

29th March 2016

## **FDF Response to FSA Proposed Advice on Rare Burgers**

This submission is made by the Food and Drink Federation, the trade association for food and drink manufacturing. Food and drink is the largest manufacturing sector in the UK (accounting for 16% of the total manufacturing sector) turning over £83.7bn per annum; creating GVA of £21.9bn and employing around 400,000 people.

FDF appreciates the opportunity to comment on the FSA proposed advice on rare burgers and would like to raise the following points:

### **Requirement for FBOs to Notify LAs Prior to Serving Burgers Less Than Thoroughly Cooked and Changes to HACCP-based Procedures Page 12, Paragraph 23**

We believe that, given the higher risk involved, LA's should be notified of plans by FBOs to use a different equivalent time and temperature to produce burgers that are thoroughly cooked but appear less than well done, ie. pink in the middle. The way that a 'pink' burger is temperature probed is absolutely critical to ensure that the coldest spot is probed, when in reality this can be easily missed. The sale of pink burgers should perhaps increase the risk rating, and therefore the audit frequency, of the restaurant concerned.

### **Section I. Thorough Cooking Page 16, Paragraph 30**

We do not understand why the advice here does not also relate to burgers made from meat other than beef, i.e. lamb.

To ensure complete clarity, we would suggest that this section should refer to 'burgers made only from 100% beef', to remove any risk of a burger deliberately containing meat other than beef from being cooked pink.

### **Section III. Controls at Suppliers and Risk and Hazard Management Page 21, Paragraph 41**

The wording here is ambiguous, as it suggests that it is acceptable to supply surface treatment to minced beef meat or burger patties to achieve the required level of food safety, which is clearly not correct. Perhaps the wording could be amended to read '...can apply surface treatment prior to mincing beef that will be used for forming burger patties.'

### **Page 22, Paragraph 43**

We would suggest that reducing/minimising contamination is far from acceptable for any mince and/or pattie that will not be cooked to 70oC for 2 minutes or equivalent and that the contamination must be removed. Minimisation of contamination is only an acceptable approach if this is qualified to add comment that if practices only minimise contamination then the mince/pattie must be cooked to 70oC for 2 minutes or equivalent.

### **Page 24, Paragraph 47**

The FBO producing the raw mince or burger pattie may not be aware of the restaurant's intention to serve burgers that are less than thoroughly cooked. Therefore, we would suggest the addition of a clause that requires the procuring FBO to clearly state in the purchasing specification that they intend to serve the burgers less than thoroughly cooked, and to clearly specify the requirements laid down in the Microbiological Criteria Regulation for minced meat (as referenced in paragraph 45) that is intended to be eaten raw.

### **Worked Examples**

#### **Page 27 Worked Example vs Page 28 and 29 Worked Examples**

The examples on page 28 and 29 suggest the use of dedicated equipment, amongst other controls, to ensure there is no re-contamination of meat treated at the supplier. We would suggest that the same advice be provided to the caterer (see Worked Example on page 27), as it is likely that storage of prepared mince will also occur here.

A failure to use dedicated equipment leads to an increased risk. Therefore, consistency of best practice advice is required, regardless of its location. This is especially true when a significant number of outbreaks relate to SME's and small food outlets.

#### **Page 29 Worked Example**

We would suggest that the final stage in this example should include a requirement for the caterer to inform the supplier that the meat will be served less than thoroughly cooked, and to agree a specification that clearly lays down the need to meet stricter microbiological criteria than would otherwise be required. If this is not laid down, the supplier cannot be expected to do anything differently to increase safety, compared to meat destined to be thoroughly cooked.

We hope that you will find these comments helpful. but please don't hesitate to contact me if you require anything further.

Many thanks and kind regards

#### **Denise Crane**

Technical & Regulatory Expert  
Regulatory, Science and Health Division  
[denise.crane@fdf.org.uk](mailto:denise.crane@fdf.org.uk)

## **The UK Food and Drink Manufacturing Industry**

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. The industry has a turnover of £83.7bn, which is 16% of total manufacturing turnover, and Gross Value Added (GVA) of £21.9bn. The industry employs around 400,000 people. Exports of food and non-alcoholic drink have doubled in the last ten years, amounting to a worth of £12.8bn in 2014.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
PPA	Potato Processors Association
SMA	Salt Association
SN	Sugar Nutrition UK
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SPA	Soya Protein Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also runs specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group (BCCC)  
Frozen Food Group  
Ice Cream Committee  
Meat Group  
Organic Group  
Seafood Committee