



Legislation affecting the Processed Meat Sector in South Africa

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Regulations and Standards

- **R 908 – HACCP** – “Heat Treated, Ready to Eat, Meat and Poultry processed meat products” - 14th March 2019
- **R 1283** – “ Classification, Packing and Marking of Processed Meat”- 1st April 2020
- **VC9100** – “ Compulsory specification for Processed Meat” – October 2019
- **SANS 885: 2011** – became compulsory standard under VC9100
- **SANS 10330:2020** – HACCP national standard not guideline
- **R 638** – Regulations governing general hygiene requirements for food premises, the transport of food and related matters – June 2018

R 908 – SANAS accredited HACCP

- Effective from 14th March 2019
- First new regulation after the Listeriosis crisis of 2018
- All business's producing ***ready to eat, heat treated meat or poultry processed meat products*** required to be HACCP certified by a SANAS accredited certification body
- This requirement has not changed

R1283 - Classification, Packing and Marking of Processed Meat

- Effective implementation date 1st April 2020
- Food Safety Agency is the DALRRD assignee tasked with implementation
- R1283 governs –
 - Compositional standards as defined in the regulation
 - Requirements for containers and outer containers
 - Marking of containers and outer containers
 - Indicating the appropriate product name
 - Batch Identification

R1283 - Classification, Packing and Marking of Processed Meat

- Country of origin
- Restricted particulars on containers and outer containers “claims”
- Geographic Indicators – e.g. Parma Ham (Prosciutto di Parma), Serrano Ham (Jamon Serrano)

Inspection Process

- Inspections are conducted on the requirements and marking of containers;
- Marking on containers can be visible on a scale label or labelling printed on the packaging;
- Marking on containers must at least be in English with the following particulars:
 - The appropriate product name
 - Any additions to the product name
 - The name and address of the manufacturer
 - The date marking
 - Indication of the country of origin
- The restricted particulars should not appear on the container, unless it is compliant to the United Kingdoms guideline.

Sampling Process

- One product range is sampled once in 12 months;
- If any discrepancies are found, the frequency of inspections & sampling increases to ensure compliance;
- Inspections and sampling is done at the source;
- Records are kept of inspected/sampled products;
- Documentation (lab results, compliance letters etc.) is send to facilities that are inspected and sampled;
- MRM analysis will be conducted if any discrepancies are found in terms of composition in products were MRM is used;
- Recipe verification of products will be conducted;
- The software program is in the process of being implemented in 2 months time.

How have producers done?

- Some producers are not familiar with the published regulation
- Producers continue to deny inspectors access to their facilities due to unwillingness to pay inspection fees?
- Producers refusal to pay the assignee for inspections that have been conducted
- Producers refusal to complete the information pack prior to Food Safety Agency conducting inspections
- Producers have not been truthful about the quantity of products produced
- Producers have denied FSA inspectors access due to Covid – 19.

How has the Food Safety Agency done?

- Food Safety Agency commenced with inspections in April 2020
- Covid restrictions hampered efforts under Levels 5 & 4
- Good working relationships have been created with different role players and producers across the industry
- A number of inspection and sampling plans have been drawn up, approved and signed by producers. Inspections and sampling is done according to these plans
- Continuous engagement with producers in order to ensure a clear understanding of the requirements of the applicable regulation has been done
- The Food Safety Agency has provided feedback quarterly to the industry, issues are quickly addressed and communication has been excellent

VC9100 – Compulsory specification for Processed Meat

- Effective implementation date 8th October 2019
- National Regulator for Compulsory Standards (NRCS) is tasked with implementation by the DTIC
- Food and Associated Industries Division (FAI) will conduct inspections
- Compulsory Specification relates to the handling preparation, processing, packing, refrigeration, freezing, chilling, labelling, marking and storage of heat treated and ready to eat processed meat products covered within the scope of SANS885.
- This includes the microbiological and food safety requirements of these products

How will inspections be conducted?

- Initially desk top inspection will be conducted with producers
- Thereafter 6 monthly physical inspections , including HACCP will be conducted
- A risk based approach will be adopted per factory site
- Production line inspections and verification of all operations will be done
- Annual food safety verification, including physical inspection will be conducted
- Planned and unannounced inspections will be conducted

Factory Inspections will cover the following

- **All** operations, sanitation & hygiene – this includes factory operations outside the scope of VC9100
- Raw material and final products
- Verification of process control measures – (HACCP)
- Food safety management system
- Construction and Maintenance of factory premises and equipment
- Samples will be drawn for Microbiological testing
- NRCS shall only issue an approval certificate after a complete physical inspection of the factory, its processes and systems are approved and it passes the necessary Microbiological product tests
- Once a factory is approved , only then will a certificate be issued.

Areas of concern identified so far

- Factory layouts
- Cross flows – people and product
- Poor hygiene and non adherence to GMP's
- Cooked and Raw product using same freezers/cold rooms
- Product traceability and labelling
- Poor micro with high % out of specification

How has the NRCS done?

- Due to Covid restrictions in 2020 not many physical site inspections were conducted
- Most factory audits have been desk top audits
- Total of 145 desk top and physical inspections completed to end March 2021
- Constrained by limited manpower in various regions

How have the producers done?

- Reluctance to register with the NRCS as a Processed Meat Producer
- Resistance in allowing NRCS inspectors entry into facilities due to Covid
- Uncertainty as to the nature and scope of inspections
- Lack of clarity on sampling plans
- Resistance to NRCS inspectors wanting documentation

SANS 885 : 2011 revision

- The new SANS 885 will be called SANS 885:2020
- 1st Draft out for comment in March/April 2021
- Compositional tables removed
- New Micro standards
- References all new regulations
- Final draft – June /July
- Completion before end of 2021

SANS 10330 : Requirements for a food safety system based on prerequisite programs and Hazard Analysis & Critical Control Point (HACCP) principles

- It specifies the requirements for the development, implementation, maintenance and continued improvement of a food safety system based on prerequisite programs and principles of Hazard Analysis and Critical Control Point (HACCP)
- This standard is based on the Codex's – General Principles of Food Hygiene- Code of Practice
- Describes the principles of control needed to ensure the supply of safe food to the consumer

R638 - Regulations governing general hygiene requirements for food premises & transport

- Published 2018
- Guidelines on the physical infrastructure, hygiene, storage and transport of perishable food
- Guideline for EHP's in issuing of COA's
- Minimum standard

What's on the horizon?

- **Raw Processed Meat Regulation** - Classification, packing and marking of certain Raw Processed Meat Products intended for sale in the Republic of South Africa
- R 2718 (Boerewors and Sausage) will be repealed simultaneously with the above regulation being published.
- No confirmed date is confirmed
- **Meat Analogues** – fall loosely under the Agricultural Products Standards act Section 6 and some products under R 2718.
- Non Meat products using meat names is new to us all and needs regulations to prevent confusion and food fraud

What's on the horizon?

- **New front of pack (FOP) labelling regulations** – to carry bolder warnings on sugar, salt, fat and allergens
- **Revision of R 146** – Labelling regulations to include FOP warnings
- More stringent regulations for labelling targeted at children
- Tighter limits on claims
- New Nutritional requirements and Nutri Tables

Thank You

SAMPA

South African Meat Processors Association