FSA ‘cold inspection’ in red meat slaughterhouses

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Introduction

1. This guidance has been produced by the Food Standards Agency (FSA) to help slaughterhouse operators work with our Lead Veterinarians (LVs) and Business Managers (BMs) to determine the possibility of allowing ‘cold inspection’ in red meat slaughterhouses processing pigs, cattle, sheep and goats. The same principles on ‘cold inspection’ may also be applied to the processing of farmed game animals.

2. This guidance was first published in July 2008 and has subsequently been updated to reflect the changes in relation to Specified Risk Material (SRM) controls. This version reflects the requirements as at July 2010.

Why was ‘cold inspection’ introduced?

3. For some years now, the FSA needed to be present at slaughterhouses processing cattle, sheep and goats throughout ante- and post-mortem inspection, and has supervised the removal of SRM as part of routine inspection procedures, along with its staining and disposal with other animal by-products.

4. SRM is those parts of cattle, sheep and goats that are most likely to contain the BSE agent in infected animals. It is essential that all SRM (as defined by the legislation) is removed from both the human and animal food chains and destroyed.

5. There are no hard and fast rules on where ‘cold inspection’ would be possible. However, in reality, we expect it will only be practical in smaller size businesses, due to the need to store and correlate all parts of every carcase and its red and green offal pending inspection.

6. An example might be where the Official Veterinarian (OV) is currently present during ante-mortem inspection and waits while the animals are slaughtered and the carcases dressed by the slaughterhouse team, before they or a Meat Hygiene Inspector (MHI) carries out post-mortem inspection. With ‘cold inspection’, the OV would be able to leave after carrying out ante-mortem inspection and other required duties, and they or an MHI would return later to carry out post-mortem checks once the carcases have been dressed.

Maintaining consumer confidence in the safety of meat produced is essential. The FSA will still carry out post-mortem inspection on all carcases and will check every cattle, sheep and goat carcases to make sure that it is free from SRM, before it is allowed into the food chain.

Our inspection process will not change where we carry out cold inspection, only the timing of our checks.
How will the FSA determine whether ‘cold inspection’ is possible?

7. This is all about partnership working. Your BM and LV, in discussion with you, will explore whether ‘cold inspection’ will be possible at your slaughterhouse.

8. We will consider:
   - the size of your business and the type of animals processed;
   - whether there is sufficient space and facilities to present all parts of each carcase for inspection (and that all parts are correlated) under suitable chilled conditions;
   - partnership working, your compliance with relevant legislation, your food safety management systems and our confidence in those systems.

These points are explained in more detail below.

Size of business and type of animals processed

9. ‘Cold inspection’ may be considered for all red meat slaughterhouses for the processing of pigs, cattle, sheep and goats. As a guide though, we expect it to be most suited to smaller slaughterhouses (for example those processing ten or less livestock units a day) where there is a delay between ante- and post-mortem inspection and where adequate detention facilities are available to allow ‘cold inspection’. We will consider each slaughterhouse on a case-by-case basis.

Note: ‘Cold inspection’ cannot be applied to:
   - to bovine animals from herds that have not been declared officially free of tuberculosis;
   - to bovine, ovine and caprine animals from herds that have not been declared officially free of brucellosis;
   - in the case of an outbreak of a notifiable disease;

10. Otherwise, where you meet all the requirements for ‘cold inspection’, your OV will only need to be present during ante-mortem inspection and also for sufficient time to ensure hygiene and welfare standards for processing of each species of animal are being met.

11. MHIs may carry out post-mortem checks and apply the health mark, subject to regular monitoring by the OV. Any carcases with abnormalities must be put aside for subsequent inspection by the OV. In the interests of efficiency, the OV may carry out ante-mortem duties and return to carry out post-mortem checks, rather than delegating duties to an MHI.
12. OV call-back arrangements will need to be in place in the event of an immediate decision being required on a carcase or its offal (for example, in the event of a suspected notifiable disease). A call-back may incur additional costs for you.

13. We know that sometimes FBOs will receive animals that have been subject to emergency slaughter on farm. While the OV must carry out post-mortem inspection of these animals, they may be processed and subject to ‘cold inspection’ when the OV is available.

**Having adequate facilities and space for delayed FSA checks**

14. Your establishment must have adequate facilities and space which allow for:
   - the *slaughter* and dressing of animals in compliance with Food Hygiene, TSE and Animal By-Products legislation;
   - the *retention* of carcases, offal and by products in compliance with Food Hygiene, TSE and Animal By-Products legislation whilst awaiting ‘cold inspection’ by FSA staff;
   - slaughter, dressing and retention of carcases (and carcase parts) and red and green offal so that *robust correlation* can be ensured. This is especially important for determining the age and identification of each animal and also which carcases, part carcases and offal, can be health marked and passed fit for human consumption.

These aspects will be reviewed by the Lead Veterinarian (LV) and BM in discussion with you before ‘cold inspection’ is introduced.

15. We will carry out regular checks during processing, to ensure hygiene and welfare requirements are met for each species. We will also make sure that you are taking all necessary measures to avoid contaminating meat with SRM during slaughter (including stunning) and removal of SRM.

16. In the event that you fail to ensure appropriate correlation of any carcases / carcase parts and their corresponding red or green offal, some meat may be rejected and will need to be disposed of as an animal by-product.

17. Before slaughtering bovine animals that require BSE testing, you will need to apply for an approval to slaughter them. You will then be assessed by your OV and LV in order to gain this approval.
Working in partnership

18. We will need to supervise the extraction of the brain stem sample of bovines requiring BSE testing once you are approved to slaughter them. That means that you will need suitable facilities to retain the heads from these animals until the end of the day. This must be included in your RMOP (Required Method Of Operation) which is necessary for your approval to slaughter such animals. Please consult your OV / LV for further guidance.

As the Food Business Operator, it will be your responsibility to ensure that you have robust systems in place to minimise the risk of any non-compliances occurring.

19. We will need to work together to ensure compliance with all the relevant legislation. You can demonstrate your compliance by:

- having an Good or Adequate score awarded on Section 2.5 HACCP as part of our routine audits, and
- having and maintaining a good records system for traceability which is clearly auditable.

If you are trading under a different name but still operating out of the same establishment, we will take your compliance level under your previous trade name into account.

20. The FSA may revert to full-time presence, for instance, if we undertake an investigation or after any formal cautions are issued to you. Any increase in attendance will result in additional costs being charged to you. Attendance levels will be reviewed during our audit of your procedures.
Meeting requirements for ‘cold inspection’

21. As part of our Business Agreement with you, we will agree requirements for ‘cold inspection’, taking into account your:
   - geographic location;
   - hours and days of operation;
   - the type and number of animals that you are processing and;
   - the food safety management systems that you have in place.

22. As well as agreed attendance on days of operation, your OV will carry out additional checks as part of our routine audit of your procedures. Unannounced visits may also be made. During these visits, or as part of the evidence gathering process, your OV will check:
   - your procedures for the slaughter and stunning of animals;
   - your verification of animal ID and correlation of carcases, offal and animal by-products;
   - your SRM controls at the slaughterhouse including SRM removal, separation, staining, storage and, where possible, collection;
   - your HACCP controls and documentation.

23. A failure to comply with the requirements for ‘cold inspection’ in your Business Agreement with the FSA may trigger an immediate review of our attendance levels at your establishment. Depending on the outcome of our considerations, we may revert to full-time presence throughout ante- and post-mortem inspection and you will incur additional charges. We will ensure all FBOs are treated fairly and consistently.

Finding out more

24. Get in touch with your FSA Lead Veterinarian or Business Manager to discuss whether ‘cold inspection’ is a possibility for you.

25. Part 3 of the ‘Guide to Food Hygiene & Other Regulations for the UK Meat Industry’ provides advice for FBOs on best practice in relation to SRM removal. You can access this on the FSA website at the link below:

   http://www.food.gov.uk/multimedia/pdfs/migpartthree.pdf