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By email to: nasreen.shah@foodstandards.gsi.gov.uk on 10 March 2014

Agriculture and Horticulture Development Board response to the FSA consultation on:
COMMISSION REGULATION (EU) No 1137/2014 AMENDING ANNEX III OF REGULATION (EC) NO 853/2004 ON THE HANDLING OF CERTAIN OFFAL ('STOMACHS AND FEET') FROM ANIMALS INTENDED FOR HUMAN CONSUMPTION

Thank you for inviting the Agriculture and Horticulture Development Board (AHDB) to comment on this consultation.

AHDB is a statutory levy board, funded by farmers, growers and others in the supply chain. Our purpose is to make our agriculture and horticulture industries more competitive and sustainable through factual, evidence-based advice, information and activity. We cover the six sectors of Pig meat in England; Beef and lamb in England; Commercial horticulture in Great Britain; Milk in Great Britain; Potatoes in Great Britain and Cereals and oilseeds in the UK.

In addition to the levy-funded operation, there is one subsidiary in the AHDB group that actively trades, called Meat & Livestock Commercial Services Limited (MLCSL). It provides data, advice, logistics and inspection services to the meat and livestock industry (predominantly red meat slaughterhouses) on a commercial basis.

For more on AHDB and its activities please see our website www.ahdb.org.uk

Our response to your consultation is as follows:

We agree in principle to the proposal to amend the regulations to allow off-site processing of stomachs and feet subject to certain conditions. The opportunity to do so will be advantageous to those small and medium operations that do not have the necessary equipment to process relatively small volumes of such products and will provide both a useful income stream and reduce wastage.

More specifically:

Stomachs: We support **OPTION 1** as proposed as it meets the requirements of the regulation without imposing unnecessary burdens.

Feet: We support **OPTION 3** rather than option 2 as proposed. We believe that the subsequent points raised in section 21 provide all the necessary safeguards to allow for national authorisation. This, along with SOP and HACCP documentation from the FBO, will provide the required controls for premises despatching and also receiving feet for further processing.

To summarise, AHDB accepts the proposal in principle but would suggest **OPTION 3** for feet as an appropriate level of control to ensure compliance without additional burden.

We thank the FSA for taking the opportunity to address regulatory burden on the industry in an open and transparent way.

Any queries on this submission should, in the first instance, be addressed to:

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