

**ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD**

**DEFRA STRATEGY FOR VETERINARY SURVEILLANCE**

1. Members will recall that, at the beginning of January 2003, the Food Standards Agency sought an ACMSF view on DEFRA's consultation document proposing a strategy for enhancing veterinary surveillance in the UK. The Secretariat sought Members' views on whether what DEFRA proposed was likely to generate the kind of information necessary in assuring the microbiological safety of food and consumer protection. The Chairman then met with a small drafting group to elaborate a consensus view and this was sent to the FSA on 21 January 2003.
2. The ACMSF's views were subsumed into FSA comments which were submitted to DEFRA on 4 March 2003. A copy is attached for the information of Members.

**Secretariat  
June 2003.**

## THE FOOD STANDARDS AGENCY'S COMMENTS ON DEFRA'S PROPOSED STRATEGY FOR VETERINARY SURVEILLANCE IN THE UK

1. The following are the comments of the Food Standards Agency on Defra's proposed strategy for veterinary surveillance in the UK. In compiling its comments, the Agency sought the view of the Advisory Committee on the Microbiological Safety of Food (ACMSF) as to whether the proposed strategy is likely to generate the kind of information necessary in assuring the microbiological safety of food and consumer protection. The Agency has largely accepted the points put forward by the ACMSF.
2. A strategic and coordinated approach to veterinary surveillance is very welcome. Important benefits could flow to the consumer from the achievement through collaboration of the much closer integration of animal health, human health and food safety. The Agency would therefore wish to play a full part in developing the strategy to ensure that food safety requirements are met.
3. To reflect those requirements the strategy needs more detail to provide a clear exposition of the objectives of surveillance. These objectives will include :-
  - Guiding the research community by alerting them to the microorganisms of interest;
  - Identifying gaps in collaboration and avoiding duplication of effort;
  - Identifying and monitoring trends in the incidence and prevalence of zoonotic microorganisms;
  - Ensuring that animal occurrence can be related, where appropriate, to outbreaks of human disease;
  - Highlighting changes in human health risks through food chain exposure pathways.
4. The ACMSF is concerned that animal health issues are predominately the focus of the strategy. Although some of these may, coincidentally, have human health implications e.g. BSE/CJD, insufficient attention is given to human exposure to pathogenic microorganisms through food chain pathways. *Salmonella enteritidis* in eggs or *Escherichia coli* O157 in cattle or *Campylobacter* spp. in poultry and pigs are, of course, very important in human health terms; but, in the absence of widespread clinical implications for livestock, and/or a significant economic or social impact on the farming community, these organisms are not afforded the attention in the strategy which they warrant in terms of the microbiological safety of food. The Agency will, on the other hand, be very interested in the (often intermittent) presence of pathogenic microorganisms in clinically normal food animals. In order to correct the strategy's lack of focus the Agency would like to see the membership of the Veterinary Surveillance Strategy Project Board

strengthened by some in-depth experience in the microbiological safety of foods.

5. The five strategic goals identified in the document are essential to achieving the above objectives. However the Agency does have some concerns as to whether the proposed prioritisation process will deliver the outputs which the FSA will need from surveillance in order to inform microbiological food safety policy development and interventions. It bears restating that the microorganisms of concern for food safety may not at first appear to be of primary economic importance to the farming industry. Trend data, and repeat surveillance, will often be required. Farm or veterinary practice-based sentinel surveillance may convey significant advantages over *ad hoc* surveillance in terms of consistency and comparability of methodology (particularly sampling frames) and results, and in relation to repeatability.
6. Turning to the question of data collection, the concept of a data warehouse populated by contributions from myriad disparate groups is very ambitious. If it is to succeed, data collected must be both reliable and comparable. A prerequisite will therefore be a uniform approach to the design, methodology, sampling framework, validation and statistical aspects of surveillance. The ACMSF has consistently stressed the need to give proper attention to these elements and has set up a standing Surveillance Working Group to facilitate the provision of advice to Government in connection with its microbiological food surveillance programme and other surveillance relevant to food-borne disease. Unless a standardised approach to surveillance can be agreed in principle and implemented in practice, the quality of data that Defra envisages collecting in its data warehouse will be compromised and meaningful comparisons across the animal-human-food spectrum will be impossible.
7. The fact that contributions to the database are to be voluntary is likely to mean that coverage will be less than comprehensive. The correct balance therefore needs to be struck between quality and quantity. In database terms, size is not, of itself, a virtue. Quality is the key. A very large database populated with unreliable data will offer very poor value. The task of quality assuring inputs will be considerable. The proposed database, RADAR, looks very complex, and a more targeted approach, based on the collection of reliable data to inform policy development, may thus be preferable. It should also be borne in mind that, if the microbiological safety of food is not an explicit component of the strategy, relevant data will not be collected.
8. Data quality will also be an important element in the prioritisation process. In order to engender confidence, the process will need to be transparent, scientifically-sound, and reflect policy priorities. Consumer concerns and confidence will also be relevant considerations. It also need to be recognised that the various contributors to the database will have different priorities, and even that there may well be different, geographical-based, priorities within single organisations.

9. The strategy also appears to lack any clear plans for either analysis or publication of the large quantities of data that will be generated. Sharing information widely is fine but leaves it open to everyone to put their own interpretation on the data. There is a strong case therefore for providing for expert interpretation of the data and its subsequent publication along with that interpretation.
10. Food safety concerns are not, of course, limited to infectious agents. It is therefore surprising that the report does not give greater emphasis to the animal feed sector. Animal feed has been the cause of several recent major animal health problems and food scares, yet UKASTA, whose members supply feed to a very large proportion of the UK livestock industry, is not listed as an organisation which has an interest.
11. The strategy concentrates very strongly on animal diseases with very few references to chemical intoxications caused by, for example lead, dioxins or mycotoxins. These chemical agents are similar to some of the microbiological agents mentioned above in that they may not cause significant animal health problems but do pose potential food safety problems. The Agency would therefore like to see greater emphasis placed on them in the strategy. This in turn will require further consideration of the profiling and prioritisation proposals.
12. Finally, please note that the description of the Agency on page 54 of the consultation document is incorrect. The Agency was set up in 2000 not 2001. The following would be a more accurate description of the Agency's purpose – "A UK-wide non-Ministerial Government Department that operates at arms length from Ministers. It was set up in April 2000 to improve the safety of the food people eat and to provide consumers with trusted and authoritative information and advice about food."

Peter Hewson  
Meat Science and Strategy Division  
Food Standards Agency  
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