



Food
Standards
Agency
food.gov.uk



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Areas of FSA Imports Work

- FSA Planning for EU Exit scenarios
- Main Imports workstreams during 2018-2019
- Strategic Surveillance
- Future Imports Strategy

Common themes

- **Increased Collaboration** – Within FSA and external Bodies such as PHAs, LAs, Government, external stakeholders.
- **Increased Engagement** – Increase in FSA capacity in various areas (Imports, Incidents, NFCU...etc) to be able to engage and gather/share intelligence.
- **Collating, sharing and standardising intelligence and data** – centralising various accessible data sources to be able gain greater value out of the information we use to make decisions.



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EU EXIT - IMPORTS

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EU Exit Scenarios

Planning for a range of scenarios, including:

- Implementation period (negotiated deal).
- No deal.
- Long term (future import control regime).

No deal planning has been the priority up until the extension of Article 50.

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**IMPLEMENTATION PERIOD
(NEGOTIATED DEAL)**

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Article 50 'Flextension'

- Following the Special European Council Summit on 11.4.2019 Article 50 was extended until 31st of October.
- Should this be followed by an implementation period, the FSA needs to be prepared for implement the Official Controls Regulation (OCR).



‘The OCR’ - Regulation 2017/625

- Negotiated over a number of years – published in April 2017.
- Will apply across the European Union from 14 December 2019.
- Has extended scope and attempts to harmonise rules across sectors.
- Repeals Regulation 882/2004, Regulation 854/2004, Directive 96/23/EC and Directive 97/78/EC.

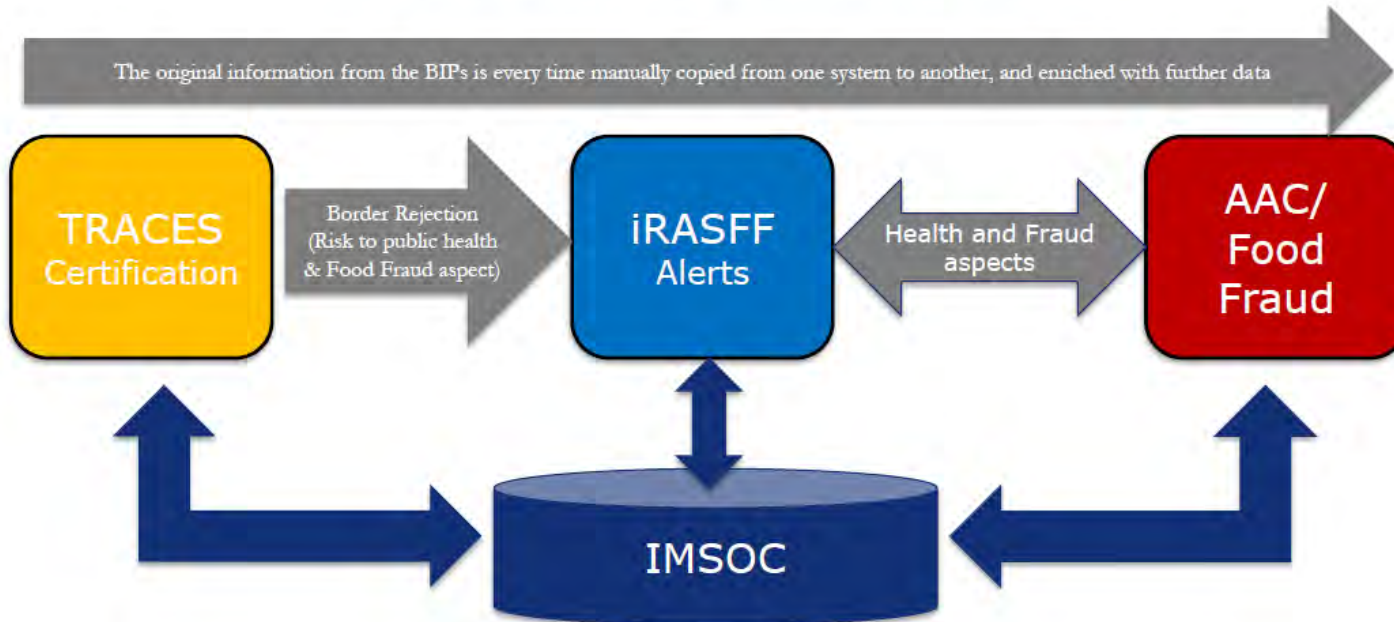


Major changes in the OCR

- A lot the OCR is about controls and conditions for food imported into the European Union – focus on integration and harmonization.
- The basic act itself sets out a few major changes:
 - BIPs, DPEs, DPls and FPls will all become BCPs (Border Control Posts)
 - Common Health Entry Document (CHED) to replace CVEDs and CEDs
 - The establishment of the Information Management System for Official Controls (IMSOC).

Information Management System for Official Controls (IMSOC)

IMSOC will make automatic what you are currently doing manually



IMSOC will be able to aggregate data on official controls from every system, and display it according to the "need to know" principle

Health and
Food Safety



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NO DEAL SCENARIO

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No Deal Planning

- Existing controls on third country food and feed imports to remain in place to continue to protect consumer safety.
- A new UK import control system (IPAFFS) is being built to replace the EU's TRACES system we currently use.
- Risk-based approach to controls of future EU food and feed imports.

Risk-based Approach

- Broadly on day 1, the risk posed by EU goods will remain the same.
- Therefore, no new controls are currently planned for imports of food and feed from the EU.
- Although no controls will apply, we will introduce pre-notification for high risk food from the EU entering the UK.
- New requirements would be introduced for third country high-risk consignments transiting through the EU to the UK.

Transit Consignments in a No Deal Scenario



- In a no deal scenario, the UK would no longer be able to rely on the EU undertaking full import controls on high-risk food and feed consignments (both POAO and high risk FNAO) transiting through the EU to the UK.
- These goods would therefore need to enter the UK through a designated port with a BIP/DPE so that the necessary checks could be carried out at the UK border.

Pre-notification of EU high-risk food and feed

What

- EU originated high-risk food or feed
- RoW high-risk food imported directly into the EU but destined for UK

Why

- Due to loss of access to EU systems
- Ensure the continued protection to UK consumers from imported food

When

- Requirement will come into effect during a No Deal scenario

For surveillance purposes only and there will be no controls on such products



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INCIDENT & SYSTEMS

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Incident & Systems (Inc RASFF) Project

- The UK currently relies on the EU framework for notifying and handling food safety issues.
- Our level of access to EU systems and networks might change when the UK leaves the EU
- To ensure food safety the FSA is strengthening and developing the incident management processes that it employs by fostering strong relationships with competent food safety authorities in Europe and worldwide and is developing new risk communication systems

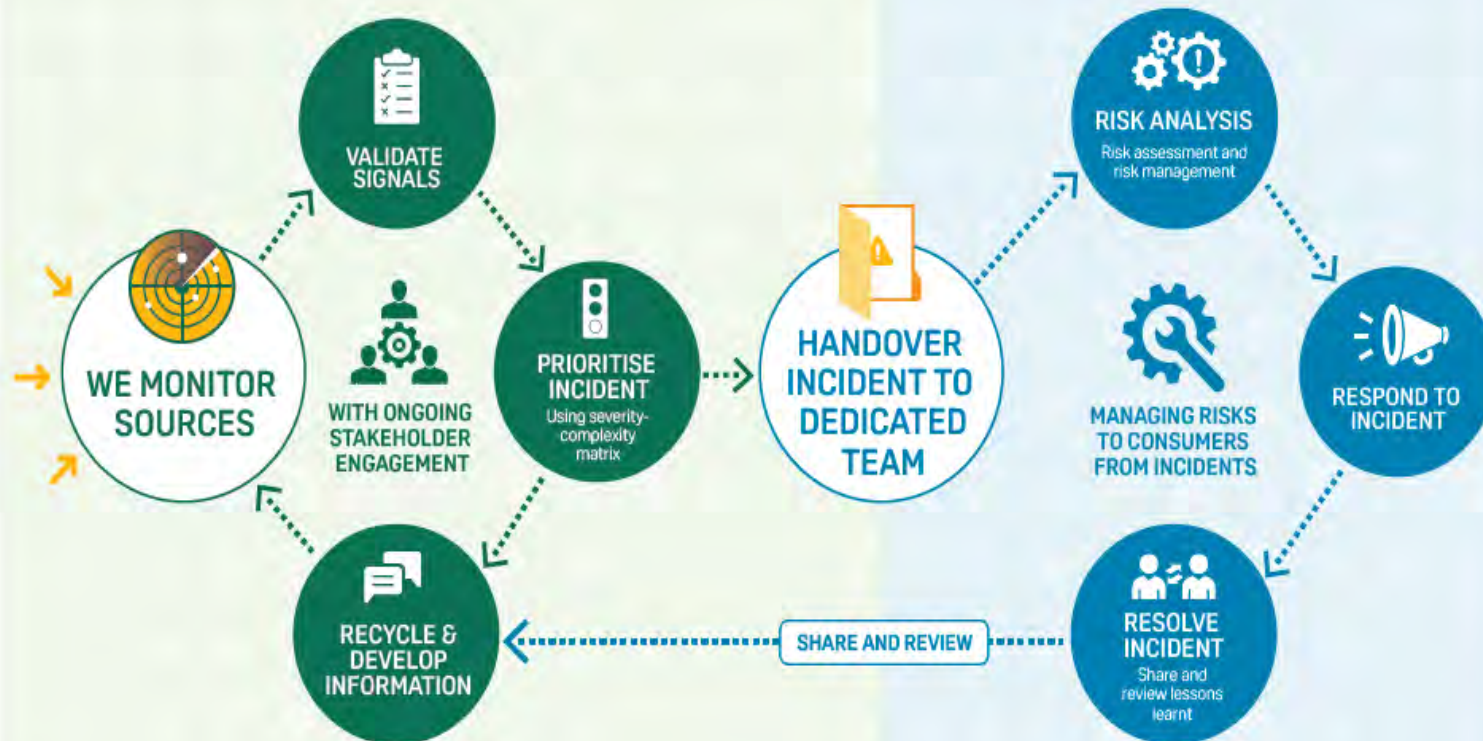
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Incident & Systems (Inc RASFF) Project (cont'd)

- We will establish additional capacity and capability within the Incidents & Resilience Unit (IRU) to interface with existing systems so that we can:
 - » engage with the competent food safety authorities of our main trading partners on a regular basis to exchange information relating to safety
 - » communicate with other countries where there are potential risks to the safety of food either being imported into the UK or exported from the UK
 - » monitor selected data sources to identify signals indicative of potential food safety risks to the UK which may require mitigation
 - » validate, triage and prioritise potential issues

FOOD AND FEED INCIDENT HANDLING AND RESPONSE

This process workflow shows one of the ways the Food Standards Agency will ensure that the high standard of food safety and consumer protection we enjoy in the UK is maintained when the UK leaves the EU



Help us monitor food and feed safety patterns and make sure food is safe and what it says it is:



www.food.gov.uk/business-guidance/food-incidents

KEY

- Introduce in 2018/19
- Continuing process
- Data source and sharing

KEY ACTIVITY BEFORE MARCH 2019:

- Recruitment and training of new team
- Refining of systems
- Implement new system

DATA SOURCES AND SHARING:

- We engage with industry, enforcement authorities and key stakeholders throughout the process
- We alert other countries, exchange information with International Network of Food Safety Authorities (INFOSAN) and others



FSA Imports Workstreams

- **TRACES:** We have worked closely with DEFRA on their project to build a new UK import control system to replace TRACES. The system is called IPAFFS.
- **Training:** We are developing imported food training aimed at PHOs and inland Officers.
- **Surveillance:** We are developing FSA surveillance to inform our ability to undertake any additional controls on imported food at the border.

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TRAINING

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Training

- Planning for a range of scenarios, including not having access to the same level of BTSF training and EU food safety systems.
- FSA are developing a national training programme to address the risks.
- Inland enforcement officers provide an essential last line of defence for managing imported food.

Training Working Group

- Representatives included: APHA (ports), PHOs, EHOs, DEFRA, APHA, PHE, Public Analysts, CIEH and Universities.
- Identified all areas related to imported food that could benefit from training courses being developed (including in the context of EU Exit)
- Worked to agree 5 priority courses for the FSA to plan and develop


Five Priority Courses

- The courses the working group felt were the top priority to develop were:
 - Introduction to Imported Food + Feed & Official Controls
 - Legislation and Enforcement
 - Sampling
 - Products of Animal Origin (POAO)
 - Food Not of Animal Origin (FNAO)

Introduction to Imported Food & Official Controls

- Free e-learning for easy access for all - Mainly aimed at newer PHOs and inland Officers to improve knowledge of imported food.
- Completed development and Launched March 2019

Introduction to Imported Food & Official Controls



Introduction to Imported Food and Official Controls

Welcome to this online learning experience!

This has been written by regulators, for regulators. It aims to support your work in imported food control, whether you are based inland or are new to working for a port health authority.

All local authorities have responsibilities for imported food control – this is clarified in the Food Law Code of Practice, in EU legislation and in domestic legislation.

The purpose of imported food law is to guarantee a high level of protection of human life and health and the protection of consumers' interests. It also guarantees fair practices in food trade, taking into account animal health and welfare, plant health and the environment. These high-level messages are enshrined in the General Food Law Regulation (EC) 175/2002.

We know that the majority of imported food regulation happens at our major sea and air ports, primarily of those foodstuffs which are known or suspected to be high risk, i.e. Products of Animal Origin (POAO) and High-Risk Food Not of Animal Origin (High Risk FNAO). These products are regulated by Official Veterinary Surgeons (OVSs), Official Fish Inspectors (OFIs) and Port Health/Environmental Health Officers (PHOs/EHOs) at the border.

However, this first line of defence at the ports does not operate in isolation but relies on inland expertise to support it with enter and with parallel regulatory activities. These vital inland checks could be thought of as the 'second line of defence' and are carried out by Environmental Health and Trading Standards staff within local authorities.

This course is an introduction to all the responsibilities for imported food control which you need to be aware of, the actions you may need to take and how to do it. Please note that imported feed is not covered in this e-learning as there is another dedicated e-learning available for this.

As you work your way through this course, you can access the helpful glossary which defines acronyms and potential new terms at any point. You can find it on the left-hand bar of each chapter.

What about EU Exit?

Login Register



What is FNAO and high risk FNAO?

A small proportion of FNAO, depending on the food type and its country of origin, may be high risk FNAO. There are little or no controls in place for FNAO which is not high risk, other than perhaps local sampling or verification programmes.

The vast majority of FNAO is not high risk.

FNAO includes all other products or materials not fitting into the category of POAO. Imports of certain 'higher-risk' FNAO are defined as such because they have been found to present a risk to public or animal health – this risk may be known or emerging.

This list contains a consolidated list of all high risk FNAO with current EU restrictions (as of January 2019):
https://www.food.gov.uk/sites/default/files/media/document/table-of-foodstuffs-with-current-eu-restrictions-january-2019_1.pdf

As the list is updated, the link to the latest version can always be found via the FSAs imported food pages:

<https://www.food.gov.uk/business-guidance/importing-high-risk-foods>

The 669/2009 element of the list changes every 6 months, so you will need to keep an eye on it!

Part 1 of this course describes the hierarchy of measures for different categories of high risk FNAO.

High risk FNAO can only enter the UK through specific ports and airports that are approved with special designations, where official controls on it will be carried out.

Approved third countries and approved establishments for POAO

Imports of POAO must come from a country approved to export a specific category of food of animal origin (Regulation (EC) 1831/2003)



consignments). This is the case with the 'arranging and known risks' list of Annex 1 Regulation (EC) 669/2009. In these circumstances the competent authority at the point of destination must be consulted – this is usually a local authority.

This is so arrangements can be put in place to ensure the consignment reaches its intended destination without having been tampered with, i.e. the seal on the consignment must remain in place until the test results are known.

If the seal has been removed or tampered with, appropriate investigative and/or enforcement action should follow.

If results show that the product is unsatisfactory then it will be for the inland local authority to seize the product and take appropriate action.

Concluding Points

The inland role in following up on suspect imported food found inland is vital. For consumers and legitimate businesses, it is the second line of defence in a complex matrix of controls.

The inland role verifies whether imported food (that is subject to import controls) has been legally imported or not by examining its documentation.

Here's a tip

Here's a tip

<https://importedfoodtraining.food.gov.uk>

Legislation & Enforcement

Chartered Institute of
Environmental Health



- 2-day classroom-style course, developed in late 2018
- Developed and delivered by CIEH
- Mainly aimed at inland EHOs and newer PHOs to improve knowledge of imported food
- First courses rolled out in January 2019
- Aiming for one course in each LA region in England + Northern Ireland & Wales
- Delivered 8 courses so far, with at least 4 more to come in 2019

Sampling



- 2x Sampling courses being developed, one online (Desq) and one practical (Fera)
- Online course – Introductory overview, covers the role of the various agencies, legislative basis for sampling, basic protocols
- Due to be ready in late July/August
- Practical course – In-depth look at sampling for more experienced officers, held at a laboratory facility, using case studies to examine scientific processes in greater depth, with interactive demonstrations
- First course due to be held in September

Future courses?



- Future courses on various topics under consideration
- We will continue to work with our training working group to identify training need
- Will try to respond flexibly to training needs of ports in context of EU Exit



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SURVEILLANCE

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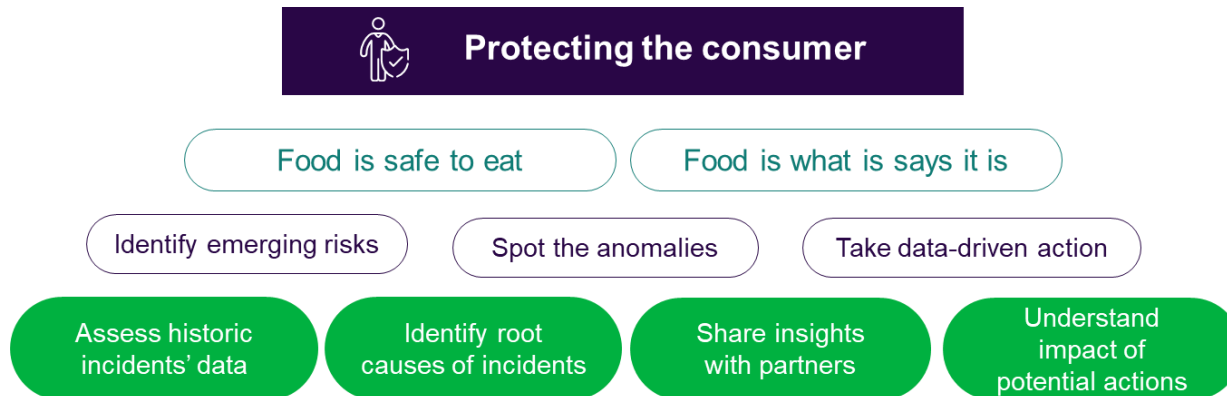
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Strategic Surveillance

- The FSA is developing its own surveillance programme
- This will improve the intelligence capability across the whole of the Agency, including for imported food.
- The Imports Delivery Team is playing a pivotal role in shaping the development of this programme

Strategic Surveillance

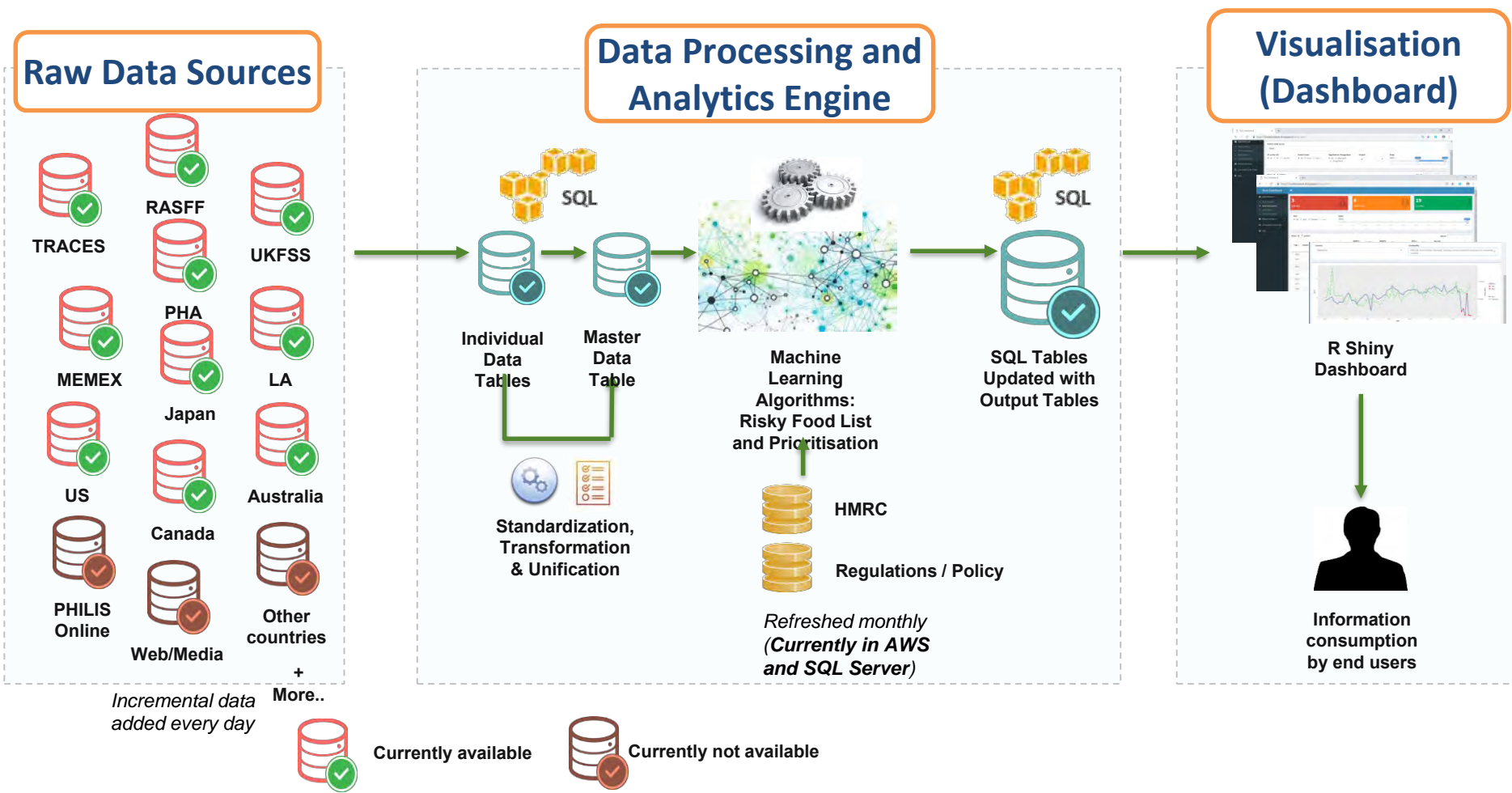
- Our aim is to make better use of (open) data to identify emerging risks before they become a risk to public health and to take data-driven actions, e.g. provide insights that can guide better use of sampling resources.
- We embed process to collect, collate, analyse and interpret data to help drive decision-making across all parts of the FSA and beyond.



Strategic Surveillance

- Collate and standardise data so it can be used more efficiently and effectively.
- Make decisions based on multiple sources of data.
- Use historic data to build predictive models to help pre-empt increase in risk rather than react to it.
- Prioritise resources by communicating collated intelligence and by using data to predict the time in which risk increases.
- Use data models built from various data sources to help identify unknown emerging risks.

Process and Data flow for the FSA Dashboard tool



Emerging Risks to highlight novel / increasing issues:

Emerging Risks

- ❑ Highlights novel risks (in last 30 days) which have not been seen in the past
- ❑ Highlights emerging risks whose occurrences have substantially increased in the recent past

Output Snapshot

Emerging risks this month

Show 10 entries

Search:

| Date | Product | Hazard | Country of Origin | Annual Average | N Warnings (prev. 12 months) | Deviation |
|------------|-------------|-------------------------|-------------------|----------------|------------------------------|-----------|
| 2019-03-20 | ginger | unfit for human | CHINA | 0.33 | 4 | 12 |
| 2019-03-15 | capsicum | pesticide residue | INDIA | 1.33 | 13 | 9.75 |
| 2019-03-18 | alage | iodine | CHINA | 0.33 | 2 | 6 |
| 2019-03-20 | bean | bacterial contamination | CHINA | 1 | 5 | 5 |
| 2019-03-25 | groundnut | health certificate | ARGENTINA | 0.67 | 3 | 4.5 |
| 2019-03-25 | raisin | ochratoxin | TURKEY | 8.33 | 36 | 4.32 |
| 2019-03-26 | groundnut | aflatoxin | ARGENTINA | 20 | 71 | 3.55 |
| 2019-03-19 | animal feed | salmonella | CHINA | 3.67 | 12 | 3.27 |
| 2019-02-28 | animal feed | genetically modify | CHINA | | 3 | 3 |
| 2019-03-15 | animal feed | salmonella | TURKEY | | 5 | 3 |

Showing 1 to 10 of 48 entries

Risk Ochratoxins-Turkey-Raisins have significantly increased in last 1 year

2 3 4 5 Next

Emerging Risks to highlight novel / increasing issues:

Emerging Risks

- ❑ We can also drill-down to all the incidents that we have seen in the last 12 months for the selected

Output Snapshot

Detail

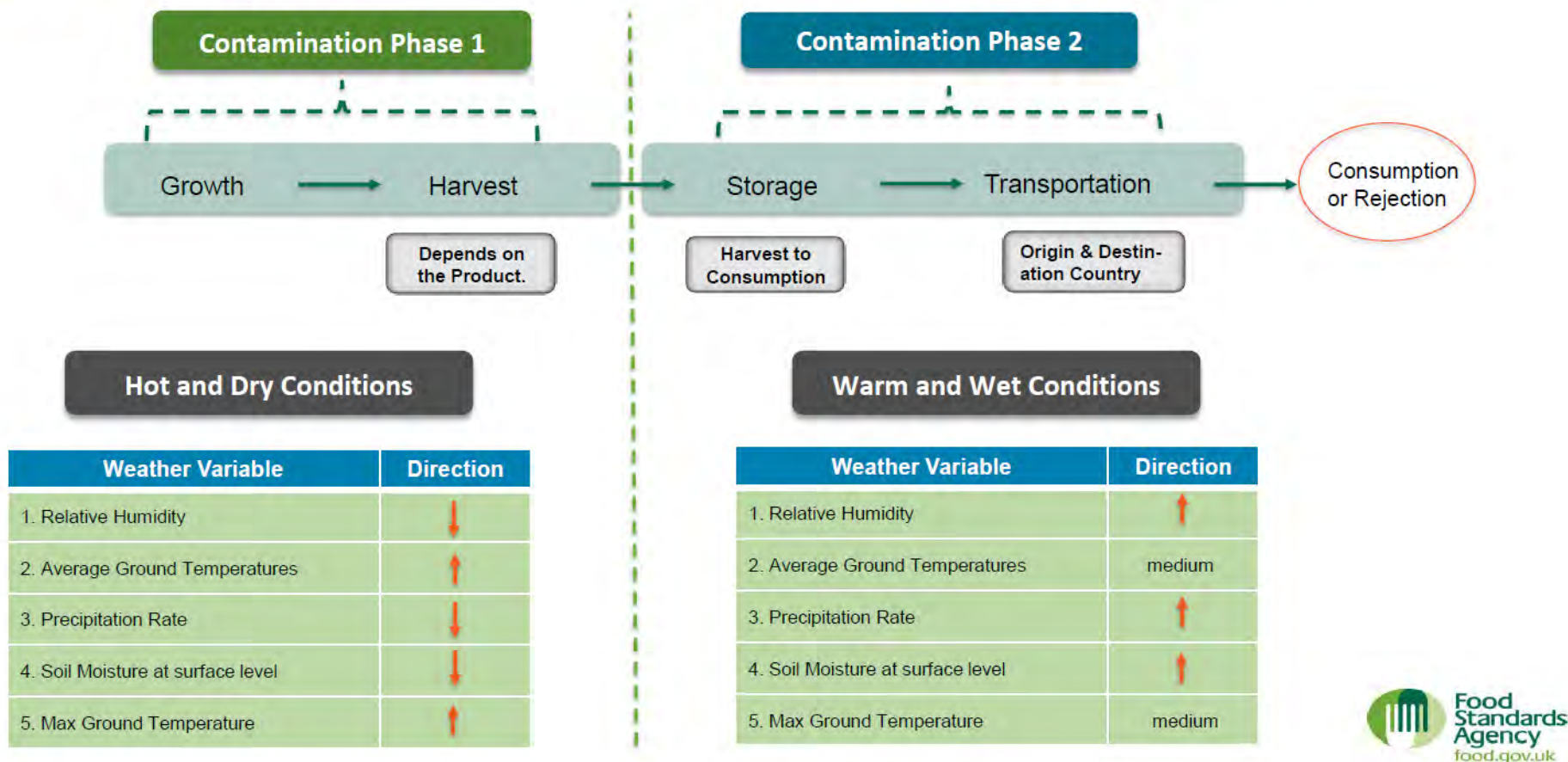
Show 25 entries

Search:

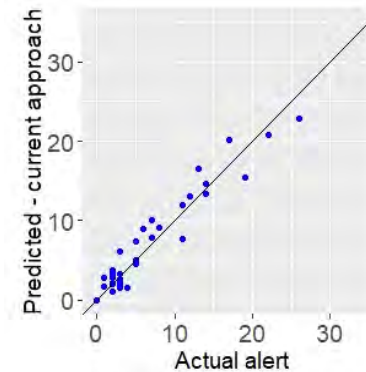
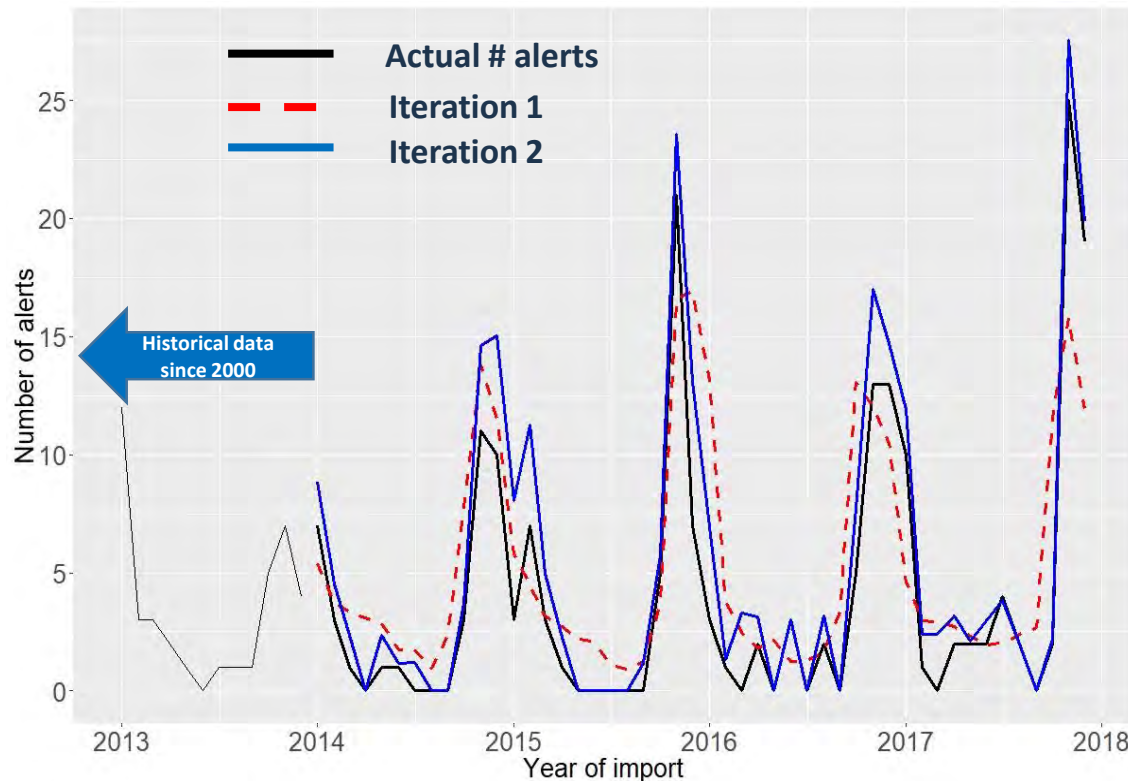
| date | Reference_ID | Source | Product | Country of Origin | Hazard | Hazard_Type | Link |
|------------|--------------|--------|---------|-------------------|------------|--------------|-----------------------------|
| All | All | All | All | All | All | All | All |
| 2019-02-25 | 2019.0706 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-02-04 | 2019.0399 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-02-04 | 2019.0397 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-02-04 | 2019.0382 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-02-04 | 2019.0383 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-01-18 | 2019.0203 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2019-01-03 | 2019.0024 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2018-12-31 | 2018.3809 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |
| 2018-12-21 | 2018.3758 | RASFF | raisin | TURKEY | ochratoxin | ochratoxin a | More detail |

Hyperlinks to the actual source of the incident

Aflatoxin contamination can occur pre or post harvest under different conditions ^{[1] [2]}

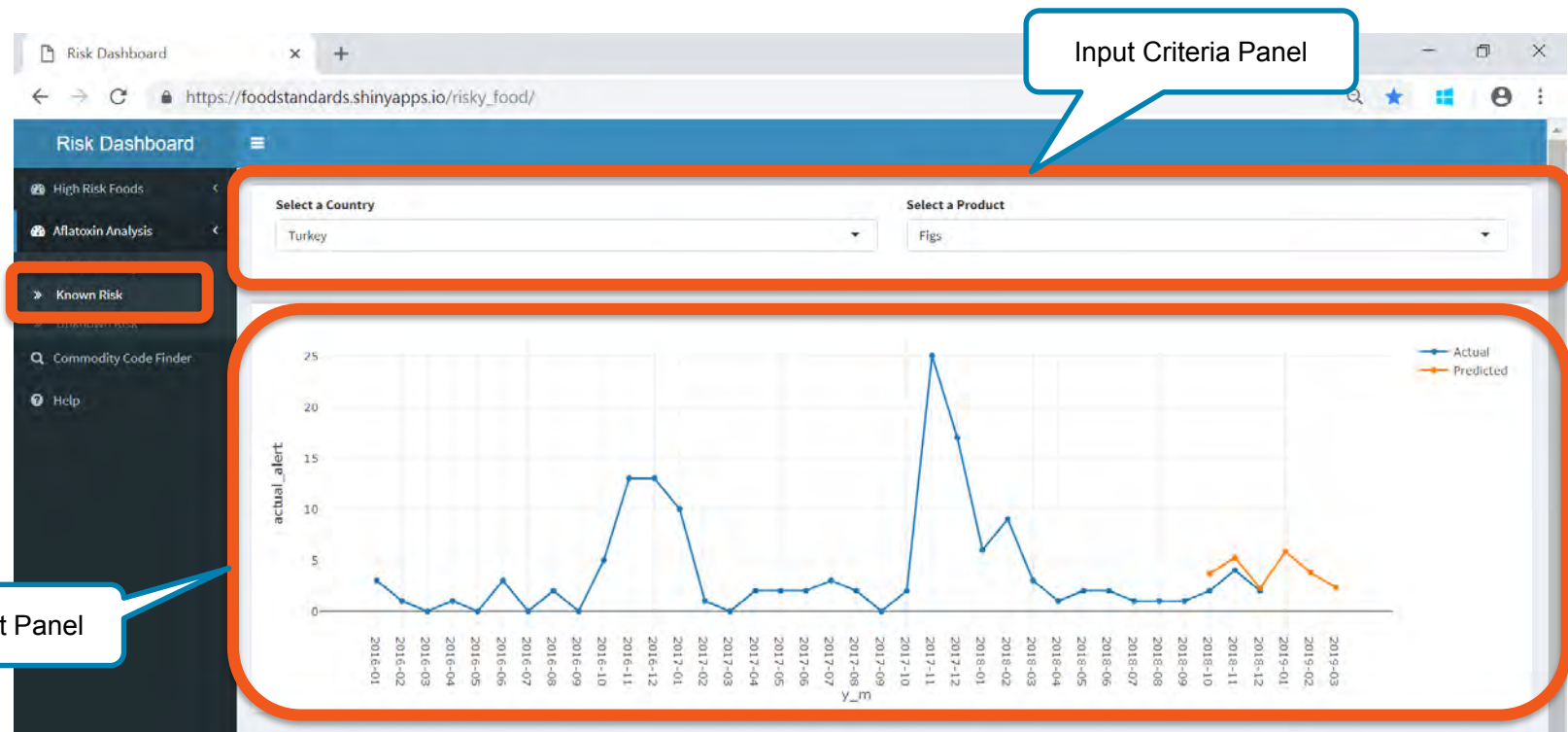


Known Risk: Predicting 'Aflatoxin Risk' in figs



- Assumption: Higher number of RASFF alerts has been used as an indicator of higher risk of food import
- Most significant variables -> majority of contamination depends on how the commodity is stored, harvested and packaged

Aflatoxin Analysis – Known Risk (1/2)



Output Panel

Aflatoxin Analysis – Unknown Risk (2/3)

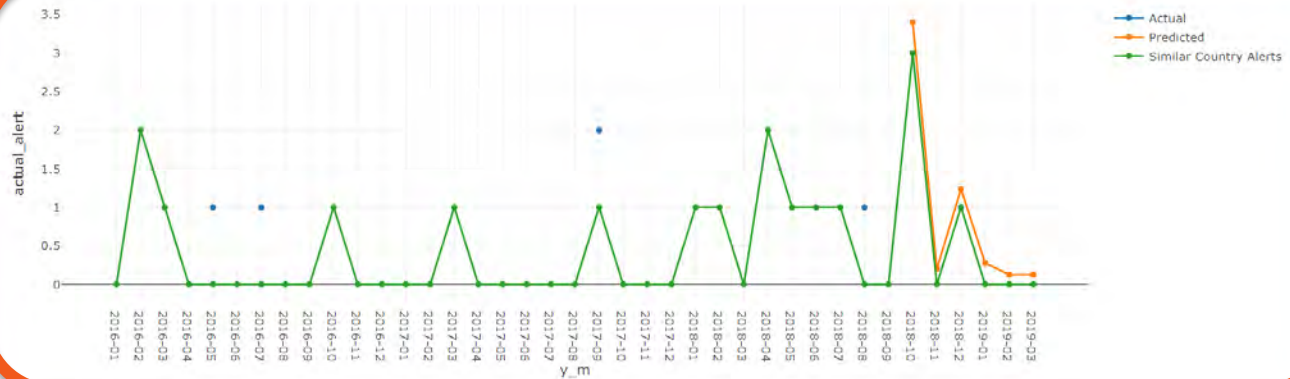
Input Criteria Panel 1

Select a Country

Bolivia

Select a Product

Brazilnuts



Output Panel 2

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FUTURE IMPORT CONTROL REGIME

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Future Borders Programme

- Cross Government collaboration
- Single Window
- Smarter Risking
- Easier for Stakeholders and Industry to operate at the Border

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**THANK YOU
ANY QUESTIONS?**
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