LV will also discuss with you the process to be followed to review authorisations of warm meat to ensure that all authorisations are documented and consistent. This process will start as soon as possible so that, where possible, consistent and documented authorisations are in place before the introduction of the other changes summarised above and explained at Annex A.

## **Background**

EU Regulation 853/2004 (Annex III, Chapter VII) requires that post mortem inspection must be followed immediately by chilling in the slaughterhouse to ensure a temperature throughout the meat of no more of than 3°C for offal and 7°C for meat from domestic ungulates, i.e. cattle, pigs and sheep. These temperatures must also be maintained during storage and transport.

However, by way of an exception the Regulation also allows for the transport of warm meat, i.e. meat which has not been chilled to the required temperature in the slaughterhouse immediately after post-mortem inspection. This can only take place where:

- the transport of warm meat between one given establishment and another for the production of specific products is authorized by the FSA;
- transport takes place in accordance with requirements specified by the FSA;
- the meat leaves the slaughterhouse, or a cutting plant on the same site as the slaughter premises, immediately; and
- transport takes no more than two hours.

It became apparent in 2012 that the operation of warm meat transport from some UK slaughterhouses was not in all cases fully compliant with the requirements of Regulation 853/2004. In light of this the FSA has reviewed the authorisation process and the way that the authorisations work in practice. The review included visits to a small number of slaughterhouses authorised to transport warm meat and the collection and analysis of data held by the Agency on this practice. A Task Group was also formed with representatives from industry and Defra to look at the issue and was central to the development of the proposed changes outlined in this letter.

The proposed changes will bring industry processes into line with EU legal requirements, address public health risks relating to current industry processes, and ensure a consistent approach to warm meat transport and therefore a level playing field for businesses. We now wish to seek your views on the proposals and to give you advance notice that, subject to considering any comments received to this letter, we intend to require FBOs to introduce the necessary changes by 25 November 2013.

The detail of the proposed changes is attached at Annex A. However, in summary the proposals would mean that:

- 'warm meat' should leave the slaughterhouse immediately after activity in the slaughterhouse on the meat has ceased with such activity including, where relevant, partial chilling and/or cutting in a co-located cutting plant;
- where the meat is not to be partially chilled, "immediate" will be interpreted to mean 3 hours from the completion of post mortem inspection of the first animal slaughtered to be transported warm to the departure of the vehicle from the slaughterhouse. The 3 hour time period is proposed as a practical maximum time to produce enough carcasses to load a vehicle. The assessment of risk was undertaken taking into account that up to 2 hours transport is permitted and estimating up to 3 hours at point of destination could occur before the meat is cool enough to halt the growth of pathogenic micro-organisms. The starting temperature of the surface of the carcass will be around 30 °C and is likely to be close to 15°C before active chilling commences depending on the ambient conditions. Under these conditions for up to a maximum of 8 hours, growth of pathogenic organisms can theoretically occur but as the surface temperature reduces growth will be slower than under ideal conditions. For example growth of *Salmonella* spp. from a starting temperature of 30°C to a temperature of 15°C after 8 hours, based on model predictions, could increase 5 fold ( 1-1.7 log cfu).

This level of growth although increasing the risk was assessed as minimal and for practical reasons could be accepted. Model predictions will vary depending on the moisture and pH values assumed. The time periods proposed should be seen as the maximum at each stage rather than a total time and operators should aim to reduce the time at each stage where possible to minimise the risk. This will be regarded as a guideline figure to be used by the OV together with an assessment of the FBO's HACCP/food hygiene management systems;

- the legal requirement of a two hour transport limit for warm meat to reach its destination must be observed;
- chilling of meat to reach legally required temperatures en route to places of destination more than two hours away must end; and
- all current authorisations will be reviewed to ensure they are fully documented and record consistent information, including details relating to hygienic transport and the premises where the meat will be delivered.

The Agency is particularly keen to know what impact these changes may have on businesses that are currently authorised to transport warm meat. For example:

- will any of these proposed changes require your business to reorganise business arrangements with your customers?
- what will such reorganisation entail and how might it impact on your business and your customer's business in terms of business efficiency (e.g. time spent) and costs incurred (e.g. additional transport costs)? Please provide details of the impact of each change and quantify the impact as far as you can; and
- will you have sufficient time to reorganise business arrangements to implement these changes by **25 November 2013**?

Please send any comments on the proposed changes and, in particular, the impact of these changes to the following contacts no later than **27 September 2013**:

FBOs and others in England - to [Simon.Tudor@foodstandards.gsi.gov.uk](mailto:Simon.Tudor@foodstandards.gsi.gov.uk)

FBOs and others in Scotland – to [Steve.Hardie@foodstandards.gsi.gov.uk](mailto:Steve.Hardie@foodstandards.gsi.gov.uk)

FBOs and others in Wales – to [Jayne.Griffiths@foodstandards.gsi.gov.uk](mailto:Jayne.Griffiths@foodstandards.gsi.gov.uk)

A similar consultation will also be carried out in Northern Ireland.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Simon Tudor', with a horizontal line underneath.

**SIMON TUDOR**  
Hygiene & Microbiology Division

## ANNEX A

### PROPOSED REVISED ARRANGEMENTS FOR THE AUTHORISATION OF THE TRANSPORT OF WARM MEAT

**1. The requirement for warm meat to leave the slaughterhouse immediately should be interpreted to mean that transport should commence immediately after activity in the slaughterhouse on the meat has ceased, with such activity including, where relevant, partial chilling and/or cutting in a co-located cutting plant.**

'Warm meat' that is *not* to be partially chilled in the slaughterhouse or co-located cutting plant

1(a) Such 'warm meat' would have to be transported immediately after post-mortem inspection (PMI) or, where appropriate, after cutting in a co-located cutting plant. In practice, it is recognised that there would have to be a period of time to allow for the slaughter, dressing and PMI of the batch to be transported warm, including subsequent cutting (where relevant) and loading of the batch into the transport vehicle. It is proposed that this time period should be 3 hours from the completion of PMI of the first animal slaughtered to be transported 'warm' to the departure of the vehicle from the slaughterhouse. This would be consistent with FSA advice that, whilst subject to a number of variables (e.g. the ambient temperature, initial bacterial load, hygiene standards in the establishment etc.), a period of 3 hours prior to transport of two hours should not generate increased public health risks. The proposal also takes account of the views of the FSA/Defra/Industry Task Group which concluded that a 3 hour period should be practical in most circumstances. It is proposed to revise the Manual of Official Controls and Meat Industry Guide to include the 3 hour period and that OVs will have regard to this time period together with other relevant factors at the establishment when considering the need to give advice to FBOs and, where necessary, take enforcement action.

'Warm meat' that is to be partially chilled in the slaughterhouse or co-located cutting plant prior to transport

1(b) The suggested interpretation of 'meat leaving the slaughterhouse immediately' would continue to allow partial chilling of carcasses prior to warm meat transport. It is not proposed to:

- set a time period for holding this type of 'warm meat' prior to transport but the FBO will need to ensure that activity on carcasses in the slaughterhouse and (where appropriate) co-located cutting plant are continuous and that the chilling process is not broken once started. This means that in all cases of partially chilled 'warm meat', the transport vehicle must maintain the temperature of the meat.
- set a minimum temperature that must be reached given that what is important for public health purposes is maintenance of the chill curve and hygienic storage.

**The two hour transport requirement must be observed.**

2. This will require some slaughterhouses and wholesalers collecting warm meat from slaughterhouses to reorganise transport/delivery arrangements to ensure warm meat is delivered within 2 hours, as required by EU law. This requirement applies equally to single deliveries and 'milk rounds' (i.e. multi drop off deliveries). So, in the case of 'milk rounds' all deliveries in the 'round' must be made within the 2 hour time period.

3. In addition, the practice of a few slaughterhouses chilling meat to legal temperatures during transport en route to places of destination more than two hours away would have to cease. As required by EU law, unless authorised as warm meat to reach its destination within two hours, meat has to be chilled to legally required temperatures prior to dispatch from the slaughterhouse. The chilling could be undertaken within the slaughterhouse, in a stationary reefer chill facility within the curtilage of the slaughterhouse or in a refrigerated vehicle prior to leaving the slaughterhouse.

### **The authorisation process should be tightened-up**

4. All current authorisations will be reviewed and documented to record consistent information as set out in Annex B. The review of all authorisations will take time given that slaughterhouse FBOs would need to liaise with receiving establishments and the slaughterhouse OVs would need to liaise with local authorities about the receipt of warm meat in premises under LA control. It is planned to start the process of reviewing applications in the near future so that, where possible, consistent and documented authorisations are in place before the introduction of the other changes explained above.

### **Note regarding specific products**

EU legislation allows for authorisation of transport of warm meat for the production of “specific products”. Current European Commission guidance explains that “specific products must be understood as any product for which the competent authority grants an authorisation”. The FSA will continue to have regard to this guidance but FBOs are asked to note that the Commission has mandated the European Food Safety Authority to assess the risks associated with the transport of ‘warm meat’ and it is highly likely that this will lead to a review of the Commission’s guidance on ‘warm meat’ and, in particular, what is meant by the phrase “specific products”.



## **ANNEX B**

### **INFORMATION TO BE RECORDED ON WARM MEAT TRANSPORT AUTHORISATIONS**

- The names and addresses of receiving establishments to which the transport of warm meat would be restricted. If details of the receiving establishments are not provided by the FBO, or wholesaler where appropriate, withdrawal of the authorisation would be considered. Note. In the case of collection of warm meat from the slaughterhouse by wholesalers, details of the receiving establishments may have to be provided in confidence direct to the OV by the wholesaler if the wholesaler considers this to be necessary in the interests of commercial confidentiality.
- Species and estimated maximum number of carcasses to be transported warm to each receiving establishment on any one occasion .
- A general description to be provided to the slaughterhouse FBO by the receiving establishment FBO of the products to be produced from warm meat. This may be a general description such as cuts of lamb, pork etc. or some other description of the intended end product. Note. Where the purchaser of warm meat is a wholesaler, it would be for the wholesaler to arrange for the provision of this information which may need to be given direct to the OV and treated in confidence for reasons of commercial confidentiality.
- Confirmation that the receiving establishment(s) agrees to receive warm meat and is aware of any conditions specified.
- Contact details of enforcement authority responsible for receiving establishment(s).
- Confirmation that the authorities responsible for enforcement at the receiving establishments (i.e. LAs or FSA Operations in GB or DARD in NI) have been contacted by the OV responsible for the despatching slaughterhouse and have no concerns about the ability of the receiving establishments to transport warm meat from the slaughterhouse (where appropriate) and hygienically handle warm meat.
- Details of transport of warm meat (e.g. route, number of delivery points etc.) and confirmation that the total journey time for the transport of warm meat will be no more than two hours.
- Confirmation that transport vehicles will be hygienic and refrigerated unless otherwise agreed by the OV.

- Confirmation that the FBO will keep records of meat transported warm (e.g. species, volumes, destinations, travel time).
- Confirmation that the FBO will advise the OV of any proposed variations in the use of the authorisation (e.g. species, destinations etc) .
- Confirmation that the OV will undertake spot checks to verify compliance with the terms of the authorisation and that future audits of FBO systems will include warm meat transport operations.
- Signature of OV and FBO, countersigned by Lead Veterinarian in GB or Divisional Veterinary Officer in NI.
- Confirmation that signed authorisation has been copied to the Operations Approvals and Veterinary Advice Team in York (for GB) and to FSA in Northern Ireland (for NI) for central record keeping and monitoring purposes.