

Department for Environment, Food and Rural Affairs

Food supply networks: integrity and assurance review

Note of Northern Ireland Industry Roundtable

Location: Stormont Hotel, Belfast

Date: 26 September 2013

Attendees:

Tony O'Neill - Moy Park Ltd

Mike Johnston - Dairy UK

Eamonn Whelan - Devenish Nutrition

Ian Stevenson - LMCNI

Deirdre McIvor - Ulster Pork & Bacon Forum

Phelim O'Neill - NIMEA

Caroline Buick - UFU

Wesley Aston - Ulster Farmers' Union

Michael Bell - NIFDA

Professor Chris Elliott – Reviewer - Review into the Integrity and Assurance of Food Supply Networks

Mike Steel – Subject Matter Expert - Review into the Integrity and Assurance of Food Supply Networks

Rebecca Kenner - Review into the Integrity and Assurance of Food Supply Networks

Nick Hughes - Review into the Integrity and Assurance of Food Supply Networks

NB: All comments are unattributed except in the case of Chris Elliott (CE)

1. Chris Elliott (CE) introduction

CE opened the meeting by stressing that his intention for the Review is to look forwards to how the integrity of the food supply chain can be improved rather than dwell on the failings exposed by the horsemeat incident. He expressed the view that we need to make the UK a harder place to commit food fraud without adding to the burden of regulation. He made

the point that stakeholder engagement thus far had been extremely good with over 70 responses made to the call for evidence. He also thanked those present for attending the meeting. He noted that it was important to receive input into the Review from stakeholders in the devolved administrations and to reflect their position in his final report.

2. Role of FSA Northern Ireland and relationship with industry

It was suggested that FSA Northern Ireland is not as agile as it could be in the way it communicates with businesses. It was felt that during the horsemeat incident the agency was taking its lead from the FSA in London and did not always have the confidence to answer the industry's questions by itself. The opinion was given that the FSA struggles to find the balance between its responsibilities to consumers and to businesses with the result being that something of an 'us and them' mentality has developed. It was felt that it strongly prioritised public safety, as is its role, but sometimes to the detriment of commercial need and reputational impact. The view was expressed that the FSA has a tendency to make science based decisions without seeking to understand the industry context and sometimes uses science to support its own view rather than seeking unbiased interpretations of scientific evidence. It was also thought that the FSA could sometimes be too quick to put new information into the public domain which had the effect of driving information underground.

It was suggested that the relationship between FSA Northern Ireland and the industry is characteristic of a generally sub-optimal relationship between the food industry and UK regulators. It was noted that when such relationships work well they are built around personal relationships, but the recent machinery of government changes have meant that many officials with whom industry personnel have built up good working relationships over a number of years have since changed roles and there is now a vacuum in knowledge and expertise within central government.

3. Standards of audits and weaknesses in current practices

CE noted that based on his experiences gained during the Review to date it was apparent that there was significant variation in the standard of audits. He identified common problems as a lack of verification of documentation through actual testing; systems that are set up to guarantee food hygiene standards rather than look for food fraud; a strong preference for announced rather than unannounced audits and a lack of specialist skills among auditors.

It was agreed that regulators and businesses need to change their mindset when conducting audits from one that looks for compliance to one that looks for fraud. There was also agreement that an auditor specialising in food business audits would have stood a far better chance of picking up horsemeat contamination than one who works across a number of different sectors.

4. Information gathering and sharing

CE suggested that information gathering and sharing is key to identification of fraud; however information is often not shared effectively between the industry and the regulator. He noted that in previous discussions he had held on the Review food businesses had expressed concern about sharing information with the regulator – in this case the FSA – because of the instinct of the FSA to make public that information. It was noted that sharing information with a government agency means the information is immediately

subject to freedom of information requests, which makes firms vulnerable to commercial and reputational damage. It was suggested that within the private sector there is a lack of faith in government to keep data secure.

CE explained that Queen's University Belfast had created a 'Food Fortress' which was a safe haven for information on food gathered by the industry. Companies are asked to test for different things and where a problem is identified the information gets shared anonymously with all the companies in the network. In response to a question on whether QUB could be subject to a freedom of information request CE said the issue had not arisen to date but noted that all the parties involved had signed non-disclosure agreements. Nevertheless, he was not 100% certain that QUB would be able to protect its information in the face of a legal challenge.

The question was posed that if there was a way of creating a 'safe space' for information that ensured it would go through some kind of anonymisation process before being made public would the industry be willing to support it?. The view was expressed that there would still be a significant fear factor to overcome with regards the reputational damage that any failure in the system could cause.

The point was made that while there are issues of trust between the FSA and the industry there is a much stronger relationship between the industry and DARD. It was noted that in instances where DARD identifies a non-hygiene related concern during a routine sampling exercise its first instinct is to work through the situation with the company involved rather than alert the public straight away.

5. Issues around testing and thresholds for adulteration

CE said it was becoming increasingly clear to him through working on the Review that an acceptable threshold for adulteration needed to be established. He suggested that for adulteration and contamination where there is no impact on human health a 1% threshold seemed a sensible level as at that level there is little financial gain to be made. He suggested that if the threshold is set any higher you are essentially licensing fraud.

There was general agreement that a 1% threshold would represent a good benchmark although it was acknowledged that technology is constantly changing what is possible in terms of levels of detection. The comment was made that any standard measure for adulteration would have to apply across Europe and for this reason the EU would need to take the lead on this.

The point was also made that for some faith groups no adulteration is acceptable; however there was broad consensus that a threshold should be one acceptable to the majority of the population and should certain faith groups require 0% contamination they would need to find a way of sourcing product which could give them that guarantee. This linked into a point about carryover from equipment in a mixed species plant which in some cases could be 1% or even higher.

CE noted that in a recent meeting with DG Sanco in Brussels conversation had taken place around thresholds and also on the subject of the lack of an EU reference laboratory for food authenticity. DG Sanco is aware of these issues and is giving them due consideration. It is also setting up its own anti-fraud unit for collation of government information on fraud. It would not however receive any information from industry.

6. Other areas of discussion

The issue of country of origin labelling was raised in respect of EU recommendations to extend COO labelling requirements to meat used as an ingredient. The opinion was given that there are both upsides and downsides to extending COO labelling, the upside being that local food can be a source of added value for suppliers, however any new label that adds value can also increase the money to be made from fraud. It was also noted that current COO labelling does not understand consumer perception of the origin of food. The example was given that an Irish stew can either be made in Ireland from Irish ingredients or in South America to a traditional Irish recipe.

The following more general comments were also made:

It is better to make existing systems work better than to introduce new ones

Whenever there are significant price pressures in the market there will always be a buyer for 'questionable' products

The report has to make recommendations that are achievable and has to tell people how to implement them

7. Next steps

It was agreed that the possibility of holding a follow-up roundtable discussion ahead of the publication of the interim report should be considered.

25 November 2013