

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

29th January 2016

Reference: OVS/2016/03

Dear Colleagues,

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

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

The purpose of this letter is to remind all BIPs of the requirement to test for Anti-Microbial Resistance (AMR) when taking samples under the UK's National Monitoring Plan for imports of products of animal origin from third countries.

The 2015/16 UK National Monitoring Plan and accompanying guidance has previously been forwarded to all BIPs by the FSA (letters on 1 April 2015 (Ref: OVS/2015/16); 5 August (Ref: OVS/2015/28) and November (OVS/2015/43) refer). It details the high, medium and low priorities as identified by FSA policy teams for testing. Included amongst the high priorities is the testing of poultry meat for Anti-Microbial Resistance, together with specific sampling guidance.

Following an analysis of the UK NMP sampling data obtained from TRACES, it is apparent that the level of AMR testing undertaken in the current NMP programme remains very low.



Department
for Environment
Food & Rural Affairs



Animal &
Plant Health
Agency



To increase sampling of this high priority area within the remaining two months of the current NMP programme, BIPs are kindly requested to review their local procedures for NMP sampling, ensuring that they clearly stipulate the requirement for AMR testing for poultry meat samples submitted to the laboratories.

A copy of the current UK National Monitoring Plan is enclosed with this letter.

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

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

Yours sincerely

John Furzer
Senior Imports Officer

National Monitoring Plan – Imported POAO sampling priorities table between October 2015 and March 2016

	High priority
	Medium priority
	Low priority

Bovine

Risk Ranking	Product Category	Hazard	Specific Sampling Guidance
High	Bovine	<i>Salmonella</i>	Ready to eat minced meat and meat preparations intended to be eaten raw. This should include “undercooked” or “rare” burgers.
	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	<i>Veterinary medicine residues</i>	Beef casings test for nitrofurans, chloramphenicol, albendazole and antibiotics
Medium	Bovine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.
	Bovine	<i>Salmonella</i>	Mechanically separated meat (MSM).

Risk Ranking	Product Category	Hazard	Specific Sampling Guidance
Low	Bovine	<i>Lead / Cadmium</i>	Include offal (kidney and liver).
	Bovine	<i>Dioxins plus dioxin-like PCBs</i>	Limits for bovine meat and liver.
	Bovine	<i>BaP and PAH</i>	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.
	Bovine	<i>Aflatoxin B1</i>	Bovine liver.
	Bovine	<i>Hormonal Growth Promoters</i>	Raw meats

Ovine

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
High	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.
Medium	Ovine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.
	Ovine	<i>Salmonella</i>	Mechanically separated meat (MSM).
Low	Ovine	<i>BaP and PAH</i>	Smoked meat (although FSA are not aware of smoked lamb product being imported)
	Ovine	<i>Aflatoxin B1</i>	Ovine liver.

Poultry

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
High	Poultry	<i>Anti-Microbial Resistance (AMR)</i>	<p><u>Raw Poultry Products</u></p> <p>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></p> <p><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>
	Poultry	Carbapenemase	Testing for carbapenemase resistant <i>E. coli</i> . ESBL <i>E. coli</i> to be isolated on two commercial chromogenic ESBL agars and counts on three agars per sample.
Medium	Poultry	<i>Coccidiosis</i>	Raw poultry (chicken, duck, turkey, guinea fowl and goose)
Low	Poultry	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
	Poultry	<i>Salmonella</i>	Meat products made from poultry meat intended to be cooked.
	Poultry	<i>Dioxins plus dioxin-like PCBs</i>	Free range birds, including ratites, are more prone to accumulate dioxins. Chicken liver is lower risk

Swine

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
High	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>Hepatitis E.</i>	
	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.
Medium	Swine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.
	Swine	<i>Salmonella</i>	Mechanically separated meat (MSM).

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
	Swine	<i>Dioxins plus dioxin-like PCBs</i>	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.
Low	Swine	<i>BaP and PAH</i>	Smoked pork meat products (sausage, bacon), also include cooked smoked sausage products. Raw meats are not susceptible to BaP contamination.
	Swine	<i>Veterinary medicine residues</i>	Nitrofurans in Hog casings

Equine

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
Medium	Equine	<i>Veterinary medicines residues</i>	Random testing for Phenylbutazone (Bute)
	Equine	<i>Salmonella</i>	Minced meat and meat preparations intended to be eaten cooked.
	Equine	<i>Salmonella</i>	Mechanically separated meat (MSM).
Low	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.
	Equine	<i>Lead / Cadmium</i>	Include offal (kidney and liver)

Fish products & crustaceans

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
High	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	<i>Veterinary medicines residues</i>	Crustaceans, test for chloramphenicol, sulphonamides, nitrofurans and penicillin
	Fish products & crustaceans	<i>Cadmium</i>	Checks should include molluscs, cephalopods and sardines. Live bivalve molluscs could also be tested
	Fish products & crustaceans	<i>Mercury</i>	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	<i>Dioxins and Dioxin-like PCBs</i>	Chinese Mitten Crabs
	Fish products & crustaceans	<i>Macrolides / Dyes</i>	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 and crystal violet and their metabolites)

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
Medium	Fish products & crustaceans	<i>Lead</i>	Checks should include cephalopods
	Fish products & crustaceans	<i>BaP and PAH</i>	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.
	Fish products & crustaceans	<i>Histamine</i>	Fishery products from fish species associated with a high amount of histidine.

Eggs

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
Low	Eggs	<i>Salmonella</i>	Egg products, excluding products where the manufacturing process or the composition of the product will eliminate the salmonella risk.
	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.
	Eggs	<i>Dioxins plus dioxin-like PCBs</i>	Limits apply only to hen eggs and hen egg products. Free range/organic eggs in particular are known to accumulate dioxins.

Milk and Milk products

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
Low	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>
	Milk & Milk Products	<i>Coagulase-positive staphylococci</i>	<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>

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
	Milk & Milk Products	<i>Staphylococcal enterotoxins (to be carried out on samples with coagulase positive Staphylococci test results greater than 10⁵ cfu/g)</i>	<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>
	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.
	Milk & Milk Products	<i>Aflatoxin M1</i>	<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>

Animal Fats and marine oils

Risk Ranking	Product Category	Hazard	Specific Sampling Guidance
LOW	Animal fats and marine oils	<i>Dioxins and Dioxin-like PCBs</i>	Animal fats and marine oils are included in 1881/2006 as amended by 1259/2011. Limits are as for the source animal except for mixed animal fat, which may be at higher risk of non-compliance because the limits are lower than those for beef/lamb/poultry fat.
	Animal fats and marine oils (specifically gelatine)	<i>Salmonella</i>	Gelatine and collagen (Criterion 1.10)

Honey

Risk ranking	Product Category	Hazard	Specific Sampling Guidance
Low	Honey	<i>Chloramphenicol</i>	The Animal and Plant Health Agency (APHA), an executive agency of the Department for Environment, Food and Rural Affairs (Defra), is responsible for the animal health aspects of imports of honey - See more at: http://www.food.gov.uk/business-industry/imports/want_to_import/animalimports/honey#sthash.qKBuSKJp.dpuf