

ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD

AD-HOC GROUP ON IMPORTS

Introduction

1. This report summarises the current view of the ad-hoc group in relation to the microbiological safety of imported food. The scope of the group's activity and its constitution is shown in Appendix I. The group met on three occasions and considered documentary and verbal evidence relating to current processes in place to prevent unsafe food entering the UK. A list of those providing evidence is shown in Appendix II and the group wishes to express its gratitude to those individuals for their time and effort.
2. In reviewing the current position regarding microbiological safety of imported foods, the group recognises that many processes exist to prevent unsafe food entering the UK and being sold to consumers and that such a short review cannot do justice to all of these. However, the group is satisfied that it has met with sufficient individuals or reviewed documentary evidence to allow it to take an initial view of processes in place regarding the safety of imported foods at a regulatory, enforcement and industrial level. Any measures do of course have to be seen within a broader European Union (EU) context and the prospect of several new member states joining is also likely to raise new challenges. The main issues that we have considered and which we would like to bring to the Committee's attention are set out below:

Legally imported animal-based foods and foods of a non-animal origin

3. The group were largely reassured regarding the provisions in place at an EU and national level to ensure the safety of animal based products entering the EU and the UK, dependant on effective enforcement. The standards in place at slaughterhouse and processing plants are regulated and subject to EU or national inspection and imported products are similarly subject to specified regulatory inspection.
4. However, there appears to be a striking difference between the measures in place to manage the safety of animal based products and those for products not of an animal origin. Products of non-animal origin are subject to the [Imported Food Regulations \(1997\)](#)¹ that specify a generic requirement that food should not be imported if it "fails to comply with food safety requirements, or is unsound or unwholesome". This is supplemented by a limited number of requirements usually relating to chemical contaminants specified in national and EU

contaminants legislation e.g. [The Contaminants in Food Regulations \(2003\)](#)². Many foods such as fruit, salads, vegetables and canned goods are recognised as potential sources of microbiological hazards and, in the case of prepared salads, are of emerging and increasing concern and have been of interest to the ACMSF ([ACMSF paper on the microbiological safety of ready to eat fruits and vegetables](#))³. This was also reinforced by evidence we heard from the Health Protection Agency which highlighted that several UK outbreaks have been associated with products of non-animal origin, such as lettuce.

5. The responsibility for the safety of such foods falls within the remit of the FSA. The FSA have and continue to review the arrangements for control of imported foods ([FSA Board Paper on Imported Foods, 2003](#))⁴ but the Ad Hoc group is concerned that a focus on potential microbiological hazards is not evident. There appears to be little guidance on the required standards and import checks necessary to assure the microbiological safety of such foods of non-animal origin.
6. **The group feels this is an area that requires further exploration to establish whether sufficient is being done to manage the microbiological safety of foods of a non-animal origin entering the market.**

Illegally imported foods

7. Illegal import of food has been recognised as a significant potential risk in relation to introduction of pathogenic microorganisms. There has been and continues to be a large amount of government and agency activity devoted to this issue in raising awareness of the dangers associated with illegal imports of food and also in reviewing the best means by which to prevent it or expose those undertaking it.
8. **The group do not feel illegal imports require further investigation by the committee at the current time.**

Foodborne disease surveillance in third countries

9. The status of foodborne disease (endemic disease, emergence of new strains or increases in outbreaks or sporadic foodborne disease) in countries exporting food to the UK, if monitored, could provide a potentially useful means of pre-empting potential spread to the UK. The group were unable to find evidence of significant agency, government or industry activity relating to the monitoring of foodborne disease in other countries and its linkage to improved importation controls, with the exception of animal disease. We heard that information was mainly shared via informal contacts and networks, for example through participation at Codex meetings, rather than by any formalised process. It is apparent that outbreaks are monitored by public health and industry professionals (although this varies for different countries), but the extent to which they are used in risk assessment is unclear.

10. **The group believes that a systematic approach to surveying and capturing information on foodborne diseases in other countries could lead to improved safety of imported foods providing such information was then used to identify potential risks that could then be effectively communicated to all of those involved in the management of food safety of imported foods (agencies, industry and public health professionals). This should not be restricted to just foods of animal origin. We therefore suggest that this issue is given further consideration by the Committee.**

Traceability

11. The importance of traceability came across very strongly from the evidence we heard. For example, inadequate traceability systems mean that the source of many outbreaks of food-borne disease remain unknown. Traceability on a one step forward, one step back basis will be a legal requirement from 1st January 2005.
12. **The Committee may wish to given further consideration to the role of traceability systems given their importance for effectively identifying and controlling microbial hazards, and as part of this, gaining a clearer understanding of the risk posed from imported foods.**

Structure of imported food control

13. It is apparent in the group's short series of presentations thus far that a large number of Government Departments and agencies are involved in the control of imported food (FSA, DEFRA (State Veterinary Service, Fish Health Inspectorate, Sea Fisheries Inspectorate, Egg Marketing Inspectorate), MHS, Customs, Local Authority) and this may lead to unclear accountabilities and duplication of effort. The consideration for the creation of a single agency to control imports or improvements in coordination of the current function has been recognised in a Cabinet Office review of import controls ([The organisation of the Government's controls of imports of animals, fish, plants and their products](#))⁵.
14. **The Ad Hoc group believes the efforts to improve coordination of import controls is critical to effective management of the safety of imported foods but further investigation is not required by the Committee given work already underway. However, we suggest that the ACMSF monitors developments in this area.**

Appendix I: Membership and scope of the ad-hoc group of the ACMSF on imported foods

Membership

Chair

Ms S Davies

Members

Professor A M Johnston

Mr A Kyriakides

Mr D J T Piccaver

Terms of Reference

To assemble information on the current situation on imported foods in order to decide whether there is a potential problem in relation to the microbiological safety of food; and to recommend to the ACMSF whether the Committee needs to undertake further action

Appendix II: List of contributors to the ad-hoc groups review

Mrs Sarah Appleby	Food Standards Agency
Ms Catherine Bowles	Food Standards Agency
Mr Tony Flower	Food Standards Agency
Mr Mike Glavin	Food Standards Agency
Dr Christine Little	Health Protection Agency
Ms Pam Rogers	HM Customs and Excise
Dr Roger Skinner	Food Standards Agency
Mr Nigel Widden	Department of Environment, Food and Rural Affairs

References

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2. www.hmso.gov.uk/si/si2003/20031478.htm
3. www.food.gov.uk/science/ouradvisors/microbiogsafety/acmsf/s5761/acmsf42meet/minutes43acmsf
4. www.food.gov.uk/multimedia/pdfs/ukcontrolsonimportedfoods.pdf
5. [www.cabinet-office.gov.uk/reports/pdf/Illegal Imports paper.pdf](http://www.cabinet-office.gov.uk/reports/pdf/Illegal%20Imports%20paper.pdf).