

Sampling prioritisation meeting for the national coordinated food sampling programme 2014-2015

Table 1 - General

Priority	Product detail	LA type	Further information & justification
1. <b>Emerging risk</b>	Targeted surveillance of “at risk” foods either by Local Authorities or at Border Inspection Points.	Ports and inland	If a potential emerging risk is identified at any point during the sampling programme we may ask for samples to be taken. Further information will be provided on individual emerging risks as they arise
2. <b>Using local knowledge and expertise</b>	Enforcement authorities may use local knowledge or intelligence to identify ‘risk-based’ local imported food sampling issues.	Ports and inland	Not applicable

**Table 2 - Imported food issues**

Priority	Product detail	LA type	Further information & justification
<p>3. <b>Imported food Issues - general</b></p>	<p>A range of issues which will affect imports of products from Third Country of Origin.</p>	<p>Mostly Ports</p>	<p>Continue to test products similar to those listed in 669/2009 where there is heightened concern – with evidence provided of the reason for concern. E-coli contamination of sprouts intended for direct human consumption or seeds for production of sprouts from third countries. (Please be aware - This listing may change when the EU bring in additional EU wide import conditions during 2013)</p> <p>Herbs and spices from Vietnam pennywort, pak wan, kinh gioi leaves and dragon fruit - for pesticide residues for risk to health;</p> <p>Herbs and spices from Vietnam (houttunya leaf, basil, kinh gioi leaves, la lot, parsley, pennywort) for salmonella</p> <p>General checks will be considered especially at airports, Inland checks on 669/2009 products and those subject to safeguard measures.</p>
	<p>Paan &amp; curry Leaves for Salmonella</p>	<p>Ports &amp; Inland</p>	<p>Inland checks for <i>Salmonella</i>, <i>Listeria monocytogenes</i> and E.Coli (VTEC – Ecoli 0157) contamination of paan leaves from Bangladesh and India, and other fresh leaf produce from these countries.</p> <p>sampling costs for paan leaves at ports of entry and inland due to salmonella concerns. The Commission are considering applying EU measures on paan leaves but we need to see what formal proposals they bring forward. These proposals are likely to be issued later in 2013. However, even if measures are applied at ports, in view of past attempts by trade to conceal paan leaves (as they are often imported in containers with other types of fruit and vegetable products), it would be useful to continue to carry out checks inland</p>

**Table 3 – Chemical**

Priority	Product detail	Analyses	LA type	Further information & justification
4. <b>Mycotoxins</b>	maize and maize products from countries in Africa	Aflatoxins	Ports and inland	There were a number of incidents reported in 2013 but these seem to vary across different countries. There were also a lot listed on the spreadsheet. As there was a high rate of non-compliance during 2012/13 UKFSS of African and Indian products, in particular corn dough and corn meal imported into the UK from India. The UK wishes to build further information on these products to contribute to the protection of public health.
	High-fibre/ bran-based breakfast cereals	Zearalenone		(imported from 3 <sup>rd</sup> countries and other Member States): We have dealt with a number of incidents over 2012/13 with regards to ZON in flour and also infected floured that has been used in bakery goods, which are on store shelves.
	Ergot alkaloids in rye- and oat-based products	alkaloids		(imported from 3 <sup>rd</sup> countries and other Member States). There has been an EU recommendation for collection and submission of data to EFSA for ergot alkaloids (2012/154/EU). Currently risk management measurements are being negotiated at the EU level, including proposals for setting maximum levels. UK data on levels of ergot alkaloids will be valuable in carrying out risk assessments.
	Spices	Aflatoxins and ochratoxin A		There has been a reduction in maximum limit for Ochratoxin A in spices with the exception of <i>Capsicum spp.</i> and to maintain vigilance on whether the new limits are being met it is appropriate to monitor these products. As it is cost effective to monitor at the same time for aflatoxins, it is important to maintain vigilance over aflatoxin contamination of spices, in particular capsicum species where non-compliance continues to be an issue. Sampling of large lots up to 1kg maybe a prudent way forward. Pyrrolizidine alkaloids (PAs) in herbal teas and infusions (both imported and within the UK). PAs are known to affect the liver and can cause cancer. There has been a continuous call for data by EFSA with regards to PAs in herbal tea. Risk assessments by other Member States seem to indicate a problem. So UK data will be useful in carrying out risk assessments.

	Poppy seeds and products with poppy seeds (bread, cake and bakery products)	Opium alkaloids		There have been many discussions regarding opium alkaloids in poppy seeds at the EU level. UK occurrence data will be helpful in identifying whether this is a problem and if any risk management actions need to be taken.
5. <b>Contact Materials</b>	Nylon kitchen utensils	PAAs	Inland only	<p>In recent years, many RASFF notifications have been issued by the UK for high migration of primary aromatic amines (PAAs) from nylon kitchen utensils imported from the Far East. Legislation on requirements for melamine ware and nylon cookware imported from China requires 10% of consignments to be checked. This leaves the majority of imported nylon kitchenware unchecked.</p> <p><b>Regulatory Limits</b> - European Commission Regulation (EU) No 10/2011 states that: “Plastic materials and articles shall not release primary aromatic amines, excluding those appearing in Table 1 of Annex I, in a detectable quantity into food or food simulant. The detection limit is 0.01 mg of substance per kg of food or food simulant. The detection limit applies to the sum of primary aromatic amines released.”</p>
	Melamine cookware	Formaldehyde	Inland only	<p>The Agency continues to receive reports detailing non-compliant samples of melamine ware, the majority originate from the Far East which have highlighted melamine ware food contact articles have been found with up to 76 times the legal limit of formaldehyde.</p> <p>Legislation on requirements for melamine ware and nylon cookware imported from China requires 10% of consignments to be checked. This leaves the majority of imported melamine ware unchecked. <b>Regulatory Limits</b> - There is a Total Specific Migration Limit (SML (T)) for formaldehyde and hexamethylenetetramine (HMTA) of 15 mg/kg (equivalent to 2.5 milligrams per square decimetre) given in European Commission Regulation (EU) No 10/2011.</p>
6. <b>Inorganic Contaminants</b>	Edible clay / chalk products and food supplements (such as clay, etherium pink, detox products.)	Heavy metals	Ports and inland	<p>Dried clays are eaten as supplements by certain communities or can be used as ‘detox’ treatments.</p> <p>High levels of arsenic, lead and cadmium have been reported in the recent past in the following: Fangocur and other mineral clay drinks; green clay; Calabash chalk and Sikor clays from Bangladesh (see ENF letter on this issue <a href="http://www.food.gov.uk/multimedia/pdfs/enforcement/enfw11019.pdf">http://www.food.gov.uk/multimedia/pdfs/enforcement/enfw11019.pdf</a>)</p>

				<p><u>Sampling is encouraged from internet sites or those LAs with businesses in their area that supply these types of product via the internet or to ethnic communities using these products.</u></p>
7. Shellfish verification testing	Shellfish (excluding scallops collected at auction halls, dispatch centres and processing establishments – LAs may still wish to consider scallops on sale at other parts of the distribution chain e.g. caterers, takeaways)	verification testing (biotoxins chemical contaminants and micro quality)	Ports and inland	<p>The FSA has asked that LAs undertake shellfish (LBM) biotoxin, chemical contaminants and micro quality verification testing at all stages of production, processing and distribution as foreseen by EU requirements, given one of the FVO's concerns on a recent audit was that there is a lack of verification of FBO compliance with the requirement to meet end product standards.</p> <p><b>The FSA recommends raw samples to be submitted for testing. samples should ideally be submitted in their raw form for biotoxins (as labs not accredited to test cooked) and micro.</b></p> <p>Public Analysts not able to carry out this specific analysis may choose to send the samples to one of the OCLs that specialises in this type of analysis.</p> <p><a href="http://www.food.gov.uk/enforcement/monitoring/foodlabs/foodcontrollabs">http://www.food.gov.uk/enforcement/monitoring/foodlabs/foodcontrollabs</a></p>
8. Irradiated Foods	Herbs, spices, food supplements, Instant noodle and similar meals	<b>Food irradiation</b>	Ports and inland	<p>While the level of non-compliance has reduced, undeclared irradiated foods continue to be identified and there are frequent RASFF reports for non EU-imports (predominantly originating in the far East). We are required to under Article 7(3) of EC Directive 1999/2/EC to forward the results of checks carried out at the product marketing stage for irradiated foods.</p> <p>The Agency is interested in sampling the specified food categories, particularly where they originate from south-east Asia, which are known to have instances of non-compliance. Whilst the level of non-compliance has reduced, undeclared irradiated foods continue to be identified and there are frequent RASFF reports for non EU-imports (predominantly originating in the far East).</p> <p>Samples are normally screened in the first instance by the Photo-stimulated Luminescence (PSL) standard method (EN 13751), although other standardised tests may be used where appropriate. PSL is a screening method and all samples showing intermediate or positive results should be sent for confirmatory analysis by another method such as the Thermo-luminescence (TL) standard method (EN 1788). It is also good practice to send a percentage of negative PSL</p>

				<p>samples for confirmatory analysis.</p> <p>The cost of TL analysis is around 3-4 times that of PSL screening and allowance should be made to enable all intermediate and positive PSL samples (and if possible a percentage of negative samples) to be sent for TL.</p>
9. <b>Process Contaminants</b>	Fish sauces / Pastes (including oyster sauce, lower ended value soya sauce)	3-MCPD	Ports and inland	<p>These have been found to contain some very high residues of a chemical 3-MCPD due to hydrolysis with hydrochloric acid during processing. 3-MCPD is regulated by EU legislation. So far as we know these products have not been examined extensively and consumers may be at risk.</p>

**Table 4 – Microbiological contaminants**

10. Micro-biological contaminants	<p><b>As part of continuous improvement we are working with Public Health to look at how we can best align our priorities and it is expected that we will be able to set these before 1<sup>st</sup> April</b></p> <p><b>At this stage we are asking local authorities to express their interests in taking samples and confirm how many they would be able to take. We will then contact those who have expressed interest to inform them on the priorities.</b></p>
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Table 5

Priority	Product detail	Analyses	LA type	Further information & justification
11. <b>Food Labelling</b>	Raw minced meat species: beef, lamb, pork, chicken and turkey mince samples	Composition criteria and labelling requirements	Ports and inland	Specific focus that labelling of fat and connective tissue must be labelled as required by either the current legislation, Commission Regulation 1162/2009 which is 'percentage of fat under ...' and 'connective tissue:meat protein ratio under ...' or-under new Regulation 1169/2011 the labelling expressions must be 'percentage of fat content under ...' and 'collagen/meat protein ratio under ...' . The latter text is the new alternative text that can be used under Regulation 1169/2011 from 13 December 2011 under transitional EU provisions but it must be used from 1 January 2014 (the date when Regulation 1169/2011 takes over from Regulation 1162/2009).
	<b>Raw meat species: beef, lamb, pork, chicken and turkey mince samples.</b>	<b>Meat speciation/DNA testing</b>	Ports and inland	Testing for the verification for the presence of undeclared meat species in meat and meat products. <b>covering broad range</b> including substitution of beef and lamb with other meats including goat and horse, pork, chicken etc - covering retail, catering, wholesalers including kebabs and curries
	<b>Single, whole pieces of fish, cooked or raw, coated or non-coated</b>	Fish speciation/DNA testing	Ports and inland	To check that fish labelled and sold as 'cod' or 'haddock' in catering establishments is of the species <i>Gadus macrocephalus</i> or <i>Gadus morhua</i> or <i>Gadus ogac</i> for cod, or <i>Melanogrammus aeglefinus</i> for haddock.  substitution of cod/haddock with pangasius etc; (ASG intelligence indicate much higher mis compliance in Ireland). Please also ask LAs to check for labelling of fish species with scientific names as this change to the legislation will be in place then – targeting retail, catering, wholesale

12. <b>Food Adulteration and Mis-description</b>	<b>Raw chicken products/preparations</b>	To check for correct labelling declarations in terms of: meat content, added water, and hydrolysed proteins	Ports and inland	<p>Market intelligence is continuing to suggest continuing problems with mislabelling of frozen chicken breast products, namely in respect of: incorrect name of food (e.g. using descriptions reserved for poultry parts under Poultry meat Marketing Regulations and not for chicken products); over-declaration of meat content; inaccurate added water declarations</p> <p>To check for correct labelling declarations in terms of: meat content, added water, and hydrolysed proteins in chicken products/preparations (e.g. chicken breast fillets) supplied mainly to the catering trade and can be sampled from wholesalers. It is proposed to continue this priority through to 2014/15 taking forward discussions with Defra and the Authenticity Steering Group who agreed that the foreign proteins added as water retaining agents are highly refined and so it would be difficult to detect any DNA present and we would want to be able to verify the species origin of gelatine in water-retaining additives used, for example in chicken as plumping agents.</p>
	<b>Basmati rice</b>			<p>The Rice Association has had issues with Pusa 1121 which is not classed as Basmati. This was/is a particular problem in the London Iranian community which traditionally uses the term 'Basmati' rice.</p> <p>The name "Basmati" is a customary name and refers to premium rice, which has special eating characteristics, and is grown in specific regions of India and Pakistan. Basmati sells at around twice to three times the price of ordinary long grain rice. Basmati entering the EU from India and Pakistan is also allowed in free of import duty. Both provide incentives for adulteration. The UK Basmati Rice Code of Practice lays down minimum specifications for Basmati rice sold in the UK in terms of approved varieties. The Code also specifies where non-Basmati varieties exceed 7% the product cannot be described as Basmati rice but has to be labelled as a mixture.</p> <p>We would like sampling to be focused on both retail and catering level</p>
	<b>Manuka honey – check for peroxide and non peroxide activity</b>		Intelligence on Manuka honey suggests there may be possible misdescription issues and misleading activity declarations occurring on some Manuka honey on sale in the UK marketplace. We would encourage Local Authorities to carry out some surveillance action in their authorities to encourage those who are selling manuka products in their areas to ensure that their products fully comply with the law. This information will help support the Agency in determining what products do not comply with the law and work to urge them stop doing so and either relabel or reformulate products correctly. Following recent interest in this product we would be looking to send all samples to the laboratories in the UK who offer testing services to verify Manuka authenticity and	

				confirm antimicrobial activity. Most reputable suppliers in the UK will have their manuka honey checked for activity to ensure what they are buying and subsequently selling to the consumers is as declared. Pollen analysis can also be used to check for misdescription.
13. Allergens	<b>Free from claims (besides from gluten) – prepacked and non-prepacked foods</b>		Ports and inland	Through the various intelligence the Agency have seen a growth in this part of the market and we are requesting that non-prepacked foods be sampled because they are making a specific claim and we need to see if that claim has been substantiated with evidence of ingredients being free from the allergen in question, allergen controls in place etc.
	<b>Use of nut powders in Asian cuisine</b>	Protein based analysis	inland	<b>Allergen management &amp; knowledge and the use of nut powders in food to ascertain whether caterers are enabled by the information they are provided and able to provide correct allergen information to their customers. All food businesses will have three years to prepare themselves to make the necessary changes to comply with the new provisions. This is a major change to how food sector businesses provide allergy information for the foods they provide</b> Protein based analysis via ELISA method. DNA methods can be used for initial screening, but these need to be further validated by a quantitative protein based method such as ELISA. Quantitation will ensure that we have information to ascertain risk to the consumer and whether we are dealing with trace contamination or with gross contamination or adulteration of food stuffs.
	<b>Sulphites in dried fruits</b>	Sulphites	Ports and inland	Sulphites in dried fruits – continue to be found undeclared and at levels that can cause allergic response

	<p><b>Non-prepacked foods to be targeted for allergenic compounds 70</b></p>			<p>In particular; almond, peanut and lupin. Almond is the lesser recognised allergen which has not been targeted very often and lupin is allergenic to many eastern Europeans. There have also been problems last year with the almond harvest and there have been a number of incidents where almond paste / powders have been adulterated with cheaper peanut which is a very potent allergen.</p>
<p>14. Additives</p>	<p><b>Colours in sauces and in seasonings used in smaller restaurants and take away outlets for Southampton colours</b></p>		<p>Ports and Inland</p>	<p>Sampling should include checks on three colours (ponceau 4R (E 124), sunset Yellow (E 110) and Quinoline Yellow (E 104)) in sauces and in seasonings used in smaller restaurants and take away outlets</p> <p>Previous EU food additives legislation permitted all three colours in seasonings (including curry powder) and in sauces (including chutney and pickle) at a maximum combined limit of 500 mg/kg. A recent amendment to the additives legislation which came into force on 1 June 2013 no longer permits the use of ponceau 4R in sauces or in seasonings. Sunset Yellow is no longer permitted in seasonings and the permitted level of Quinoline Yellow has been reduced to 10 mg/kg. For sauces, including chutney and pickle, the maximum limit for Quinoline Yellow has been reduced to 20 mg/kg and Sunset Yellow to 30 mg/kg</p> <p>These are three of the so called “Southampton colours” which the FSA has asked UK industry to voluntarily withdraw from their products due to links with hyperactivity in children. Where they are used, EU legislation stipulates that the product has to include a warning label. Whilst we understand that most UK retailers, a large number of manufacturers and some of the larger caterers are no longer using these colours in their products, or will be likely to have reduced the levels according to the new limits, we do not know whether this is the case in smaller restaurants and take away outlets. It would therefore be helpful to check whether or not the colours used in seasonings and sauces in these establishments comply with the reduced limits in the legislation</p>

15. <b>Nutrition and Health claims</b>	<b>Food supplements - body building products:</b>	dangerous substances (e.g. DNP) or borderline medicinal substances.	Ports and inland	Recent incidents have shown the continued availability of some products containing dangerous substances (e.g. DNP) or borderline medicinal substances. Therefore sampling would be justified on food safety and consumer protection grounds. Many such food supplements originate in third countries therefore sampling could be done at ports in addition to inland. It would be a priority to check products sold in gyms and online, in addition to retail high street stores.
	<b>Unauthorised Health claims</b>	<b>Unauthorised Health claims</b>	Ports and inland	There are many products on the market that bear health claims and websites promoting products using unauthorised health claims. Therefore checking for unauthorised health claims on all types of foods and food supplements in particular, would be beneficial. From January 2014, the only claims 'on hold' will be those for botanical substances; one for very low calorie diets; one for reduced lactose foods and, possibly still, five for caffeine. It should therefore be easier than ever to identify unauthorised health claims. Sampling could be done at ports and inland, including products sold in stores and online