

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

5 August 2015

Reference: OVS/2015/28

Dear Colleagues,

**UK NATIONAL MONITORING PLAN FOR IMPORTS OF PRODUCTS OF ANIMAL ORIGIN 2015/16 – INCLUSION OF ANTIMICROBIAL RESISTANCE (AMR) TESTING**

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

**Purpose**

1. To reiterate the Food Standards Agency (FSA) request to include AMR testing of raw and cooked poultry meat as part of the UK's National Monitoring Plan for imports of Products of Animal Origin (POAO) and provide further details of the laboratories who have agreed to undertake this analysis and associated cost.

**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 FSA 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



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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.

3. The issue of AMR is a key priority across all of Government and the FSA has an interest in the role of food chain in the development and transmission of AMR including imported foods as a potential source of AMR bacteria. However, there is currently a lack of data on the prevalence and levels of AMR bacteria in imported foods such as raw and cooked chicken. The FSA recognised that this gap in our knowledge could be addressed by including AMR testing as part of the National Monitoring Plan which will help to inform risk assessment and management. In future, we may also decide to expand AMR testing to other food commodities.
4. In April 2015, the FSA sent to you a table of high sampling priorities for inclusion under the National Monitoring Plan for Imports of POAO for 2015/16. A key priority was for the testing of poultry for AMR, specifically testing of:
  - Raw poultry meat for enumeration of *Campylobacter* isolates and then these isolates should be tested against a panel of antibiotics in single and multi-drug combinations. The antibiotics should comprise of Ampicillin (A), Chloramphenicol (C), Ciprofloxacin (Cp), Erythromycin (E), Gentamicin (G), Kanamycin (K), Nalidixic Acid (Nx), Neomycin (Ne) and Tetracycline (T).
  - Cooked poultry meat for *Escherichia coli* (*E. coli*) enumeration and then further analysed for the presence of Extended Spectrum Beta-Lactamase (ESBL) producing *E. coli*.
5. Public Health England (PHE) and Animal and Plant Health Agency (APHA) have agreed to undertake this AMR analysis and have provided costings below:

***Campylobacter* species enumeration, speciation and antimicrobial susceptibility testing by breakpoint testing:**

Organisation	Description of work	Price Excluding VAT
PHE	Enumeration of <i>Campylobacter</i> species present within raw poultry meat sample following the requirements of EN/ISO/TS 10272-2 by PHE Food, Water and Environmental Microbiology Service Laboratory.	£40.00 per sample
PHE	Speciation and antimicrobial breakpoint testing by the Gastrointestinal Bacteria Reference Unit at PHE Colindale.	£50.00 per isolate
<b>Total cost per sample</b>		<b>£90.00</b>

**ESBL-producing *E. coli* enumeration and characterisation:**

<b>Organisation</b>	<b>Description of work</b>	<b>Price Excluding VAT</b>
PHE	Sample handling and overnight transport by DX Couriers of sub-sample to Animal Plant and Health Agency (APHA) Weybridge for testing.	£9.70 per sample
APHA	Total for ESBL <i>E. coli</i> isolation on two commercial chromogenic ESBL agars and counts on three agars per sample.	£94.55 per sample
APHA	Summary of costs of genetic tests per positive isolate by PCR to detect CTX, OXA, SHV or TEM gene in positive isolates and sequencing to confirm ESBL gene type (Genetic tests are based on batches of at least 20 isolates being tested at a time).	£58.59 per isolate
<b>Total cost per sample</b>		<b>£162.84</b>

6. 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 AMR should be notified directly to Bobby Kainth at the FSA ([bobby.kainth@foodstandards.gsi.gov.uk](mailto:bobby.kainth@foodstandards.gsi.gov.uk)).
7. **Contact point for enquiries:** If you have any enquires please contact the Imports Team at [imported.food@foodstandards.gsi.gov.uk](mailto:imported.food@foodstandards.gsi.gov.uk)

Yours sincerely



**Alex Schofield**  
**Senior Imports Policy Advisor**