

RETAIL AND PROCESSED MEAT PRODUCTS INDUSTRY – QUARTERLY REPORT

JANUARY 2021 – APRIL 2021



INTRODUCTION

April 2021 marked one year of the implementation of the Processed Meat Product Regulation. Despite the challenges COVID-19 brought, ensuring products of top quality to consumers remains a priority in the industry.

The processed meat products industry as well as the retail sphere, has definitely been more orientated on ensuring compliance, through their continuous commitment and laser like focus of adherence to regulation(s) and act(s) as required by the Department of Agriculture, Land Reform and Rural Development (DALRRD) and therefore, the mandate we are responsible to enforce.

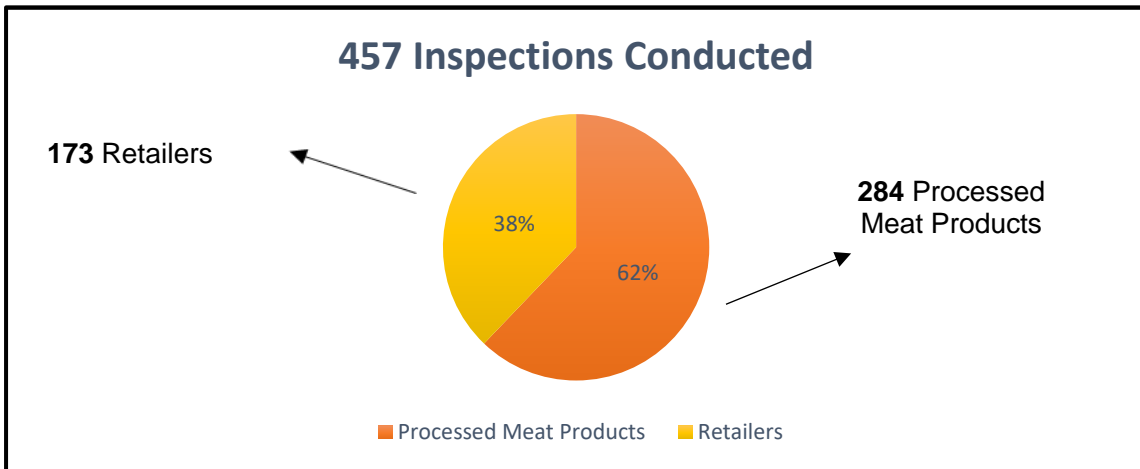
We are of the view that the Act and regulation(s), has definitely impacted the industry in a positive way and would like to take this opportunity and give credit to consumer focused and compliance driven producers and retailers.

Due to the 2021 inflation rate in South Africa, Food Safety Agency (Pty) Ltd proposed a 4% inflationary increase of the inspection and sampling costs. The proposed fee increase was sent out for comments on 31 March 2021. No comments were received from industry regarding the proposed fees.

The new fees have been gazetted in the government gazette and will be implemented from 01 July 2021. See attached for ease of reference.

REPORT:

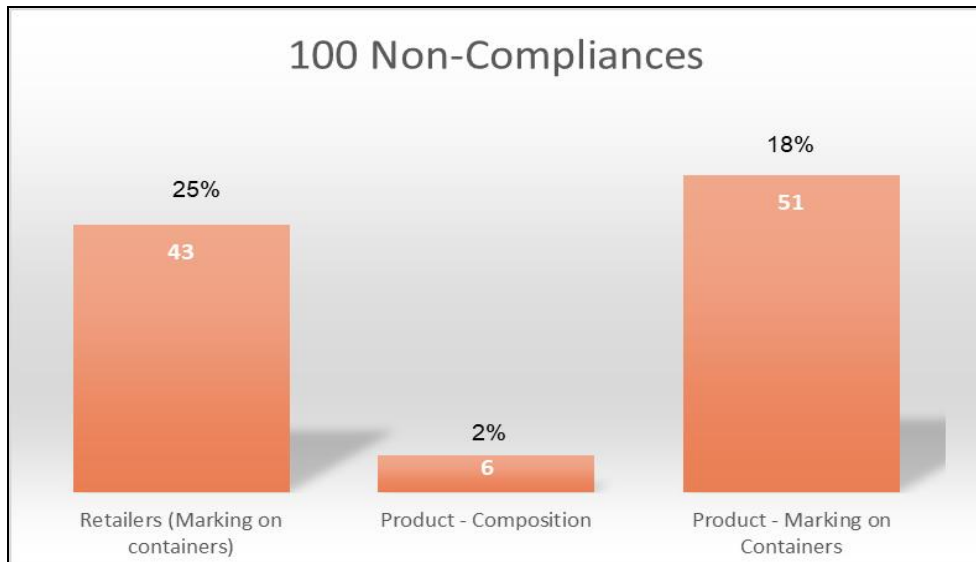
TOTAL NUMBER OF INSPECTIONS CONDUCTED FROM THE MONTHS OF JANUARY 2021 – APRIL 2021.



TOTAL PRODUCTS COMPLIANT FROM THE MONTHS OF JANUARY 2021 – APRIL 2021



THE TOTAL NON-COMPLIANCES FROM THE MONTHS OF JANUARY 2021 – APRIL 2021



In terms of the non-compliances for both composition and the marking of containers, it was found that the following as indicated in the below table were not indicated on the container (labelled) and the minimum requirements were not adhered to as per Regulation 1283 of 4 October 2019 (Processed Meat Products):

<u>Composition</u>	<u>Marking on Containers (Labelling)</u>
- Fat Content; and	- The country of origin not indicated on the packaging/scale labelling
- Total Meat Equivalent (TME)	- Restricted particulars being used on containers/packaging
	- Restricted particulars used as additions to the product name
	- Inappropriate product name used on container/packaging
	- Words/method of expressions indicated on the container that may create a misleading impression regarding the quality, nature, class, origin or composition of the processed meat products
	- Date marking appearing on the container not being preceded by the appropriate wording “best before”/”best quality” before date and/or “use by”
	- The appropriate product name for processed meat products presented for sale in a display fridge not indicated in the immediate vicinity of each class.



CHALLENGES EXPERIENCED:

In summary, the following challenges were experienced from January 2021 to April 2021:

- a. Several butcheries and retail stores, are not familiar with the published regulation and its requirements, therefore refusing the assignee entry to their facility, and/or refusing to pay the gazetted fees. In this regard, some matters have been reverted to our lawyers and some were handled internally, between the assignee and the producer/butchery or retail store and resolved accordingly.
- b. Identification of all the processed meat products producers in South Africa. The inspectors of Food Safety Agency (Pty) Ltd spend a large amount of time on the road to identify new producers, in both the formal and informal sectors.
- c. The assignee designed a product list percentage document for the producers to complete, enabling the assignee to set up an inspection and sampling plan for the respective producer who provided the information and completed document as requested. Upon the first inspection it became evident that these producers were producing a lot more than what was stipulated on the completed form. Plans therefore were adapted where needed, which lead to an increase of inspections and sampling.
- d. Some Producers do not want to complete the product list to disclose the number of products produced.
- e. There are still several municipalities that informed producers, butcheries as well as the assignee itself, that Food Safety Agency (Pty) Ltd does not have the mandate to enter, inspect and sample butcheries that produce processed meat products. This matter has been addressed on an individual basis and resolved accordingly.
- f. COVID-19 has affected the industry and businesses on a very large scale and we as the assignee are not blind to the effect and impact of same. In this instance, we have taken extra-ordinary measures to keep our personnel as well as the personnel of all facilities we have to enter, safe. We have adhered to all producers, retailers, re-packers, etc. requests in terms of protective equipment and procedures or policies. After taking all the requests and other measures into consideration, access is still refused by some facilities. COVID-19 is therefore used as an excuse, although the facilities have not stopped with the production of any product and in turn, did not stop the selling of products to consumers. This is also addressed and resolved on an individual basis.
- g. In order for the assignee to calculate the Lean Meat Content (LMC) and Total Meat Content (TMC) For whole muscle, comminuted and reformed products, verification of recipes and/or ingredient lists will need to be conducted. Since ingredient lists (recipes) are seen as trade secrets, no electronic copies of the recipe would be requested from the inspectors of Food Safety Agency. Physical copies of recipes provided during the inspection will be left at the premises and not taken with by our Inspectors. We respect the fact that the name, legacy and brand of each company rests on the success of their recipes. The inspectors will verify the recipe and/or ingredient list as to if the recipe is followed on the day of the inspection. The Mechanically Recovered Meat (MRM) would also have to be sampled raw (therefore at the production facility) to be able to test for the calcium content contained in the product. This will mostly apply for products that have been found non-compliant in terms of compositional requirements as per the regulation.

RECIPE VERIFICATION

Recipe verification is a written description of the ingredients contained in the processed meat product and the components of the ingredients including food additives, the proportions of the ingredients and components used, as well as the method of manufacturing of the product which will determine the category and class of the processed meat product.

Processed meat products are categorised in the following classes were specific compositional standards need to be complied to according to R,1283 of 04 October 2019.

- Whole muscle processed meat products.
- Comminuted processed meat products.
- Reformed processed meat products.
- Coated processed meat products.
- Unspecified processed meat products.
- Geographical indication (GI) processed meat products.

Processed meat product names provided for varies products manufactured should depend on the method of production to determine the class, sub-class and the compositional standards required for each product produced. Hence the importance of conducting recipe verification at the manufacturers.

Recipe verification will enable Food Safety Agency to ensure that the appropriate product name is being used on the container and that required compositional standards as stipulated in R.1283 of October 019 are met.

The inspection shall be conducted in the presence of a person in charge of the production or responsible for the production and handling of the production process and/or a representative of the facility, unless otherwise required by the facility.

Any deviation shall be documented and communicated to the person in charge of the facility. Inspections will be conducted where the product is being produced and no inspector will be allowed to leave the premises with any documentation provided on site by management concerning recipe verification.

All products to be verified will be independently selected. The recipe of any products produced will be requested to conduct the verification and not all recipes of the products produced on site will be verified at once. Only products produced on the day of inspection and sampling will be verified.

If the same product is being produced that was previously sampled and verified, the product will not be taken again for analysis if the laboratory/compositional results were found compliant, to prevent any duplication of sampling. The Inspector will complete the recipe verification checklists developed by Food Safety Agency clearly with the required information for every product verified:

- Date of product verification
- The Name of the product being verified
- The class/sub-class of the product in accordance to R.1283 of 04 October 2019
- The Ingredients of the product being verified
- The % contribution of every ingredient used (info provided by manufacturer)
- The meat equivalent factor (document provided by DARLLD) for each ingredient used. This document will be shared with the manufactures on the day of inspection.

- The Fat and protein content of any ingredient that has been used as part of the recipe and is not specified on the meat specification and meat equivalent document provided. This information will enable us to ensure compliance in terms of Lean Meat Content (LMC) and Total Meat Content (TMC) by conducting calculations.

The verification process is to ensure that the product is produced in accordance with the recipe provided. The verification process will confirm that the product name as stated on the container meets the specifications of R.1283 of 04 October 20219.

The inspector will send through all inspection checklists to the Manager: Processed Meat Products. After the submission of the inspection checklists to the Manager: Processed Meat Products and receiving of laboratory results, the manager will complete the calculations of the Lean Meat Content (LMC) and Total Meat Content (TMC) on the recipe verification checklist by determining the non-meat proteinaceous material used from the information provided on the recipe verification checklist:

$$\% \text{ Lean meat content} = (\% \text{ total nitrogen} - \% \text{ non – meat proteinaceous material}) \times 30$$

$$\% \text{ Total meat content} = \% \text{ lean meat content} + \text{Fat}$$

The compliance of the LMC and TMC will be incorporated in the compliance/non-compliance letter issued to the manufacture with the laboratory results.

TRAINING OF FOOD SAFETY AGENCY'S PERSONNEL

Food Safety Agency scheduled a training session for the inspector personnel of Food Safety Agency in March 2021 in order for our personnel to increase their exposure to the processed meat industry by.

- Receiving more valued insights, other than the regulation, of the processed meat industry environment.
- Discuss any challenges, concerns or questions, with industry partners.
- Received practical training on the production of processed meat products.
- Broaden their spectrum of the implementation of regulations and understanding the complex processes of changing recipes, marking on containers, etc.
- Giving them an overview of the supply chain with regards to the processed meat industry.

The aim of the training session was to improve the overall standard of our inspection and sample taking as well as our inspector personnel. The training also provided the inspectors with a better understanding of the industry and the complex workings of the overall supply chain.

CONCLUSION

Despite the challenges that Food Safety Agency keeps experiencing in terms of enforcing the mandate of R.1283 of 4 October 2019, there are a few success outcomes accomplished.

An informal producer that was found to be producing products that were not compliant in terms of compositional analysis, was refusing Food Safety Agency access to conduct the inspections where a legal mandate was obtained to seize the producer's products and it was discovered on the day of seizure that the producer was no longer in operation. No non-compliant products are not being produced further from the producer as the facility has since been closed down.

A number of inspection and sampling plans have been drawn up, approved and signed by producers and inspections and sampling is done according to these plans.

Continuous engagement from manufactures to get a clear understanding of the requirements of the applicable regulation and good working relationship are created with different role players and manufacturers.

The importance of enforcing the mandate of R.1283 of 04 October 2019, has been seen in the reduction of the number of non-compliances in terms of composition in the last 8 months, as compared to the first 4 months of the regulation implementation. However, more non-compliances are being identified in terms of the marking of containers at producer and retail stores.

We do want to thank all relevant stakeholders for their continuous commitment to customer satisfaction, being compliant with the regulations and working with Food Safety Agency (Pty) Ltd to ensure high standards within the industry.

Compiled by: Food Safety Agency (Pty) Ltd

Please contact us for any enquiries at info@afsq.co.za or go to our website www.foodsafetyagency.co.za to find out more.

