Amanda Porter CEnvH

Eggs- Case Study
The Storage Facility - Cat E
Glapwell Lanes Farm, WR & A Wildgoose is a family business located either side of the main A617 road in north east Derbyshire, between the towns of Chesterfield (7 miles) and Mansfield (5 miles) operated by two directors and two managers.

The storage facility consists of 8 units, two of which are chilled units. Units 1 and 2 are cold stores.
The Economic Value of The Egg Industry

- 52.5% of eggs are purchased from Retail stores, 23% are used in Food Manufacturing and 24.5% in Food Service.
- The retail egg market is worth £804.5m a year, to put this into context it is larger than crisps, tea, sugar and baked beans!
The Call....A Monday not a Friday

- Telephone call Monday 26th September 2016 from Rosemary Woodward DEFRA Egg Marketing Inspector
- There were concerns regarding the quality of the eggs
- An E rated premise, ironically in my diary for the same afternoon
- Business had an alternative intervention so not seen for 6 years
- I was on my way
Storage
One Customer

Company A Foods

Information taken from the corporate website

- The leading egg supplier to the retail trade
- Each week they individually grade, pack and deliver over 60 million eggs.
- Work in close collaboration with key customers to create added value propositions under their retailer brand
Brands Behind Company A
Customers with Liquid Pasteurised Egg

Marks & Spencer

Greggs

McDonald’s
Egg Standards

- Grade A Retail
  - Eggs have a statutory limit of a best before no more than 28 days of lay
  - Lion Code have a lower limit of 21 days from date of lay
- These eggs were Grade A which had been downgraded to Grade B
Egg Quality

- External quality is determined by shell cleanliness, texture and shape
- Internal Quality is determined by the egg white cleanliness and viscosity, size of the air cell, yolk shape and yolk strength
The Legislation

EC Reg 853/2004 Annex III section X chapters 1, 2 and 3

Egg and Egg Products

Storage Conditions
Clean, dry, free of odour
Effectively protected
Temperature should preferably be kept constant
Details of how the temperature is monitored
Dating records checked and up to date
Glapwell’s Compliance

- The Food Business Operator *does* have an appropriate documented procedure for traceability regarding supplies to them and who they supply which includes:
  - An accurate description and quantity, name and address of the FBO from which the food has been dispatched to which also include agents.
  - An identifying lot, batch or consignment number
  - Date of dispatch
The Problem

- Every single day for three months the farm tried to raise the issue regarding the quality the eggs with Company A.
- The eggs were in chilled storage and then were moved to ambient. The company wouldn’t pay for chilled.
- I saw signed documents and an email chain to confirm that the raw materials director knew of the problem.
- All the directors in Company A knew of the problem.
The Problem

- The raw materials director was on site at Glapwell 3-4 times a week
- Before I entered the storage areas I told the manager at Glapwell Lanes Farm and the DEFRA inspector that I had to consider the eggs were for liquid pasteurisation only
The Infested Product
Maggots and seepage from the pallets
Condensate - Loss of moisture due to age of product. Had been stored for 3 months.
Clearly an unfit product
The Amount

- 84 pallets of eggs approximately 850,000 eggs in total
- Too many, large monetary value to act on my own
- How many were truly unfit and how many were suitable for pasteurisation
- I had trust in DEFRA, I knew the compliance of the storage facility but had no working relationship with the company
- The eggs could have made their way to the processing site in Harrogate
Action Taken

- No dispatches were due that day but the storage company agreed to telephone me if the company were planning to move the stock over the next couple of hours. They signed my PACE book in agreement.

- A telephone call was made to the company QA director and he was told that eggs were not to be moved.

- I returned to the office to speak to my manager
Company A

- QA director agreed to meet me on site on the Wednesday. My photos were shared to the corporate directors.
- We spoke to Harrogate District Council by teleconference.
- We couldn’t secure co-operation from Harrogate. They didn’t see it as a priority and the product was not to leave storage.
- Clearly we wouldn’t allow the product to leave but they weren’t accepting of the quality of the product being handled. Despite the plant being approved.
- We had intelligence of when the rubbish was being pushed through (Weekends/agency staff and no core managers on site).
The Meeting

- My manager and myself met the QA manager. We had to accept we may have to go down to a tray by tray basis and could be a lengthy process.

- Discussion was had as to why we were in the situation of storing such a large quantity of an unfit product.

- Stability of price and the market. Poor sales forecasting.
How to Determine The Quality

- Smell was key. If we could smell cardboard that was a good indicator
- Egg breaking
- Breaking the eggs open and looking at the air cell.
- The air cell is in the large end of the egg and grows in size as the egg gets older
- Egg yolk from a newly laid egg is round and firm. As an egg gets older, the yolk absorbs water from the egg white, increasing its size
- In an older egg the yolk looks flat
80 out of 84 pallets were detained
Destruction

- Agreement was made on a pallet by pallet basis. There were still 84 pallets to work through and to be sent as waste.
- This couldn’t go in one load.
- As soon as we were given the details of which disposal site was to be used we shared the information with Trading Standards.
- I had to be there for every load checking the pallet numbers with the dispatch note. I had to check the destination with the driver, check there was no clean product already on board and check their destination.
Destruction

- The first disposal site towards York was approved for composting catering waste category 3 NOT category 3 raw egg
- We would not have known this level of detail without consulting Trading Standards
- The lorry was turned away by TSOs in East Yorkshire
- The eggs were now destined for a disposal site in Barnsley
Consignments had to be labelled in accordance with Animal By Product Regulations
Destruction

- I watched all 80 pallets get loaded and retained copies of the dispatch notes and vehicle registration numbers and driver names.
- Work diary had to be flexible as generally I found out the night before that eggs were being moved.
- The bulk of the disposal took one week.
The product being moved for disposal
The Cost
To The Company
£100,000
The Current Position

- Harrogate plant has been mothballed
- Eggs and finished egg products were removed by the same company from another cold store on our district
- Business has been reduced with Glapwell Farm (recently)
- This was the farm's main source of income
- Where is it being used? Moved to where?
The Business

- Now conditionally approved as a cold store as the business has changed customer profile

- Much better working relationship, they are regularly in contact. Six yearly contact will no longer happen.
Considerations

- Difficulty in securing transport and storage of a product which was unfit, infested and noxious
- The size of the consignment, almost 1 million eggs to transport and store
- The length of time to get it heard. A recent seizure was not heard for 3 weeks until an appropriate bench could be found. Lay magistrate was not happy to take it.
- The past compliance of the storage facility. The stress already placed on the family with the eldest director recently diagnosed with a terminal illness.
- The company has their own fleet of lorries
Knowledge Gained

- A much better understanding of Animal By Products
- Dialogue with our legal team to discuss access to courts and magistrates
- Working with Trading Standards to gain information quickly regarding disposal sites
Knowledge Gained

○ More joint working between ourselves and Animal Health
○ Recent intervention with Animal Health and EHOs regarding Animal By Products and a national supermarket chain back hauling products of animal origin back to depot.
Hello Amanda,
It was great to meet you and I’m so pleased that those eggs have been treated as they have, it’s a positive result. Thank you for your hard work in getting them removed from the food chain and hopefully we will see an improvement of the systems in place now. As these eggs are going for disposal I would be interested in knowing their final destination.

Please just get in contact if I can be of any further assistance.

Rosemary Woodward.
Egg Marketing Inspector