The Naked Bean
Unit 12 Howemoss Drive, Aberdeen
16 May 2014
Food Hygiene

Notes on Interpretation

Requirements:
1) These items relate to matters that are required in terms of the above-mentioned legislation. In order to allow you to make informed choices each item below indicates:
   a) What requirement has to be met
   b) The respects in which it has not been met, and
   c) Where appropriate a course of action which in my opinion would satisfy the requirement

   In most cases there will be more than one course of action which could satisfy a given requirement. In these cases it is open to you to take any such other course of action which meets the requirements. It may be advisable to discuss alternative proposals with me so that I can advise you whether there are other requirements which might have to be taken into account when considering an alternative course of action.

   Where the word must is used, it also indicates a requirement.

2) This is not a Notice requiring works to be carried out, however, any breach of a requirement could, at a future date, be the subject of an Improvement Notice. The purpose of this report is to advise you of such matters so that you can attend to them without the need for such Notices.

3) The items contained in the attached schedule[s] relate to matters as found at the time of inspection and cover[s] only the areas inspected. Where a practice, etc. is not explicitly mentioned in this report it should not be taken as an indication of compliance with any provision of the Food Safety Act or any regulations made under it.

Overview

I carried out a food hygiene inspection to assess how well you control food safety hazards and comply with food safety legislation. The assessment comprised of a physical inspection of the premises, observation of the food handling practices, examination of available documentation, and a discussion with XXXX XXXXXXX, XXXXXXX XXXXXXX and XXXX XXXXXX.

Whist I was pleased to note everybody’s positive attitude towards food safety, there were areas of concern in relation to cross contamination. In addition, all businesses are required to have a documented food safety management system implemented into their food business. More information in relation to this and any further matters which require your attention are detailed below.

If you require any further information or clarification on any of the points raised, please do not hesitate to contact me.
Food Safety Management Procedures (Hazard Analysis Critical Control Points)

Regulation (EC) 852/2004 Article 5

Article 5 of Regulation (EC) 852/2004 requires all food business operators to develop and implement a food safety management procedure based on HACCP principles. HACCP, or hazard analysis, is a system whereby you consider all the steps in your food operation from the delivery of the raw materials and ingredients through each stage to the final service of food to the customer. This will include delivery, storage (ambient and refrigeration/frozen), preparation (cross contamination risks, stock rotation etc), cooking, and where applicable, hot-holding, cooling and reheating (i.e. temperature control).

It is important that you as the food business operator have a food safety management system which relates to the day-to-day activities carried out within your food business.

Therefore, to comply with this legal requirement, you must identify the stages in your catering operation where things may go wrong and where risks to the safety of the foods are present. At each stage it is critical to develop and put in place effective controls to prevent any problems from occurring and to ensure food safety.

As previously mentioned, as the food business operator you are required, by law, to put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles, which must consider the following:

a) Hazards (What can go wrong)

Identify all the hazards in your food operation which might go wrong and result in food poisoning or cause injury, (e.g. the transfer of bacteria from work surfaces to cooked, ready to eat foods, or the presence of foreign material such as glass or plastic in food).

b) Critical Control Points (CCPs)

CCPs are the stages in your food business where the hazards must be controlled to ensure your food is safe to eat. All hazards at CCPs must be reduced to a safe level or eliminated by a suitable control measures. (e.g. adequate cooking/re-heating of foods or sanitising equipment between raw and cooked products).

c) Critical Limits

Critical limits are specified safety limits which your critical control points must achieve. (e.g. if food is to be kept chilled and you have decided
that the temperature of the refrigerator must be no higher than 5°C, then 5°C is the critical limit).

**d) Monitoring**

You must monitor all your control measures and critical control points. (e.g. cooked food must reach a core temperature of 75°C, therefore 75°C is the critical limit). The purpose of monitoring, in this example, would be to check that the critical limit has been met i.e. temperature monitoring, to ensure that the cooked food had a core temperature of 75°C. As well as monitoring the critical control points, you must also record this temperature.

**e) Corrective Actions**

If you monitor a control measure and find it has failed its critical limit, you must act to make the food safe or prevent it from being used. This is a corrective action. (e.g. if the critical limit of your refrigerator is 5°C and you monitoring checks finds it to be 10°C, the corrective action could be to call the maintenance engineer and consider if the food is safe to use, relocating food to an alternative fridge if required.

**f) Verification**

From time to time you will need to ensure your HACCP based system is working. This also involves ensuring that your procedures are effective in controlling hazards and check your procedures are being applied in practice (e.g. check the control measures at critical control points are being applied), and that, where necessary, appropriate corrective actions is being taken and the checks are being recorded.

In addition from time to time, you must examine your food business to see if anything has changed which might need your control measures to change (e.g. new food items may have new hazards and need new controls, or new equipment may require different thermostat settings).

**g) Documentation**

The entire system must be documented and be relevant to the nature and size of your food business. The documented system must demonstrate that food safety hazards have been identified and fully considered; and that comprehensive records are provided of not only specific recording operations for example refrigerator monitoring but also the hazard analysis itself.

This close examination of your food business operations, known as ‘hazard analysis’ is not difficult to carry out and the controls you put in place can be very simple.

**Timescale for compliance:** Please email your HACCP documentation for comment by 30 June 2014
2. **Hot Water**

*Regulation (EC) 852/2004, Annex II, Chapter I, Paragraph 4*

At the time of my visit I was disappointed to find no running hot water. I was advised the lack of hot water may be due to:

i. Hot water timer not programmed to switch on early enough.

ii. Lack of storage capacity.

iii. Fault with the tap.

Food businesses must have an adequate supply of hot running water at all times. You must investigate what is causing the lack of hot water and address this issue.

**Timescale for compliance: Immediately**

3. **Pest Control**

*Regulation (EC) 852/2004, Annex II, Chapter IX, Paragraph 4*

You do not have a pest screen at the window in the kitchen, and staff require this to be open for ventilation.

Adequate procedures must be in place to control pests. You must therefore install a pest screen at this window.

**Timescale for compliance: Three weeks from receipt of this report**

4. **Control of Cross Contamination**

*Regulation (EC) 852/2004, Article 5*

4.1 **Cling Film**

Whist I was pleased to note you have separate designated cling film dispenser for raw and ready to eat foods, the raw cling film dispenser is stored underneath the table in close proximity to the ready to eat cling film dispenser.

To ensure staff do not use the incorrect dispenser, as witness at the time of the visit, this dispenser should be stored elsewhere in the kitchen.

**Timescale for compliance: Immediately**

4.2 **Storage**

Whist you have a designated area in the refrigerator for raw meats, I was disappointed to find a plastic container of olives stored at the bottom of your refrigerator next to your raw meats.
Storing ready to eat foods in this manner poses a risk of cross contamination. You must ensure ready to eat foods are stored above raw foods at all times.

In addition, unwashed/dirty salad and vegetables were stored together and above ready to eat foods. You must organise your refrigerator to ensure raw foods are stored below ready to eat foods at all times. You must have your raw meats stored at the bottom, dirty/unwashed salads and vegetables on the next shelf up and ready to eat foods near the top.

**Timescale for compliance: Immediately**

4.3 *Ready-to-eat Vegetable Preparation*

The preparation procedures for vegetables that will be eaten raw were discussed at the time of inspection. Further controls require to be implemented to control the risk of *E. coli* O157.

You must identify at which point during your preparation process you are considering these vegetables as ‘ready-to-eat’ as oppose to ‘raw’, for example after the washing process. You must then ensure that the correct preparation area and equipment is used for each stage of preparation. For example when preparing cabbage for coleslaw the following procedure should be implemented:

i. Chop the cabbage on a brown/raw vegetable board using raw vegetable equipment within the raw preparation area. Initial preparation must not be carried out on a green salad board within a ‘clean’ area as these vegetables are potentially contaminated.

ii. Wash the cabbage thoroughly under clean running water.

iii. Finish preparation on a green/ready-to-eat salad board with a ready-to-eat knife within the ready-to-eat/salad area. Final preparation must not be carried out on a brown/raw board which is potentially contaminated.

You must assess the preparation of all vegetables to be eaten raw and ensure that all food handlers are aware of which equipment and which preparation areas to use and when.

**Timescale for compliance: Immediately**

4.4 *Protective Clothing*

Staff are wearing the same apron for the preparation of raw food for the rest of the working day. A contaminated apron may facilitate the spread of harmful bacteria to other cooked and ready-to-eat foods prepared thereafter.

Staff must either remove their contaminated apron after raw preparation is complete and put a clean cotton apron on, alternatively a disposable plastic apron can be worn when preparing raw meat that can then be removed and disposed of.
A cotton apron worn during the preparation of raw meat must be washed within a washing machine on a boil wash setting to ensure that harmful bacteria are destroyed.

**Timescale for compliance: Immediately**

5. **Date Coding**

*Regulation (EC) 852/2004, Article 5*

Whilst most foods were labelled with a use by date, there was a container of Greek style yoghurt which was not dated. The manufacturer’s instructions state this product must be used within 3 days of opening. You must ensure all foods are labelled with a use by date.

**Timescale for compliance: Immediately**

6. **Temperature Records**

*Regulation (EC) 852/2004, Article 5*

Whist I was pleased to note temperature records were available; I was disappointed that you are not recording the temperature of your cooked meats and hot held soup.

As discussed, temperature monitoring is required to ensure food is stored at temperatures to control growth of bacteria to ensure food is safe. Comprehensive recording is necessary to prove the food is safe.

Absent or incomplete records will not support a due diligence defence, which may be required in the event of a complaint or incident of food poisoning.

**Timescale for compliance: Immediately**

**Food Hygiene Information Scheme**

In addition, the Food Hygiene Information Scheme allows consumers to see how well food businesses in their area have performed at their last food hygiene inspection and provides consumers with clear information about the hygiene standards within catering and retail outlets. The scheme effectively ‘opens the door’ to your kitchen and/or food areas and means the outcome of your food hygiene inspection will be made public.

In relation to the outcome of this food hygiene inspection, as there are several items which are critical to food safety, we are unable to award a ‘Pass’ certificate at this time, and instead an ‘Improvement Required’ certificate will be issued to you. An ‘Improvement Required’ indicates that the business failed to meet the legal requirements in relation to food safety and food hygiene.
Please be aware that the information relating to the outcome of this food hygiene inspection will be published on Aberdeen City Council’s website.

Although in this instance you have not attained a ‘Pass’ certificate, you do have the opportunity to do so, as follows:-

i. Once your food business has fully dealt with all of the items detailed in the food hygiene inspection report, please let us know and we will arrange to re-inspect your premises within seven days of your notification. Please contact the Commercial Team on: 01224 523800 should you wish to arrange a re-inspection of your premises. Please note, we will only visit your premises once.

ii. Provided there is clear evidence that all the items have been addressed and that compliance with the food hygiene regulations has been achieved we would be in a position to issue a ‘Pass’ certificate. However, if items of non-compliance are noted then the ‘Improvement Required’ certificate will remain.