

## Submission to BRF from Ed Hick

The last twenty years have seen radical changes in the whole of the meat processing and retail sectors. Most of these changes are the result of an acknowledged and flawed de facto policy of centralisation. This policy has effectively closed many traditional businesses, whose inherent but modest profitability was undermined by some rather senseless dogma.

Fundamentally this has not been in the best interests of consumers or small business, replacing choice and competition with sterility as the foundation stone of the sector. Needless to say this approach has suited big business. Science has been given unquestioned and indeed undemocratic primacy in all areas of food production. Very much a ...“ we know what's best for you!” approach!! This has its own problems. Many personal wish lists in the form of recommendations have been peddled as regulations. Foisted upon individuals as though law!

It would not have been uncommon in the 1980's for myself and my brother to have killed 20 pigs per week. During this time, we would have often been inspected by 4 local authority appointed veterinarians! I know this seems hard to believe, but I'm quite sure all mileage and overtime records required to prove my point would have been filed as we were always in operation from 7am! Our retail outlets were inspected by the local EHO's by the local Health Board (as was). Thereafter we were subject to Dept of Agriculture inspections. What chance did we or indeed the hundreds of other small butchers that are now gone have? Just how big a risk did we collectively pose? It would be very interesting to see what reduction, if any, in food poisoning incidences have been brought about by these actions.

An easily identified example of the zeal with which silly recommendations became “law” was the headlong rush in the late 80's to insist that wooden cutting boards be replaced by nylon ones. Thousands of years of collective human experience was cast aside, for a new material, because somebody thought it would be better. They proved absolutely impossible to keep clean and were all eventually thrown out and replaced with timber again. The cost of this would have run to excess of IRI 2,000, or more depending on chopping block sizes! This was no small expense in the 80's!!! Particularly for a small retail business trying to compete with the multiples! Recent research in Canada shows that far from being difficult to clean, wooden boards actually have an inherent anti bacterial function that is not yet fully understood. Yet our great grandparents knew to use timber boards, and the chances are they had never even heard of bacteria!

Today, there are continuing examples of this silliness. A look at the FSAI guidance notes for meat processing requires a multitude of rooms, a log of the number of flies caught to be maintained, microbiological water sampling of municipal water supplies to mention a few. Most if not all of these measures will be discarded within a few years, as the above example illustrates.

Most of these “advances” are at the expense of smaller business. The numbers of butcher's shops that have closed in recent years beggars belief. That traditional small businesses are effectively closed, is doubtless in the interests of bigger business who have steadily increased market share in every product line in every sector. A cynic with a black heart might draw some correlation between the provenance of the drivers of food safety policy and the CV's of senior executives

within this “new” industry...