

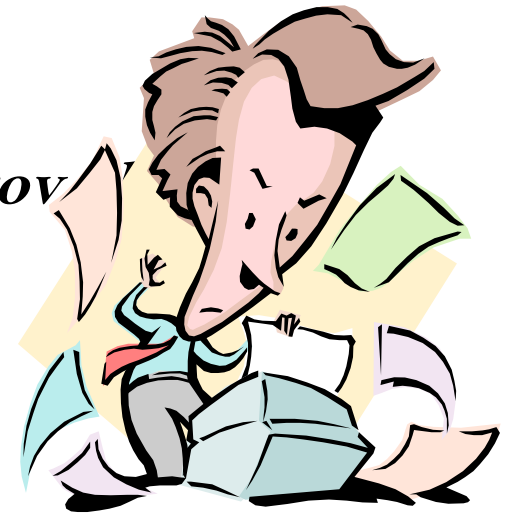


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Food Safety – BIP Training Day – 2 June 2014

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UK NATIONAL MONITORING PLAN FOR IMPORTS OF POAO 2014/15

- The FSA has taken on responsibility from Defra, the National Monitoring Plan for POAO for 2014/15
- This was launched on 2 May this year
- Legal basis for this is the same as in previous years which is set down in Directive 97/78/EC and Regulation 136/2004

National Monitoring Plan - background

Regulation 136/2004 laying down procedures for veterinary checks at BIPs

- Annex II:
 - “member States must submit consignments of products presented for importation to a monitoring plan”.
 - “in particular to detect residues, pathogenic organisms or other substances dangerous to humans, animals or environment”
 - “objective to monitor conformity with Community legislation”

National Monitoring Plan - background

Regulation 136/2004 laying down procedures for veterinary checks at BIPs

- Annex II:
 - “must be based on the nature of the products”
 - “the risk they represent”
- Take account of:
 - “frequency and number of incoming consignments”
 - “results of previous monitoring”

UK NATIONAL MONITORING PLAN FOR IMPORTS OF POAO 2014/15

- Aim is to develop a more flexible approach to NMPs
- They should be linked closely to individual BIP sampling Plans
- Not create additional costs or burden for business
- Plans will be risk based and targeted

UK NATIONAL MONITORING PLAN FOR IMPORTS OF POAO 2014/15

- The Plans will use TRACES as the intelligence Hub for defining where the risks are in relation to the product/origin of the goods passing through individual BIPs
- Other intelligence may also inform the NMP at specific BIPs.
- The requirements of the % levels in the old NMP from Decision 94/360/EC will no longer apply

National Monitoring Plan - background

Decision 94/360/EC – reduced frequency of physical checks

- How risk based?
- Does it allow BIPs flexibility to select samples?
- Does it reflect nature of trade at BIPs?

UK NATIONAL MONITORING PLAN FOR IMPORTS OF POAO 2014/15

- However a random element of testing still needs to be applied, based on throughput, to ensure “BIP shopping” is not easy to identify for predictive sampling
- For audit purposes in this first year we have asked BIPs to maintain the current level of sampling but to use the intelligence they have to target this more
- This rewards those in compliance and is a form of an ‘assurance scheme’ which we can start to identify

UK NATIONAL MONITORING PLAN FOR IMPORTS OF POAO 2014/15

- BIPs will provide the monthly returns to the FSA in accordance with EU requirements
- These can be audited against the throughput of the BIP and in relation to the risks identified using the matrix which has been circulated with the NMP
- We intend to monitor the returns and also look to our own information systems to identify any emerging or possible risks and to amend the plan on a regular basis where such issues are found

National Monitoring Plan 2014/15

The NMP sets out guidance on:

- under general categories of animal products.
- the specific products where In certain cases the hazard is more likely to be found.
- products that should be considered for sampling

Product list

Product category	Hazard	Guidance on specific products to sample
Bovine		
	Salmonella	<p>Minced meat and meat preparations intended to be eaten raw</p> <p>Minced meat and meat preparations intended to be eaten cooked</p> <p>Mechanically separated meat (MSM)</p> <p>Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk</p>

Product list

Product category	Hazard	Guidance on specific products to sample
Ovine / Caprine	Salmonella	<p>Minced meat and meat preparations intended to be eaten raw</p> <p>Minced meat and meat preparations intended to be eaten cooked</p> <p>Mechanically separated meat (MSM)</p> <p>Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk</p>

Product list

Product category	Hazard	Guidance on specific products to sample
Fish products & crustaceans (as in Annex I of 94/360/EC)		(Note - definition of this category in Annex I of Decision 94/360/EC is – fish products in hermetically sealed containers intended to render them stable at ambient temperatures, fresh and frozen fish and dry and/or salted fishery products)
	Histamine	Fishery products from fish species associated with a high amount of histidine. Fishery products which have undergone enzyme maturation treatment in brine, manufactured from fish species associated with a high amount of histidine.
	Lead	Checks should include cephalopods, which are included in Regulation 1881/2006.

Product list

Product category	Hazard	Guidance on specific products to sample
Eggs	Salmonella	<p>Egg products, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.</p> <p>Ready-to-eat foods containing raw egg, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.</p>
	Dioxins plus dioxin-like PCBs	Limits apply only to hen eggs and hen egg products. Free range/organic eggs in particular are known to accumulate dioxins.

Product list

Product category	Hazard	Guidance on specific products to sample
Milk & Milk Products	Salmonella	<p>Cheeses, butter and cream made from raw milk or milk that has undergone a lower heat treatment than pasteurisation</p> <p>Milk powder and whey powder.</p> <p>Ice cream containing milk ingredients, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk</p> <p>Dried infant formulae and dried dietary foods for special medical purposes intended for infants below six months of age.</p> <p>Dried Follow-on formulae</p>

Product list

Product category	Hazard	Guidance on specific products to sample
Other fishery products		(Note - definition of this category in Annex I of Decision 94/360/EC is – other fishery products that those mentioned above, and bivalve molluscs)
	Salmonella	Cooked crustaceans and molluscan shellfish. Live bivalve molluscs and live echinoderms, tunicates and gastropods.
	E.coli	Live bivalve molluscs and live echinoderms, tunicates and gastropods
	Lead	Checks should include molluscs and cephalopods, which are included in Regulation 1881/2006. Live bivalve molluscs could be tested.
	Cadmium	Shellfish are well known for accumulating cadmium. Checks should include molluscs and cephalopods. Live bivalve molluscs could be tested.
	Mercury	Mercury accumulates in all fish, particularly predator species, and mercury in fish is a common RASFF report for environmental contaminants.
	Dioxins plus dioxin-like PCBs	Fish and shellfish are included in 1881/2006 as amended by 1259/2011. This would include live bivalves and crustaceans if imported. However, all are considered low risk.
	BaP and PAH4	Bivalve shellfish are prone to PAH contamination. Live bivalve molluscs could be tested for BaP.

Anti-Microbial Resistance

UK Five Year Antimicrobial Resistance Strategy 2013 to 2018

- We are aware of evidence gaps in some areas. For example, research is needed to provide a more detailed understanding of the significance of different transmission pathways between the environment, humans, animals and **the food supply chain** in promoting transfer or increase of resistance in human and veterinary pathogens, so we can target and prioritise our interventions appropriately to minimise resistance.

Product list

Product category	Hazard	Guidance on specific products to sample
Poultry		
	<p>For raw meat products only, antimicrobial resistance (AMR) for <i>Campylobacter</i> species</p> <p>For raw meat products only, presence of ESBL¹ <i>Escherichia coli</i></p> <p>¹ ESBL: Extended Spectrum Beta-Lactamase</p>	<p>See accompanying: NMP April 2014 microbiological document for detailed analysis</p>

Additional sampling – raw poultry products

Initial sampling will focus solely on **raw poultry products** tested for:

- **Enumeration and antimicrobial resistance (AMR) for *Campylobacter* species**
- The *Campylobacter* isolates will be enumerated and then tested against a suite of antibiotics in single and multi-drug combinations, comprising:
- Ampicillin (A), Chloramphenicol (C), Ciprofloxacin (Cp), Erythromycin (E), Gentamicin (G), Kanamycin (K), Nalidixic Acid (Nx), Neomycin (Ne) and Tetracycline (T).

Additional sampling – raw poultry products

Initial sampling will focus solely on **raw poultry products** tested for:

- **Enumeration and presence of Extended Spectrum Beta-Lactamase *Escherichia coli* (ESBL-*E. coli*)**
- The *E. coli* isolates will be enumerated and then analysed for the presence of ESBLs, using the '*Combination disc methods*' (PHE). See guidance (Pg.7):
- Laboratory Detection & Reporting of Bacteria with Extended-Spectrum b-Lactamases (http://www.hpa.org.uk/webc/HPAwebFile/HPAweb_C/1194947314416)

National Monitoring Plan - Reporting

Monthly reports to FSA:

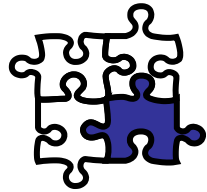
- Return for Commission
- FSA assess monthly results and review the sampling plan
- Monitoring in terms of sample numbers, test results, product range
- Depending on results - the sampling strategy may be adjusted the year

Other measures for targeted risk based checks

POAO - Reinforced checks data under Article 24 of 97/78/EC

Food not of animal origin (FNAO) – early warning system

- Monitor RASFFs across EU
- Assess emerging risks to health
- Alert PHAs, inland LAs and importers
- Potentially increased border controls are applied



**Review of
Reg. 882/2004
(Single proposal)**

**Inspection
Fees**

**OC on
residues
of vet med**

**Veterinary
border
controls**

**AH
related
controls**

**PH
related
controls**

**Seeds&PM
related
controls**

Recast

Impact

- Whole agri-food chain covered
 - Food and feed
 - Animal health and welfare
 - Animal by-products
 - Residues and plant protective products
 - GMOs
 - Plant health and plant reproductive materials
 - Organic and protected geographical status
- The proposal won't change the official controls that are currently delivered, but will change how Member States approach official control delivery.

Impact – PHAs / importers

- Changes to the current imports regime will establish a common set of rules applicable to all checks carried out at borders on animals, products of animal origin, plants and other products that must be checked before they enter the EU
- This will be done by establishing minimum requirements for facilities, equipment, etc. at **border control posts**, and
- by having one **Common Health Entry Document** that importers will use to notify authorities of the arrival of consignments
- A common IT system (TRACES) will be used to track the movement of animals, products of animal origin and products of plant origin
- Greater flexibility on official controls for low risk goods

Impact – PHAs / importers

Border Control Posts – replace Border Inspection Posts, Designated Points of Entry, Designated Points of Import and First Point of Introduction

Animals and certain goods subject to checks at BCPs:

- Animals
- POAO, germinal products, animal by-products
- Plants, plant products
- Goods of non-animal origin currently under Reg 669/2009
- Animal and goods subject to emergency safeguard measures
- Animals and goods for which specific imports measures have been applied

Impact – PHAs / importers

- Provides powers for:
 - Commission to issue lists of animals and goods subject to Border Control Post checks
 - Official certification
 - Transhipment and transit
 - Documentary checks – 100%
 - Identity and physical checks – process for setting frequency
 - Designation of Border Controls Posts
 - Suspension of Border Control Posts

Impact – PHAs / importers

- Border Control Posts – minimum requirements:
 - Sufficient number of suitably qualified staff
 - Premises / facilities appropriate to nature and volume of animals and goods
 - Equipment and premises for performance of official controls on animals and goods covered by designation
 - Arrangements to enable official controls and enforcement action to be taken in cases of suspicion, non-compliance or consignments presenting a risk
 - Equipment for operation of TRACES
 - Access to official laboratories
 - Arrangements to prevent cross contamination
 - Arrangements to prevent spread of diseases into EU

Delegated and implementing acts

- The proposal includes a significant number of delegated (44) and implementing (38) acts, examples of which are;
 - Delegated acts to supplement the provisions of the proposed Regulation and lay down additional rules for carrying out official controls in specific sectors, establish minimum frequency of certain controls and additional tasks and responsibilities of the competent authorities
 - Implementing acts to establish standard model forms to provide information to the Commission or other Member States and detailed rules for approving pre-export controls
- The FSA and other Government departments are carefully considering whether the proposed use of delegated and implementing acts is actually justified and needed, and whether it is in line with the EU's scope of competence.

Local competent authorities

- The risk based approach to controls is maintained
- Official controls to be carried out as much as possible in a manner that minimises the burden on businesses.
- Enforcement authorities will need to provide businesses with a copy of their report on official controls, both in case of non-compliance or compliance with the law.
- To reinforce transparency, new rules will establish the minimum level of information about official controls that must be made public.

Central Government

- A requirement for Member States to lay down rules in order to enforce the Regulation by way of effective, proportionate and dissuasive penalties.
- A strengthening of the requirement to provide administrative assistance to other Member States where necessary to ensure the efficiency of controls in cross-border non compliances
- New provisions detailing actions to be taken where there is the suspicion of non-compliance in order to confirm or eliminate the suspicion or doubt
- Coordination by the Commission of measures and actions to be taken where non-compliance might have ramifications in more than one Member State
- New EU information management system for official controls (IMSOC)

Charging

- Introduction of mandatory charging and the requirement that Member States recover the full cost of official controls
 - Removal of the minimum charges for certain official controls such as meat, fishery products, dairy and imports
- Mandatory exemption for micro businesses, defined as those businesses that employ less than 10 people and with an annual turnover/balance sheet of less than €2m.
 - Exemption wouldn't apply to additional official controls carried out following detection of non-compliance.

Next steps

- Under Greek Presidency - redrafting of Commission proposal began
- European Parliamentary elections – May 2014
- Under Italian Presidency of the Council – July 2014: the redrafting process will be continue.
- Confirmatory vote on 1st reading position – Autumn 2014: the new Parliament will hold a confirmatory vote on the 1st reading position adopted in April.
- Election of new college of Commissioners – October 2014: Commission priorities will be affected by the appointment of the new college of Commissioners.
- Given the complexity of the proposal and broad scope, do not expect the proposal to be agreed until late 2015.

Food Imports: A regulatory Aspect

Any Questions

