

E. COLI 0157 CONTROL **OF CROSS-CONTAMINATION**

GUIDANCE FOR FOOD BUSINESS OPERATORS AND LOCAL AUTHORITIES













For all queries about this guidance — including if you require the information in an alternative format such as audio, large print or Braille — please use the email below.

CONTACT DETAILS: enforcement@fss.scot

SUMMARY

Intended	This guidance is for all types of businesses that handle both raw foods (that can be a source of <i>E. coli</i> O157) and ready-to-eat foods. For example:
audience:	Manufacturers and processors
	 Retailers, caterers and carers (including movable and/or temporary premises and premises used primarily as a private house)
Which UK nations does this cover?	This guidance applies across Scotland only.
Purpose and how to use this guidance:	The purpose of this document is to provide guidance on the steps for food businesses to take in order to control cross-contamination between raw foods that are a potential source of <i>E. coli</i> O157 and ready-to-eat foods. Following this guidance will also help control cross-contamination from other foodborne bacteria such as Campylobacter, Salmonella and other <i>E. coli</i> strains.
	The measures required to control cross-contamination will vary between different businesses and should be proportionate to the risk posed in accordance with the specific activities carried out, such that:
	A food business operator should undertake a risk assessment on site to decide the controls necessary to minimise the risk of cross-contamination and ensure food safety. This guidance provides options on the steps that a food business can follow depending on what is achievable and appropriate in their particular business. The controls that are considered necessary should be discussed with the local authority, and where relevant primary authority, who can advise on their suitability.
	A local authority should ensure that food business operators have adequated controls in place to reduce the risk of cross-contamination and ensure the safe production of food. This will include having full regard to the circumstances of each particular business. If a food business has a home authority then it would be advisable to liaise with that authority to ensure that an informed and consistent approach is taken.
Structure of the guidance and legal status:	This guidance is formatted in three columns: • Column 1 lays down the legal requirements contained in Regulation (EC) No 852/2004 with which food businesses must comply.
Jogai Siaios.	• Column 2 sets out recommended means by which food businesses may comply with the regulations in order to control cross-contamination with <i>E. coli</i> O157. Where possible, it provides different options for compliance, the suitability of which will be dependent on the activities and particular circumstances relating to each business. It is for the business to determine the controls that are appropriate given their activities and for the relevant local authority to assess the suitability of the controls. Whilst businesses are advised to follow this guide to compliance, it is open to a business to demonstrate to their local authority that it can achieve the objectives of the regulations in other ways.
	 Column 3 provides guidance on good practice within food businesses.
Key words:	Contaminants and food contact materials
	• Food law, monitoring and controls
	Hygiene and food safety
Review date:	April 2017

REVISION HISTORY

This guidance follows the Government Code of Practice on Guidance. If you believe this guidance breaches the Code for any reason, please let us know by emailing betterregulation@foodstandards.gsi.gov.uk. If you have any comments on the guidance itself, please call us using the contact number on page 2 or complete our ongoing Guidance survey.

Revision No.	Revision date
3	December 2014
4	April 2017

ACKNOWLEDGMENTS

This guidance has been reviewed as part of a Working Group consisting of:

- Falkirk Council
- Moray Council
- North Lanarkshire Council.

We would like to acknowledge the helpful contributions provided by all. In addition thanks to all those who read and commented on the drafts.

CONTENTS

Summary Revision History Acknowledgments		3 4 4		on 4: Personal Hygiene and ling Practices Hand washing Protective clothing	32 34 36
1.1 1.2 1.3 1.4	Who is this guidance for? What is cross-contamination? Steps to control cross-contamination Sources of <i>E. coli</i> O157	6 8 9 10	Section and 1 5.1 5.2	on 5: Management Controls training Documented procedures Record keeping	38 40 40
Sectio 2.1 2.2	on 2: Separation Separation of areas – decision tree Food preparation rooms/areas	12 13 14	5.3 5.4 5.5	Corrective actions Verification and review Training	42 42 42
2.3 2.4 2.5 2.6 2.7	Storage and display Equipment and utensils Complex equipment Cash registers Sinks	16 16 18 20 20	Section	on 6: Glossary	44
2.8 2.9	Wrapping and packaging materials Staff	22 22			
Section 3: Cleaning and Disinfection		24			
3.1 3.2 3.3 3.4	Heat disinfection Chemical disinfection Standards for disinfectants and sanitisers Cleaning materials	26 26 28 30			

SECTION 1: INTRODUCTION



Food Standards Scotland (FSS) has produced this guidance document to help food businesses comply with food hygiene legislation contained in Regulation (EC) No. 852/2004 to control cross-contamination with *E. coli* O157.

Escherichia coli O157 (commonly abbreviated *E. coli* O157) is a harmful bacterium that is particularly dangerous because it has the ability to survive during refrigeration and freezing, and has been shown to be tolerant of acid, salt and dry conditions. If consumed, even at very low doses, it can lead to death or serious untreatable illness. Even after recovery from infection, some cases are left with permanent kidney or brain damage. Special attention should always be regarded to vulnerable groups, such as young children or the elderly.

The primary objective of this guidance is to ensure the food produced and sold in the UK is safe to eat and consumers are protected. The risk of cross-contamination with *E. coli* O157 must be considered and controlled in any food business where both raw and ready-to-eat (RTE) foods are handled.

E. coli O157 is a hazard that needs to be controlled through the business' food safety management system. To help businesses comply with this requirement the guidance clarifies:

- the circumstances in which E. coli O157 cross-contamination hazards should be considered
- the control measures that can be applied to control cross-contamination with *E. coli* O157
- that if such controls fail, there is an imminent risk to consumers with potentially severe consequences.

By following the steps provided in this guidance a food business will help control crosscontamination from other foodborne bacteria such as Campylobacter, Salmonella and other *E. coli* strains.

The control measures required will vary between different businesses and should be proportionate to the risk posed in accordance with the specific activities of the business.

Local Authorities (LA) will be able to advise on the control measures required in a specific business. This guidance lays down the legal requirements and FSS's interpretation of how to comply with these requirements followed by good practice. Businesses are advised to follow this guide to compliance, but it is open to a business to demonstrate to their local authority that it can achieve the objectives of the regulations in other ways.

There is a risk of cross-contamination if the same piece of complex equipment is used to process raw and RTE foods. The risk may be adequately controlled by an effective cleaning and disinfection process, but requires that all surfaces that could potentially be contaminated, either directly or indirectly, are subjected to the required chemical or heat disinfection. Due to the complexity of certain types of machinery, such as vacuum packers, it would be considered too difficult to effectively clean such equipment between uses during the normal operation of a business. Equipment that has multiple internal parts that require to be dismantled to be cleaned and disinfected, it would be advisable that the business ligise with their LA so that they can assess that the cleaning methodology is effective. If the manufacturers instructions are available, these should be followed.

Page 18 discusses the different approaches in more detail on all types of equipment.





1.1 Who is this guidance for?

This guidance is for all types of businesses that handle both raw foods (that can be a source of *E. coli* O157) and RTE foods.

It will also help LAs during their inspections of food premises to ensure that the risk of cross-contamination with *E. coli* O157 is under control.

The guidance does not apply to the following types of food businesses:

- primary producers and growers (for example farmers)
- food businesses that handle only prewrapped/pre-packaged food in a way that prevents cross-contamination such as distributors, warehouses, and some retailers where open food is not handled or packed on site
- approved manufacturing processors such as cheese manufacturers or raw milk processors (such as those pasteurising milk), which already have their own established systems to control cross-contamination.

However, the above mentioned businesses are still required to comply with food hygiene regulations and are recommended to follow specific guidance on good hygiene practices¹.

1.2 What is cross-contamination?

Cross-contamination is one of the most common causes of food poisoning. It happens when harmful bacteria are spread onto food from other food sources, such as raw meat or soiled vegetables (known as direct cross-contamination) or from surfaces, hands or equipment that have been contaminated (known as indirect cross-contamination).

Figure 1: Examples of cross-contamination



¹ Some examples could include: Code of Hygienic Practice for Fresh Fruit and Vegetables www.codexalimentarius.org/roster/detail/en//c/80352/ or the Code of good practice for specialist cheese makers www.specialistcheesemakers.co.uk/best-practice/



1.3 Steps to control cross-contamination

The key control measures outlined in this guidance to control cross-contamination with *E. coli* O157 are:

- Separation between raw and RTE foods
- Effective cleaning and disinfection procedures
- Personal hygiene, particularly hand washing, and handling practices
- Effective management controls and training.

1.4 Sources of E. coli O157 in food

E. coli O157 can be found in the following sources, and all these products are required to be handled as if E. coli O157 is present:

- Raw meat E. coli O157 is most commonly associated with beef, lamb, goat and venison, but it has also been found in pork, poultry and the offal of all the mentioned meat.

 Raw bacon must be handled as raw meat because the salting/curing process will not quarantee the removal of harmful bacteria.
- Fresh Produce Fruits and vegetables that are not supplied as RTE must be treated as a potential source of *E. coli* O157 and to make them safe to eat they will need to undergo an adequate washing² and/or processing treatment (for example peeling or cooking). Soil where fresh produce grows can become contaminated with bacteria such as *E. coli* O157 which can transfer to fruits and vegetables. Root crops and leafy vegetables sold loose are likely to have the most soil on the outside.

Fresh produce that is not supplied as RTE is to be handled, stored and displayed in such a way that it does not contaminate RTE foods. Special attention is required when storing soiled vegetables to ensure that they do not contaminate other produce that may not be supplied as RTE but are likely to be consumed raw (for example fruits such as strawberries or raspberries).

- Fruits and vegetables that have been supplied as RTE should already have been subjected to controlled procedures to ensure that they do not present a risk to health. It is not necessary to re-wash them and re-washing is not recommended as it could introduce an additional cross-contamination risk.
- Raw milk products Raw milk supplied to be manufactured and supplied as a RTE product should be treated as RTE. The processing of raw milk in the manufacture of RTE products is beyond the scope of this guidance.
- Untreated water supplies Water can be an important source of microbiological hazards because harmful bacteria may survive in water for months. Water supplied to food businesses, including private supplies, must meet potable water standards.

² Washing will help to remove bacteria including *E. coli* from the surface of fruit and vegetables. Most of the bacteria will be in the soil attached to the produce. Washing to remove any soil is, therefore, particularly important. When washing vegetables, do not just hold them under the running tap, rub them under water, for example in a bowl of fresh water starting with the least soiled items first and then give each of them a final rinse. Washing loose produce is particularly important as it tends to have more soil attached to it than pre-packaged fruit and vegetables – NHS choices – How to wash fruits and vegetables: www.nhs.uk/Livewell/homehygiene/Pages/How-to-wash-fruit-and-vegetables.aspx

SECTION 2: SEPARATION



The design of all food businesses should permit good food hygiene practices, including protection against contamination with E. coli O157 and other harmful bacteria.

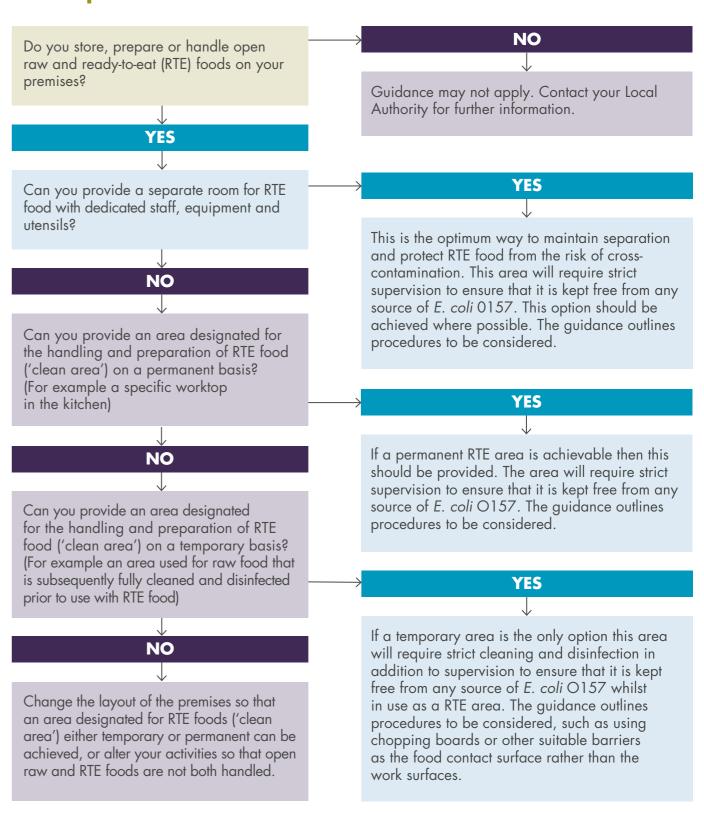
Raw food contaminated with E. coli O157 may transfer bacteria to RTE foods either by:

- direct contact through unsafe handling and storage, or by
- indirect contact through staff movement and poor personal hygiene or unsafe use of equipment, utensils and food contact surfaces.

Identifying separate work and storage areas, food contact surfaces, equipment and utensils for raw and for RTE foods is the most effective way to prevent cross-contamination.

If physical separation is not possible the adequate cleaning and disinfection of the areas used to prepare food will be the main control.

2.1 Separation of Areas Decision Tree – What is achievable?



 Legal requirement
 Guide to compliance

 (EC) No 852/2004 Annex II Chapters I, II and III
 2.2 Food preparation rooms/areas

2.2 Food preparation rooms/areas

Chapter

- (2) the layout, design, construction, siting and size of food premises are to:
 - (a) permit adequate maintenance, cleaning and/or disinfection, avoid or minimise air-borne contamination, and provide adequate working space to allow for the hygienic performance of all operations;
 - (c) permit good food hygiene practices, including protection against contamination and, in particular, pest control.

Chapter II

- (1) In rooms where food is prepared, treated or processed (excluding dining areas and those premises specified in Chapter III, but including rooms contained in means of transport) the design and layout are to permit good food hygiene practices, including protection against contamination between and during operations. In particular:
- (f) surfaces (including surfaces of equipment) in areas where foods are handled and in particular those in contact with food are to be maintained in a sound condition and be easy to clean and, where necessary, to disinfect. This will require the use of smooth, washable corrosion-resistant and nontoxic materials, unless food business operators can satisfy the competent authority that other materials used are appropriate.

Chapter III

Requirements for movable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles), premises used primarily as a private dwelling-house but where foods are regularly prepared for placing on the market and vending machines:

- (1) Premises are, so far as it is reasonably practicable, to be so sited, designed, constructed and kept clean, and maintained in good repair and condition as to avoid the risk of contamination.
- (2) In particular, where necessary:
- (b) surfaces in contact with food are to be in sound condition and be easy to clean and, where necessary, to disinfect. This will require the use of smooth, washable, corrosion-resistant and non-toxic materials, unless food business operators can satisfy the competent authority that other materials used are appropriate;
- (h) foodstuffs are to be placed as to avoid the risk of contamination so far as is reasonably practicable.

When both raw and RTE foods are handled and prepared from the same

premises, there must be effective procedures in place to prevent cross-contamination.

The hierarchy outlined in the decision tree must be used to determine which of these options is most appropriate in relation to the activities undertaken by the business, as well as what is achievable for the business. Refer to the separation of areas decision tree (page 13) to determine what is appropriate.

The options for a food establishment are either:

 using a permanent separate room for RTE food only. This separate room should have dedicated storage facilities, staff, equipment, utensils and sinks for the handling and preparation of RTE food only.

or

2. using an area designated for the handling and preparation of RTE food (also referred to as 'clean area') on a permanent basis. The area must be of sufficient size for the operations carried out, and suitably constructed and installed in such a way as to ensure that RTE foods can be effectively protected from any potential contamination (for example located sufficiently away from areas where splashing may contaminate RTE foods).

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- 3. using an area designated for RTE foods based on time separation (also referred to as a 'temporary clean area'). This area will have been cleaned and disinfected to the required standards prior to being used for RTE foods. When taking this option the following needs to be taken into consideration:
 - Time separation is to be managed in such a way that ensures that contamination from *E. coli* O157 has been effectively removed from all surfaces (including staff hands) that come in contact with RTE foods. Worktops must be thoroughly cleaned and disinfected after the area has been used to prepare raw foods before it can be used for RTE foods. Depending on the activities carried out it might also be required to clean and disinfect the walls in the area. (See Section 3: Cleaning and disinfection).
 - When using time separation, work surfaces must not be used as food contact surfaces. A suitable barrier, such as a chopping board or a container, can be used as the surface directly in contact with food.
 - The spaces above and below the work surface will need to be taken into consideration to avoid anything stored in them becoming contaminated or becoming a potential source of contamination.

It is recommended that separate areas are provided for raw and RTE foods. Where practicable, use separate rooms that include:

- separate fridges, freezers, display units
- separate designated staff/ uniforms
- separate designated equipment
- separate designated utensils
- separate sinks
- separate wash-hand basins.

When time separation is used, it is recommended, where possible, to prepare RTE foods first in a designated area before undertaking preparation of raw foods. This area must be thoroughly cleaned and disinfected after preparing raw food.

Legal requirement	Guide to compliance		Advice on good practice
(EC) No 852/2004 Annex II Chapter IX	2.3 Storage and displays		2.3 Storage and display
(2) Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination. (3) At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state. (5) Food businesses manufacturing, handling and wrapping processed foodstuffs are to have suitable rooms, large enough for the separate storage of raw materials from processed material and sufficient separate refrigerated storage.	As identified from the decision tree (Page 13), use separate storage and display facilities for raw and RTE foods. However the same storage (for example same fridge/freezer) or display unit can be used for raw and RTE foods as long as the storage space is of sufficient size and the storage is planned in such a way that contamination is avoided. Adequate separation within storage and display will often mean raw food has to be stored below RTE food unless other measures in place ensure that cross-contamination can be avoided.	Door handles can be a potential source of cross-contamination, and should be included on cleaning checklists/schedules. If the food stored is wrapped or packaged, attention needs to be paid to the integrity and condition of the packaging to avoid the possibility of it becoming a source of contamination (for example damaged or soiled packaging). Staff need to be instructed on adequate separation within storage and display equipment so that they are clear on where to store food safely.	It is good practice to use separate storage and display facilities including refrigerators, freezers and display units for raw and RTE foods. It is good practice to store raw and RTE foods in separate designated areas even if the food is in sealed containers. One way to control the potential risk cross-contamination from door handle is to get staff that handle raw foods to wash their hands before touching do handles. Ensure packaging is robust, not damaged or leaking and food is checked regularly to ensure integrity and adequate condition of packaging it is good practice to label designate areas to make them clearly identifiate to all staff as being for the storage of RTE or for the storage of raw foods.
(EC) No 852/2004 Annex II Chapters II, III and V	2.4 Equipment and utensils		2.4 Equipment and utensils
Chapter II (2) Adequate facilities are to be provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment. These facilities are to be constructed of corrosion – resistant materials, be easy to clean and have an adequate supply of hot and cold water. Chapter V (1) All articles, fittings and equipment with which food comes into contact are to: (a) be effectively cleaned and, where necessary, disinfected. Cleaning and disinfection are to take place at a frequency sufficient to avoid any risk of contamination. Chapter III, Requirements for movable and/or temporary premises (2) in particular, where necessary:	If equipment and utensils (for example chopping boards, containers, tongs) are to be used for raw and RTE foods, they should be disinfected by heat or an adequate dishwasher cycle between uses (see Section 3: Cleaning and disinfection). If heat disinfection or a dishwasher is not possible, separate equipment and utensils should be used for handling raw and RTE foods and must be stored and washed separately.	Equipment, utensils, dishes and wrapping materials used for RTE foods are not to be stored in open storage (i.e. a storage area that cannot be closed) such as underneath a worktop where preparation of raw foods is undertaken as this could lead to cross-contamination.	It is strongly recommended that businesses have dedicated separate equipment and utensils for raw and RTE foods and these should be easily identifiable for example colour code. Equipment and utensils should be washed in a dishwasher following the manufacturer's instructions.

Legal requirement	Guide to compliance		Advice on good practice
(EC) No 852/2004 Article 5 and Annex II Chapter IX (3)	2.5 Complex equipment ³		2.5 Complex equipment
Article 5 2) The HACCP principles consist of the following: a) identifying any hazards that must be prevented, eliminated or reduced to acceptable levels; b) identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or reduce it to acceptable levels; c) establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identifiable hazards. Chapter IX 3) see page 16.	There is a risk of cross-contamination where the same piece of complex equipment, such as vacuum packers, slicers and mincers, are used to process raw and RTE foods. Depending on the complexity of equipment the contamination may not be adequately removed during routine cleaning and disinfection process and can result in any RTE foods subsequently processed becoming contaminated. FBOs must ensure that: Equipment with multiple internal parts that are not easily accessed are not to be dual used as there is a risk of cross-contamination, unless the equipment is fully dismantled and disinfected between uses. The reason is that contamination can occur throughout the internal components of the machines that cannot be adequately disinfected without a full dismantle. In the case of vacuum packers, a full dismantle should only be undertaken by a competent engineer as the internal components need to be accessible, cleaned and disinfected. Equipment that has multiple internal parts that require to be dismantled to be cleaned and disinfected.	For other types of less complex equipment, such as temperature probes, mixers and weighing scales, the FBO needs to determine whether it is safe to dual use during the normal operations of a working day. This will involve: • determining how complex the equipment is; • how the equipment is used/dual used by the business (for example continuous use versus occasional); • the activities of the business; and • the required cleaning and disinfection to minimise the risk of cross-contamination. The required cleaning and disinfection will be dependent on the equipment, such that simple flat surfaces will be easier to disinfect than lots of smaller moving parts. Chemical disinfection as outlined in section 3.2 is allowed for these items. It may therefore be possible to dual use certain types of less complex equipment if the business has the correct controls in place and can demonstrate a validated method of cleaning and disinfection. In principle, it is strongly advised that separate equipment be used where possible and dual use is used as the last resort.	It is recommended to label or colour code complex equipment so all staff are aware of its intended use. If permanent areas for raw and RTE fo preparation have been designated then complex equipment should be located in the suitable area dependion its use. Where possible, Enforcement Office should be using ATP (Adenosine Tri Phosphate) Monitors to validate the cleaning and disinfection methodolo in place.

to be cleaned and disinfected, it

instructions are available, these

should be followed.

would be advisable that the business liaise with their LA so that they can assess that the cleaning methodology is effective. If the manufacturers

³ Machinery intended for use with foodstuffs is required to comply with the European Machinery Directive 2006/42/EC

Legal requirement	Guide to compliance		Advice on good practice
(EC) No 852/2004 Article 5 and Annex II Chapter IX (3)	2.6 Cash registers		2.6 Cash registers
see page 16.	Cash registers and other non-food contact equipment (for example pens, phones, chip and pin machines, light switches, etc.) may be shared by staff handling raw and RTE foods. The main control is that staff wash their	hands before handling any RTE foods (see Section 4: Personal hygiene and handling practices).	Good practice would be to have separate cash registers ensuring one is kept in the raw area and one is kept in the RTE area. Cash registers should be included in the cleaning schedules.
(EC) No 852/2004 Annex II Chapters II and III	2.7 Equipment and utensils		2.7 Equipment and utensils
 Chapter II (2) Adequate facilities are to be provided, where necessary, for the cleaning, disinfecting and storage of working utensils and equipment. These facilities are to be constructed of corrosion – resistant material, be easy to clean and have an adequate supply of hot and cold water. (3) Adequate provision is to be made, where necessary, for washing food. Every sink or other such facility provided for the washing of food is to have an adequate supply of hot and/or cold potable water consistent with the requirements of Chapter VII and be kept clean and, where necessary, disinfected. Chapter III Requirements for movable and/or temporary premises. (2) In particular, where necessary: (d) where foodstuffs are cleaned as part of the food business' operations, adequate provision is to be made for this to be undertaken hygienically; (e) an adequate supply of hot and/or cold potable water is to be available. 	As per the decision tree (Page 13), separate sinks should be used for raw and RTE foods and equipment. However sinks can be shared provided that the sink, including the taps and any other fittings, is cleaned and disinfected between uses. When the sink is shared for raw and RTE foods, the food must not come into direct contact with the sink. A container can be used to avoid direct contact. Disinfectants used to disinfect shared sinks are required to comply with the BS EN 1276 or 13697 or equivalent standards (see Section 3: Cleaning and disinfection).		It is recommended to have separate sinks: • one for washing equipment and utensils used for raw foods and/or for rinsing raw foods such as fruits and vegetables • one for washing equipment and utensils used for RTE foods and/or for rinsing RTE foods such as cooked rice or pasta. It is not recommended to wash raw meat (for example poultry), due to the increased risk of splashing bacteria onto surrounding surfaces. It is not recommended to rewash vegetables or fruit that have been supplied as RTE.

Legal requirement	Guide to compliance		Advice on good practice
(EC) No 852/2004 Annex II Chapter X	2.8 Wrapping and packaging materials		2.6 Cash registers
 Material used for wrapping and packaging are not to be a source of contamination. Wrapping materials are to be stored in such a manner that they are not exposed to a risk of contamination. Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. Where appropriate, and in particular in the case of cans and glass jars, the integrity of the container's construction and its cleanliness is to be assured. Wrapping and packaging material re-used for foodstuffs is to be easy to clean and, where necessary, to disinfect. 	Materials used to wrap and/or pack RTE foods must be stored in a designated area and the wrapping material must be kept free from contamination at all times. Staff handling wrapping and packaging materials must ensure that their clothes and hands are not vehicles for contamination when loading or removing wrapping and packaging materials. Food businesses must ensure that food received wrapped and/or packaged from other establishments is visually checked to ensure that the integrity and condition of the packaging do not pose a risk of cross-contamination, and that the separation between raw and RTE foods during transport is adequate.	When unpacking/unwrapping packaged foods, ensure that packaging and wrapping materials are removed hygienically and are not a source of contamination.	It may be possible to establish an assured standard of cleanliness of the wrapping and packaging material through contractual arrangements with the supplier. For example, auditing the packaging material supplier or requesting written confirmation detailing the hygienic procedures followed to ensure that the wrapping/packaging materials are safe to be used with RTE food. Food businesses may consider having a written agreement with their suppliers about the delivery requirements. Where necessary, raw foods should be unpacked and/or unwrapped and placed in designated containers before they are brought into the kitchen or storage area.
(EC) No 852/2004 Annex II Chapter XII	2.9 Staff		2.9 Staff
Food business operators are to ensure: (1) That food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity.	Staff must not be a source of contamination. Staff need to be supervised, instructed and/or trained to ensure movement between raw and RTE areas is managed in such a way that the risk of cross-contamination is minimised.		Good practice, where appropriate, is to have separate staff for handling raw and RTE foods.
	In areas designated for RTE foods based on time separation and in catering environments, shops and similar premises where it may not be practical to have permanent separate staff for different tasks, it is essential that staff are trained to the required standard and that the highest levels of training and personal hygiene are to be maintained to ensure that staff are not vehicles of cross-contamination (see Section 4: Personal hygiene and handling practices).		

SECTION 3: CLEANING AND DISINFECTION

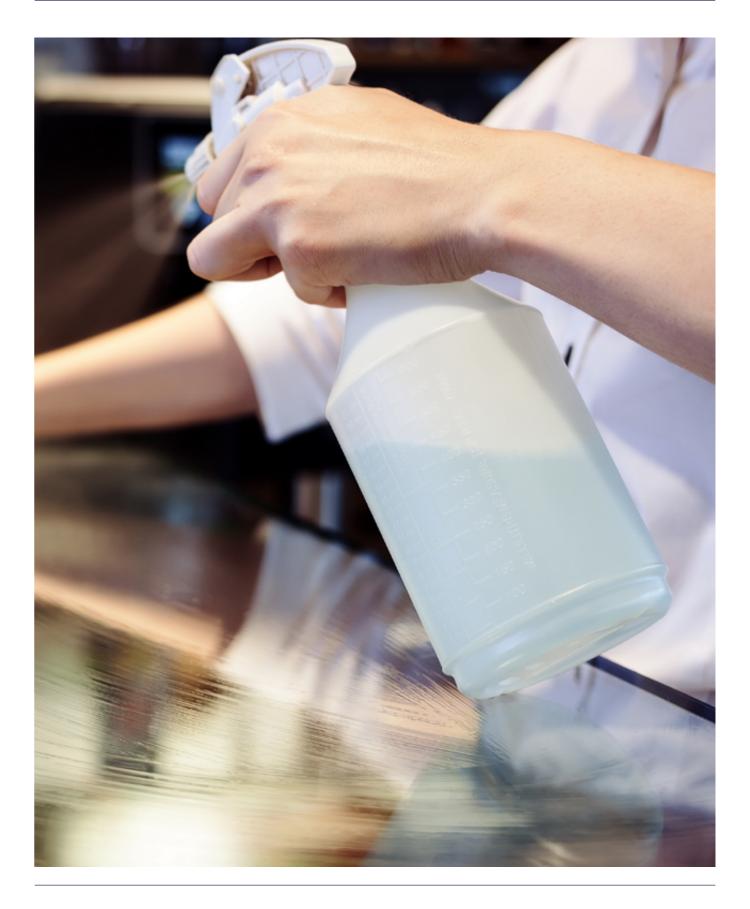


When complete physical separation is not possible, cleaning and disinfection procedures are considered critical to control cross-contamination and to ensure food safety.

E. coli O157 and other harmful bacteria have to be effectively removed from all surfaces and equipment before they can be used in the preparation of RTE foods.

If cleaning and disinfection is not performed properly, it may result in the contamination of food and subsequently a health risk for consumers.

It is essential that staff designated for carrying out cleaning and disinfection procedures are adequately supervised, instructed and/or trained to ensure the procedures are carried out effectively every time.



Legal requirement	Guide to compliance		Advice on good practice
(EC) No 852/2004 Annex II Chapters I and V	3.1 Heat disinfection		3.1 Heat disinfection
icood premises are to be kept clean and maintained in good epair and condition. The layout, design, construction, siting and size of food premises are to permit adequate maintenance, cleaning and/or disinfection, avoid or minimise air-borne contamination and provide adequate working space to allow for the hygienic performance of all operations. All articles, fittings and equipment with which food comes into contact are to: The effectively cleaned and, where necessary, disinfected. Cleaning and disinfection are to take place at a frequency sufficient to avoid any risk of contamination; The equipment and the surrounding area. Septer IX See above The to be kept clean and maintained in good epair and the whole aring and disinfection section.	disinfected or put through an adequate dishwasher cycle between uses.	If heat disinfection or a dishwasher is not available then equipment and utensils should not be shared and as such be specifically designated for either raw or for RTE foods (see Section 2: Separation).	The use of dishwashers to clean utensils and food equipment is good practice as long as they are properly maintained, serviced routinely and the full cycle is not interrupted once it has started. Food businesses should follow the manufacturer's instructions of use which usually include instructions on removal of food particles, correct loading (i.e. avoid overloading), pre-rinsing equipment and utensils, removal of limescale from water jets, filters and drains, appropriate use of chemicals and regular cleaning of the machine. If chemical disinfection is used within a dishwasher, this should be discussed with the relevant chemicals' manufacturer to ensure the chemicals used are adequate. Where heat or a dishwasher is not available it is good practice to use separate designated sinks to wash equipment and utensils.
	3.2 Chemical disinfection		3.2 Chemical disinfection
	When the same non-food contact surfaces such as worktops, sinks, etc. are used at different times to prepare raw and RTE foods, they must be cleaned and disinfected between uses. Chemical disinfectants used in these areas need to comply with BS EN standards 1276 and/or 13697 or equivalent. Disinfection will only be effective if carried out on visibly clean surfaces that are free from grease, film or solid matter. Chemical disinfection must always be carried out as a two-stage process:	Stage 1: general cleaning using a detergent This involves the physical removal of visible dirt and food particles from surfaces and equipment, followed by a thorough rinse to ensure the removal of all residues from the surface before moving to stage 2.	It is good practice for businesses to 'clean as you go' to ensure that work areas, utensils and equipment are kept to the required levels of hygiene during the working day.

Legal requirement	Advice on good practice	Guide to compliance	Advice on good practice
See 3.1 and 3.2	3.2 Chemical disinfection	3.2 Chemical disinfection	3.2 Chemical disinfection
	Stage 2: disinfection This involves the use of a disinfectant following the manufacturer's instructions for its dilution rate and contact time. Disinfectants will not be effective if used on dirty surfaces, or if applied at the incorrect dilution or for the insufficient contact time or the incorrect temperature. When using a sanitiser, the two stage cleaning process as described 3.1 and 3.2 is still required. Therefore apply the sanitiser (or a detergent) first for general cleaning, rinse and then apply the sanitiser again for the disinfection stage.	Chemicals must always be used in accordance with the manufacturer's instructions regarding dilution, contact times and rinsing. Staff involved in cleaning procedures must be supervised, instructed and/or trained as required (see Section 5: Management controls and training).	When choosing disinfectants for chillers/freezers you should check with the supplier if the disinfectant chosen is effective when used at low temperatures. Chemicals should be purchased from reputable suppliers. Training on cleaning procedures should include: all appropriate health & safety information; materials and equipment required; name of productions and required contitimes, as well as the overall standard to be achieved as part of the cleaning and disinfection process.
	3.3 Standards for disinfectants and sanitisers		3.3 Standards for disinfectants and sanitisers
	Any disinfectant or sanitiser used to control cross-contamination with E. coli O157 must at least meet the requirements of one of the following published standards at the recommended use, dilution and contact time: • BS EN 1276; or • BS EN 13697 or, as a minimum, other test standards that meet the conditions and requirements used in these standards. These standards provide assurance that the disinfectant (or sanitiser) is capable of reducing a range of harmful bacteria, including E. coli, to acceptable levels if used as stated by the manufacturer.	FBOs and staff must ensure that they are using the appropriate disinfectants; if the standard is not displayed on the product's label they need to contact the supplier or manufacturer for confirmation.	Disinfectants should be freshly prepared according to manufacture instructions. If disinfectants or sanitis are being prepared in advance or transferred into new bottles (for example to dilute concentrated products) then it is good practice to put label instructions on the bottle of how to use the chemical, for examp to specify contact time, expiry date of the product, dilution rate and if it requires rinsing. Further information on chemicals can be obtained through the Health and Safety Executive, www.hse.gov.uk

Legal requirement	Guide to compliance	Advice on good practice
See Above	3.4 Cleaning materials	3.4 Cleaning materials
	FBOs must ensure that the cleaning equipment is not a source of contamination. Cloths that have been used to clean raw food areas must not be used to clean RTE areas unless suitably washed between uses in such a way that ensures that E. coli 0157 has been destroyed. Cleaning materials (for example cloths, brushes, etc.) used on the floor must be separated from materials used on other surfaces such as worktops. Cleaning of floors must be carried out in a way that does not contaminate surfaces in a clean environment (for example by splashing).	Cleaning equipment should be in good condition and regularly cleaned and disinfected or replaced as required. For example, a suitably high temperature can be obtained using a hot cycle in a washing machine that typically operates at 90°C. It is advisable that cloths for raw use be washed separately. The use of disposable single-use cloths is recommended to prevent cross-contamination. Steeping cloths in bleach or disinfectants is not considered an effective measure to control cross-contamination with E. O157. Any organic matter, such as grease, dirt or food left on the cloths will reduce the effectiveness of the bleach or disinfectant properties. Cleaning materials for different area should be easily identifiable (for example colour coded), and stored separately. Colour coded cloths sho be used to avoid the dual use befor cleaning or disposal. Floors can never be regarded as clean, any food or surfaces of equipment that come into contact with any floor must be considered a potentially contaminated (food must be discarded and containers must all assets and the contact with any floor must be considered a potentially contaminated (food must be discarded and containers must all assets and the contact with any floor must be considered as potentially contaminated (food must be discarded and containers must all assets and the contact with any floor must be considered as potentially contaminated (food must be discarded and containers must all assets and the contact with any floor must be considered as potentially contaminated (food must be discarded and containers must all assets and the contact with any floor must be considered as potentially contaminated (food must be discarded and containers must and the contact with any floor must be considered as potentially contaminated (food must be discarded and containers must and the contact with any floor must be considered as potentially contaminated (food must be considered and containers must and the contact with any floor must be considered as potentially contaminate

cleaned and disinfected).

SECTION 4: PERSONAL HYGIENE AND HANDLING PRACTICES

It is essential that staff follow good personal hygiene practices to help prevent cross-contamination of harmful bacteria to RTE foods.

Effective handwashing and suitable clean protective clothing can help prevent harmful bacteria spreading to food, work surfaces, equipment etc. through hand contact or clothing.



Step 1
Wet your hands thoroughly under warm running water and squirt liquid soap onto your palm.



Step 2
Rub your hands together palm to palm to make a lather.



Step 3
Rub the palm of one hand along the back of the other and along the fingers.
Repeat with the other hand.



Step 4
Put your palms together with fingers interlocked and rub in between each of the fingers thoroughly.



Step 5
Rub around your thumbs on each hand and then rub the fingertips of each hand against your palms.



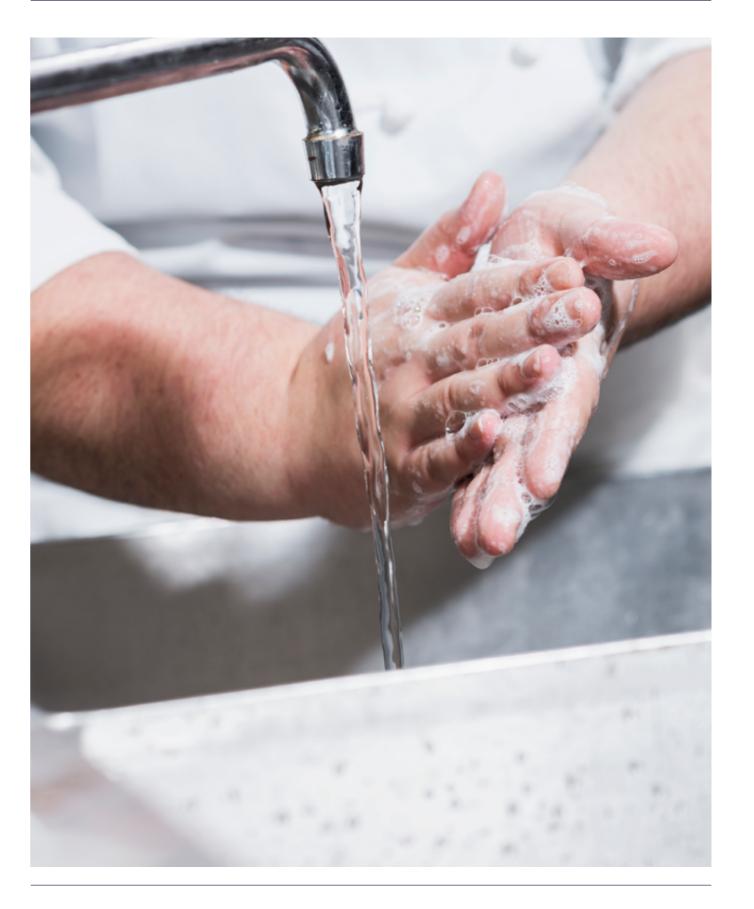
Step 6
Rinse off the soap with clean water and dry your hands thoroughly.
Ensure the taps are turned off hygienically, for example using a disposable towel.

There must be procedures in place to monitor and manage strict adherence to a documented handwashing procedure and to the appropriate use of protective clothing to control the risk of cross-contamination with E. coli O157.

The FSA has produced hand washing videos as well as printable diagrams on effective hand washing for use by food businesses:

Videos: www.youtube.com/
watch?v=eUGqNUG_1C8

CookSafe handwashing: food.gov.uk/multimedia/pdfs/csposter.pdf



Legal requirement	Guide to compliance	Advice on good practice
(EC) No 852/2004 Annex II Chapters I, III & VIII	4.1 Hand washing	4.1 Hand washing

Chapter I

(4) An adequate number of washbasins is to be available, suitably located and designated for cleaning hands. Washbasins for cleaning hands are to be provided with hot and cold running water, materials for cleaning hands and for hygienic drying. Where necessary, the facilities for washing food are to be separate from the handwashing facility.

Chapter III

Requirements for movable and/or temporary premises.

- (2) In particular, where necessary:
 - (a) appropriate facilities are to be available to maintain adequate personal hygiene (including facilities for the hygienic washing and drying of hands, hygienic sanitary arrangements and changing facilities).

Chapter VIII

(1) Every person working in a foodhandling area is to maintain a high degree of personal cleanliness and is to wear suitable, clean and, where necessary, protective clothing. Washbasins must be located so as to prevent contamination of RTE foods by splashing, and have an adequate supply of hot and cold, or appropriately mixed, running water, cleaning materials and hygienic means of drying hands.

In order to control cross-contamination, handwashing is required:

- prior to handling RTE food
- after touching raw food and its packaging, including unwashed fruit and vegetables
- after a break
- after going to the toilet
- after cleaning
- after removing waste
- after blowing your nose.

Measures are to be taken before touching phones, light switches, door/fridge/freezer handles and cash registers to ensure these are kept clean.

Although there may be slight variations on handwashing techniques all include the following steps:

- wetting of hands prior to applying soap
- a prescribed technique for hand rubbing, aimed at physically removing contamination from all parts of the hands
- rinsing of hands
- hygienic drying.

It is important that staff dry their hands thoroughly as bacteria can spread more easily if hands are wet or damp.

It is good practice to use non-hand operated taps at handwashing facilities as they reduce the risk of cross-contamination.

Taps can be a source of contamination, and therefore it may not be appropriate for hands to come into contact with taps after they have been washed. It is recommended that a disposable paper towel can be used to turn the taps off.

Single use, disposable towels are recommended for hygienically drying hands. Re-usable towels are not recommended.

For extra protection against harmful bacteria and contamination, it is recommended to use an anti-bacterial hand wash that has disinfectant properties conforming to the European standards BS EN 1499. This information should be available on the label of the product, or can be obtained from the supplier/manufacturer.

Hand sanitising gels can provide an additional level of protection when applied after handwashing. Gels, if used, should conform to BS EN 1500 standard. It should be noted that these gels do not necessarily remove visible dirt and should never be used as a replacement for handwashing.

Where possible, working practices should minimise the requirement of frequent handwashing, for example by preparing raw foods at different times to RTE food or by having separate staff for different dedicated activities (so one handling raw foods and one handling RTE foods).

Minimising direct hand contact with food by using clean tongs or other utensils may help reduce cross-contamination risks.

Even with these procedures effective handwashing needs to be followed to help further reduce any risks, for example the risk of cross-contamination with utensil handles.

Gloves are not a substitute for effective handwashing. If gloves are used they should be changed as per the list for when handwashing is required and if they become damaged or torn. Hands should also be washed prior to putting gloves on and when necessary after taking them off (for example it may not be required when only RTE food is handled).

The use of separate identifiable or colour coded packs of disposable gloves for different activities might assist with cross-contamination.

Legal requirement	Guide to compliance	Advice on good practice
(EC) No 852/2004 Annex II Chapter VIII	4.2 Protective clothing	4.2 Protective clothing
	Protective clothing must not present a cross-contamination risk, and therefore if contaminated it needs to be changed prior to handling RTE foods.	Where appropriate, it is good practice for food businesses to have separate sets of clothing for handling raw and RTE foods (and ideally separate staff).
	Staff members must wash their hands after changing contaminated clothing and before putting on clean clothing. When the same staff handle raw and RTE food alternately (for example during cooking) there is no need to change protective clothing for different activities but care must be taken to ensure	When appropriate, food businesses may consider using designated colour coded aprons or disposable aprons for different activities.
	that clothing does not become contaminated, or pose a risk of cross-contamination otherwise it will need to be changed. Systems in place must ensure that any visitor entering the premises follows the established hygiene controls.	There is not a recommended specific temperature to wash staff uniforms. The important point is that staff working with RTE foods should always wear suitable, clean clothing that does not present a risk of indirect

cross-contamination.

Food Standards Scotland has produced guidance for food businesses on actions to take for staff that have an illness or have been ill; Food handlers' fitness to work guide can be accessed at: www.foodstandards.gov.scot/food-handlers-fitness-work-best-practice-advice-food-businesses

SECTION 5: MANAGEMENT CONTROLS AND TRAINING



Effective food safety management controls are critical to control cross – contamination with E. coli O157.

The food hygiene legislation requires FBOs to put in place food safety management procedures based on the HACCP principles. It is not the intention of this guidance to explain those requirements in full; however, some of these requirements are dealt with in this section.

FBOs must ensure that food handlers are supervised and instructed and/or adequately trained to understand the importance of food hygiene matters in line with their work activity.

Training/instruction should cover the importance of separation of raw and RTE foods, the importance of personal hygiene, in particular effective hand washing and the hazards associated with inadequate cleaning and disinfection. All staff involved in cleaning procedures need to be trained to ensure they are competent before being asked to undertake heat or chemical disinfection.



egal requirement		Guide to compliance	Advice on good practice
EC) No 852/2004 Article 5	5.1 Documented procedures	5.1 Documented procedures	5.1 Documented procedures
Food businesses operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles. The HACCP principles referred to in paragraph 1 consist of the following: identifying any hazard that must be prevented, eliminated or reduced to acceptable levels; identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels; establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards; establishing and implementing effective monitoring procedures at critical control points; establishing documents and records commensurate with the nature and size of the food business to demonstrate the effective application of the measures outlined in subparagraphs (a) to (f).	FBOs must keep up-to-date documented procedures that cover cross-contamination control and be part of the relevant staff training. FBOs should consider and, where appropriate, document: Potential sources of E. coli O157 in the business. Method of separation (for example permanent separate areas). Cleaning procedures for surfaces, equipment and utensils. Detail the type of disinfection required for each area/equipment (i.e. heat disinfection, chemical disinfection, etc.).	 Personal hygiene procedures (for example hand washing requirements, personal hygiene rules and use of protective clothing). Staff training. 	You may find the following helpful ButcherSafe Safe Catering CookSafe. It is good practice to use labels to identify designated areas and/or to use colour coded equipment an utensils designated for RTE foods. It is recommended to display posters describing the correct har washing technique and the person hygiene rules.
(EC) No 852/2004 Article 5	5.2 Record keeping	5.2 Record keeping	
	Record keeping is essential to demonstrate that procedures for the control of cross-contamination are adhered to. Records must be kept for an appropriate time long enough to ensure information is available in case a product needs to be traced back. Depending on the activities of the business these may include: Records of monitoring and verification activities. Records of non-conformances and corrective action taken. Records of cleaning, maintenance	 Records of review of the food safety management systems. Systems have to be reviewed whenever substantial changes are made (for example when introducing a new product or when using new ingredients in a recipe). Evidence of training and supervision which should include training on cross-contamination procedures. 	It is not necessary to set up comp systems – simple records easy to understand will be sufficient in accordance to the size of the bus and the activities that it undertake Documents and records should be retained for a period of time which relates to factors such as the shell life of the product, period of staff employment (for training records) frequency of scheduled cleaning programmes, etc. It is good practice to review the systems at least once a year.

Legal requirement		Guide to compliance	Advice on good practice
(EC) No 852/2004 Annex II Article 5		5.3 Corrective actions	5.3 Corrective actions
e) establishing corrective actions when monitoring indicates that a critical control point is not under control.	When things go wrong, such as a loss of control, it is essential to take immediate action to ensure food safety. If a RTE product has potentially been contaminated with E. coli O157 the affected operation must stop immediately. The FBO must remove the contaminated product to a safe area and investigate the cause. Then the	 following may be appropriate: Disposal of contaminated product. Re-work of potentially contaminated product (for example heat treatment with temperatures that will destroy E. coli O157, for example 70°C for 2 minutes). Withdrawal or recall of the contaminated product (inform the local authority and the FSA via: www.food.gov.uk/policyadvice/incidents/report/). 	
(EC) No 852/2004 Annex II Article 5	5.4 Verification and review		5.4 Verification and review
f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs a) to e) are working effectively.	Periodic reviews of all procedures established to control cross-contamination with E. coli O157 are required regularly and whenever there are significant changes to operations. Food businesses are required to check and confirm that the controls in place are effective during both quiet and busy periods, and particularly when a new procedure is introduced.	Any verification check that establishes a loss of control must be considered a serious risk of cross-contamination and corrective actions are to be taken immediately.	Verification should ideally be carried out by someone other than the persoresponsible for monitoring and can be done in house or by external independent third party (for example you are member of a specific scheme Verification procedures can include: audits to suppliers, validation of critical limits, corrective actions taker calibration of instruments used for monitoring, servicing of machinery, environmental sampling, etc.
(EC) No 852/2004 Annex II Chapter XII	5.5 Training		5.5 Training
ood business operators are to ensure: 1) that food handlers are supervised and instructed and/or trained in food hygiene matters commensurate with their work activity; 2) that those responsible for the development and maintenance of the procedures referred to in article 5(1) of this regulation or for the operation of relevant guides have received adequate training in the application of the HACCP principles.	Staff must be instructed or trained in all safe methods that are relevant to the job they do and the competency of staff must be supervised and reviewed regularly to establish the need of refreshing any training. Staff responsible for the development and maintenance of the HACCP plan must receive specific training in HACCP.		Although there is no legal requirement to attend a formal training course, food businesses may consider using recognised training courses specific to the requirements of their particular business. The necessary skills can also be obtained through other methods such as on-the-job training, self-study, or relevant prior experience.

SECTION 6: GLOSSARY



The following definitions are specific to this guidance:

- 'anti-bacterial hand wash' hand sanitising products such as bactericidal liquid or foam soaps.
- 'area designated for RTE foods' –
 Also referred to as a 'clean area' an area within a food establishment that is specifically designated for RTE foods and managed in a way that ensures that harmful bacteria such as E. coli O157 have been effectively excluded from all surfaces and from food handlers that will come in contact with RTE foods. The designated area can be used on a permanent basis or a temporary basis, where it is used at different times for raw foods.
- 'BS EN' British Standard, European Norm. Disinfectants that comply with BS EN 1276 and/or BS EN 13697 published standards or alternative standards that meet the same conditions have shown to kill E. coli O157 if applied as directed by manufacturers.
- 'chemical disinfection' reduction of the levels of microorganisms using approved chemical agents (disinfectants or sanitisers).
- 'clean as you go' keeping the work area clean and tidy at all times whilst working. This may include cleaning up spills, wiping down surfaces, removing waste to bins and generally keeping the work area, tools and equipment and persons working in it to the required levels of hygiene to produce safe food.

- 'complex equipment' items of equipment that can be very difficult to clean adequately between uses. In particular this may be because it is hard to access all parts of the equipment or because they are made up of a number of small parts and surfaces which may not be smooth or easy to clean. For example, slicers, mincers and vacuum packing machines.
- 'contact time' the period of time that the disinfectant needs to be left on the surface to work effectively.
- 'contamination' the presence or introduction of a biological, physical or chemical hazard in a food or food environment.
- **'critical limit'** A criterion that separates acceptability from unacceptability for the prevention, elimination or reduction of identified hazards such as E. coli O157.
- 'cross-contamination' the spread of harmful bacteria onto food from either other food sources, such as raw meat or soiled vegetables (known as direct cross-contamination) or from surfaces, hands or equipment that have been contaminated (known as indirect cross-contamination).
- 'detergent' product used for general cleaning (to dissolve grease and remove dirt). Detergents do not have disinfectant properties (i.e. if used on their own they are not able to kill bacteria such as E. coli O157).
- 'dilution rate' quantity of water to use with a concentrated chemical before it can be used. Always follow the manufacturer's instructions.

- 'disinfectant' product capable of reducing the levels of specific bacteria when applied to visibly clean surfaces at the specified dilution and for the recommended contact time.
- 'FBO' Food business operator.
- 'foodborne' microorganisms, such as bacteria which use food as a vehicle to move onto humans where they can multiply.
- 'HACCP' Hazard Analysis and Critical Control Points.
- 'hand sanitising gels' hand sanitising products, such as alcohol-based gels/ bactericidal (capable of killing bacteria) hand gels and wipes.
- 'handling' to pick up and hold, move, or touch with the hands.
- 'hazard' a biological, chemical or physical agent in, or condition of, food with the potential to cause harm to the consumer's health.
- 'leafy vegetables' includes, but is not limited to all varieties of lettuce, spinach, cabbage, watercress, chicory, endive and radicchio and fresh herbs such as coriander, basil, and parsley.
- 'monitoring' a pre–arranged programme of checks (observations or measurements) of critical and/or 'legal' limits to check whether control measures are in danger of failing and which determine the need to take corrective actions.
- 'non-food contact surfaces' surfaces
 that do not normally come in direct contact
 with food (for example walls), but can
 potentially cause cross-contamination due to
 its close proximity to exposed food.

- 'packaging' placing of one or more wrapped foodstuffs in a second container (and the second container itself).
- 'potable water' water meeting the minimum requirements laid down in Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption.
- 'protectiveclothing' coats, overalls, aprons, gloves, headgear and footwear.
- •'raw foods' in this context include raw meat and any raw food, including fruit and vegetables and any ingredient that are potential sources of E. coli O157 (fresh or frozen). Raw fish and shellfish are outside the scope of this guidance as they are not potential sources of E. coli O157.
- 'raw meat' uncooked red meat (including mince, bacon and sausages) poultry, game and offal. Raw meat includes both fresh and frozen meat
- 'ready-to-eat foods' (RTE) foodstuff or ingredients that are intended to be consumed without the need of further heat treatment or processing. For example cooked meats, washed/peeled fruits, salads, pies, bread, cheese and sandwiches.
- 'recall' when customers are asked to return/dispose of a food product.
- 'root crops' include potatoes, onions, carrots, beets, and turnips.
- 'sanitisers' products that combine a disinfectant and a detergent in a single product. For effective disinfection they must be used twice: first to clean and then again to disinfect.



- 'sterilising sink' a sink unit used for sterilising equipment and utensils. Must be able to operate to a temperature capable to destroy E. coli O157.
- 'supervision' the process of overseeing the performing of tasks and procedures to ensure that they are carried out effectively and that the required standards are met.
- 'validation' collecting and evaluating scientific and technical information to determine whether the HACCP plan, when properly implemented, will effectively control the identified food hazards. "The business is going to do the right thing".
- **'verification'** checking or confirming that the HACCP-based procedures are achieving the intended effect, i.e. food safety hazards are under control. "Confirmation that the business is doing what had planned to do".
- 'visibly clean' free from any visible grease or film or solid matter. A visibly clean surface can still be contaminated by harmful bacteria if it has not been disinfected.
- 'withdrawal' stop using/selling a food product.
- 'wrapping' placing of a foodstuff in a wrapper or container in direct contact with the foodstuff concerned, and the wrapper or container itself.

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