

PROGRESS REPORT ON FSA-FUNDED RESEARCH ON SKIN-ON SHEEP (“SMOKIES”) AND RELATED ACTIVITIES

EXECUTIVE SUMMARY

1. The FSA first commissioned work on hygienic skin-on sheep production in 2003 and subsequent research on veterinary medicines is due to be completed by August 2009. Until the research has been completed and properly evaluated, the Agency will not formally make a case to the European Commission for a national derogation or other change to EU law to permit the legal production of skin-on sheep meat for human consumption.
2. At the July 2008 Board meeting, John Spence proposed that the Agency take some “in principle” decisions before the science is reported and to investigate options for action on a contingent basis. The Board agreed.
3. The possible legalisation of the production of skin-on sheep meat for human consumption is an issue of considerable significance to the farming industry in Wales with the farming unions, National Sheep Association and other interested parties who are keen for this to be expedited because of the perceived importance to the industry and wider rural economy. The Welsh Food Advisory Committee recently discussed the issue at a public meeting and concluded that every effort should be made to progress matters towards possible legalisation. Rural Affairs Ministers at the Welsh Assembly Government also take a keen interest in skin-on sheep meat and the potential boost that legalisation could give to the farming industry in Wales.
4. The key decision will be whether or not (with Ministerial support) to submit a dossier to the European Commission. The case will be strengthened if the study shows there is no increased risk to consumers compared to skin-off sheep meat with the normal permitted use of veterinary medicines. If the research shows there are additional risks, the findings will inform the drafting of product specifications to control any additional risks adequately, for example through restrictions on the animals accepted for production.

5. The Board is asked to:

- **note** progress with the research and the action that is now planned. Details of the action planned are shown in Annex 1 and of the current research at Annex 2.

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Issue

1. To provide an update on the work that is planned in conjunction with Agency research into skin-on sheep.

Strategic Aims

2. Improved consumer protection from food fraud and illegal practices.

Background

3. Under EU hygiene legislation the carcasses of sheep must be completely skinned with the exception of heads and feet. However there is currently a market for illegally produced skin-on sheep carcasses to meet demand from some ethnic groups. They are produced in premises that have not been approved for the slaughter of animals and are commonly called “smokies”, as they are produced by singeing or burning the fleece. Such production is illegal. Slaughter in premises that are not properly approved carries significant risks relating to unhygienic practices, lack of controls on specified risk material and animal by-products, and lack of traceability.
4. In November 2003, the Agency commissioned research to assess whether it is possible to produce skin-on sheep carcasses safely and hygienically in slaughterhouses. The main findings of this work, published in a peer-reviewed scientific journal in January 2006, were that under controlled conditions 'skin-on' sheep meat can be produced hygienically. The work also provided evidence to support the development of a meat inspection protocol.
5. Subsequent work commissioned by the Agency in 2005 looked at the issue of veterinary medicines in relation to skin-on sheep meat and how the withdrawal periods were calculated. It concluded that insufficient data existed to assess skin-on meat for certain medicines.
6. Following the independent review of both pieces of work in March 2007 the Agency advertised in September 2007 for further work to address the gaps in knowledge.

Research started in February 2008 with the aim of determining whether certain veterinary medicines, including those that control external parasites and flies in sheep and concentrate in the skin and skin-fat, could pose a risk to consumers of skin-on sheep meat. This research is expected to be completed by August 2009.

7. The European Commission has responded positively to initial informal contact from officials, and its comments will inform subsequent preparation of our submission and supporting material. The Commission indicated that any dossier may be referred to the European Food Safety Authority (EFSA). Although this would take time, a favourable assessment by EFSA would make it easier to achieve eventual success in changing the legislation.

Board Action Required

8. The Board is asked to:

- **note** progress with the research and the action that is now planned. Details of the action planned are shown in Annex 1 and of the current research at Annex 2.

ACTION NOW PLANNED

By January 2009:

- (a) Work will be undertaken to look at the hygiene legislation and set out the legal basis for a derogation and which hygiene and inspection requirements would need to be amended, the scope for a national or EU wide measure, and to obtain legal advice. Data will also be sought from interested parties to develop the economic/potential market case. Hybu Cig Cymru (Meat Promotion Wales) has indicated that they are willing to carry out some market research into skin-on sheep meat. They are working up some proposals and hope to put them to us in the near future.
- (b) Work with MHS and others will be carried out to review the meat inspection information already provided by the research and to propose any necessary revisions to current instructions for ante- and post-mortem inspection of skin-on sheep, including production specifications and any issues involving animal health and welfare, for inclusion in the submission.
- (c) A scientific dossier will be produced with the evidence to support the derogation from a food safety aspect. In addition to the microbiological work this will include the ongoing work on veterinary medicines so it can be updated when the research has been completed.
- (d) The issue will be raised during meetings with Member States on future meat hygiene controls or in the margins of Working Group meetings.

By February 2009:

- (e) On completion of the above, a further discussion with the Commission to establish their views on the legal basis etc. and how to proceed.

Spring – Autumn 2009

- (f) Updates to interested parties and informal consultation at appropriate intervals.¹

¹ A requirement for subsequent formal public consultation will arise in advance of any EU or UK legislation being made.

(g) Following production of the draft specifications (see (c) above), the development of a commercial process that can meet the production specifications. We would envisage this work being led by organisations such as Hybu Cig Cymru (Meat Promotion Wales) with industry funding. The development of appropriate equipment will be vital if the process is to become viable.

Once research results are available:

(h) The findings will be presented to the Veterinary Residues Committee.

(i) If required, a risk assessment will be undertaken.

(j) The submission and accompanying dossier will be updated/ finalised.

October/November 2009

(k) Subject to the outcome of (h) – (j) above a paper will go to the open meeting of the Board in October 2009, seeking agreement to FSA advice to Ministers.

(l) Subject to the outcome of (k) above a submission to Ministers in four UK countries will be made seeking agreement to formally approach the European Commission.

(m) Subject to the outcome of (l) above a formal approach to the European Commission to seek legislative change will be made.

DETAILS OF THE CURRENT RESEARCH PROJECT

1. The production process for sheep feet, which are allowed to be produced for human consumption, is similar to the production process envisaged for skin-on whole carcasses which currently are not allowed to be produced.
2. The sheep from which feet are currently harvested are considered to be representative of the sheep that could be used to produce skin on carcasses if the procedure is permitted.
3. Sheep feet are a readily available testing matrix compared to skin on sheep carcasses which would all have to be produced experimentally.
4. Sheep which go into the food chain may have been treated with a range of veterinary medicines and the withdrawal period should have been respected.
5. Sheep have been treated experimentally with the medicine cypermethrin in a separate unrelated study funded by the Medicines Directorate (VMD) looking at water course contamination. The feet from this study which will be “incurred” have been made available by the VMD and are included in the study as a “positive control” as the samples are known to have come from sheep treated with a medicine.

QUESTIONS THE RESEARCH IS EXPECTED TO ANSWER

6. The information obtained from testing sheep feet will help answer the question if the current withdrawal period is appropriate for sheep produced with the skin on.
7. The additional study of feet from sheep experimentally treated with the medicine cypermetherin and sacrificed at different times following treatment will answer the question of what happens during a period of withdrawal for this medicine.

SCHEDULE OF PLANNED RESEARCH ACTIVITY

February 2008

- (a) Following open competition the research project is commissioned to:

- test the skin from legally available skin-on sheep feet for a range of veterinary medicines; and
- as a positive control test feet from sheep experimentally treated with the medicine cypermethrin available from a separate project funded by VMD.

April 2008

- (b) Prioritisation of veterinary medicines to be studied, identification of test methods and consideration of sampling approach.

May 2008

- (c) Abattoirs identified and their willingness to participate in the project agreed.

June 2008

- (d) Development of a random 12 month sampling scheme, sampling methodology, test portion preparation and validation of test methods for skin from skin-on sheep feet.

July 2008

Training of abattoirs and MHS staff in sample collection and commencement of sample collection.

January 2009

Analysis of the first six months of sampling complete.

July 2009

Analysis of the second six months of sampling and analysis from the separate study on cypermethrin complete.

August 2009

Final report.