

Assuring the safety of primary food ingredients

The wide tar brush that is the popular media does not distinguish between a good egg producer and a bad one or between a good beef farmer and a bad one.

This was an early lesson for British farmers as they stumbled from the salmonella in eggs crisis to the BSE in beef disasters of the 1980s and 1990s.

Once they accepted responsibility for the problems and realised that the protective cloak of Government and 'the regulations' were just thin tissue in the eyes of the consumers, they realised they had to address the risks of on farm unsafe food production.

They had to have a system that would assure the production of safe food; a system that would work in the real world of farming and a system that would stand up to independent scrutiny.

How does it work?

David Clarke is the Chief Executive of Assured Food Standards (AFS) which is the independent organisation created to develop and maintain the highest standard of safe food from the farm.

In a recent interview with International Food Hygiene, he explained how it works.

The UK food industry has been developing standards in different sectors of agriculture for over 20 years. There have been separate schemes for areas like the poultry sector but these were set up and controlled by the growers and processors themselves. The industry and consumers were anxious that any such assurance schemes would be independent.

AFS was started in 2000 and today it has schemes for pig standards; beef and lamb standards; chicken standards; turkey standards; dairy standards; fresh fruit, vegetables and salad standards; and combinable crops standards. The standards cover the vast majority of food grown in the UK.

In the beginning each scheme was established by the formation of a board.

"This looks after the strategic thinking from that sector so that we are aware of the issues of that sector and we know at what level the standards should be pitched," David told International Food Hygiene.

"Then we have the technical panel of



experts who roll up their sleeves and deliver specific recommendations. So that in every one of the commodity sectors we have a two tier structure of experts drawn from stakeholder interest from the retailers back to the processors and the farm producers, so we have some pretty good expertise."

In the beginning these groups met many times to establish the nuts and bolts of the scheme and though they meet less often now there are regular gatherings to review and upgrade the schemes to respond to new challenges. These can result from changing legislation, from changing consumer expectations or they can be a response to new food safety challenges.

Animal welfare important

David explained that animal welfare was an important part of the schemes' remit and this could be a topic that required a response. There is no question, for example, that recent TV programmes have changed consumer perception and demands for welfare changes in the poultry industry.

"That up swell has now banged into the brick wall of recession and we are experiencing some interesting tensions," David

told us. "We have to be careful we do not lead the industry into places only to find that customers have gone somewhere else. It is important that if the consumers want and are prepared to pay for higher welfare then we must be able to change the standards because one of the strengths of our schemes is that they are able to validate those expectations. Without such validation the claims are just marketing hype."

Validation is the underlying strength of the schemes and that has to be independent and verifiable.

A farmer, in whichever scheme, has to comply in such a way that fulfils the scheme's requirements.

"The standards cover the activities on the farm and the objectives include making sure the food produced is safe and that the farming activity is not detrimental to the environment," David

added, "so we make sure of things including controlling pollution. This involves storing chemicals and oil and pesticides in a way that is no threat to the environment. We would be concerned about the proper handling of manure, and in the livestock sectors we are concerned about animal welfare."

"We also recognise that some of those areas go beyond the farm gate. We are not as some people label us, simply focused on on-farm assurance. We are concerned about animal transport, livestock markets and right into the abattoirs to the point of slaughter, so in the livestock sector we have standards that cover those areas as well."

"If we do not have control of animals as they pass through these markets we lose control of the traceability which is an important part of our remit."

Each participating farm has to be inspected on a regular basis. The AFS standards work within an EN 45011 system and they are certified by a certification body accredited by UKAS or another national accreditation body. AFS allows commercial certification bodies to use their standards on a fairly rigid basis.

The Certification Bodies are allowed to use them under certain conditions such as

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how they are used, how they are interpreted and how often inspections must be carried out. In some cases there are specifics like the competence requirements for inspectors which are specified in the licence body agreement.

"We have more than one certifying body to ensure competition but we tend to keep it tight so there are rarely more than three or four," David added. This was intended to achieve a balance between the need for competition against the need to be able to manage them and ensure a concentration of expertise. They have to be accredited to UKAS under EN 45011 which has in itself requirements of competence, management and training.

"What is probably the most important of all is the supervision of the individual inspectors and the need for consistency in the quality of the inspections," David told us. "I think the other schemes learned that lesson early on when inspectors tended to work in their own way to interpret the requirements as they saw fit."

It became apparent that the inspectors had to be more controlled and had to be managed to achieve a measurable and assured standard of inspection and reporting.

Quality control

On top of the UKAS requirements AFS has some quality control of its own. All reports on inspections come into their own database which allows it to look at trends and identify, for example, how some inspectors are stricter than others. It also allows checks on some procedural things like the promptness of annual inspections. Another useful data set is the non-conformance information that not only flags up the completion of follow up to ensure corrective action within 28 days, but can indicate trends in the challenges being faced by the farmers.

"I believe we have a tight system at several levels to make sure that things are effective," David told us. "This is reinforced with, for example, good relationships with many local authority Trading Standards departments. They have responsibility for health and safety, animal welfare and some feed standards. This relationship has helped both the enforcement professionals and the farming professionals by exchanging information about the interpretation of standards and legal requirements."

From the early stages the different schemes, though they operated independently, learned from one another. One of the important factors has been that AFS has answered the need for a system for agriculture that added to, rather than replaced, the existing and developing schemes in other parts of the food chain.

"We do not try to duplicate in areas where standards exist, for example the livestock feed sector is well covered with its own high standards for imported feed, feed



production and processing and we will rely on those rather than duplicate them."

Following dioxin problems in feed, salmonella in Chilean fish meal and the trauma of BSE, David believes that the UK industry and some feed producers on the near continent have got good control schemes. So the AFS livestock schemes say that they must use feed that has been produced under a known and trusted scheme.

Similarly, downstream in terms of food processing the AFS is well aware what organisations such as the British Retail Consortium with its global scheme requires within the food processing sector and acknowledges the stupidity of duplication.

"If anyone wants to put a Red Tractor logo on a bottle of milk, for example, the dairy farm must conform to our requirements on the farm, at collection and in the dairy."

"If a cheese processor wishes to use the logo on their cheese products the milk source has to be certified as complying with the AFS Dairy scheme and the cheese process and production must be BRC Global inspected and certificated."

The Red Tractor is the public face of the AFS schemes. It can appear on meat and poultry, on dairy products, on cereals and flour, salads and fruit. It can even apply to beer that has been brewed entirely from grain grown and harvested under the Combinable Crop Scheme. The farmers who take part in the AFS schemes pay to do so. There are costs of membership and there are costs involved in setting up the on-farm compliance. In addition, to achieve certification they have to pay the certification body that carries out the inspection and issues the certificate of compliance.

So what is the payback? Firstly, there is that assurance of using a management scheme that will greatly reduce the risks of the individual business producing unsafe food. Secondly, by working together the risk to the whole industry is much reduced, especially in schemes like the Combined Crops sector, where as much as 80% of the UK's cereal acreage is under the scheme.

Thirdly, individual companies venturing into such schemes frequently discover that the application of new management disciplines have a positive knock-on in improving

efficiencies and savings. The big payback is the recognition from the food processors, retailers and consumers that these food products have been grown and handled under independently assured systems.

"We own or approve the schemes. We own the logo and by including the processing standards it enables us to have a complete chain governing the logo use," David stated. The Red Tractor is only ever seen on food that truly deserves to carry it."

Importance of traceability

It is important that such a system can be traced back up the chain. Should a problem arise then a quick identification of the source will shorten the time of the crisis, identify and isolate the source, and put the problem right. It maintains consumer confidence in the Red Tractor and all the remaining good products.

"A logo helps to pull through the traceability system. No one can use that logo without AFS say so," David continued, "and if we are not happy that they are fulfilling all the requirements of standards and traceability they do not get the logo. If they are using the logo that gives AFS the right to go onto the farm and into the factory to make sure they are doing it right, and have the traceability systems. It is written in the conditions for the use of the licence."

AFS even sends one of the certification companies into all the companies during the year to make sure the traceability systems are working properly. David believes this is absolutely vital. There are now about 450 packing sites allowed to use the logo ranging from abattoirs packing £100 million of product per year to small producer/packers in the fresh produce industry.

Collectively, those sites are packing assured food from 80,000 UK farms. It is a credit to the ability of private industry to run such a scheme. There are about 10 people in full time employment on the scheme. There are six in the London office, of which two are full time promoting the scheme to the public.

The six sector boards each have a chairman who does about two to three days a month, four are farmers, one is an academic, another is a consultant and another is a retired chairman of a major poultry integrator. AFS is a not for profit organisation funded by the fees and payments for licences from the farmers and food companies. It is, in effect, owned by the whole of the UK food industry and the diversity of interests ensures that no single group or organisation can have an undue influence over the schemes.

The AFS carries the schemes through to the consumer by promoting the Red Tractor symbol through a co-ordinated public relations programme.

Now it is an established kite mark of assurance that consumers can trust. ■

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