



Summary Report

Audit of Specified Risk Material (SRM) Controls and Authorisation of Retail Butchers for Removal of Vertebral Column (VC) from Carcasses of 24–30 month Bovines in Great Britain

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Audit Sponsor	TSE Division , Food Standards Agency
Report Author	Patrick Otto , Audit Branch, Enforcement Division, Food Standards Agency
Audit Team Members	Graham Forbes, Jesus Gallego, Andrew Gangakhedkar, Laureano Garcia, Sally Hayden, Robert Hutchinson, Charles McLean, Alan Noonan, Patrick Otto and Christina Walder
Audit Programme Managers	John Cragg and John Questier

Foreword

Audits of local authorities' (LAs) and the Meat Hygiene Service's (MHS) feed and food law enforcement functions are part of the Food Standards Agency's arrangements to improve the consistency and effectiveness of enforcement and consequently to increase consumer protection and confidence in relation to food. These arrangements recognise that the enforcement of UK feed and food law relating to feed and food safety, hygiene, composition, labelling, imported food and feeding stuffs is largely the responsibility of LAs and the MHS. These regulatory functions are delivered by the MHS in approved meat establishments and through LA Environmental Health and Trading Standards Services in all other food establishments.

The main aim of the audit scheme is to maintain and improve consumer protection and confidence by ensuring that LAs and the MHS are providing effective food law enforcement services. The scheme also provides the opportunity to identify and disseminate good practice and obtain information to inform Agency policy on feed and food safety.

The power to set standards, monitor and audit food law enforcement authorities was conferred on the Food Standards Agency by the Food Standards Act 1999. The Agency's audits of LAs are undertaken under section 12(4) of the Act.

Agency audits assess LAs' conformance against the Food Law Enforcement Standard "The Standard", the Food Law Code of Practice, the Feed Law Enforcement Code of Practice, the MHS Manual for Official Controls and relevant enforcement guidance or instructions issued by the Agency. 'The Standard' was published by the Agency as part of the Framework Agreement on Local Authority Food Law Enforcement and is available on the Agency's website at www.food.gov.uk/enforcement/foodlaw/frameagree/.

Further information on the Agency's LA audit scheme, including Questions and Answers on the operation of the scheme and details of good practice identified during the audits, is available on the Agency's website at www.food.gov.uk/enforcement/auditscheme/.

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1. Background

1.1 Introduction

- 1.1.1 Following harmonisation of United Kingdom (UK) SRM controls with those applicable in other Member States, the UK took up a derogation, under EU legislation, to allow the removal of SRM vertebral column (VC) from 24-30 month cattle by specifically authorised butchers' shops. Under the derogation, authorised butchers were required to implement effective procedures for the removal and disposal of SRM VC as category 1 animal by-product (ABP). The controls also required slaughterhouses and cutting plants to dispatch carcasses or part-carcasses containing SRM VC to only authorised butchers.
- 1.1.2 This summary report records the key findings and recommendations arising from the audits of 16 approved meat establishments and 16 LAs in England and Scotland, which were carried out between March and April 2007. The audits of LAs in England included verification checks at 24 authorised butchers' premises. In Scotland, these checks are routinely covered during the LA Core Audits.
- 1.1.3 The audits assessed the effectiveness of official controls relating to the handling, processing and dispatch of 24–30 month bovines in approved meat establishments, and the handling and processing of carcasses dispatched for VC removal as well as SRM disposal arrangements from authorised premises.
- 1.1.4 Individual audit reports outlining audit findings and recommendations were provided to the MHS and all audited LAs that were responsible for implementing the required improvements or ensuring that FBOs had carried out appropriate corrective actions.

1.2 Reasons for the Audit

- 1.2.1 This audit programme was developed by the Audit Branch of the Agency to gain assurance that official controls implemented by the MHS and LAs in approved and authorised premises were effective and that FBO's SRM and ABP controls in approved establishments and authorised premises were effective.
- 1.2.2 The approved meat establishments were randomly selected for audit subject to later confirmation by the Official Veterinarian (OV) that 24-30 month carcasses were being despatched to butchers premises for further processing.
- 1.2.3 The selection of LAs was based on the location and geographical spread of a representative number of authorised butchers' premises in England.

The authorised premises were selected from:

- (i) Information obtained from the linked focused audits of 24 – 30 month bovine SRM controls in slaughterhouses and cutting establishments;
- (ii) Details of authorised butchers premises notified to the Agency by Local Authorities (LAs)¹;
- (iii) Any other relevant sources of information.

Annex I lists the LAs that were audited and the numbers of authorised premises visited.

1.3 Scope of the Audit Programme

1.3.1 The audits assessed the MHS and LA arrangements for implementation of relevant official controls, including the authorisation of butchers, compliance with FSA instructions and the enforcement of requirements under the Transmissible Spongiform Encephalopathies (TSE) (No. 2) Regulations 2006², the Community Animal By-Product Regulations (EC) 1774/2002³, the Animal By-Products Regulations (ABPR) 2005⁴ and associated legislation in Scotland.

1.4 Audit Approach

1.4.1 The audits assessed the implementation of official controls through:

- (i) Structured interviews with relevant MHS staff in approved establishments and with appropriate LA officers;
- (ii) Checks of MHS and LA records relating to routine official controls, butchers' authorisations, premises audits/inspections and any resulting follow-up and enforcement activity including database checks;
- (iii) Joint visits with LA officers to a selection of authorised butchers' premises;
- (iv) Structured interviews with FBOs in approved establishments and authorised butchers' premises;
- (v) FBO document and record checks at approved establishments and at the authorised premises.

¹Details of authorised butchers premises notified to the Agency are available at:
<http://www.food.gov.uk/foodindustry/meat/meatplantsprems/butchervertebra>

² Hereafter referred to as the TSE (No.2) Regulations 2006

³ Hereafter referred to as the Community ABPR (EC) 1774/2002

⁴ Hereafter referred to as the ABPR 2005

1.5 Key Objectives of the Audits

1.5.1 The detailed assessments carried out during the audits sought to establish if:-

- (i) Controls in approved establishments for the identification, traceability and dispatch of 24 – 30 month carcasses with SRM VC to authorised butchers were effectively implemented;
- (ii) Controls within approved establishments were fully embedded in the relevant establishment;
- (iii) FBO controls in approved establishments achieved the required outcomes with regard to the dispatch of carcasses and handling of ABPs and were in accordance with requirements;
- (iv) Official controls implemented in respect of the processing, handling and dispatch of 24-30 month cattle carcasses or part-carcasses containing SRM VC were sufficiently robust and effectively applied in approved establishments;
- (v) Procedures for authorisation of butchers were effectively applied by LAs;
- (vi) Records of butchers' authorisations were maintained and appropriate notifications of authorisations were made to the Agency;
- (vii) Official controls were implemented to ensure that authorised butchers handle and process carcasses or part carcasses containing VC in accordance with their authorisation, the Required Method of Operations (RMOP) and requirements of the TSE Regulations 2006 and the ABPR EC 1774/2002;
- (viii) Relevant controls and practices in authorised premises were adequately reflected in the RMOP;
- (ix) The controls were well understood and effectively implemented in authorised premises;
- (x) FBO controls in authorised premises achieved the required outcomes in respect of:
 - Receipt, identification, storage and traceability of carcasses/meat;
 - SRM VC removal, staining and storage;
 - Cleansing and disinfection;
 - Disposal of SRM VC.

2. Executive Summary

2.1 Official Controls in Approved Meat Establishments

2.1.1 Meat Hygiene Service (MHS) controls and FBO controls were assessed in 16 approved meat establishments that were despatching 24-30 month carcasses containing vertebral column to butchers for further processing. An additional slaughterhouse was visited but it was found that 24-30 month cattle were not processed.

2.1.2 MHS controls were found to be effective in 13 of the establishments. In the remaining 3, it was found that MHS officials had not detected deficiencies in the FBOs' controls at 2 establishments. At the third establishment the MHS had identified deficiencies in FBO controls, however, they had then proceeded to take remedial action on behalf of the FBO.

2.1.3 FBO controls were found to be robust in 12 of the 16 establishments assessed but remedial action was needed in the remaining 4. In 2 of the establishments, carcass traceability systems were effective, but there was inadequate assurance that the receiving butchers were authorised. At the other 2 establishments butchers authorisation had been verified but internal traceability systems were weak.

2.1.4 Overall the control systems were adequate and being effectively applied. Where weaknesses were identified, these were attributable to lack of controls in specific establishments. These were highlighted in individual audit reports. No high level recommendations were made regarding the controls for despatch of carcasses from slaughterhouse to butchers.

2.2 Official Controls Implemented by Local Authorities

2.2.1 LA controls were assessed in 16 LAs located in different regions of England. The authorities were selected from those that were confirmed to have authorised butchers for the removal of SRM VC from carcasses of 24 – 30 month bovines.

2.2.2 The audits confirmed that all 16 audited Authorities had been proactive in disseminating guidance, information and advice on the Transmissible Spongiform Encephalopathies (TSE) (No 2) Regulations 2006 and the Animal By-Products (ABP) Regulations (EC) 1774/2002 to FBOs. These included correspondence, guidance and instructions from the Food Standards Agency (FSA or the Agency).

2.2.3 In addition to disseminating helpful guidance material, it was clear that all the LAs had actively assisted businesses to achieve compliance with the requirements.

- 2.2.4 The audits also confirmed that the majority of LA Food Safety Services had compiled comprehensive records of advice, legislation and guidance on the authorisation process and local authorities' responsibilities and roles in relation to the implementation of official controls. This information was readily available to authorised officers. It was evident that information had been effectively cascaded to authorised officers and that relevant issues had been discussed at team and local Food Liaison group meetings. In addition, at least half of the audited authorities had provided more formal staff training.
- 2.2.5 Overall the audits confirmed that the authorisation of butchers had been promptly carried out in accordance with legal requirements and FSA guidance by most LAs.
- 2.2.6 Whilst there were some records to show that LA officers were carrying out checks to verify compliance with legal requirements, centrally issued guidance and the Required Method of Operation (RMOP) during routine food hygiene inspections, it was found that the details of checks carried out, inspection findings, follow-up actions and advice given were not always adequately recorded. There were also significant variations between Authorities and between individual officers in the quality and thoroughness of compliance verification checks.
- 2.2.7 Six of the 16 audited authorities had taken measures to ensure more thorough and consistent verification of SRM controls and disposal arrangements, by developing documented procedures and inspection checklists, or by incorporating checklist items on the model RMOP.
- 2.2.8 The audits also revealed that only 1 of the audited authorities had provided their authorised butchers with the recommended model ABP movement document template or carried out adequate checks to assess compliance with the FBO's obligations under Regulations (EC) 1774/2002 to keep records specifying particulars of category 1 SRM consigned from their premises.
- 2.2.9 The implementation of follow-up actions and closure of corrective actions by LAs were generally satisfactory, apart from 2 authorities which had not undertaken follow-up visits to confirm compliance with requirements.
- 2.2.10 Of the audited authorities, only 2 had not complied with the request to notify the Agency about the butchers' authorisations that had been granted.
- 2.2.11 A number of examples of good practice were identified in some LAs during the audits. These related mostly to the development of procedures to improve effectiveness and consistency in the implementation of official controls, and are outlined in Section 6 of this report.

2.3 FBOs' Controls in Authorised Butchers' Premises

- 2.3.1 FBO controls were assessed in 24 authorised butchers' premises that were located in the 16 audited LAs.
- 2.3.2 The visits to authorised butchers' premises confirmed general compliance with legal requirements and centrally issued guidance by the majority of FBOs. All FBOs had adopted the model RMOP that had been issued by the Agency, and in most cases, their operations were carried out in accordance with the RMOP.
- 2.3.3 Significant deficiencies were observed in 2 authorised premises, where FBO's procedures for carcass receipt, identification and traceability were inadequate. In the case of 2 further authorised premises, poor carcass handling practices presented significant cross-contamination risks.
- 2.3.4 Deficiencies with category 1 SRM record-keeping practices were also noted in all but 1 of the 24 authorised premises. It was observed that the majority of FBOs did not maintain adequate records of the quantities of category 1 SRM generated and that consigned for disposal, as required by the Animal By-Products (ABP) Regulations (EC) 1774/2002.
- 2.3.5 However, 22 of the authorised butchers had made adequate arrangements for collection or disposal of category 1 SRM. Of these, 3 authorised butchers transported category 1 material themselves to other establishments for disposal, but only 1 of these took the SRM to an approved intermediate site. The remaining 2 who did not comply with the requirement to take category 1 material only to approved establishments were referred to Animal Health (AH) and a Trading Standards service for appropriate follow-up or enforcement action.

3. Detailed Audit Findings

3.1 FBO Controls in Approved Meat Establishments

3.1.1 The audits assessed controls in 16 slaughterhouses and found that FBO controls were adequate in 12 of them.

3.1.2 Controls at 4 establishments required remedial action by the FBO to ensure that they were robust:

- (i) One FBO had identified which butchers were authorised to process 24-30 month carcasses, but was not using this information as part of a system to assure that relevant carcasses would not be dispatched to butchers without authorisation for VC removal;
- (ii) Another FBO had established controls but lapses in traceability undermined them. Some of the kill numbers on carcasses were blurred or illegible. On the day of audit the OV had noted that 2 carcasses were incorrectly identified, and as a result, a full check of all cattle slaughtered was carried out to regain control;
- (iii) In 2 establishments the FBOs had adequate systems to trace the destination of relevant carcasses but had not carried out checks to establish if the receiving butchers were authorised to receive the carcasses for further processing. Additionally at 1 of these establishments the FBO was not endorsing commercial documentation with the required information to indicate that the carcasses contained vertebral column that required removal and disposal as SRM.

3.1.3 Of the 12 establishments where controls were considered to be adequate it was considered that controls could be further enhanced in 4 of them:

- (i) One FBO removed all VC from 24-30 month cattle at a co-located cutting plant but there was no auditable record to verify this;
- (ii) At another establishment controls would be improved if the FBO obtained hard copy confirmation of the butcher's approval status;
- (iii) At one establishment controls were adequate but commercial documents did not highlight that the carcasses contained bovine vertebral column that required removal and appropriate disposal;
- (iv) Whilst controls at another establishment were fundamentally adequate, the FBO had become confused and the commercial documents accompanying relevant carcasses stated that they were 'OTM carcasses, VC removed' when in fact they were 24-30 month carcasses, with VC *to be* removed.

3.2 MHS Controls in Approved Meat Establishments

- 3.2.1 The controls prescribed for MHS officials regarding the despatch of 24-30 month carcasses from slaughterhouses to authorised butchers were not extensive as they did not add to existing official controls. In general it was found that the controls were well implemented with improvement necessary at only 2 of the 16 establishments assessed.
- 3.2.2 At 2 establishments the MHS officials had satisfied themselves that FBO traceability systems were adequate but had not gone on to verify that the FBO had controls in place to ensure that relevant carcasses were despatched only to butchers who were authorised for removal and disposal of the vertebral column.
- 3.2.3 At a further establishment, the MHS officials had identified that FBOs' controls did not prompt verification that the receiving butcher was authorised. Having raised the issue with the FBO, MHS officials carried out the necessary checks rather than requiring the FBO to take the necessary corrective action.

3.3 LA Implementation of Official Controls

3.3.1 Procedures for Authorisation of Butchers

- 3.3.1.1 The audits assessed LA records relating to the authorisation process, verification of compliance and any follow-up actions. In addition, LA procedures for routine inspection of retail butchers were assessed to establish if they included appropriate checks to identify new premises that required authorisation.
- 3.3.1.2 The audits confirmed that all the audited LAs had written to retail butchers in their areas to explain the requirements for authorisation to remove SRM VC from carcasses of 24–30 month bovine carcasses. The Authorities had also disseminated relevant guidance, instructions and authorisation application packs issued by the Agency and where necessary, provided additional advice and support to FBOs.
- 3.3.1.3 Whereas the Agency did not require LAs to visit applicants' premises to assess their suitability and compliance with requirements before granting authorisation, the majority of audited Authorities had nevertheless decided to visit and offer advice to FBOs on the requirements for authorisation. This demonstrated that most LAs had pro-actively assisted businesses to comply with the requirements.
- 3.3.1.4 In one authority, the inspecting officer visited an applicant's premises and noted that the FBO had failed to adequately stain and store SRM material as required under the ABPR. The Authority consequently refused the authorisation application. The reasons and evidence leading to the decision were thoroughly documented and the action was agreed with the Authority's legal services, in line with internal procedures. It was evident from an examination of file records that the LA had taken an appropriately graduated approach to enforcement. The FBO was notified about the refusal in writing and was provided with guidance on the appeal provisions.
- 3.3.1.5 In the minority of cases where authorities had granted authorisation without visiting applicants' premises, verification of compliance with requirements for authorisation and the procedures covered by the RMOP had been carried out during subsequent programmed food hygiene inspections.
- 3.3.1.6 Thirteen of the 16 audited authorities had granted authorisations in writing using the authorisation template issued by the Agency. Many of the LAs had customised the template by adding their logo or in some cases laminated them for FBOs, who were sometimes required to show proof of authorisation at approved establishments. The need to issue authorisations in writing was discussed with the other 3

authorities, who subsequently issued their authorisations using the recommended template, following the audits.

- 3.3.1.7 During the audit programme 2 authorised butchers which had been notified to the Agency by their respective Authorities as requiring approval as cutting plants, following legislative changes, were brought to the attention of auditors. The authorities sought clarification on who had enforcement responsibility for the premises and were advised that such premises must remain under LA enforcement until they were approved in accordance with official Agency guidance.

3.3.2 Records of Butchers Authorisations

- 3.3.2.1 All audited Authorities had established and maintained accurate and up to date registers of authorised butchers' premises. Registers were maintained in paper form or on the database systems and in some cases in both formats. Two LAs had introduced specific authorised premises codes for use with their databases.
- 3.3.2.2 Authorised premises file checks confirmed that the audited Authorities were generally keeping appropriate records of the authorisation process.

3.3.3 Notification of Authorisation to the Agency

- 3.3.3.1 At the time of the audits, 14 of the audited LAs had provided the Agency with details of authorised butchers in their areas, in accordance with centrally issued instructions. Some discrepancies between the information submitted by LAs and that published on the Agency website were noted during the audits and were all subsequently corrected. The 2 Authorities that had not complied with the request for information subsequently submitted details of butchers' authorisations to the Agency following the audits.

3.3.4 Effectiveness of Official Controls Exercised by the LA and Record-keeping

- 3.3.4.1 The audited Authorities had generally been proactive in taking the initiative to improve authorised officers' understanding of the legal requirements and LA enforcement roles under the TSE (No 2) Regulations 2006 and the ABPR. This was done in most cases by circulating relevant information to officers, making available the essential information and guidance, through formal discussions at team meetings and in some cases through discussions at regional food liaison group meetings.
- 3.3.4.2 A number of Authorities had adopted innovative approaches to promote consistency of official controls, including development of

new procedures which were incorporated into their services' operational quality management systems. One of the authorities had developed a comprehensive authorisation process flow diagram covering all key steps of the authorisation process. Others had developed specific checklists with appropriate prompts, which were in some cases incorporated in the model RMOP⁵.

- 3.3.4.3 The audits also confirmed that all the audited Authorities had compiled and maintained comprehensive resource files that contained relevant information, legislation and guidance for use by their authorised officers. The model RMOP and enforcement guidance issued by the Agency were generally considered by LA officers to be comprehensive, easy to follow and had helped to improve officers' understanding of the requirements.
- 3.3.4.4 LAs' approaches to authorisation of officers involved in butchers authorisation and/or inspection of authorised premises tended to fall in 2 main categories. In the majority of cases, authorities had followed recent LACORS advice by authorising their officers under the general provisions of the European Communities Act 1972, and regulations issued under it. However, other authorities had issued specific authorisations to their officers under the TSE (No. 2) Regulations 2006, in addition to the general authorisation provisions under the European Communities Act 1972.
- 3.3.4.5 In all LAs, apart from 1, the audits confirmed that official controls in premises subject to authorisation were being undertaken by appropriately authorised and suitably qualified and experienced officers. In the LA where the authorisation of one officer did not meet the requirements of the Code of Practice in relation to training, experience and competency, it was recommended that the authority should undertake assessments of officers' experience, competency and training before authorising them under food legislation and ensure that officers undergo suitable training and supervision prior to being authorised.
- 3.3.4.6 LA file records were audited as part of the assessment of the effectiveness and appropriateness of official controls implemented by officers. Whilst records showed that most LA officers had carried out some checks to verify compliance with legal requirements, centrally issued guidance and the RMOP during routine food hygiene inspections, it was found in many cases that details of the checks carried out, inspection findings, follow-up actions and advice given were not always adequately recorded. There were also significant variations in the quality and thoroughness of compliance verification checks between authorities and between authorised officers.

⁵ See Section 6 (Page 21) – Examples of Good Practices Identified

- 3.3.4.7 It was also found in many LAs that file records did not always clearly indicate if inspections had assessed the effectiveness of FBO's procedures for receipt of carcasses, identification of carcasses requiring VC removal, traceability of carcasses, disposal arrangements for SRM VC, cleansing and disinfection practices and checks of relevant records kept by the FBO.
- 3.3.4.8 However, 6 of the 16 audited authorities had recognised the need to ensure more thorough and consistent assessments of SRM controls and disposal arrangements by authorised officers and had developed documented procedures, inspection checklists or included inspection prompts on the model RMOP. Some examples of good practice identified are outlined in Section 6.
- 3.3.4.9 The audit findings stimulated constructive discussions with authorities on the most effective ways of improving the consistency of inspections in authorised premises. The general consensus was that consistency could be more effectively achieved if the Agency were to develop and disseminate a model inspection checklist.

3.3.5 Implementation of Follow-up Actions and Closure of Corrective and Preventive Actions

- 3.3.5.1 Apart from the examples given in the foregoing section, the audits confirmed in the majority of cases that LA food hygiene inspections were generally followed by advice letters or inspection reports. Most letters outlined inspection findings, contraventions identified, the matters that the FBO was required to address and advice/guidance given to the FBO.
- 3.3.5.2 In cases where deficiencies with procedures in the RMOP had been identified and recorded on file, it was noted that officers had scheduled follow-up revisits to verify completion of corrective actions. However, in a few cases, there were no records of the corrective actions undertaken by the FBO or if there had been any follow-up action taken by the LA.
- 3.3.5.3 Two LAs had taken the initiative to assist FBOs to incorporate SRM and ABP controls into their Hazard Analysis Critical Control Points (HACCP) procedures and related documents and records. Examples of these are outlined among other good practice identified in Section 6 of the report.

3.4 FBOs' SRM and ABP Controls in Authorised Butchers' Premises

The following sections outline the findings of the joint visits to authorised premises to assess FBO's SRM controls and ABP disposal arrangements.

3.4.1 RMOP

3.4.1.1 The audits confirmed that FBOs in all the authorised premises had adopted the model RMOP issued by the Agency, although it was noted in 2 cases that these had not been signed by FBOs to confirm that carcase handling and processing practices were in accordance with the RMOP. Deficiencies in FBO practices were noted in some cases, but it was found that procedures and practices implemented by the majority of FBOs were broadly compliant with those outlined in the model RMOP.

3.4.2 Carcase Receipt, Identification and Traceability

3.4.2.1 FBO procedures for carcase receipt, identification and traceability were assessed in all authorised premises visited. Deficiencies in the identification and traceability of 24–30 month carcasses were observed in 2 authorised premises but apart from those, the procedures were generally implemented satisfactorily by FBOs.

3.4.2.2 In the majority of cases commercial documents accompanied 24–30 month carcasses, and carcase receipt records included details of the delivery date, the animals' ear tag numbers, date of slaughter, kill numbers and the weights of carcasses. A number of FBOs kept additional paper-based or computerised carcase receipt records to improve internal traceability.

3.4.2.3 In the authorised premises visited, FBOs employed a variety of methods, based on colour-coded carcase tags, to differentiate carcasses of 24–30 month animals and other carcasses. In the 22 premises where practices were found to be satisfactory, FBOs used variants of colour-coded tags attached to carcasses or part-carcasses. In all cases, apart from 2 where the procedures for carcase identification and traceability were deficient, it was noted that tags were generally retained on carcasses and part carcasses containing VC to ensure traceability at all stages before SRM VC removal.

3.4.2.4 Although the majority of the audited authorised premises were small traditional butchers, the sizes and layout varied from one premises to another, but generally cold storage capacities tended to be limited. In most cases the facilities comprised of one walk-in chiller although a few premises had separate walk-in freezers. Because of space limitations only 2 of the authorised premises had designated separate

cold stores for 24–30 month carcasses. In the other cases, FBO's had designated areas of the cold store for hanging 24–30 month carcasses or part carcasses containing SRM VC.

- 3.4.2.5 Deficiencies in carcase storage were noted in 2 authorised premises, where the separation of carcasses was inadequate to prevent cross-contamination. Apart from these, the practices observed in the majority of cases were found to be adequate to prevent cross-contamination.

3.4.3 SRM VC Removal and Contamination Control

- 3.4.3.1 The visits confirmed that most FBOs had provided their staff with specific training and/or instructions on the techniques for SRM VC removal, in addition to the information and advice that had been disseminated by the Agency through LAs. The particulars of the training provided were recorded by some FBOs. The pictorial guidance on SRM VC removal that was issued by the Agency was also used for training purposes and was available for reference in most of the authorised premises.
- 3.4.3.2 SRM VC removal from 24–30 month carcasses were in most cases carried out on the same work tables or cutting blocks used for processing other carcasses. The common procedure for preventing cross-contamination risks in most premises relied on separation (of carcase processing) 'by time' to ensure that carcasses of under 24 month bovines were 'boned out' at different times from SRM VC removal from 24–30 month carcasses. In some cases where only 24–30 month carcasses were received on a particular day of the week, they were boned out only on those particular days.
- 3.4.3.3 Six FBOs had taken further preventive steps to minimise the risk of cross-contamination by designating separate colour coded tools and equipment for SRM VC removal.
- 3.4.3.4 The measures to prevent cross-contamination and the techniques employed for SRM VC removal were generally satisfactory, and were carried out in accordance with the RMOP.

3.4.4 Cleaning and Disinfection

- 3.4.4.1 Fourteen of the FBOs had adequate documented cleaning schedules, which outlined cleaning procedures and practices, including, the use of suitable detergents, disinfectants and methods and requirements to thoroughly clean and disinfect all tools, equipment and surfaces immediately on completion of SRM VC removal.
- 3.4.4.2 The cleaning and disinfection procedures and practices were generally satisfactory in all but 2 authorised premises. The LAs

concerned implemented satisfactory follow-up action plans following the visits.

3.4.5 SRM VC Staining and Disposal Arrangements

- 3.4.5.1 SRM VC generated at authorised premises was in all cases kept in lidded wheelie bins except in 1 case where the storage container was unsuitable for the purpose. The relevant LA subsequently confirmed that it had satisfactorily verified compliance with requirements for storage of SRM VC awaiting collection. All FBOs had adequate supplies of Patent Blue V for staining SRM VC.
- 3.4.5.2 The SRM generated in 19 of the authorised butchers premises were collected by approved category 1 ABP processors, and transported for further processing to sites, which were approved as required under Article 4(2) of the Community ABPR (EC) 1774/2002. Among the remaining premises, it was confirmed that 3 FBOs had made arrangements to transport their own SRM. Of these, 1 delivered to an approved intermediate plant, but 1 of them was delivering to an abattoir, that had not been approved as an intermediate plant contrary to FSA instructions, the other 1 took category 1 material to another butchers premises. Animal Health (AH) was informed about the unapproved abattoir and undertook to consider an application for approval from the operator. In the case of the FBO who was delivering SRM to another butcher, the LA Environmental Health Officer (EHO) had referred the issue to their Trading Standards service for further enforcement action.
- 3.4.5.3 Two authorised butchers were approved as category 1 ABP incinerators, so all the material generated at their premises was incinerated on site.
- 3.4.5.4 It was noted that the quantities of SRM generated in some authorised premises were too small to be commercially viable for separate collection. In such cases most FBOs tended to combine category 1 material with category 3 material which were then disposed of together as category 1 material.
- 3.4.5.5 Of the 24 authorised premises, only 1 had adequately detailed and accurate records of category 1 material consigned in accordance with requirements under the Community ABPR (EC) 1774/2002 and the ABP Regulations 2005. The 3 FBOs who transported their own category 1 material for disposal did not keep any records, while the other 20 FBOs kept copies of waste transfer notes issued by ABP collectors, but none of them used the recommended 'ABP Movement Document' (commercial document), which had been circulated to LAs by the Agency. The audits revealed that the majority LAs were not aware of the existence of the model ABP movement document, although it had been circulated by the Agency on 31 July 2006.

3.4.5.6 It was observed from examination of waste transfer notes that most did not accurately or clearly specify the detailed information required under Annex II, Chapter III of the Community ABPR (EC) 1774/2002. It was also not possible in most cases to reconcile the quantities of SRM consigned with the quantities likely to have been generated in such premises.

3.4.5.7 The ABP record-keeping requirements were discussed with LAs and FBOs to clarify the requirements and to emphasise that the responsibility for accurate record-keeping belonged to both consignors and transporters of category 1 ABPs. LAs were requested to distribute the recommended commercial document to FBOs and to ensure that ABP consignment records accurately specified consignment details in accordance with requirements and as specified in the model commercial document.

3.4.6 FBO Records

3.4.6.1 The following FBO operational records were requested and/or checked during the visits to authorised premises:

- Commercial documents for incoming carcasses;
- RMOP;
- Staff Training records;
- Cleaning schedule;
- ABP commercial documents;
- Waste Transfer notes for dispatch of SRM VC for disposal;
- HACCP Plans.

4 Summary of Audit Findings

4.1 LA Implementation of Official Controls

Category of LA function audited	Findings	
	No. of LAs Satisfactory	No. of LAs Unsatisfactory
Procedures for Authorisation of Butchers	13	3
Records of Butchers' Authorisations	16	0
Notification of Authorisation to the Agency	14	2
Effectiveness of Official Controls implemented by LA and Record-Keeping	10	6
Implementation of Follow-up Actions and closure of Corrective and Preventive Actions	10	6

4.2 FBO SRM Controls in Authorised premises

Category of FBO SRM control audited	Findings	
	No. of APs ⁶ Satisfactory	No. of APs Unsatisfactory
RMOP	19	5
Carcase Receipt, Identification and Traceability	22	2
SRM Removal and Contamination Control	21	3
Cleaning and Disinfection	22	2
SRM VC Staining and Disposal Arrangements	3	21

⁶ APs – Authorised Premises

5 Summary of Recommendations to LAs

Recommendations included in Audit Reports	No. of LAs made to	Associated Risk
<p>(i) Local Authorities should ensure that authorisations are issued in writing. The authorisations must specify the particulars of the premises, the purpose for which it is granted; and any conditions that are applicable. The authorisation should also state that it is dependent on continuing compliance with requirements and may be revoked in case of non-compliance. The authorisation template issued by the Agency, (which may be adapted), is recommended for use. <i>[The TSE (No. 2) Regulations – Reg. 6, FSA circulars Ref: ENF/E/06/021 of 22 March 2006 and Ref: ENF/E/06/028 of 7 April 2006]</i></p>	3	<ul style="list-style-type: none"> • Non-compliance with Regulation 6 of the TSE (No 2) Regulations, which require authorisations to be issued in writing and to specify particulars of the premises, the name of the occupant and the purpose for which authorisation is issued. • FBO might not be aware of any conditions relevant to the authorisation or that authorisation is subject to continuing compliance with requirements.
<p>(ii) Authorities should continue assessing and determining butcher authorisations at premises that are awaiting approval from the Agency as cutting plants and carry out food hygiene inspections at these premises at a frequency which is not less than that required by the Food Law Code of Practice. <i>[Food Law Code of Practice, Chapter 4.1 and FSA Circular ENF/E/06/030 of 26 May 2006]</i></p>	1	<ul style="list-style-type: none"> • Risk that official controls are not implemented in relevant establishments.
<p>(iii) LAs should notify details of authorised butchers' premises to the Agency as requested. <i>[FSA Circulars ENF/E/06/053 TSE 0138 of 31 July 2006, TSE 0138 ENF/E/06/066 of 12 October 2006 and TSE 0138 ENF/E/07/001 of 09 January 2007]</i></p>	2	<ul style="list-style-type: none"> • The Agency would not possess accurate and complete records of authorisations issued by LAs.
<p>(iv) Authorities should assess their officers' experience, competency and training and where necessary ensure that officers undergo suitable training and supervision before authorising them under food legislation. <i>[Food Law Code of Practice – 1.2.2 & 1.2.4]</i></p>	1	<ul style="list-style-type: none"> • Risks that officers implementing official controls may not be adequately experienced, competent or trained and significant contraventions and the associated food safety risks are not effectively identified; and appropriate follow-up actions undertaken.

<p>(v) Authorities should ensure that officers carrying out inspections thoroughly and systematically gather and record information from the observation of practices, procedures and processes and discussions with the FBO. <i>[Food Law Code of Practice – Chapter 4.1]</i></p>	3	<ul style="list-style-type: none"> • Significant inspection findings required to inform LA follow-up or subsequent enforcement actions may not be recorded. • LA enforcement may not be implemented in accordance with the Food Law Code of Practice, which requires enforcement officers to maintain records of inspections and discussions with FBO during visits to premises.
<p>(vi) Authorities should further develop their systems, for ensuring that routine inspections/visits assess procedures and practices against all key elements of the RMOP in a consistent and systematic manner. LAs should provide structured inspection checklists to include all relevant checks and ensuring checks to determine whether a butcher requires authorisation. <i>[FSA Circular ENF/E/06/021 of 22 March 2006, Food Law Code of Practice – Chapter 4.2]</i></p>	12	<ul style="list-style-type: none"> • Risk that routine inspections/visits do not fully and adequately assess compliance by the FBO with all elements of the RMOP and fail to identify butchers who may require authorisation.
<p>(vii) Authorities should ensure that follow-up visits are undertaken where appropriate to assess FBOs' compliance with requirements and key elements of the RMOP. <i>[Food Law Code of Practice, Chapter 4.2, and FSA Circular ENF/E/06/028 (update) of 20 April 2006 and ENF/E/06/021 of 22 March 2006]</i></p>	7	<ul style="list-style-type: none"> • Risk that completion and closure of FBOs corrective and preventive actions are not verified.
<p>(viii) Authorities should ensure that routine inspections include checks to verify that authorised butchers are generally operating in accordance with their authorisation including the RMOP procedures. The RMOP should be signed by the FBO and counter-signed by the LA to confirm the current methods of operation at the premises, and where necessary the RMOP should be revised, adapted and updated. <i>[FSA Circular ENF/E/06/039 of 22 June 2006]</i></p>	3	<ul style="list-style-type: none"> • The practices and procedures for SRM VC removal and category 1 ABP disposal arrangements are not confirmed, and the RMOP does not reflect current practices and procedures.
<p>(ix) Authorities should carry out follow-up checks and ensure that subsequent inspections and visits include verification of the record-keeping requirements relating to the commercial documents for carcasses received by the FBO and traceability of carcasses requiring SRM VC removal. <i>[Operator RMOP and FSA circulars ENF/E/06/028 of 7 April 2006 and ENF/E/06/053 of 31 July 2006]</i></p>	3	<ul style="list-style-type: none"> • Risk of failure to identify and maintain traceability of 24 – 30 month carcasses or to reconcile quantities of SRM generated with the quantities consigned for disposal.

(x)	<p>Authorities should ensure that inspections, visits and follow-up checks include verification of the effectiveness of measures to prevent cross-contamination between carcasses requiring SRM VC removal and those not requiring SRM VC removal. <i>[Operator RMOP and FSA circulars ENF/E/06/028 of 7 April 2006 and ENF/E/06/053 of 31 July 2006].</i></p>	3	<ul style="list-style-type: none"> • Agency instructions specify the measures required to minimise cross contamination risks and compliance cannot be verified without assessment of effectiveness of relevant FBO procedures.
(xi)	<p>Authorities should ensure that FBOs in authorised premises store Category 1 material awaiting collection/disposal in appropriately labelled, lidded and leak proof containers, in accordance with Community ABP Regulations (EC) 1774/2002 and the ABP Regulations 2005. <i>[Community Animal By-Products Regulation (EC) 1774/2002 - Article 7, ABPR 2005 – Regulation 8 and FSA Circular ENF/E/06/053 TSE 0138 of 31 July 2006].</i></p>	2	<ul style="list-style-type: none"> • Risk of SRM contamination of food and feed.
(xii)	<p>Local Authorities should carry out follow-up checks and ensure that subsequent inspections and visits include verification of the record-keeping requirements under the Community ABPR (EC) 1774/2002 and the ABPR 2005. <i>[Community Animal By-Products Regulation (EC) 1774/2002 - Article 9, ABPR 2005 – Regulation 32 and FSA Circular ENF/E/06/053 TSE 0138 of 31 July 2006].</i></p>	14	<ul style="list-style-type: none"> • The quantities of SRM generated and consigned for disposal; and the destination of consigned category 1 ABP cannot be reliably assessed or reconciled.

6. Examples of Good Practice Identified

6.1 Examples of Good Practice identified in Approved Meat Establishments

This section contains examples of observed good practice, that contributed to the effectiveness of controls.

Audit finding	
Approved Establishment 5	<ul style="list-style-type: none">The FBO had developed a comprehensive spreadsheet which linked carcase details to the details of the authorised receiving butcher.
Approved Establishment 7	<ul style="list-style-type: none">The OV had set up a system of random traceability checks for 24-30 month carcasses retained in the chillers at establishment 7.

6.2 Examples of Good Practice identified in LAs

Local Authority	Good Practice Identified
Blackpool Council	<ul style="list-style-type: none">The Authority had developed and implemented a comprehensive process flow diagram to guide officers carrying out authorisations or inspecting authorised premises.
Lancaster City Council	<ul style="list-style-type: none">The Authority had introduced a special authorisation code on their database to identify authorised premises.
Mid-Devon District Council	<ul style="list-style-type: none">The Authority had developed thorough and comprehensive documented procedures on butchers' authorisation to provide guidance to their officers, as part of their operational quality procedures. The procedure included a clear and concise process flow diagram.
Newcastle under Lyme Borough Council	<ul style="list-style-type: none">The Authority had developed and implemented an authorisation procedure and checklist for officers to guide them through the authorisation process;The Authority had developed and implemented an inspection form to enable the consistent assessment of butchers by their officers.

<p>North Devon District Council</p>	<ul style="list-style-type: none"> • The Authority had developed and implemented comprehensive authorisation procedures and a structured inspection assessment checklist for their officers' use; • The Authority had produced a detailed advice letter and poster for FBO's to provide them with simple additional guidance on authorisation requirements; • The Authority LA had provided each authorised butcher with a guidance note containing contact details for approved ABP plants and stain suppliers; • The Authority had produced letters to FBOs in relation to both refusal and revocation of authorisation, as well as a letter to a beef supplier informing them that their customer's authorisation had been revoked.
<p>North West Leicestershire District Council</p>	<ul style="list-style-type: none"> • The Authority had introduced a special authorisation code on their database to identify authorised premises.
<p>Penwith District Council</p>	<ul style="list-style-type: none"> • Premises file records demonstrated thorough assessment of compliance by officers; • The Authority had developed and implemented specific protocols and checklists covering their enforcement responsibilities under the TSE and ABP Regulations; • The Authority had worked with FBOs to review their HACCP plans and documentation to reflect the procedures for handling, and processing of 24 – 30 month carcasses containing VC, and the SRM controls.
<p>Sefton Council</p>	<ul style="list-style-type: none"> • The Authority had taken the initiative to assist the FBO to incorporate SRM and ABP controls into the HACCP-based food safety management system documentation.
<p>Tewkesbury Borough Council</p>	<ul style="list-style-type: none"> • The Authority customised the authorisation document by incorporating their logo and laminating it for FBOs; • The Authority adapted the RMOP by adding a column for officers to record 'notes on compliance' against all relevant areas of the RMOP – it was called the Operator RMOP Compliance Record; • The Authority had produced an information sheet on Category 1-3 ABPs for FBOs; • The Authority had included a section on the general food hygiene inspection form under 'Refuse' to include a prompt for Waste oil/Animal By-Products arrangements with a yes/no tick box and a comments box.

West Devon Borough Council	<ul style="list-style-type: none">• Officers spent time with a local authorised butcher to observe the techniques of VC removal in order to gain further knowledge of the practices and procedures;• The Authority modified the RMOP and tailored it for specific premises by including names of staff responsible for particular procedures.
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7. Conclusions and Discussions

- 7.1 The main objective of the audits was to assess the effectiveness of official controls implemented by enforcement authorities and the SRM controls applied by FBOs at all stages of the beef processing and supply chain in England and Scotland. FBO controls are intended to provide a high level of public protection by minimising the risks of BSE infectivity getting into the feed and food supply chain. The audits provided independent verification and scrutiny of official controls and FBO controls implemented following harmonisation of UK SRM controls with those applicable in other EU Member States.
- 7.2 The findings from audits of 16 approved meat establishments confirmed general compliance with legal requirements and Agency instructions by 12 of the 16 establishments. Auditors concluded that the deficiencies observed in the 4 remaining establishments were related to controls within the establishments and were not generalised. In all cases satisfactory corrective measures were implemented by FBOs to eliminate the deficiencies and to prevent recurrence.
- 7.3 In view of the above, our recommendations were limited to the control of deficiencies that we identified in specific establishments and no higher level recommendations for the general controls in approved meat establishments are made.
- 7.4 The results of the assessments provide reasonable assurance that the SRM controls are generally implemented effectively in approved meat establishments. However, it is essential that the current levels of internal audits of approved meat establishments by the MHS should be maintained with respect to SRM controls, and the Agency should maintain ongoing external scrutiny and surveillance of the MHS functions during routine audits. In particular, the MHS should ensure that routine audits consistently verify FBO compliance with the in-plant traceability requirements and provide confirmation that 24–30 month bovine carcasses containing VC are only consigned to authorised butchers' premises.
- 7.5 The findings from the audits of FBO controls in 24 premises authorised to remove SRM VC from 24–30 month carcasses and the official controls implemented by the 16 relevant LAs confirmed satisfactory levels of compliance with most requirements. Some deficiencies were noted with ABP disposal arrangements and record-keeping, and with the effectiveness of some LA inspections.
- 7.6 The most common deficiency identified was in the inadequacy of records of SRM consigned for disposal by FBOs. Most LAs were unclear about the FBOs' ABP record-keeping responsibilities under the ABPR EC 1774/2002. It was also found that most LAs had not disseminated the model ABP movement document that was circulated

by the Agency on 31 July 2006 (Circular Reference: ENF/E/06/053-TSE/0138), to authorised butchers or in some cases were not aware of the existence of the document. As a result it was observed that most LAs had not carried out adequate follow-up checks to verify if they were being correctly completed and were sent with consignments of ABPs, as required. There was also a general lack of clarity regarding the ABP record-keeping requirements, with most LAs assuming that waste transfer notes left by ABP collectors, which in most cases were incomplete and/or inaccurate, were sufficient to comply with the requirement. Whilst this is an issue that requires further guidance from Defra, with the consideration of the concerns raised about burdens imposed by ABP record-keeping on FBOs', it was clarified during and following the audits that the responsibility for complying with the record-keeping requirements rested with the FBO, as the 'consignor'. The Agency should consult and seek clarification from Defra on this issue and thereafter, should issue written enforcement guidance to LAs to ensure more consistent verification of compliance and if necessary, recommend other options for improving compliance by FBOs.

- 7.7 The audits also confirmed that all the LAs visited had actively taken steps to disseminate information and guidance on authorisation, to butchers, and had generally been efficient in processing applications for authorisation in line with Agency guidance. The authorities had also taken steps to familiarise their officers with their enforcement roles and responsibilities. However, it is essential to address the observed deficiencies and inconsistencies in the implementation of official controls by many LAs. The general consensus that emerged from discussions with LA officers was that this would be best achieved by introducing inspection protocols or checklists covering all elements of the FBOs controls.
- 7.8 The Agency should consider developing and disseminating an authorised premises inspection template to LAs. Some good examples of inspection checklists developed by LAs were seen during the audit programme. It is intended that these will be made available to other authorities in line with the Agency's commitment to promote sharing of good practices from audits.
- 7.9 The other deficiencies with the LAs' implementation of official controls and FBOs' controls in authorised premises that are detailed in this report were mostly isolated in nature and confined to particular LAs or authorised premises. Following the audits, all LAs submitted 'action plans' detailing the improvements and actions undertaken to address audit recommendations, and their target completion dates. The action plans submitted by relevant LAs confirmed that the authorities had undertaken appropriate corrective actions including follow-up visits to verify compliance with requirements and in all cases to disseminate the example ABP 'movement document'.

7.10 It can be concluded that, notwithstanding the issues identified, the audits provided reasonable grounds for confidence that the controls in England and Scotland are being effectively implemented and the findings provide assurance about the effectiveness of measures to control risks associated with SRM VC removal and disposal.

8 Issues for the Agency

8.1 Consistency of LA enforcement

It is suggested that the Agency considers developing and disseminating to LAs, an authorised premises inspection template with appropriate prompts covering all relevant enforcement areas under the TSE (No 2) Regulation 2006 and Regulation (EC) No 1774/2002, The template should be capable of being adapted and/or incorporated into LAs' standard food hygiene inspection forms/checklists. It is further suggested that the Agency should liaise with LACORS to implement this recommendation and should also avail the examples of inspection procedures/protocols that have been developed by various LAs to other Authorities.

8.2 Consistency of LA follow-up action

The Agency should consider developing and disseminating enforcement guidance covering key requirements under the TSE (No 2) Regulation 2006 and Regulation (EC) No 1774/2002, to LAs, to advise officers on the most appropriate enforcement options for the most common/likely non-compliances. This could be in standard Question and Answer (Q & A) format.

8.3 Enforcement of requirements under Regulation (EC) No 1774/2002

It is suggested that the Agency should consult Defra, the competent authority under the ABPR, on the most effective and practical ways of improving compliance with SRM controls and associated record-keeping requirements under Regulation (EC) No 1774/2002, among 'small' FBOs. Any new proposals or guidance should not impose additional burdens on FBOs. Thereafter the Agency should issue written enforcement guidance to promote more consistent verification of compliance, and the use of appropriate enforcement options by LAs.

8.4 Accuracy of the Agency's central database of authorised premises in England

It is suggested that the Agency should simplify and improve the notification and record-keeping procedures to ensure that details of authorised premises notified or updated by LAs remain accurate and up to date on the Agency's database.

9 Annex I: Local Authorities Selected for Audit

The following table lists the LAs selected for audit, the numbers of authorised butchers in their areas and the numbers of premises visited during audits.

LAs Audited during the SRM Controls Audit Programme

Local Authority	No. of Authorised butchers' premises	No. of Authorised premises visited
Alnwick District Council	2	2
Blackpool Council	1	1
Chester City Council	2	1
Coventry City Council	3	1
Harborough District Council	5	2
Lancaster City Council	1	1
Mid Devon District Council	6	2
Newcastle-under-Lyme Borough Council	3	2
North Devon District Council	11	2
North West Leicestershire District Council	2	1
Penwith District Council	6	2
Sefton Council	1	1
Solihull Metropolitan Borough Council	4	1
Tewkesbury Borough Council	5	2
Tyndale Council	3	2
West Devon Borough Council	6	2

No. of LAs Audited	16	Total No. of Authorised premises in audited LAs	61	Total No. of Authorised premises visited	24
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Annex II: Approved Meat Establishments where FBO and MHS controls were Audited

Approved meat establishment	Approval number	Audit Date
Lockerbie Abattoir	1584	21/03/2007
Long Compton Abattoir	4236	26/01/2007
E&T Jackson & son	4294	10/01/2007
Newton Abattoir	4330	28/02/007
Robert G Tuckey	4392	27/02/2007
Rose County Foods	4486	05/03/2007
Pickstock (Ashby) Ltd	4786	01/03/2007
J W Sargeant	5217	30/01/2007
Fowler Bros. Ltd	5280	18/01/2007
Inst. Of Animal Health	6151	16/01/2007
J Bullock & Sons	8029	01/02/2007
C D V George	8122	01/03/2007
J Broomhall Ltd	8145	29/01/2007
Tom Lang Ltd	8301	05/02/2007
C&S Meats	8354	02/02/2007
Rhinds of Elgin	1124	15/03/2007

Annex III: Summary Report Circulation

DEFRA

MHS

TSE Division – Food Standards Agency

Spongiform Encephalopathies Advisory Committee (SEAC)

Food Standards Agency internal circulation to relevant policy branches

FSA website

Copyright Library

British Library

Library of the House of Commons

LACORS

Chartered Institute of Environmental Health (CIEH)

Animal Health

Alnwick District Council

Blackpool Council

Chester City Council

Coventry City Council

Harborough District Council

Lancaster City Council

Mid Devon District Council

Newcastle-under-Lyme Borough Council

North Devon District Council

North West Leicestershire District Council

Penwith District Council

Sefton Council

Solihull Metropolitan Borough Council

Tewksbury Borough Council

Tynedale Council

West Devon District Council

Annex IV: Glossary

ABP	Animal by-products
ABPR	Animal By-Products Regulations
AOV	Area Official veterinarian
BSE	Bovine Spongiform Encephalopathy
DEFRA	Department for Environment, Food and Rural Affairs
EHO	Environmental Health Officer
FBO	Food Business Operator
FSA	Food Standards Agency
HACCP	Hazard Analysis Critical Control Points
HICP	Hazard Identification and control Plan
IAG	Independent Advisory Group
IRG	Implementation Review Group
LA	Local Authority
LACORS	Local Authorities Coordinators of Regulatory Services
MHS	Meat Hygiene Service
MHI	Meat Hygiene Inspector
MOC	MHS Manual for Official Controls
OTM	Over Thirty Month
OTMHC	Over Thirty Month for Human Consumption
OV	Official Veterinarian
RMOP	Required Method of Operation
SEAC	Spongiform Encephalopathy Advisory Committee
SMHI	Senior Meat Hygiene Inspector
SRM	Specified Risk Material
SRM VC	Specified Risk Material Vertebral Column
AH	Animal Health
TSE	Transmissible Spongiform Encephalopathy

VC

Vertebral Column

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 - Lancaster City Council
 - Mid Devon District Council
 - Newcastle-under-Lyme Borough Council
 - North Devon District Council
 - North West Leicestershire District Council
 - Penwith District Council
 - Sefton Council
 - Solihull Metropolitan Borough Council
 - Tewksbury Borough Council
 - Tynedale Council
 - West Devon District Council

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