



Glasgow City Council

Health and Social Care Policy Development Committee

20 January 2016

Report by Executive Director of Land and Environmental Services

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Traceability in the Halal Meat Supply Chain

Purpose of Report:

To advise the Committee of the work currently being undertaken by Land and Environmental Services in relation to traceability in the halal meat supply chain.

Recommendations:

- That the Committee discuss and consider the content of this report.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes No consulted: Yes No

1. Background

- 1.1 In 2010, in response to allegations of the supply of illegal halal meat, this Service carried out a survey to determine whether illegal meat was being processed in, or distributed to Glasgow establishments. It was concluded that whilst there was no evidence meat was being illegally slaughtered or processed, the documentation and labelling was, in many cases, insufficient to allow meat to be verified as being legal.
- 1.2 Since that time, this Service has continued to receive and investigate allegations that halal meat from illegal sources is being supplied to Glasgow establishments. In one case this resulted in officers seizing almost 1 tonne of meat from two Glasgow halal butchers. The meat had been supplied by an unapproved cutting plant in Lancashire.
- 1.3 Recent allegations received by this Service include:
- Supply of meat by unregistered traders;
 - Supply of meat without any health marks;
 - Illegal street-trading of meat from unmarked vans.

2. Reputational Risk

- 2.1 The horsemeat scandal in January 2013 raised public awareness of the potential for food fraud in the meat supply chain and further highlighted the potential consequences of inadequate traceability and labelling.
- 2.2 Concerns about illegally slaughtered animals entering the food chain still remain, with reports of an estimated 89,000 sheep stolen from farms in the UK in 2014.
- 2.3 It would appear that some food businesses have not learned lessons from the horsemeat scandal. Unless traceability significantly improves it will continue to be impossible to differentiate legal meat from that originating from illegal sources. Consequently, Glasgow food businesses remain at risk of food crime from elsewhere in the food chain.
- 2.4 Glasgow plays a key role in the halal meat distribution chain. There are forty-three halal butchers and several cutting plants located within the City. A significant quantity of the halal meat supplied in Scotland is either sourced directly from, or distributed via, establishments in Glasgow. However, with this key role comes a risk to reputation if the supply chain is subjected to criminal activity.

3. Enforcement Approach

- 3.1 The enforcement approach applied by LES to date has been to focus on compliance at suppliers and processors. However, it is now considered that in order to achieve a significant improvement in compliance, the wider supply chain requires to be considered.
- 3.2 This approach will allow this Service to acquire a greater understanding of the Halal Meat supply chain in Glasgow than that which could be obtained by looking at premises in isolation.
- 3.3 It is not clear why the non-halal meat supply chain is not subject to similar allegations. However, if during the course of the project it becomes apparent that there is non-compliance in this supply chain, the scope of the project will be amended accordingly.

4. Scope

- 4.1 The project aims through enforcement and provision of guidance to:
- To ensure that all halal meat supplied by Glasgow food businesses can be verified as coming from legitimate sources; and
 - To protect suppliers and consumers of halal meat in Glasgow from food crime.

5. Objectives

- 5.1 The key objectives of the project are to:
- Create a database of the Halal meat supply chain in Glasgow to allow for ongoing, easier identification of fraudulent supply.
 - Identify the extent of any fraudulent activity associated with the supply of Halal meat to or by Glasgow establishments.
 - Increase confidence amongst LES food enforcement officers regarding traceability in the meat supply chain.
 - Liaise with the Scottish Food Crime and Incident Unit (and, if necessary, the Food Fraud Unit in England) in the event that any fraudulent or suspected fraudulent activity is identified, to allow for a coordinated response.
 - Remove any Halal meat from the food chain which has not been produced, processed or distributed in accordance with the Hygiene Regulations.

- Report on findings and influence strategy within the Council and nationally via external Agencies such as Food Standards Scotland and the Scottish Food Enforcement Liaison Committee (SFELC).

6. Actions

- 6.1 Traceability inspections were carried out in a small number of establishments as part of the pilot stage of the project. Contraventions of a similar nature were identified in all premises. Before carrying out further inspections, it was considered appropriate to prepare and circulate a letter outlining the common contraventions, together with guidance on how businesses can comply. This was issued to all halal butchers prior to carrying out further traceability inspections.
- 6.2 A 'traceability pack' was produced for halal meat suppliers, comprising a guidance note and template monitoring forms (which can be used to assist compliance with traceability requirements). This will be issued to all businesses during traceability inspections.
- 6.3 Supplier information was collected from halal butchers and used to create a database of known registered suppliers of halal meat to Glasgow establishments. This database will be accessible to officers and will continue to be developed to allow easier identification of unregistered suppliers.
- 6.4 A guidance leaflet was produced for caterers advising them of the requirement to ensure that all meat delivered to them be supplied by approved or registered suppliers and accompanied by a detailed invoice and label. This leaflet has been made available to LES food enforcement officers to issue to catering establishments during routine inspections. Whilst the complaints received by this Service relate to the supply of halal meat, the guidance leaflet will be issued to all caterers, not only those using halal meat.
- 6.5 Communication with other agencies is key to verifying and improving traceability nationally. To date, this has included:
 - Joint inspections with Food Standards Scotland to allow them to assess how this project may link with other national food crime work;
 - Liaison with Food Standards Agency and Trading Standards in England and Wales to request investigation into non-compliance associated with establishments under their enforcement remit;
 - Liaison with other Environmental Health departments in Scotland to verify that suppliers are registered with them.

7. Outcomes

- 7.1 Three unregistered Glasgow-based suppliers of halal meat have been identified so far.

7.1.1 Action:

These suppliers were traced, are now registered as food businesses and subject to food hygiene and food standards inspections by this Service.

7.2 Meat supplied to Glasgow food businesses was found without a species declaration on the label, only the cut of meat, e.g. 'Flank', or 'Shoulder', being provided. This meat was understood, by the business, to be lamb. However, there was no labelling or documentation to confirm that this was the case.

7.2.1 Action:

This matter was referred to Food Standards Agency as the enforcing authority for the supplying establishment. A response has been received advising that this matter has been rectified.

8. Further Actions

- 8.1 Full traceability inspections will be carried out at all halal butchers in 2016.
- 8.2 The work will be communicated nationally to other Local Authorities via the food liaison group network in order to encourage increased verification of traceability during inspections.
- 8.3 Where hitherto unknown suppliers are identified, the matter will be raised with relevant Local Authorities to verify that the businesses are registered/approved.
- 8.4 Routine traceability checks will be carried out by officers during inspection of caterers to ensure that all meat (not only halal meat) can be traced. It is anticipated that by actively monitoring and enforcing compliance at the final business in the food chain, suppliers will be under further pressure to comply in order to prevent losing business.

9. Conclusions

- 9.1 While a key driver for this project was the level of complaints relating to the halal meat supply chain, the guidance produced will be used to assist food businesses throughout Glasgow in improving their traceability and reducing their exposure to food crime from elsewhere in the food supply chain.
- 9.2 The creation of a database of halal meat suppliers will allow more effective and efficient investigation of any future complaints regarding the supply of illegal halal meat. It is currently not considered necessary to expand this database to include suppliers of non-halal meat or other products e.g. fish and shellfish. However, this could be actioned at a later date if deemed appropriate.
- 9.3 The project has also raised awareness amongst LES food enforcement officers thus enabling an enhanced capability for the identification of food crime concerns in relation to traceability during inspections.

10. Policy and Resource Implications

Resource Implications:

<i>Financial:</i>	None
<i>Legal:</i>	Potential food law enforcement where criminal and/or fraudulent activity is observed.
<i>Personnel:</i>	None
<i>Procurement:</i>	None

Council Strategic Plan:

- A city that looks after its vulnerable people;
- Improving health and well-being;

Equality Impacts:

<i>EQIA carried out:</i>	No – An equalities screening exercise was conducted.
<i>Outcome:</i>	A full EqIA deemed to be not necessary.

Sustainability Impacts:

<i>Environmental:</i>	None
<i>Social:</i>	None
<i>Economic:</i>	None

11. Recommendations

11.1 That the Committee discuss and consider the content of this report.