

# ADVISORY COMMITTEE ON THE MICROBIOLOGICAL SAFETY OF FOOD

## AD HOC GROUP ON IMPORTED FOOD

### INTERIM REPORT TO ACMSF

#### Terms of Reference of Group

- 1.1 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.

#### Background

- 2.1 The previous report made to ACMSF (reference ACM/665) in November 2003 reached the following conclusions:-
  - a) More information was needed in order to decide whether sufficient is being done to manage the microbiological safety of foods of a non-animal origin entering the market.
  - b) The 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 safety of imported food.
  - c) Further consideration was needed on 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.
  - d) Need to monitor developments in co-ordination of import controls as it is critical to the effective management of the safety of imported food.
- 2.2 The original remit was to assemble information on imported foods to decide whether there is a potential problem. The group has since met on a further two occasions in order to receive evidence in relation to the outstanding issues.

#### Controls of foods of non-animal origin

- 3.1 Legislation to implement Regulation (EC) No. 178/2002 (Official Control of Food and Feed) will come completely into force on 1<sup>st</sup> January 2006. This will require that food and feed imported into the Community shall comply with food law equivalent to legislation and conditions within the Community. This will help to ensure consistent standards of food prepared within the Community

and that imported from 3<sup>rd</sup> countries. Consultation on the implementation legislation will commence after Easter.

- 3.2 The requirement for registration or approval of food premises is being reviewed. Consideration is being given to the designation of specific ports of entry for certain foods. The Food Standards Agency considers that this would enhance controls of certain high risk food of non-animal origin and is working with LAs and PHAs to enhance enforcement of imported food controls at borders and inland, including, sampling, provision of training for enforcement officers and guidance to the trade.

## **Traceability**

- 4.1 Article 18 of Regulation (EC) No. 178/2002 contains the requirement that food or feed should be traceable at all stages of production, processing and distribution. This requirement was brought into effect on 1<sup>st</sup> January 2005.
- 4.2 The legislation requires that food and feed business operators are able to identify the person from whom they have been supplied with food and feed and to whom their products are supplied. All businesses need to be able to show appropriate information to competent authorities on demand.
- 4.3 The scope of the requirement covers all food and feed, food-producing animals and other substances intended for incorporation into food or feed. It is too early for an impression to be formed of the success of the requirement. There is also uncertainty about the extent to which the trade is knowledgeable about the requirement, especially amongst small businesses.
- 4.4 Correct and effective implementation of this requirement will enable recall and emergency procedures to be effective if and when required. The recent Sudan I issue associated with Worcester sauce appears to have highlighted the significant difficulties that still exist, especially amongst small businesses in effectively tracing ingredients.

## **Outbreaks of food-borne illness and imported food**

- 5.1 Outbreak surveillance data in England and Wales has been collated since 1992. However the accuracy of the information is limited by the effectiveness of the outbreak investigation. Variation occurs in the evidence obtained about the origin of food, the origin of food sampled, the extent of case control studies undertaken and the influence of other contributory factors. Some larger outbreak investigations are lead by the Health Protection Agency but most are investigated by Local Authorities.
- 5.2 In many cases, food is identified as a type only, ingredients are not specified and the origin of food and ingredients not determined. There is, consequently, little evidence about the extent to which imported food or imported ingredients are implicated as a cause of outbreaks. Reports may not always produced to document the conclusions of an investigation and therefore any evidence concerning the involvement of imported food in outbreaks is insufficiently reliable to be the basis for a risk assessment.

- 5.3 The HPA is currently preparing a protocol for use in connection with outbreaks involving non-UK eggs to encourage improved investigation and documentation. The traceability requirement will enable improved investigation into the source of ingredients to be undertaken.
- 5.4 Limited information makes it difficult to assess the overall contribution made by imported food to the causation of outbreaks of food-borne illness in the UK.

### **Bush meat**

- 6.1 The *ad hoc* Group has been requested to consider a review of the microbiological risks of illegal imported bush meat recently commissioned by the Food Standards Agency. The views of the Group will be presented to the full Committee for consideration once the Group has finalised the outcome of its deliberations.

### **Conclusions**

- 7.1 Regulation (EC) No. 178/2002 places new requirements on food businesses to ensure their food is produced, processed and handled to consistent standards whether it originates inside or outside the Community. Evidence suggests that controls will become more effective in relation to food of non-animal origin. Details have yet to be finalised therefore currently , the potential effectiveness of the new control regime cannot be assessed.
- 7.2 Traceability controls have recently come into force. Their effectiveness is as yet unknown. This requirement will facilitate improved investigation techniques to be developed.
- 7.3 Due to the limited reporting of provenance data, few reported outbreaks have been attributed to imported foods. Effort is needed to collate more detailed information in order to establish the origin of foods implicated in outbreaks.
- 7.4 Further information is needed to assess the risk associated with the microbiological safety of imported food under the forthcoming legislative framework.

### **Recommendation**

- 8.1 The ACMSF is asked to note the contents of this interim report. A further report will be provided once the Group has completed its consideration of the review of bush meat being currently undertaken on behalf of the Food Standards Agency.

### **Ad Hoc Group on Imported Food March 2005**