

AUDIT
REPORT

Audit of Labelling and
Traceability of Poultry
Meat in Retail and
Catering Establishments

JULY 2013



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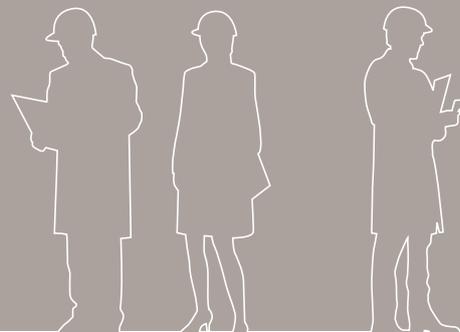


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1. EXECUTIVE SUMMARY

The Food Safety Authority of Ireland (FSAI) completed a small scale audit of food catering and retail businesses in Ireland to determine compliance with poultry labelling and traceability requirements.

The audit consisted of 12 site inspections made up of seven butchers and five hotels. The food businesses were selected randomly and were provided with individual reports following the audit of their business. The information obtained in this audit will be used to validate claims further back the traceability chain at wholesale level in another series of audits.

Irish consumers eat more chicken than any other meat and place a significant importance on the origin of chicken, with 'local' or 'Irish' chicken being perceived as more desirable. As a result, supermarkets and catering companies use this demand to differentiate their products and garner a higher price for 'Irish products'. It is therefore important that the information provided to customers is true and accurate and they are not misled.

Six of the 12 establishments (50%) audited provided customers voluntarily with written information regarding the origin of poultry products. Four of the seven butchers made claims regarding the Irish origin of the poultry meat. The evidence presented by the butchers to validate these claims included: the details of the growers displayed on the boxes from suppliers and the approval mark¹ on the box. It should be noted that the approval mark on a box does not denote origin; it simply indicates the last place of processing/packaging which may or may not be the country of origin. It does not guarantee that the country of origin of the product was Ireland. Two of the five hotels audited made claims regarding sourcing ingredients and/or meat locally. Whilst these hotels sourced ingredients from local suppliers, some of the poultry originated from other Member States and from third countries - China and Thailand. The food businesses were requested to amend this information as it was deemed misleading to customers. To safeguard their customers' best interest, food businesses should have written assurances from suppliers regarding origin.

A significant increase in the understanding and knowledge of poultry marketing standards and the general labelling requirements is required in butcher shops. Breaches in labelling legislation were identified in five of the seven butcher shops audited, e.g. 'best-before' dates applied to labels as opposed to 'use-by' dates, lack of information regarding storage conditions etc.

All businesses audited could identify one step back in the food chain, i.e. where the meat delivered to their business came from. However, in terms of complying with their own food safety management or traceability systems, the audit identified a number of gaps and lack of compliance with their own procedures.

Country of origin labelling is currently mandatory for certain products such as beef, fish, honey, olive oil, fresh fruit and vegetables. In the case of poultry, it only becomes mandatory when its absence might mislead consumers as to the true origin of the product or if the product is imported from a third country. Under new rules, the mandatory indication of country of origin or place of provenance will be extended to poultry delivered to catering outlets or sold at retail level. These new rules are likely to be introduced by the end of 2013. It is incumbent on food business operators to ensure that they have written assurance from suppliers regarding the provenance of the poultry meat they sell and provide consumers with genuine country of origin information.

¹ Manufacturers or wholesalers approved by the competent authorities in line with the Regulations must ensure that meat has an approval mark applied to the product or packaging when it leaves the premises. This allows for traceability of products as it moves between establishments.

2. INTRODUCTION

The FSAI has overall responsibility for the enforcement of food law in Ireland, which is carried out predominantly through service contracts with Government departments and agencies. The FSAI carries out targeted audits of food businesses each year to determine the level of compliance with current food law and the effectiveness of its enforcement.

An audit of poultry meat labelling and traceability in retail and catering outlets was undertaken by the FSAI as part of the planned programme of targeted audits. The audit project was carried out in butcher shops and hotels.

Ireland has one of the highest levels of poultry meat consumption within the EU, with in excess of 25.7kg per capita per year consumed². It is estimated that over 90% of the poultry meat used in the Irish food service sector is imported. Ireland imports over four million chicken fillets on a weekly basis as there is an unusually high demand in this country for them. Statistics show that for every sale of a single chicken leg in Ireland, there is a matching sale for eight chicken fillets. This preference for chicken fillets by Irish consumers simply cannot be met by domestic supply, hence the high level of imports of fillets³. Currently, poultry meat is only required to indicate country of origin if it originates from outside the EU or where its absence would mislead the consumer. It is imperative that, when consumers are informed of the provenance of the poultry meat they are buying, it is accurate.

This summary report draws on the findings of the individual site inspections and relates solely to the food businesses visited as part of the audit.

2.1. Audit Objective

The objective of this audit was to assess the labelling and traceability of poultry meat in retail and catering outlets. The audit focused on the businesses food safety management system with regard to labelling and traceability of poultry meat and the information provided to customers.

2.2. Audit Scope

The scope of the audit was the labelling and traceability of poultry meat in retail and catering outlets.

2.3. Audit Criteria and Reference Documents

The principal audit criteria referred to during the audit were:

- **Regulation (EC) No 178/2002** laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended (in particular Article 16 Presentation and Article 18 Traceability)

² CSO, 2011

³ safefood Consumer Focused Review of the Chicken Food Chain, 2012

- **Council Directive 2000/13/EC** on the approximation of laws of the Member States relating to the labelling, presentation and advertising of foodstuffs Directive 2000/13/EC relating to the labelling, presentation and advertising of foodstuffs as amended
- **Council Regulation (EC) No 1234/2007** establishing a common organisation of agricultural markets and on specific provisions for certain agricultural products as amended
- **Commission Regulation (EC) No 543/2008** of 16 June 2008 laying down detailed rules for the application of Council Regulation (EC) No 1234/2007 as regards the marketing standards for poultry meat as amended
- **Commission Directive 2008/5/EC** of 30 January 2008 concerning the compulsory indication on the labelling of certain foodstuffs of particulars other than those provided for in Directive 2000/13/EC of the European Parliament and of the Council
- European Communities (Labelling, Presentation and Advertising of Food stuffs) Regulations, 2002 (**S.I. No. 483 of 2002**) as amended
- European Communities (Labelling and Marketing Standards for Poultrymeat) Regulations, 2010 (**S.I. No 328 of 2010**)
- European Communities (General Food Law) Regulations, 2007 (**S.I. No. 747 of 2007**) as amended
- European Communities (Food and Feed Hygiene) Regulations, 2009 (**S.I. 432 of 2009**)
- European Communities (Official Control of Foodstuffs) Regulations, 2010 (**S.I. No 117 of 2010**) as amended
- European Communities (Marketing Standards) (Crops and oils) Regulations, 2011 (**S.I. No. 378 of 2011**)

2.4. Audit Methodology

This audit was undertaken using documented procedures which are included in the FSAI Quality Management System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI audit obligations and are in accordance with the requirements of Regulation 882/2004 (including Article 6.1 of Commission Decision 677/2006) and Section 48 (9) of the FSAI Act.

Twelve businesses were selected randomly for site visits, seven retail and five catering establishments.

2.5. Current Legal Requirements

Food business operators are required to place safe food on the market and to ensure that consumer information is accurate and not misleading. In addition to complying with the labelling requirements of S.I. No. 483 of 2002, poultry meat on sale at retail outlets must comply with additional requirements set out in various European Regulations known as the Poultry Marketing Standards.

These Regulations define poultry meat as including:

- Domestic fowl (*Gallus domesticus*)
- Ducks
- Geese
- Turkeys
- Guinea fowl

These Regulations require that poultry meat is marketed as fresh, frozen, or quick-frozen. They do not currently apply to poultry meat products or preparations, e.g. chicken nuggets, chicken burgers etc. Fresh poultry meat, e.g. chickens or turkeys breasts, that was frozen cannot be thawed and sold as fresh or 'previously frozen'.

Frozen **poultry meat** or **quick-frozen poultry meat** must be sold in that state, e.g. frozen turkey, or used in:

- (a) Meat preparations marketed as frozen or quick-frozen, e.g. frozen breaded chicken breast
- (b) Meat products, e.g. frozen turkey can be thawed, cooked and stuffed and sold as stuffed turkey breast

Pre-packaged Poultry Meat

In the case of pre-packaged poultry meat, the following particulars must appear on the packaging or on an attached label:

- Product name, i.e. species and form of presentation or species and cut, e.g. chicken with giblets, duck breast, turkey leg
- The class (class A or class B)
- In the case of fresh poultry meat, the total price and the price per weight unit at the retail stage
- In the case of fresh poultry meat, the date of minimum durability must be indicated by the 'use by' date in accordance with Article 10 of Directive 2000/13/EC. This indication must be followed by a description of the storage conditions which must be observed
- The condition in which the poultry meat is marketed, i.e. fresh, frozen or quick frozen and the recommended storage temperature
- The registered number of the slaughterhouse or cutting plant in accordance with Article 4 of Regulation (EC) No 853/2004, except in the case of cutting and boning at the place of sale as provided for in Article 4(2)(d) of that Regulation
- In the case of poultry meat imported from third countries, an indication of the country of origin
- Net weight

- Name or business name and address of the manufacturer or packager, or of a seller established within the EU)
- Poultry meat packaged with packaging gases must be labelled 'packaged in a protective atmosphere'

The Regulations allow for the use of certain terms on the labelling of poultry meat if the relevant conditions specified in the Regulation are fulfilled. These terms are:

- 'Fed with ___ % of ___'
- 'Extensive indoor' ('Barn reared')
- 'Free range'
- 'Traditional free range'
- 'Free range - total freedom'

These terms may be supplemented by indications referring to the particular characteristics of the respective types of farming.

Loose Poultry Meat

Poultry meat sold loose/without pre-packaging in butchers or at retail outlets must bear the following indications:

- Product name, i.e. species and form of presentation or species and cut, e.g. chicken with giblets, duck breast, turkey leg
- The class (Class A or B)
- The price per weight unit at the retail stage
- The condition in which the poultry meat is marketed (i.e. fresh, frozen or quick frozen)
- The registered number of the slaughterhouse or cutting plant, and
- In the case of poultry meat imported from third countries (i.e. from outside the EU), an indication of the country of origin
- Commission Regulation (EC) No 543/2008 requires that in the case of fresh poultry meat, the date of minimum durability shall be replaced by the 'use by' date in accordance with Article 10 of [Directive 2000/13/EC](#). This indication must be followed by a description of the storage conditions which must be observed

3. INFORMATION PROVIDED TO CUSTOMERS – Audit Outcomes

Information is typically provided to customers in butcher shops by means of labels and/or black/white boards. In hotels, information is provided verbally and/or via menus. Six of the 12 establishments (50%) audited provided customers voluntarily with written information regarding origin.

Butchers

Four of the seven butchers made claims regarding the Irish origin of the poultry meat. The evidence presented by the butchers to validate the origin claims included:

- For fresh chicken fillets - the details of the growers displayed on the boxes from suppliers (four establishments)
- For breaded chicken fillets - the approval mark on the box indicating the establishment where processing took place (two establishments)

It should be noted that the approval mark on a box does not denote origin it simply indicates the last place of processing/packaging. In the three butchers that did not provide Irish origin claims, the poultry meat was labelled with approval marks from the Netherlands and Northern Ireland.

In general, the butchers audited were not very familiar with the requirements of the poultry marketing standards and general labelling requirements. Breaches in labelling legislation were identified in five of the seven butcher shops audited. Examples of the breaches identified included:

- 'Best-before' dates applied to labels as opposed to 'use-by' dates
- No product name provided
- Description of the storage conditions which must be observed was absent.

Hotels

Two of the five hotels audited made claims regarding sourcing ingredients and/or meat locally. Whilst these hotels sourced ingredients from local suppliers, some of the poultry originated from other Member States such as Italy, Poland, the Netherlands and from third countries - China and Thailand. The food businesses were requested to amend this information provided as it was deemed misleading to customers.

Table 1: Country of Origin Information provided to Customers at Hotels Audited

	Hotel A	Hotel B
Statements	'All dishes are freshly prepared and ingredients are sourced locally.'	A green shamrock featured on menu items which was identified in a foot note as 'authentic Irish'. In addition the menu stated 'It is our policy to source as much local ingredients as possible for our menus: Our eggs and poultry are supplied by (4km from hotel)'. We source our beef, lamb, pork, bacon, poultry and eggs from small scale suppliers and suppliers approved under the Bord Bia Quality Assurance scheme and are of Irish origin'.
Country of origin of poultry on site on the day of the audit	Chicken – Holland and Belgium Turkey – Poland	Chickens – Northern Ireland and the Netherlands Duck – France, China and Thailand

4. TRACEABILITY

All of the establishments audited were able to identify the source of poultry meat deliveries to their establishment. However, different systems were in place to record the details of deliveries. Regarding the provenance of the poultry meat supplied, the food business operators relied on:

- Verbal assurances from suppliers
- Invoice declarations
- Box/label information

In some cases, the information provided from the same supplier varied, e.g. a batch of chicken fillets had a label indicating Irish origin, a different batch may have a similar label without any indication of country of origin.

Butchers

Five of the seven butchers used invoices to record deliveries which provided sufficient information to trace back to suppliers. One butcher shop recorded the traceability information for each delivery. However, significant gaps in the information recorded were identified by the audit team at that establishment.

Hotels

Four of the five hotels recorded deliveries on intake sheets. However, gaps in records and/or missing entries were identified in all five hotels visited. So as to maintain in-house traceability, one hotel recorded all traceability information at delivery however, the food business operator did not know which code was the unique batch number and as a result, the system did not work effectively.

5. NEW EU FOOD LABELLING LEGISLATION

Country of origin labelling is currently mandatory for certain products such as beef, fish, honey, olive oil and fresh fruit and vegetables. In other cases, it only becomes mandatory when its absence might mislead consumers as to the true origin of the product and in the case of poultry if it originates from outside the EU. Under new rules, the mandatory indication of country of origin or place of provenance is extended to the meat of pigs, sheep, goats and poultry. Following an EU impact assessment on the introduction of such rules, the EU Commission is required to introduce legislation setting out how origin will be determined and how this information must be indicated. The European Commission must introduce these rules by 13th December, 2013.

6. CONCLUSIONS

When retailers and caterers make claims regarding the provenance of the poultry they are selling, they generally do not have written specifications supporting those claims. There was a reliance on the information on box labels and verbal assurance from suppliers regarding provenance of the meat supplied to the businesses audited. During the course of this audit, when country of origin information was not provided, it was generally found that the origin of the meat was from outside Ireland. In two establishments, the country stated on the approval mark was considered the origin of the meat, which may not necessarily be the case. It is important to note that there are a number of processing plants in Europe - mainly in the Netherlands - where poultry is imported from outside the EU. Once this product is processed in these establishments, it is considered an EU product under European legislation, though the actual chicken may have originated outside the EU.

Claims made by two of the hotels audited that food was sourced locally were misleading consumers. While the food may be bought from a local supplier, the provenance of the food was found to be much more global.

In 5 out of the 7 retail establishments audited, there were non-compliances identified with labels demonstrating a lack of familiarity with the requirements of the poultry meat marketing standards and the general labelling requirements.

The majority of butcher shops use invoices to record deliveries for traceability purposes. In hotels, ingredients were generally recorded on a goods intake sheet. In some cases, this was just for fish and meat and in other hotels, all food deliveries were recorded.

Some businesses had developed, as part of their food safety management system, more detailed records to demonstrate traceability. The audit identified gaps in the completion of these records.

7. RECOMMENDATIONS

The implementation of new rules governing the labelling of country of origin for all species should increase the level of transparency to customers regarding where their meat is coming from. Businesses should update their food safety management systems and educate their staff on the new legal requirements to ensure they are complied with. Retailers and caterers should request written specifications detailing the country of origin of the meat supplied to them.

Butchers should review the requirements of the poultry marketing standards and general labelling requirements to ensure they are being complied with. Hotels and caterers making claims regarding sourcing products “locally” should review the source of all ingredients to ensure consumers are not being misled.

To assist the retail and catering industry to fully meet its obligations in regard to food labelling, the FSAI along with other stakeholders, should provide further guidance on the new rules.

The outcome of these audits will require follow-up audits by the FSAI and/or its official agencies of manufacturers and wholesalers further back the food chain.



Abbey Court,
Lower Abbey Street,
Dublin 1.

Advice Line: 1890 336677
Telephone: +353 1 817 1300
Facsimile: +353 1 817 1301
Email: info@fsai.ie
Website: www.fsai.ie