



The Society of
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SOFHT FOCUS

The Magazine of the Society of Food Hygiene and Technology

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BACK TO BASICS

WRITE UP & PHOTOS



SOFHT FOCUS EXCLUSIVE

Understanding the role of
professional pest control

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THOUGHTS FROM THE EDITOR...

**It's that time of the
year again...**



It's hard to believe that a year has passed since I took on the role of Editor of SOFHT Focus! Again, I find myself penning a forward just ahead of SOFHT's annual highlight, the Lecture, Lunch & Awards – an excellent opportunity for the Directors to hear from you face-to-face and discover what else you might want from SOFHT and SOFHT Focus, one of multiple means of engaging with you. As the highlight of the SOFHT calendar, I know just how much work Karen Best, the office team and Directors invest in this event and yet every year it somehow manages to surpass the last!

Congratulations to all nominees and good luck to you if you are up for an award! Preoccupied with food quality, safety, authenticity and innovation our members are the enablers of the industry, so it would be remiss not to mention food and drink! Yet again, we will be hosted by THE BREWERY who have now developed an excellent reputation for the great food and wine they've served to SOFHT members, year after year. If you haven't booked already, you'll find details in this edition, so, hope to see you on the 20th of November.

This edition is the first following our successful Back to Basics Conference on the 23rd of September at the Nottingham Belfry, I hope you'll enjoy the report and photos from the day. Our 'Director in the spotlight' in this edition is Sarah English, whom I'm sure you will enjoy getting to know a little better.

I hope you enjoy this issue and once again thanks to the team for producing another great edition, the next one will follow and report on our wonderful Annual Lecture, Lunch & Awards! I hope to see you there on November 20th, but don't forget you will also be able to avail of our free regular forums in October (Hygiene Manager on the 20th and Legislation on the 22nd).

Enjoy Autumn and hope to see you soon!

Sukh Gill, Editor SOFHT Focus

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Introduction

PAUL DAVIDSON, SOFHT CHAIR

Welcome to the autumn edition of SOFHT Focus!

I would like to start this edition by thanking everybody for your continued support to the Society.

We recently held our ‘Back to Basics’ Conference in Nottingham which was well attended and had some amazing speakers which you will read about later in this edition. The events team are already hard at work on the 2026 agenda which already is shaping up to be an exciting year. Our education agenda is progressing with some activities planned in the run up to Christmas with the young people at Blackburn Youth Zone plus several of our members, which we will showcase later in the year. It is not too late to get involved if your company is looking for youth based educational activities, just reach out to myself or the SOFHT Team and we will help link you up with this project.

I am looking forward to seeing you all at the SOFHT Annual Lecture, Lunch & Awards on the 20th November. This year our guest lecturer is Richard Humphrey, Operations Director, of His Church. His Church charity specialises in providing secure, ethical and sustainable charitable solutions for residual stock including food. These items are re-distributed directly and through a support network of over 3000 Registered Charities in the UK to vulnerable people in the local and wider community. I’m looking forward to hear how they work in partnership with most major manufacturers and distributors in the UK, who simultaneously benefit from reduced costs associated with transport, waste and storage, and are thereby helped in also achieving their CSR objectives.

Enjoy this episode of SOFHT Focus and please continue to give us feedback on both content and events that you would like us to cover.

All the best, Paul.

Lizzie Latest

Despite the dark & cold autumnal nights, Lizzie the cat is perfectly content.

Having traded a stray’s life for a warm home, she now spends her evenings curled up on Karen’s lap or enjoying the cozy comfort of stretching out in front of the gas fire.



New Members

We are pleased to welcome the following members to SOFHT:

Gold	
Five Star Pest Control	Hygiena International Ltd
Silver	
Nutrition Works Ltd	
Bronze	
James Blair	Steve Cole
Peter Jefferson	Ben Leavey
Leah Martisano	Mark Ogden
Janine Parmar	Paul Ritchie
Laura Smith	Richard Swan
Derek Watson	Thomas Williams

FOCUS on a SOFHT Director

Sarah English

We spoke to Sarah English, Regulatory Compliance Advisor at Tesco who has been a SOFHT Board Director since 2023.

Sarah, tell us about your career so far and any key events

After graduating in Food Science, I was given the opportunity to set up a brand-new quality control lab for an animal feed processor, with a project brief of two empty rooms and a budget to spend on whatever I wanted. Fortunately, I spent wisely and managed the quality team for the next two years before moving into food manufacturing. 30+ years on, I have held several roles within the food industry including project management, quality, NPD and commercial functions. My most exciting challenge has been to project manage the development of a disused farm building and successful opening of a Farm Shop & Butchery, sourcing locally from farmers and small producers. Unfortunately I didn't get my own television programme like Clarkson.

What advice would you give to somebody considering a career in the food industry?

Grab as many opportunities as possible and don't be afraid to take that step out of your comfort zone. I have had some great experiences and achievements which would never have happened if I hadn't taken that leap of faith, though I will admit sometimes I needed a little push from behind.

How do you think SOFHT can play a part in supporting the industry - in particular SMEs?

Starting out in a small family-run business, SOFHT has been an integral part of my career with training and advice. Over the years, SOFHT has continued to be a trusted source of knowledge, support and industry insight—helping me grow into the role I hold today. With members who have a wealth of knowledge and experience, SOFHT is there to support and advise SMEs, and particularly those who are about to start their food industry journey.

Key interests outside of work? Hobbies?

I do have a gym pass though I prefer being outdoors. I like the fresh air, especially by the sea. Listening to audiobooks, usually a good crime thriller, is my way of relaxing.

Do you cook? Signature dish?

Stir fries are my go-to quick and easy meal. I do start off with good intentions to expand my range of meals, but that pesky thing called the food industry gets in the way and by the time I get home, it's back to the wok.



What would be your perfect meal?

Due to my lack of cooking skills – I will leave that to the experts, a five-course tasting menu with wine pairing would be the perfect afternoon.

What about food hell?

Moules mariniere. I will try most things once, but not this.

Favourite holiday destination? Most interesting/awful/strange place you've visited?

My most interesting holiday was a 7-day trip across Morocco, starting with a two-day camel trek in the Sahara Desert (yes it gets a bit sore by day two!) and then heading – fortunately by Land Rover – across the Atlas mountains and finishing at the Atlantic Coast.

Having audited factories in Norway in a previous role, my ideal destination would be somewhere in the Fjords.

Music fan? Beethoven or Oasis?

My radio is tuned to Absolute Classic Rock though I do miss a CD player in the car as I have a big box of CD's gathering dust.



BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY



BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY

CONFERENCE & EXHIBITION

TUESDAY 23RD SEPTEMBER 2025 | NOTTINGHAM BELFRY

The Back to Basics conference took place on Tuesday 23rd September 2025 at the Nottingham Belfry, bringing together industry experts to revisit the core principles of food safety, hygiene, and quality management. The day covered key topics including auditing, workforce training, cleaning and disinfection, pest management, raw material control, and labelling, providing delegates with valuable practical insights and updates.

Leon Ford and **Michael Bromfield** from **NSF** discussed 'An auditor's view of the basics'. They stressed the importance of first impressions when the auditor arrives at site. Senior management commitment is an important part of the audit and this is reflected in how ready the site is to receive the audit. Auditors will notice how calm and organised the management team is throughout the audit. Chemical control, hygiene and fabric are still the top non-conformances being raised in audits so this should be a focus area for companies. Auditors are looking at whether the product is being manufactured, handled and labelled correctly. Being prepared and organised is the best way for an audit to go well. Ensuring that all records are readily available when the audit is taking place and ensure you know the standard. Let Area Managers lead the audit in their areas so the auditor can see ownership and culture of the area. Leon and Michael gave many great examples of situations they had experienced during their audit career.



Christopher Palmer from **Hotel Chocolat** discussed 'Training & recruitment of personnel and managing temporary workforce'. He explored the challenges experienced with sites that have both agency and site contacts. Christopher described a new approach to recruitment which considered how they advertise jobs. He described how going back to basics by talking to people in the local community about the benefits of taking up a temporary contract at Hotel Chocolat worked for their company. Having fun at their assessment centre with potential new recruits was illustrated with a focus on why certain activities and tests are selected. Christopher gave tips on red flags to look out for when conducting recruitment and the type of questions to ask. The importance of a focused and robust induction process was discussed. Get information the new recruit will want to know explained first before moving on to Health and Safety and Food Safety as you will have improved focus by the individual. Christopher finished by explaining the importance of reward and recognition in engaging a workforce.

BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY



Dr John Hines from **SC Johnson Professional** gave a talk on 'Hand Hygiene'. He started by explaining the importance hand washing has in breaking the chain of contamination and the pathogens of concern. John broke down the key steps of handwashing and emphasised the importance of hand drying at the end of the process. We were reminded when to wash hands and looking at how people move through sites and their access to handwashing stations. The talk led on how to monitor and assess efficacy and compliance of hand hygiene within the site. John described common handwashing challenges that he has come across. He explored symptoms leading to these challenges and gave tips on how these could be solved. Looking for products that help reduce skin conditions is important to consider so staff feel happy and confident when handwashing. This led on to choosing the right actives in your handwashing product. John discussed hand cleaning verses hand hygiene consideration and where you may consider handwashing and / or sanitising. The talk finished by exploring the balance of skin care with compliance and how skin irritation can lead to reduced compliance. This highlighted the importance of 'The right time, The right place and the Right product' for hand hygiene.

George Fiotakis and **Gul Akbar** from **Ecolab** gave a talk on 'Cleaning & Disinfection - Open Plant Cleaning'. The talk took us through the importance of knowing your risks with reference to open plant cleaning. What are your environmental vectors to consider, for example air handing systems? Have you checked the transfer of people and equipment. How to build a food safety culture to ensure standards are being met was discussed remembering that people are an important part of success. The talk covered going back to basics in following key cleaning steps in the right order and the importance of picking the right chemical to use at the right time during the cleaning process. George and Gul explored the future impact of digitisation and its place in open plant cleaning.



Derek Thomas from **Diversey** gave a talk on 'Cleaning & Disinfection - CIP'. The types cleaning devise needs to be efficient for the task in hand. Difficulty of cleaning large scale enclosed systems was discussed. Advantages of CIP included reducing safety issues around entry into large vessels, minimising manual effort through automation and good cleaning standards. CIP have running cost factors that need to be considered, and Derek discussed ways that costs can be reduced through reclaiming detergent and rinse water and by having good chemical controls. General steps to CIP were covered from pre-rinse cycle, detergent cycle to final rinse cycle. Derek showed schematics on different CIP methodologies that are available for sites to use. He explored desirable system features that are essential for CIP systems. Impact of changing pipe work diameters within a pipe run was explained as to its effect on flow rate. Derek shared his experience in resolving CIP issues including avoidance of dead-legs and other pipework related problems. The talk then moved on to advise around vessel cleaning and the importance of mechanical energy needed to deliver good hygienic standards. Derek reminded us of the criticality of CIP monitoring programs coupled with visual inspections and microbiological verification.

Mark Scott from **HIS** delivered a lecture on 'Getting the best from your hygiene contractors'. The talk looked at why companies choose to use hygiene contractors which included recognising their specialist skill set and the services they can provide. Mark gave advise on how you choose the right contractor for your business needs and the type of areas you should consider. Setting appropriate contract specification is important ensuring they reflect the operational need. People, training and equipment were discussed including identifying who is supplying the equipment and chemical needed for the work. Specific consideration of the manufacturing environment and product need to be clear e.g. allergens. Expectation and goals including budget, KPI, audit performance and training need to be agreed upfront. Mark discussed the importance of holding regular meetings and inspections with all parties and gaining feedback to ensure that the correct level of service is being achieved.



BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY

Garry Pearson from **Kersia** gave a talk on 'Fundamentals of Food Factory Design & Layout'. Garry illustrated defence considerations against external and internal factory hazards. The consideration of flow of people, packaging, product, waste and utilities. A 5 point defence plan was discussed regarding barriers preventing pest entry, eliminating harbourage of microorganisms, reducing cross contamination, kill and removal processes and management and control. First line of defence considerations of the external building structure was highlighting including the importance of suitable drainage and building foundations. The talk covered a wide range of subject areas including doors, loading docks, walls, floors, lighting and roof structure to name just a few. Garry moved on to cover room zoning between wet and dry areas and areas of higher hygiene risks. Internal barriers and segregation requirements were discussed for hazards such as microbiological and allergens that need to be controlled. Garry shared his knowledge of suitable materials of construction for infrastructure and the hygienic control of construction practices.



Grahame Turner from **Nurture Pest Control** covered 'Basic Pest Management'. The talk focused on selecting your contractor and protecting your site. Grahame explained the differences between biological, physical and chemical controls used to manage pests. The talk looked at pre-requisites of your pest management company and the offer they can provide to your business. It is important to ensure that you have access to all the necessary procedures and documentation that you will require. Grahame discussed the number and location considerations of rat boxes together with interesting views around different rat box contents. Internal mouse monitors, electronic fly killers, crawling insect monitors, and moth monitors were also covered during the talk. Grahame then discussed specific targeted pest traps and how these can be deployed. The importance of data collection, trend analysis and report requirements was covered. Grahame ended his talk by highlighting areas of improvement that business need to take around cleaning, proofing and facility infrastructure to prevent pest activity.

Sarah Whiting from **2 Sisters Food Group (2SFG)** gave a talk on 'Raw material control and management'. Sarah started by looking at the BRCGS requirements regarding raw materials and packaging controls. The focus of the talk was on supplier management and raw material integrity, the importance of specifications, raw material inspection and control. Sarah discussed the importance of full transparency of the total supply chain including manufacturing sites, packing sites, agents & brokers. Processing and quality parameters are key to understand when assessing raw materials to be used in your business. Shelf life considerations of ingredient from intake, in process use to final product shelf life need to be assessed. Sarah highlighted trade bodies, societies, government sources and websites that are useful as sources of information. Third party accreditation, level of expertise is an important factor when selecting the right supplier partners. The importance of risk assessment and supplier history in supplier management was explained. Food contact packaging must have the same level of rigour as food ingredients when conducting risk assessments. Sarah moved on to talk about supplier approval and audits, exploring the potential of controlled 'audit clubs'. Sarah shared what important information she looks for on a specification. Fraud and adulteration potential across the supply base should be a key part of your supplier management programme. Sarah closed with raw material inspection and control.



BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY



David Wroe from **SGS** spoke on 'Labelling matters'. He explored what is mandatory on a food label. The difference between customary, legal or descriptive food names was discussed and how complex correct food naming can be. Ingredient lists with QUID and allergen declarations was discussed. Date, storage, nutrition information and country of origin marking, statutory warnings or statements and the name and address of the food business operator (FBO) were covered. David shared data from FSA /FSS showing that there had been 1,036 product recalls between 2016-2021. He then demonstrated that labelling problems remain with a further 153 recalls between Aug 2024 & Aug 2025. Allergen labelling issues remain a high percentage of product recalls. David explained areas where allergen labelling mistakes can occur and the potential cost impact to your business. David also stressed that good specification writers are a prerequisite for any good food business. The talk concluded with new label regulations that are on the horizon.

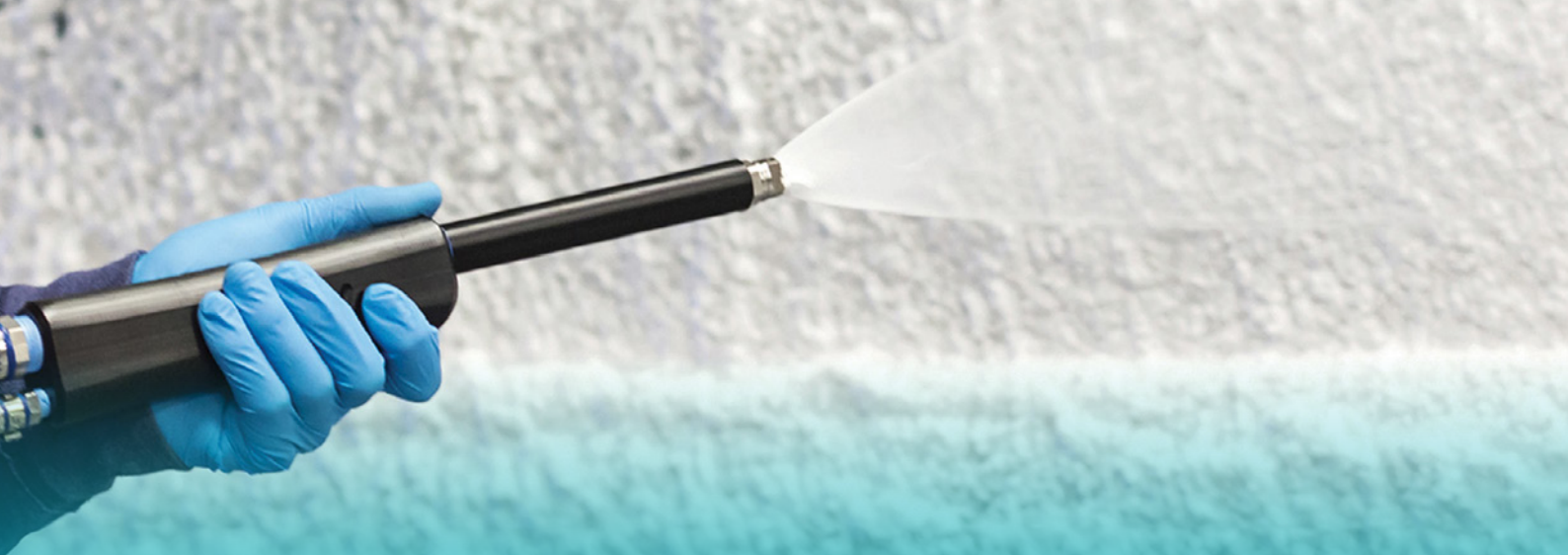
Llinos Thomas from **Hygiena** gave a talk on 'Sampling for success'. It was pointed out that a swab gives you a snapshot whereas historic data gives insight and that insight should define your strategy. Environmental Monitoring Programmes (EMP) were described starting with an EMP design. Vectors such as traffic flow are important to consider when building Environmental Management Programmes. The execution, verification and documentation of EMP was discussed. Llinos gave examples of risk-based zoning and test frequencies at used at sites. The talk went on to look at fit for purpose testing, trend analysis, acting on out of specification results and improvement activities. Llinos shared how EMP performance should be reviewed at your routine site management meetings. The value of trend analysis and hotspot mapping was discussed. It is important that you have the right swab for the right purpose for hygiene verification, for example sponge swabs verses traditional swabs, ATP, allergen swabs, protein swabs, species tests. Typical harbourage sites were highlighted and Llinos explained good techniques and common errors that can occur when swabbing. It is important to set limits, define actions and record everything.



The conference ended with a panel discussion.

BACK TO BASICS FUNDAMENTALS OF FOOD SAFETY - EXHIBITORS





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Getting back to basics on pest control means understanding the role of the professional across the entire chain of food production, says Niall Gallagher, Technical Manager at British Pest Control Association (BPCA).



As pest professionals, our members operate across a huge range of environments, from houses, flats and student accommodation to hospitals, farms, factories and hotels. Our members employ trained and experienced technicians who are committed to protecting human environments from the disease, distress and destruction that can be caused by an infestation.

Basic principles of professional pest control

Essentially, pest professionals must always strike a balance between protecting our native wildlife and preventing or eliminating risks to public health and safety.

BPCA member businesses are endorsed by the Government via the TrustMark quality scheme as they must carry the correct insurances and are trained and qualified technicians.

They are assessed to the British Standard in pest management EN 16636 and follow BPCA's Codes of Best Practice which set out the standards expected on key topics, from treatment and control of specific pests to the Code of Conduct and Health and Safety.

Pest professionals also need an understanding of key legislation, from food safety regulations to wildlife management and product restrictions, alongside the skills required to assess a site, create a strategy and implement a proofing, treatment or control plan.

Implementing a safe Integrated Pest Management strategy also requires safe chemical use and adherence to any restrictions in relation to the site, building and product.

Many BPCA members now consult at building and installation stages, to ensure points where pests can access a building are sealed correctly, appropriate fittings

UNDERSTANDING THE ROLE OF PROFESSIONAL PEST CONTROL

are in place and gaps around doors and above suspended ceilings are sealed correctly.

There are also members who specialise in specific pests or methods that help keep pest species away from key human environments.

Pest professionals at work from field to fork

From working alongside farmers to prevent pest issues among crops and livestock to helping food and hospitality business remain pest-free, BPCA members offer a wide range of services that support our food chain.

There is an increasing call for farmers to consider pest professionals as part of their support network – on hand to help boost profits by reducing pest-related damage.

This is applicable across multiple farming and growing businesses, with pest professionals specialising in a range of services from grain fumigation and protecting crops from rodents to tackling mites in commercial poultry flocks or dealing with moles to help prevent the spread of Listeriosis within dairy herds.

Pest professionals are also a vital component of food production, helping to keep factories and production units safe from pests that can contaminate products, or could be vectors of bacteria and disease.

Likewise in hospitality and food service settings, the presence of pests is not only a health and safety risk but could potentially lead to prosecution.

The regulatory framework set out in the Food Safety Act 1990 and the Food Hygiene Regulations 2005 made under it, deems food unsafe if it is considered to be injurious to health or unfit for human consumption.

The regulations set out general hygiene requirements for all food business operators. The layout, design and construction of food premises should permit good food hygiene practices

including protection against contamination and, in particular, adequate pest control.

Procedures should be based on the Hazard Analysis Critical Control Point (HACCP) principle, used to examine processes and identify hazards, so measures can be taken to reduce risk.

Pest management is part of Good Manufacturing Practices (GMP) for food businesses, which is a prerequisite for HACCP-based procedures. As an integral part of the GMPs, it should be carried out with due diligence.

Pest Control in the Food Industry (revised 2015) guidelines drawn up by the National Pest Advisory Panel (NPAP) of the CIEH, are aimed at the food-manufacturing sector.

The principles are the same at all stages of processing, from production (farmers and growers), raw material and ingredient suppliers, to warehousing, distribution and retail, but the level of pest control contract specification will vary.

Spot the signs of SPIs – how pest-aware are you?

Businesses where food is produced, sold or served can be impacted by a wide range of pests.

Rodents are prevalent in the winter months as they move inside seeking warm shelter near a food source.

Rats urinate everywhere they go and can pass diseases to humans through contact with its body or urine in a food preparation area.

Mice spread disease to humans through urine, droppings and bedding – and will mark their territory with urine as well as carrying dirt and bacteria as they travel.

Sparrows and starlings also have the potential to carry food-borne diseases and so must be kept away from food manufacturers and distributors.

Research suggests wild birds can pass diseases to humans either by direct contact or via their droppings, with more than 110 pathogens reportedly carried by pigeons.

Food businesses should always seek professional advice if birds become an issue as all wild birds, their eggs and nests are protected under the Wildlife and Countryside Act 1981.

However, the world's 'most expensive' pests are the beetles, moths and larvae classed as Stored Product Insects (SPIs), which can leave enormous amounts of product unfit for human consumption.



UNDERSTANDING THE ROLE OF PROFESSIONAL PEST CONTROL

They can enter the food chain at any point, using products including cereals and grains as both harbourage – a place to shelter and breed – and food source.

Common SPLs in the UK include:

- Rice weevil
- Biscuit beetle
- Indian meal moth
- Grain weevil
- Confused flour beetle
- Saw-toothed grain beetle
- Larder beetle
- Mill moth.

SPLs spread quickly and will cause food to become tainted, which is visible as discolouration.

Infested grain tends to become warmer, which can lead to damp, mould and even grain germination.

Moth larvae leave webbing which contaminates food products and can cause damage to machinery and equipment. They also have chewing mouthparts which can damage food and packaging.

Weevils make visible exit holes in grains and insect larvae also leave frass (excrement), which is a common sign of an infestation.

Regular machine inspections by a pest professional, such as a BPCA member, can identify any low-level activity, reducing the risk of further contamination to products, which can be costly in the long term if a recall becomes necessary.



Collaboration is key to keeping premises pest-free

A pest control maintenance cycle is one of the best ways to ensure infestations are spotted and treated early to minimise impact and ensure compliance with regulations.

BPCA always recommends a 'prevention rather than cure' approach and our members work with businesses to implement proofing measures that will deter pests from entering premises in the first place as part of an Integrated Pest Management (IPM) plan.

Recommendations made by a pest professional should be considered for implementation in a timely manner, to ensure proofing and treatment measures already in place continue to be effective in protecting against pests.

If pests are present and an infestation is emerging, swift action is essential to try and prevent an escalation. Many pests multiply quickly, particularly if they have found a safe harbourage and nearby food source.

Often, a well-established cycle of inspections designed to identify potential opportunities for pests, measures to deter them and systems to report possible early sightings are more efficient and cost-effective than waiting until an infestation has taken hold.

To find a BPCA member visit:
bpca.org.uk/find.





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HEALTH & FOOD, THE NEED FOR OUTCOME BASED COOPERATIVE REGULATION

SUKH GILL

In the last edition I shared the opportunity given by the Chartered Trading Standards Institute (CTSI) for me to speak on the future of food regulation and diet and health in one of the two sessions of its annual conference in Blackpool. As promised, I hope the following report on the need for outcome based cooperative regulation from the second session is of interest to SOFHT readers.

CTSI as an institute and the profession that it represents champions consumers & I'm proud to be a long-standing member and Fellow of it. In my role as Secretary General of the Irish Health Trade Association representing the interests of our consumers goes hand in hand with the interests of its members. In relation to food, those consumers represent a health culture that prizes diet (including supplementation and herbal remedies) as the primary route to good health which the sector has grown to meet. It has done this with no support and against a challenging regulatory environment established in the EU.

Healthcare systems under pressure

There is no doubt that self-care takes pressure off overburdened healthcare

systems and would sustainably benefit society, given:

- a. the aging populations in Europe
- b. the rise of non-communicable diseases linked to diet and lifestyle; and
- c. the threat of future pandemic risks.

Food is essential to life, and a healthy diet is essential to health. Yet government driven dietary approaches have failed to the extent that it is now medicating people out of obesity – which has its pro's, but many con's too.

Better regulation could support healthier choices

The UK has assimilated an EU Regulation, which two decades later hasn't lived up to its promise and is working against consumer's fundamental rights and interests in health. Despite the current

UK regime for Health Claims having been brought in post-Brexit, it does not regulate substantively differently to the EU. So far, in that regard the UK has not availed of a better regulation opportunity – an opportunity where it could show leadership in Europe.

With my Irish perspective, as Secretary General to the IHTA you'd be justified to ask, why I should care what happens in the UK? Both the UK and Ireland rely on imports for food security and consumer choice. Differences, reformulation and additional cost to comply with market differences can make smaller markets unattractive and threaten consumer choice and even food security. So, divergence matters.

However, better regulation leadership from the UK might also trigger a re-think in the EU. Moreover, there are some areas where a new approach using tools



common to both the UK and EU, creatively, may offer pan-European solutions. It's encouraging then, that after two decades of stagnation in Europe, the UK is looking at a 'New approach to ensure regulators and regulation support growth' as set out in the UK Treasury's detailed policy paper.

While underlining the importance and benefits of regulation the paper rightly concludes that the current regulatory landscape is not functioning as effectively as it should – holding back growth and inhibiting private sector investment.

Informed Choice

One area that would benefit from critical review is the current approach to certain health claims. If an outcome-based cooperative approach to regulation (espoused by Professor Christopher Hodges – Oxford University) was employed in this area we could facilitate better informed choices by consumers. Such an approach involves 6 key elements:

1. All stakeholders agree on purposes, outcomes, evidence metrics, and systems.
2. They agree on expectations for how those who wish to be trusted should behave and set out this agreement in a code.
3. All actors who wish to join the "trust community" and "regulatory trust track" produce evidence that they are trustworthy. The type of evidence will evolve and be proportionate to the business and risk.
4. Those actors who do not wish to produce evidence of trustworthiness continue to be regulated under traditional rules and enforcement, but without the benefits of having a trusted reputation, including benefits of regulatory sandboxing, such as procurement, commercial, employment, and investment advantages and a reduction in regulatory burden.
5. The trusted parties cooperate in a trusted and respectful environment, identifying and fixing problems,

delivering the achievement of desired outcomes, and increasing performance.

6. All parties help to identify harms and risks quickly and take action to deliver protection.

Ours is a sector that is often put down as the cause of ills yet it has the capability to support positive health outcomes; outcomes that officials should be supporting in a collaborative approach to regulation with the sector and its consumers.

Given:

- a. the scale of assimilated law;
- b. limited civil service resource; and
- c. competing agendas for parliamentary time;

change, if left to officials, is challenging to say the least.

The case of probiotics

However, with critical review, creativity and collaboration with Trade Associations, using existing legal frameworks, I believe it is possible to support both prosperity and protection. Moreover, some of those frameworks could also facilitate a high level of consumer protection that may be acceptable to the EU and legally compatible with both jurisdictions.

In relation to better regulation of Health Claims there a number of opportunities where Industry could take a lead, but an area that particularly stands out are claims related to microbiome support e.g. probiotic claims.

A critical review of the EU guidance shows that this is based on unreliable assumptions, including:

- a. what probiotics are (are they 'nutrients'; 'food' or 'other substances'?)
- b. That the use of the term is a claim, whereas it can be mandatory food information.
- c. That claims are implied health claims within the scope of NHCR required to be accompanied by specific authorised claims.

These doubts alongside the building scientific evidence raise questions, in turn, on whether it is good administration to restrict the rights of consumers:

- a. of access to information; and, thereby
- b. preventative health care.

The science of the gut microbiota has a part to play here in two senses:

- From the scientific interest, public research investment and risks facing society it seems that preventative health related to the gut microbiome is an urgent and highly important issue of individual and societal health.
- Secondly, regulation needs to make a logical distinction between host physiology and the physiology of the gut microbiota.

Poorly functioning microbiomes compound over time and over generations and are linked to development of preventable chronic diseases. Long-term nutrition solutions are required to support stable microbial communities over a lifetime to promote a healthier host.

While the science is complex and emerging, it does not hinder the use of diet to recover beneficial gut microbiomes now. Establishing or recovering functional gut microbiomes involves being able to acquire and retain microorganisms, which necessitates commitments to diet or lifestyle changes, and importantly, the means and resources to engage in these changes.

Alongside strategies for "microbial-based intervention", society needs to support "microbial-promoting lifestyles". Of course, that entails access to fresh, high-fibre and nutritious foods but also facilitating informed choice by identifying and removing other barriers such as guidance that is disproportionately restrictive.

Given the essential role of the microbiome in immunity and preventable chronic disease development, prevention strategies are important at both an individual and societal level; especially given:

HEALTH & FOOD, THE NEED FOR OUTCOME BASED COOPERATIVE REGULATION

- a. the rising risk of antimicrobial resistance;
- b. in the wake of further pandemic risks;
- c. the rising economic burden on healthcare systems of preventable chronic disease in an aging UK/EU population.

Why is it logical to make a distinction between host physiology and the physiology of the gut microbiota? The microbiome is subject to influences of the individual host and its environment and diet; that make it individual and variable. Unlike the physiology of the human host's cells, tissues, organs and organ systems, there is no standardisation of the physiology of the gut microbiome as there is huge variability in its constitution between subjects as well as individual changeability.

As the NHCR is concerned with the host physiology that logic can take us out of the Nutrition and Health Claims Regulation's pass/fail claims system. That would then allow all communications commensurate with existing and emerging science on probiotics thereby supporting consumers right to information. That in turn is a pathway to supporting "microbial-promoting lifestyles" and access to preventive health care. Such claims commensurate with existing and emerging science must nevertheless comply with the principles-based approach of the assimilated Unfair Commercial practices directive (UCPD). In the UK, since April 2025 this is now enshrined in the Digital Markets, Competition & Consumers Act 2024.

However, responsibilities for food regulation sit with several departments, further complicated by devolution and local delivery. The regulation of unfair commercial practices in the UK sit with TSOs and the Competition & Markets Authority.

A role for codes?

When it comes to regulation to avoid unfair commercial practices 'siloing' or multiplicity of regulators and even borders

are not unsurmountable barriers. This is because the law allows for sectoral codes on commercial practices (including claims) to provide a high degree of consumer protection. Driven by responsible trade they also allow for a more commercial approach to guiding compliance while simultaneously providing for checks and balances that would prohibit such codes from promoting non-compliance with legal requirements including fraudulent practices.

Such Codes would benefit from the unique understanding that responsible traders have of its own sector including established good/best practice, globally, which could inform its professional diligence i.e. the market practices recognised as honest in the sector – which can also evolve with emerging science.

Any code developed for probiotic or prebiotic claims could take into account and ensure coherence with the approaches in general food law and NHCR to ensure that information is substantiated by science and not misleading; but wouldn't have to have to retain its unduly restrictive pass/fail approach.

At the time of implementation of UCPD both UK and EU regimes recognised that the control exercised by code owners at a national or regional level to eliminate unfair commercial practices may avoid the need for recourse to administrative or judicial action and allow for prioritisation of official controls in other areas. Such codes have the aim of pursuing a high level of consumer protection with organizations representing consumers informed and involved in their drafting.

In the advent of Brexit, such codes have the potential to operate across Europe by industry agreement as long as they do not promote non-compliance with legal requirements given that the EU regulatory tools that could support this have been assimilated and re-cast in UK law.

Codes have the advantage of:

- a. requiring less or even no civil servant time,

- b. with Government intervention only as a 'check and balance'.
- c. need not impact on legislative timetables and
- d. can be easily updated to accommodate scientific developments.

With its Trade body representation, UK BExGs are well positioned to support an outcome-based collaborative approach to achieving compliance in this way for other qualifying issues, such as where guidance is outdated.

Compatibility with OBCR

The use of codes is compatible with the core elements of OBCR as:

- 1. Yes** - All stakeholders agree on purposes, outcomes, evidence metrics, and systems.
- 2. Yes** - 'professional diligence' set out in an agreement in a Code of Conduct.
- 3. Yes** - actors agree to be bound by a Code, creating a "trust community". Agreed 'honest market practices' are akin to a "regulatory trust track" setting out evidence to support claims. Evidence evolves with science proportionate to the business and risk.
- 4. Yes** - UCPD includes checks and balances that prohibit codes from promoting non-compliance with legal requirements including fraudulent practices. Nevertheless, regime recognises that the control exercised by code owners to eliminate unfair commercial practices may avoid the need for recourse to administrative or judicial action.
- 5. Yes** - Responsible businesses cooperate in a trusted and respectful environment, identifying and fixing any problems with the Code. Delivering the achievement of desired outcomes, through compliance with a Code that is flexible and can be adapted easily as science and evidence for claims evolves.
- 6. Yes** - All parties help to identify necessary amendments to the Code and conduct to manage 'harms and risks' quickly.

OUTCOMES

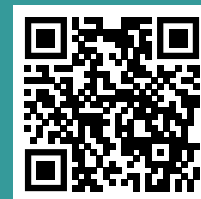
Such an approach could support the following outcomes:

- 'PREDICTABLE' APPROACH TO REGULATION ENCOURAGING INNOVATION & INVESTMENT
- WELL INFORMED & PROTECTED CONSUMERS, PROSPEROUS BRANDS
- LESS STRESS ON HEALTHCARE SYSTEMS FROM PROTECTIVE APPROACH
- HEALTHIER POPULATIONS MORE RESILIENT TO DISEASE
- NATURAL HEALTH PRODUCTS UNDERPINNED BY PROPORTIONATE REGULATION
- BETTER HEALTH & ECONOMIC OUTCOMES FROM IMPROVED NUTRITION
- GROWTH POTENTIAL ENABLED = INCREASING PRIVATE & PUBLIC REVENUE
- HOSTILE ENVIRONMENT FOR 'BAD ACTORS'; LEVEL FIELD FOR BRANDS
- SECTOR PLAYING A GROWING IMPORTANT ROLE ALONGSIDE OTHER SECTORS

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For food manufacturing facilities, the persistent threat of *Listeria monocytogenes* often resides within microbial biofilms. These biofilms are notoriously difficult to eliminate using traditional cleaning and disinfection methods because the bacteria are encased in a protective layer of extracellular polymeric substance (EPS). While historical industry practice may have viewed enzymatic cleaners with scepticism, a deeper look at their chemistry and targeted application protocols reveals their strategic value as a complementary tool in Open Plant Cleaning (OPC).



The core function of an enzymatic cleaner is to catalyse the breakdown of the biofilm's structural components, allowing disinfectants to reach the target microorganisms. However, the term "enzymatic cleaner" is exceptionally broad, covering a vast range of formulations and efficacy levels. Meaningful evaluation requires a clear understanding of the primary enzyme categories at play. Any commercially available enzymatic product is typically a blend of multiple enzymes, each targeting a different component of the biofilm matrix (Stiefel et al., 2016).

Proteases catalyse the breakdown of proteins, which are generally the most structurally important component of

mature biofilms (Pant et al., 2023), and for this reason, they show strong promise for biofilm dissolution. One study found that a polysaccharidase/protease treatment combination was most effective, though delayed activation of the protease was necessary to achieve efficacy, which was achieved by immobilising the protease within alginate beads (Orgaz et al., 2007).

Another major group includes the Polysaccharidases, which target the sugar-based components of the EPS. This group features cellulases, which break down cellulose found in biofilms formed by organisms like *Pseudomonas* (Jayasekara & Ratnayake, 2019). Cellulases were only found to be effective against mixed-

species biofilms whose EPS was heavy in polysaccharide content (Fanaei Pirlar et al., 2020). Amylases, which represent about 25% of the global market share of cleaning enzymes (Gonçalves et al., 2020), target starch-based polysaccharides and have shown efficacy in disrupting biofilms from pathogens such as *Staphylococcus aureus* (Fleming & Rumbaugh, 2017).

Amylase production is also thought to be the causative explanation for the competitive exclusion of other biofilm-formers by *Bacillus subtilis* (Lahiri et al., 2021). Additionally, DNases break down extracellular DNA (eDNA), a critical element in the initial attachment stage and structural stability of the EPS matrix in several species,

including *L. monocytogenes* (Jang & Eom, 2020; Tang et al., 2013; Voglauer et al., 2025; Wang et al., 2023; Zetzmann et al., 2015). While research supports DNases' efficacy, they are often considered impractical or expensive for widespread industrial use (Brown et al., 2015; Karygianni et al., 2020). Lastly, Lipases break down lipids or fats; while common in commercial products, less independent research exists to fully support their role in general multi-species environmental biofilms (Pant et al., 2023).

Crucially, the efficacy of any enzymatic product depends entirely on the specific structural and compositional makeup of the biofilm's EPS, which varies based on the facility's unique microbiome and microenvironments (Wang et al., 2023). What works effectively in one plant may fail in another. Therefore, two prudent steps are mandatory when evaluating a new product: first, carefully investigate its enzyme formulation, including the optimal pH and temperature requirements for the enzymes, and second, conduct rigorous on-site efficacy trials in your own facility to confirm performance against the local microflora.

Beyond matching the enzyme to the target, two primary concerns historically surround the use of enzymatic cleaners in food

production: the potential to create nutrients and the risk of releasing viable cells. Both concerns are effectively mitigated through proper application and protocol design.

First, regarding the mitigation of nutrient risk: Enzyme action breaks down complex organic soil into smaller, more bioavailable components—essentially creating potential food for surviving bacteria. This risk is managed by ensuring the enzymatic cleaning step is only one part of a robust and comprehensive cleaning sequence. This sequence must include a thorough intermediate rinse and the final biocide application to eliminate liberated cells and residual organic matter before it can support bacterial growth. The operational goal is sequential: disruption, followed immediately by biocide application.

Second, the issue of prioritising speed over extended contact time addresses the risk of viable cell release. Not all enzymes require the same extended contact times (an hour or more) as certain Clean-in-Place (CIP) applications (Pant et al., 2023). If this weren't true, the risk of enzymatic biofilm disruption releasing viable, mobile bacteria before disinfection would be paramount. The key insight for open plant cleaning (OPC) is that enzymatic formulations must prioritise

rapid action over sustained contact. Modern enzymatic formulations are increasingly designed for speed, often working effectively within minutes. This rapid disruption allows the cleaning team to immediately follow up with the disinfection step, dramatically minimising the window where liberated bacteria pose a dispersal risk. This approach necessitates selecting enzyme variants that maintain high activity at the ambient temperatures typically achievable in an open plant environment, rather than the sustained high-temperature conditions common in CIP systems. Temperature control, therefore, becomes a crucial operational constraint that dictates the choice of fast-acting enzymes.

Understanding these technical nuances shifts the perspective on enzymatic cleaners. They are not a "silver bullet" to replace traditional chemistry, but when properly formulated for rapid action and strategically integrated into comprehensive cleaning protocols, they represent a powerful, additional arrow in the quiver against environmental biofilms. For facilities struggling with persistent *Listeria* environmental contamination, strategic use of a matched enzymatic product can significantly enhance the effectiveness of their existing seek-and-destroy protocols.



ONLINE



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Reuben had been enjoying a family holiday in Devon when a trip to A&E resulted in the worst nightmare imaginable. Nobody could ever have known what was about to unfold for Reuben & his family, and what followed turned out to be the worst 7 days of their lives.



Reuben passed away in his loving Mummy's arms on the 21st August 2012 aged 23 months, and just 2 days later on the 23rd, Reuben's Retreat was born. Reuben's Mummy launched the charity in his memory to ensure that his short, but precious life wasn't in vain. Reuben's mummy always says that we have the ability to leave the world a better place than we found it. She felt this for Reuben too as she also believes that each life, however brief, forever changes the world.

Our aim is to relieve the distress of families bereaved of their child or those who have a child who is complexly poorly and may face an uncertain future. We provide emotional and practical support through peer led support groups including online and outdoor activities, holistic therapies, one to one counselling, bespoke in memorial events, interactive therapies such as music, animal and art therapy, memory making events in our hydrotherapy pool, movie & sensory room and play room, in addition to in-house apartment breaks.

Reuben's Retreat is a place for families bereaved of a child to **remember and rebuild** and those with a child who is complexly poorly to **relax and recharge**; walking side by side with them for as long as they need us.

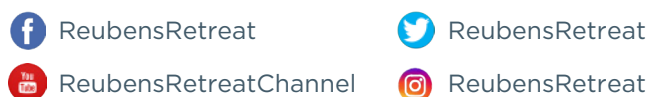
Reuben's Mummy always says...

"Everybody has something to bring to Reuben's Retreat, this project will be built on love, compassion & generosity."

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Thank you for taking the time to read about our cause, and please pass on our details to a friend. It costs nothing to you but could make a huge difference to families that need us.



Reuben's Retreat - Registered Office
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The Lodge at Reuben's - Head Office - Park Crescent, Glossop, Derbyshire SK13 7BQ
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