

DVMs for distribution

Border Inspection Posts (England) – for action
Chief Port Health Officers – for action

cc:

Nominated officers for Imported Food (England)
APHA
CIEH
APA
Trading Standards Institute
Health Protection England

1st April 2015

Reference: OVS/2015/16

Dear Colleagues,

UK NATIONAL MONITORING PLAN FOR IMPORTS OF PRODUCTS OF ANIMAL ORIGIN 2015/16

This letter is addressed to Border Inspection Posts and Chief Port Health Officers in England only.

Purpose

1. To provide BIPs with a copy of the UK's National Monitoring Plan for imports of Products of Animal Origin and request that samples are taken and returns logged on TRACES, from 1 April 2015.

Background

2. Directive 97/78/EC and Regulation 136/2004 require Member States of the EU to have a National Monitoring Plan to detect residues, pathogenic organisms or other substances dangerous to humans, animals or the environment. The Food Standards is developing the Plan to be more flexible with risk based priorities targeted using the intelligence and knowledge of BIPs, the EU Commission's TRACES web based data collection system and FSA's data collection systems. The Plan requires a random element of samples to be determined by BIPs which reflects current levels of sampling of throughput of products of animal origin. This is designed to ensure that no predictive element can be made as to what products may or may not be sampled at any BIP.



Department
for Environment
Food & Rural Affairs



Animal &
Plant Health
Agency



3. I attach a copy of the UK National Monitoring Plan for imports of products of animal origin from third countries. The plan has 2 parts:

- a sampling table setting out what FSA policy teams have identified as high priority for testing;
- a sampling table setting out what FSA policy teams have identified as medium and lower priorities for the UK;

This replaces the information in the BIP manual, which will be updated in due course.

4. Authorised Officers should also use their local intelligence and knowledge to target samples that are taken under the National Monitoring Plan where they consider it is appropriate and where such products enter through the relevant BIP. The current level of sampling is sufficient and while the samples should cover as far as possible the full range of contaminants and products in the Plan, we understand that not all such products come through every BIP and some may be small in number and quantity. You may use previous results and RASFF to direct sampling (i.e. which contaminant(s) to sample for) but you should note that this is a monitoring plan rather than safeguard activity so there should be some unpredictability to the choice of consignment to be sampled. Due consideration should also be given to the Food Law Code of Practice and associated Practice Guidance issued by the Food Standards Agency.

5. Please note the Plan **does not include** the following:

- Samples taken under the VMD's non-statutory surveillance programme.
- Samples taken as a result of Article 24 procedures.
- Samples taken under specific EU safeguard.
- Samples taken under the FSA's National Coordinated Sampling Programme which should be submitted through UKFSS (not TRACES)
- Sampling of live animals and animal by-products.

6. The Plan **does include** the following:

- Microscopy and samples taken for bacteriological examination as part of the general import controls.
- Samples taken based on suspicion, where the consignment **is not** subject to an Article 24 procedure.

7. In previous years National Monitoring Plan returns have had to be sent in monthly using an Excel spreadsheet. In order to reduce the burden on Port Health Authorities the FSA are pleased to confirm that we are now able to compile this data directly from the TRACES system so Port Health Authorities will no longer be required to report monthly.

IMPORTANT – PLEASE NOTE

The National Monitoring Plan data can only be accurately collated if the ‘RANDOM’ box is completed on Page 2, Section 29 of the CVED and entered on TRACES when a sample is taken under the National Monitoring Plan.

Samples taken under the FSA’s National Coordinated Sampling Programme should not be entered onto the TRACES system

8. Results of laboratory tests should be entered on to the TRACES system as soon as they are received, in addition any positive results relating to Anti-Microbial Resistance should be notified directly to Kara Thomas at the FSA at Kara.Thomas@foodstandards.gsi.gov.uk

9. FSA will review the Plan throughout the year and will further develop the Plan based on changing priorities.

10. Action for Authorised Officers

- Use the guidance to target National Monitoring Plan sampling activity at the BIP from 1 April 2015.¹

Contact point for enquiries: If you have any enquires please contact the Imports Team at imported.food@foodstandards.gsi.gov.uk

Yours sincerely

Gary Welsh
Senior Imports Policy Advisor

¹ Unsatisfactory results should also be reported immediately using the RASFF system in the normal manner.

National Monitoring Plan – Imported POAO sampling priorities table 2015/16

HIGH PRIORITY ITEMS

Product Category	Hazard	Specific Sampling Guidance
Poultry	Anti-Microbial Resistance (AMR)	<p><u>Raw Poultry Products</u> Campylobacter isolates should be enumerated and 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)</p> <p><u>Cooked Poultry and other ready to eat poultry products</u> <i>E. coli</i> isolates should be enumerated and then analysed for the presence of Extended Spectrum Beta-Lactamase <i>Escherichia coli</i> (ESBL-<i>E. coli</i>)</p> <p>Please also report the results of all positive AMR tests to Kara Thomas at Kara.Thomas@foodstandards.gsi.gov.uk</p>
Bovine	<i>Salmonella</i>	Ready to eat minced meat and meat preparations intended to be eaten raw
Bovine	<i>Salmonella</i>	Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.
Bovine	Veterinary medicine residues	Beef casings test for nitrofurans, chloramphenicol and antibiotics

Product Category	Hazard	Specific Sampling Guidance
Ovine	<i>Salmonella</i>	Ready to eat minced meat and meat preparations intended to be eaten raw
Ovine	<i>Salmonella</i>	Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.
Swine	<i>Salmonella</i>	Ready to eat minced meat and meat preparations intended to be eaten raw
Swine	<i>Salmonella</i>	Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.
Swine	<i>Salmonella</i>	Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.
Equine	Veterinary medicines residues	Random testing for Phenylbutazone (Bute)

Product Category	Hazard	Specific Sampling Guidance
Fish products & crustaceans	<i>Salmonella</i>	Cooked crustaceans and molluscan shellfish. Live bivalve molluscs and live echinoderms, tunicates and gastropods.
Fish products & crustaceans	<i>E.Coli</i>	Live bivalve molluscs and live echinoderms, tunicates and gastropods.
Fish products & crustaceans	Veterinary medicines residues	Crustaceans, test for chloramphenicol, sulphonamides, nitrofurans and penicillin
Fish products & crustaceans	Cadmium	Checks should include molluscs, cephalopods and sardines. Live bivalve molluscs could also be tested
Fish products & crustaceans	Mercury	Mercury accumulates in all fish, particularly larger predatory oily fish. RASFF reports are common in imports from Asia / Indonesia so priority should be considered from species from those areas
Fish products & crustaceans	Dioxins and Dioxin-like PCBs	Chinese Mitten Crabs
Fish products & crustaceans	Macrolides / Dyes	Farmed products, particularly from Vietnam and India and to a lesser extent China. Should be tested for trimethoprim, macrolides and dyes (e.g. malachite green)

National Monitoring Plan – Imported POAO sampling priorities table 2015/16

MEDIUM AND LOWER PRIORITY ITEMS

Product Category	Hazard	Specific Sampling Guidance	Priority
Bovine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.	Medium
Bovine	<i>Salmonella</i>	Mechanically separated meat (MSM).	Medium
Bovine	Lead / Cadmium	Include offal (kidney and liver).	Low
Bovine	Dioxins plus dioxin-like PCBs		Low
Bovine	BaP and PAH	Smoked meat and heat-treated meat products (flame-grilled burgers are high risk although unlikely to be imported). Raw meats are not susceptible to BaP contamination.	Low
Bovine	Aflatoxin B1	Bovine liver.	Low

Product Category	Hazard	Specific Sampling Guidance	Priority
Ovine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.	Medium
Ovine	<i>Salmonella</i>	Mechanically separated meat (MSM).	Medium
Ovine	BaP and PAH	Smoked meat (although FSA are not aware of smoked lamb product being imported)	Low
Ovine	Aflatoxin B1	Ovine liver.	Low
Swine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.	Medium
Swine	<i>Salmonella</i>	Mechanically separated meat (MSM).	Medium
Swine	Dioxins plus dioxin-like PCBs	Lower limits apply than for beef and lamb so there is a higher risk of non-compliance. Problems have been associated with product from Chile in the past.	Medium
Swine	BaP and PAH	Smoked pork meat products (sausage, bacon), also include cooked smoked sausage products. Raw meats are not susceptible to BaP contamination.	Low

Product Category	Hazard	Specific Sampling Guidance	
Equine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.	Medium
Equine	<i>Salmonella</i>	Mechanically separated meat (MSM).	Medium
Equine	<i>Salmonella</i>	Meat products intended to be eaten raw, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.	Low
Equine	Lead / Cadmium	Include offal (kidney and liver)	Low
Fish products & crustaceans	Lead	Checks should include cephalopods	Medium
Fish products & crustaceans	BaP and PAH	Dried / Smoked fish particularly from Africa (but not dried/smoked fish used for stock and seasoning). Does not apply to fresh fish, crustaceans or cephalopods. Bivalve shellfish are prone to PAH contamination.	Medium/Low
Fish products & crustaceans	Histamine	Fishery products from fish species associated with a high amount of histidine.	Low

Product Category	Hazard	Specific Sampling Guidance	
Eggs	<i>Salmonella</i>	Egg products, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.	Medium
Eggs	<i>Salmonella</i>	Ready-to-eat foods containing raw egg, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.	Medium
Eggs	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.	Medium
Poultry	Coccidiostats	Raw poultry (chicken, duck, turkey, guinea fowl and goose)	Medium
Poultry	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.	Low
Poultry	<i>Salmonella</i>	Meat products made from poultry meat intended to be cooked.	Low
Poultry	Dioxins plus dioxin-like PCBs	Free range birds, including ratites, are more prone to accumulate dioxins. Chicken liver is lower risk	Low

Product Category	Hazard	Specific Sampling Guidance	
Milk & Milk Products	<i>Salmonella</i>	<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>	Low
Milk & Milk Products	Coagulase-positive staphylococci	<p>Cheeses made from raw milk</p> <p>Cheeses made from milk that has undergone a lower heat treatment than pasteurisation.</p> <p>Ripened cheeses made from milk or whey that has undergone pasteurisation or a stronger heat treatment.</p> <p>Unripened soft cheeses (fresh cheeses) made from milk or whey that has undergone pasteurisation or a stronger heat treatment.</p>	Low

Product Category	Hazard	Specific Sampling Guidance	
Milk & Milk Products	Staphylococcal enterotoxins (to be carried out on samples with coagulase positive Staphylococci test results greater than 10 ⁵ cfu/g)	<p>Cheeses made from raw milk</p> <p>Cheeses made from milk that has undergone a lower heat treatment than pasteurisation.</p> <p>Ripened cheeses made from milk or whey that has undergone pasteurisation or a stronger heat treatment.</p> <p>Unripened soft cheeses (fresh cheeses) made from milk or whey that has undergone pasteurisation or a stronger heat treatment.</p>	Low
Milk & Milk Products	<i>Enterobacter sakazakii</i>	Dried infant formulae and dried dietary foods for special medical purposes intended for infants below six months of age.	Low
Milk & Milk Products	Aflatoxin M1	<p>Raw milk, heat treated milk and milk for the manufacture of milk-based products</p> <p>Infant formulae and follow-on formulae, including infant milk and follow-on milk.</p>	Low
Animal fats and marine oils	Dioxins and Dioxin-like PCBs		Low