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Food Standards Agency  
Regulatory Officer  
Directorate Support Unit

### **Cadmium and Lead in Offal a Way Forward: Options on the Issue of Non-Compliant Offal Entering the Food Chain**

Dear Nasreen,

Thank you for the opportunity to comment on the above. The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland representing over 11,500 farming families and as such, we would like to make the following observations and comments;

- Based on the current FSA consultation, we are not satisfied that there is a sufficiently strong evidence base to make an informed policy decision.
- We are concerned that the sample sizes being used in this study are too small to be truly representative of the wider industry.
- We are concerned that only information from GB has been presented and that there is no information presented specific to Northern Ireland to suggest if either of these substances are an issue here.
- There is no information or data contained within the consultation to suggest that the UK population is suffering any adverse affects from the current levels of exposure from either cadmium or lead to warrant any changes being introduced.
- To our understanding, the current research was conducted in GB. As both cadmium and lead accumulate from an animal's environmental exposure, we request access to geological survey data/maps to demonstrate whether Northern Ireland has a higher or lower environmental level of cadmium or lead than the rest of GB.
- We request evidence that the levels of cadmium or lead in animals born and reared in Northern Ireland are failing EU MLs.
- We are of the opinion that it is unlikely that cadmium levels rise suddenly from 4% at 71 months of age to 35% at 73 months of age. We therefore believe that further research is required in cattle over 72 months to establish at what point a significant number of kidneys/livers begin to move above the ML for cadmium/lead. It is possible that if the background levels of cadmium in Northern Ireland are lower than the UK average, then the cut of point should be set at 100 or 120 months. If environmental cadmium/lead levels are higher in Northern Ireland it may be prudent to set a lower age limit.
- We would like to query the effect of any dilution effect on offal produced. It is the opinion of the committee that while one individual kidney may fail the ML, once the kidney is chopped/ground up and mixed amongst several other kidneys, then the resulting mixture may well be below the ML. As such, we are interested to know if there is any evidence of final products on supermarket shelves being above the MLs for either cadmium or lead?
- We question how the current EU MLs have been set (Cadmium in meat – 0.05 mg/kg, in liver – 0.5 mg/kg, in kidney – 1 mg/kg; Lead in meat – 0.1 mg/kg, in offal – 0.5mg/kg). It is our opinion that these

MLs may not be reflective of the UK general public's eating habits and therefore exposure to these substances i.e. we believe that most people would eat some form of meat once or twice a day, whilst most people would only eat kidney or offal once or twice per year. There is therefore an argument to suggest that the MLs set for offal are too low (assuming of course that the levels in meat have been set low enough).

- We believe that an individual's exposure to either of these substances is a multiplication of the levels in the product consumed multiplied by the frequency that an individual consumes them. Realistically, the individual that eats two kidneys with 0.95 mg/kg cadmium has a higher exposure and subsequent accumulation than an individual who consumes one kidney with 1.05 mg/kg. As such, we question whether a more prudent course of action may be for the FSA to issue advice on how often individuals should consume these products in the same way many health bodies suggest only eating tuna twice a week to avoid accumulation of high levels of mercury in the body.
- Based on the information in the current consultation, the UFU's position is that no action should be taken until a more robust evidence base has been established that details more information on the background environmental level of both cadmium and lead in Northern Ireland, the levels of cadmium and lead in the kidneys and livers of livestock born and reared in Northern Ireland, a clearer demonstration of the age at which a significant proportion of kidneys or livers begin to fail MLs (e.g. 72 months/80 months/100 months/120 months). If the findings concur with the evidence of this initial pilot study, then the UFU's position would likely move to 3a (voluntary restriction), although we would still suggest that further evidence is required to suggest the most appropriate age at which to exclude kidneys and livers in order to protect consumers whilst ensuring as little waste to the industry as possible.

#### **Consultation questions (NI):**

- 1) Based on conversations with NIMEA we are led to believe this is a fair reflection of the value of a kidney.
- 2) Information not known by UFU membership.
- 3) Information not known by UFU membership.
- 4) N/A
- 5) Meat processors would lose the value of this product. They will likely experience a cost associated with batching animals. There will likely be a cost to separate this material. If this material can not be sent to the pet food market, processors will be forced to pay to send it for rendering. Each of these costs will impact upon the margin per animal. As a result, processors will likely attempt to pass these costs onto farmers through a reduced price for their animals.
- 6) N/A
- 7) Information not known by UFU membership.
- 8) Information not known by UFU membership.
- 9) Information not known by UFU membership.

On behalf of the members of the UFU, I trust that these comments will be considered as part of this consultation process.

Yours sincerely,

**Dr Geoff Thompson**

**Policy Officer**

**Animal Health, Pigs, Poultry**