



**Summary report of LA activity
and key findings from
Imported Food Sampling and
Surveillance Grants
2004/05**

1 Background to the initiative

1.1 The Imported Food Sampling and Surveillance Project was first launched in 2003/04 as part of a cross-Government initiative to achieve a Step Change improvement in imported food controls. Following on from the success of the project and after consulting with the Sampling Co-ordination Working Group, the Agency decided to take forward a similar project in 2004/05.

1.2 As in the previous year, bids from Port Health Authorities and Local Authorities were considered by an Assessment Panel in September 2004. They were considered against various success criteria with the overarching objective that work should improve overall food sampling and surveillance for imported food generally and provide better information to assist in future sampling programmes. Bids were expected to focus around the priority areas for attention agreed by the Sampling Co-ordination Working Group which were:

- Microbiological examination of cooked or blanched shellfish
- Animal feed, including
 - Mycotoxins (Aflatoxins, Fuminisins, Ochratoxins)
 - heavy metals (lead, mercury, arsenic, cadmium)
- Aflatoxins in products not covered by EC emergency decisions, including
 - maize meal and other maize products, generally at manufacture/retail level
 - groundnuts, generally at ports, but also at retail level
- 3-MCPD in soy sauce and related products, generally at retail level looking at a variety of brands
- Building on findings from the 2003/04 project, focussing on
 - continued work on water in chicken, Sudan dyes, general labelling
 - general findings of the 2003/04 activity report looking at failure rates by country of origin, food categories and analytical areas
- Using local knowledge and expertise based on a local assessment of risk taking into account issues such as the type and number of importers in your area. Supporting information should be supplied to justify the bid and set in the context of local priorities.

1.3 The Panel recommended that 58 bids receive funding with £840,000 allocated to the project. This brings the total funding for the project to almost £1.5 million to date.

Table 1: Authorities receiving funding, by Authority type

LA Type	2003/04	2004/05
County	9	8
District	3	5
Unitary	9	13
London Borough	5	9
Liaison/Regional Groups	10	11
PHA	11	12
TOTAL	47	58

- 1.4 PHAs and LAs carried out sampling between October 2004 and March 2005 and were required to report on findings by 31 March 2005. Because of the tight timescales of the project, a handful of results are still outstanding but these should not materially change the overall findings of the project.
- 1.5 Generally speaking, there has been a high level of commitment from those LAs and PHAs involved in the project, meeting challenging deadlines for reporting the results and committing to follow up action where appropriate.

2 Summary of findings

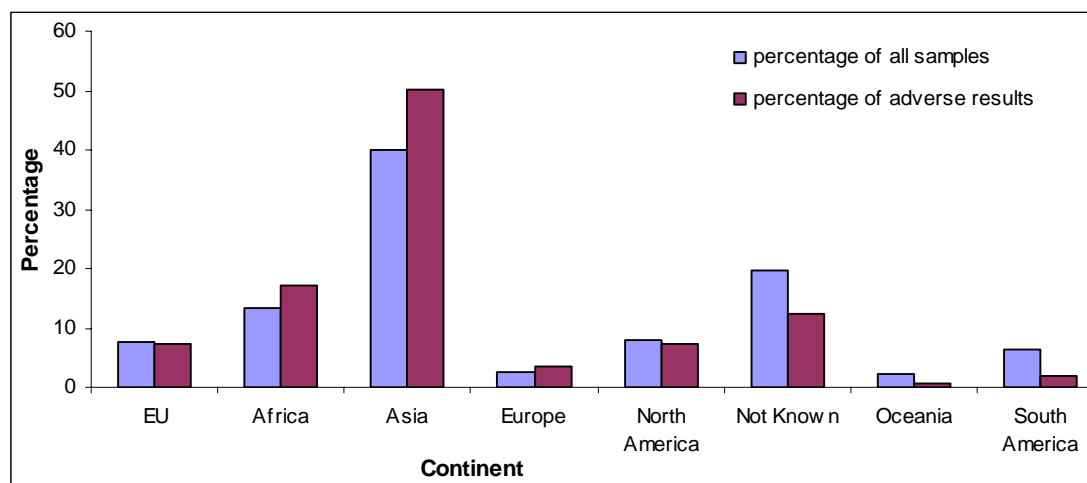
- 2.1 In total, 4,806 samples were taken under this project, with 19 per cent failing examination or analysis. Of the 912 adverse results, 884 failed chemical analysis with the remaining 28 being microbiological failures.
- 2.2 146 Local Authorities took part in the project through 58 separately funded bids.
- 2.3 The overall failure rate was 19 per cent, with 3 per cent of samples failing microbiological examination and 23 per cent failing of chemical analysis.
- 2.4 40 per cent of all samples taken came from countries in Asia; these returned 50% of the adverse results reported. The country with the highest number of samples taken was India with 455 samples taken, of which 144 (32 per cent) failed.
- 2.5 Fruit and vegetables was the most sampled category, with 722 samples taken and a failure rate of 16 per cent, the vast majority of which were labelling contraventions.
- 2.6 Labelling contraventions accounted for 71 per cent of all failures. Of those chemical failures that were not labelling, Aflatoxins were the biggest source of concern with 79 samples failing, followed by Sudan dyes with 65 samples failing.
- 2.7 Of the 28 microbiological failures, 16 were herbs and spices, 4 were fruits and vegetables and 4 were fish and shellfish.
- 2.8 A LACORS Co-ordinator is looking into some of these results and will be reporting his findings later in the year.

3 Country of origin of samples taken

3.1 Products from Asia formed 40 per cent of all samples taken (1,924 samples) but returned 50 per cent (458 samples) of the adverse results reported. Similarly, products from Africa formed 13 per cent of samples (639 samples) taken but returned 17 per cent (156 samples) of the adverse results.

3.2 By contrast, products from South America formed 7 per cent of samples taken (311 samples) but only returned 2 per cent (17 samples) of the adverse results. Chart 1 illustrates these figures for each continent.

Chart 1: Percentage of samples taken and adverse results reported by continent



3.3 The country of origin was unknown or shown as a product of more than one country for 958 of the samples taken, with 113 of the adverse results falling into this category.

Table 1: Countries returning the highest number of adverse results

Country of origin	Continent	Sample Numbers	Adverse Results	% samples adverse
India	Asia	455	144	31.6%
Thailand	Asia	245	65	26.5%
Ghana	Africa	222	59	26.6%
China	Asia	268	51	19.0%
Pakistan	Asia	165	43	26.1%
South Africa	Africa	131	41	31.3%
United States	North America	235	25	10.6%
Turkey	Europe	75	24	32.0%
Jamaica	North America	39	24	61.5%
Nigeria	Africa	96	21	21.9%

Table 2: Reasons for failure for countries with highest number of failures

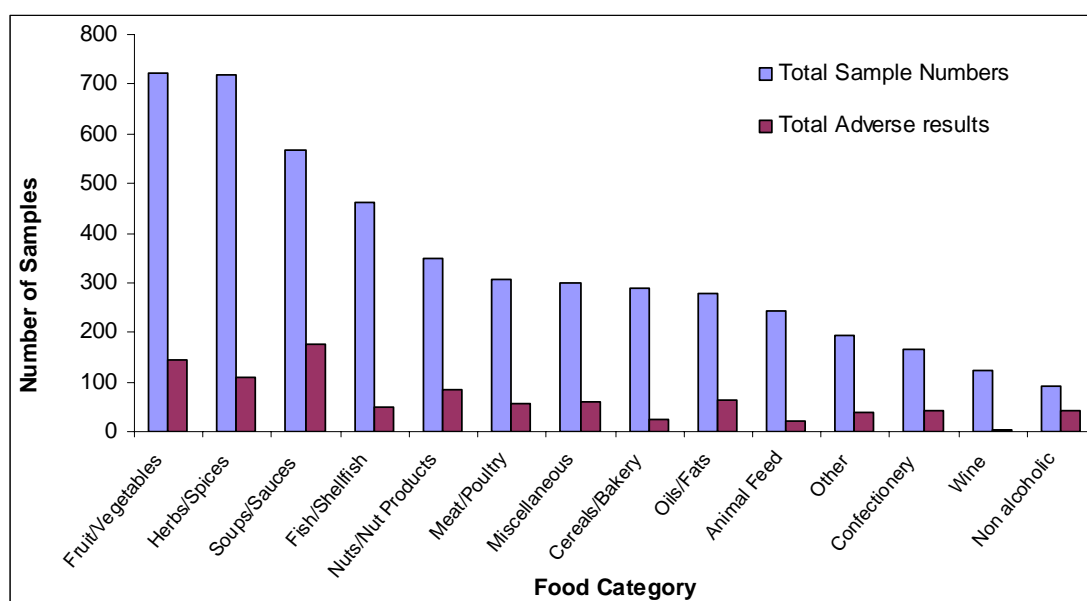
Country of origin	India	Thailand	Ghana	China	Pakistan	South Africa	United States	Jamaica	Turkey	Nigeria
3-MCPD		1								
Added Water		2								
Aflatoxins	14		27	2	10		3			6
Allergens	1			3			2		1	1
Erucic Acid	3									
Heavy Metals				4						1
Microbiological quality	7	4		2	3				1	
Pesticides	10		1							
Preservatives					1					
Sudan	3		25		2					5
Sulphur Dioxide				1					1	
Labelling:										
Basic	70	46	4	29	16	39	10	18	14	7
Misleading	22	5	2	6	5	2	4	3	3	
Missing statements	14	7		4	6		6	3	4	1
Total adverse results	144	65	59	51	43	41	25	24	24	21

- 3.4 Table 1 shows the countries whose products returned the highest number of adverse results and Table 2 breaks down these failures by broad analytical type for these countries.
- 3.5 Products from India were sampled more than those from any other country (455 samples) and had the highest number of failures (144 samples), with a failure rate of 32 per cent. 74 per cent of the failures in products from India related to labelling issues, slightly higher than the 71 per cent overall failure rate for labelling.
- 3.6 For those countries whose products returned the highest number of adverse results, Turkey (32 per cent) and Jamaica (61 per cent) returned the highest failure rates. However, the vast majority of the problems identified on products from these countries were labelling; 88 per cent of adverse results from Turkey related to labelling and 100 per cent of those from Jamaica.
- 3.7 Products from other countries saw higher failure rates for non-labelling issues, such as Ghana where 46 per cent of failures related to Aflatoxin levels and 42 per cent related to Sudan dye contamination. 23 per cent of failures on products from Pakistan failed because of the presence of Aflatoxins, which also accounted for 29 per cent of failures on products from Nigeria.

4 Food categories

4.1 Fruit and vegetables was the most sampled food category accounting for 15 per cent of all samples taken. Of 722 samples of fruit and vegetables taken, 144 adverse results were reported, a 20 per cent failure rate. Herbs and spices accounted for a further 15 per cent of all samples, with problems identified in 108 cases. Chart 2 illustrates the number of samples and adverse results generally by food category.

Chart 2: Numbers of Samples and Failures by Food Category



4.2 The highest failure rates were for non-alcoholic drinks (46 per cent) and confectionery (25 per cent), although samples from these categories were not taken as extensively as others. Nuts and nut products (25 per cent) and oils/fats (24 per cent) also recorded higher failure rates than the 19 per cent average across all samples.

4.3 Table 3 overleaf gives further information on the failure rates by food category.

Table 3: Adverse Results by Food Category

Product	Total Sample Numbers	Total Adverse results	Percentage of failures in food category	Failures as percentage of all failures
Fruit/Vegetables	722	144	19.9%	15.8%
Herbs/Spices	719	108	15.0%	11.8%
Soups/Sauces	566	175	30.9%	19.2%
Fish/Shellfish	461	51	11.1%	5.6%
Nuts/Nut Products	349	86	24.6%	9.4%
Meat/Poultry	308	58	18.8%	6.4%
Miscellaneous	300	59	19.7%	6.5%
Cereals/Bakery	288	23	8.0%	2.5%
Oils/Fats	277	65	23.5%	7.1%
Animal Feed	244	20	8.2%	2.2%
Other	193	38	19.7%	4.2%
Confectionery	166	41	24.7%	4.5%
Wine	122	2	1.6%	0.2%
Non alcoholic	91	42	46.2%	4.6%
Grand Total	4806	912	19.0%	100.0%

5 The main problems found

- 5.2 238 samples failed chemical analysis for non-labelling offences; these are set out in the table below and broken down by food category. Of the more serious offences, such as those products in which Aflatoxins, Sudan dyes or erucic acid were found, 52 products have been removed from sale and destroyed. In some cases, resampling is underway and in others the products were no longer on sale when the LA revisited the premises. Formal enforcement action is being considered by LAs in some cases, but LAs have also used the opportunity to inform and educate businesses. The LACORS Co-ordinator will be looking at the different types of follow up action pursued and will offer a view its appropriateness and the consistency of action for similar results across different LAs.
- 5.3 Table 4 highlights the main chemical failures found by food category and shows that Aflatoxins, herbs and spices and nuts and nut products accounted for just over 60 per cent of all the non labelling problems arising.

Table 4: Chemical Failures (non Labelling) by food category

Product	Nuts/ Nut Prods	Herbs/ Spices	Oils/ Fats	Meat/ Poultry	Fruit/ Veg	Animal Feed	Miscellaneous	Soups/ Sauces	Fish/ Shell-fish	Other	Total
Aflatoxins	41	27			1	4	4			2	79
Sudan		14	45				3	2		1	65
Heavy Metals						7	4		9		20
Allergens	11	4								2	17
Pesticides					14						14
Meat Content				12							12
Added Water				9							9
Erucic Acid			1		2			4			7
Ochratoxins						4					4
Preservatives					1			1		2	4
3-MCPD								3			3
SO ₂		1			1					1	3
GM							1				1
Total	52	46	46	21	19	15	12	10	9	8	238

- 5.4 Tables 5 and 6 overleaf show the breakdown of the main problems found, with Aflatoxins and Sudan dyes by country. Aflatoxins in products from Ghana, India and Pakistan were found in a higher number of products than those from other countries. They were generally found in expected food types such and herbs and spice and nuts and nut products.
- 5.5 Sudan dyes in oils and fats from Ghana were of concern and accounted for 37 per cent of all products found to contain Sudan dyes.

Table 5: Aflatoxins by country

	Herbs and Spices	Nuts and Nut Products	Others Misc.	Animal Feed	Cereals and Bakery Products	Confectionery	Fruit and Vegetables	Total
Ghana	1	24	1		1			27
India	10	4						14
Pakistan	9	1						10
Not specified/ more than one country	1	2	1	4			1	9
Nigeria	2	3	1					6
United States		3						3
Lebanon	2					1		3
Iran		3						3
China	2							2
Sierra Leone			1					1
Malawi		1						1
Total	27	41	4	4	1	1	1	79

Table 6: Sudan Dyes by Country

	Others Oils and fats	Soups, Broths, Sauces	Herbs and Spices	Others Miscellaneous	Additives	Total
Ghana	24			1		25
Not specified/ more than one country		14	4		1	19
Nigeria	4		1			5
India		1	2			3
Sierra Leone	3					3
EU			2			2
Pakistan			1	1		2
Lebanon			2			2
Syrian Arab Republic			1			1
Morocco			1			1
Bulgaria				1		1
United Arab Emirates		1				1
Total	31	16	14	3	1	65

6 Labelling Issues

6.1 The majority of chemical failures related to labelling, with 646 (71 per cent) of all failures relating to labelling information. In some cases, this will have been a technical breach, but in others the information included on the labelling was deemed misleading to the customer. In total, 446 labelling breaches have been described by LAs as basic labelling faults, accounting for almost half of all adverse results recorded. These included issues such as the format of the nutritional labelling, incorrect terms being used to describe the best before date (e.g. "expiry date") and the business name and address not being included. 93 labelling failures have been described as being misleading, including products with inaccurate ingredients lists, for instance with no fat content declared, the wrong nutritional levels shown or ingredients not listed. In some cases the LA has resolved the labelling problem with the company directly, but we have also asked LACORS to investigate issues coming out of this project.

Table 7: Labelling failures by Food Type

	Basic Labelling Fault	False description likely to mislead	Missing specific data	Total
Soups, Broths, Sauces	144	8	13	165
Fruit and Vegetables	85	20	16	121
Others: Miscellaneous	28	10	11	49
Herbs and Spices	38	5	3	46
Confectionery	23	6	10	39
Drinks: Non-alcoholic	25	3	10	38
Fish and Shellfish	27	8	3	38
Meat, Game, Poultry	10	12	13	35
Nuts, Nut Products, Snack Products	20	7	6	33
Cereals and Bakery Products	9	6	5	20
Others: Oils and fats	17		2	19
Foodstuffs Particular Nutritional Uses	8	1	4	13
Dairy Produce	1	2	3	6
Prepared Dishes	5	1		6
Animal feed			5	5
Beverages	1	3		4
Additives	2			2
Drinks: Wine	1	1		2
Egg and Egg Products	1		1	2
Ice Cream and Desserts			2	2
Drinks: Alcoholic	1			1
Grand Total	446	93	107	646

7 Regional and LA type findings

- 7.1 Differences in sample numbers between regions reflect the spread of bids received from LAs in this project and are influenced by the location of the larger ports of entry such as London, Southampton and Felixstowe.
- 7.2 However, Chart 3 shows there were difference in failure rates between regions, with failure rates of samples taken in the South East and the West Midlands being higher than average. This could be for a number of reasons such as the type of food sampled and the focus of the products sampled in the individual projects making up the numbers in different regions.

Chart 3: Percentage of Samples and Failures by region



8 Follow up Activity

- 8.1 LACORS have appointed a Co-ordinator to undertake a review of the sampling failures identified in this project. David Walker, formerly Head of Service at Shropshire Trading Standards has been appointed to this role.
- 8.2 The Co-ordinator will identify failures and local authorities for follow up, looking specifically to clarify:-
- the nature of the failure, particularly in relation to labelling failures
 - the follow up action pursued and to offer a view to LACORS and the Food Standards Agency on a) its appropriateness and b) the consistency for similar results across different LAs
 - whether further assistance may be appropriate to assist progressing appropriate enforcement action in individual cases and consider with LACORS and the Food Standards Agency whether such further assistance is appropriate
- 8.3 Contact and discussions will initially be undertaken by phone/email but it is recognised that meetings with relevant local authorities may be appropriate.
- 8.4 The Co-ordinator will report on any gaps in current co-ordination arrangements and make recommendations as to how future co-ordination can be improved and will report regularly to LACORS on activities with a final report on activity with recommendations for future work expected in September 2005.
- 8.5 All those LAs leading on projects were written to on 7 June 2005 asking them for their assistance on helping the Co-ordinator in drawing together some key points for future consideration. The letter also pointed out that the Co-ordinator will be at hand to offer advice on individual cases if required, recognising that although decisions on enforcement are for individual Local Authorities to take, but it may provide an opportunity to access support and assistance on a case by case basis.

9 Conclusions

- 9.1 We continue to analyse the data from this project to help to identify whether there are particular products or problems on which further action would be useful. This may include meeting with trade bodies and liaising with importers of certain products or the representatives of countries to help to address specific problems. This work will be ongoing over the next few months.
- 9.2 What is clear that the findings to date give an indication that ongoing work is required to ensure the quality of imported food, both to protect public health and to provide clear labelling to assist consumers in making informed decisions about products.
- 9.3 Over the two years of this project, LAs have been asked to pursue follow up action on adverse results and we know that work to remove unsafe products from sale has been carried out. In some cases prosecutions have been taken, but it is important to understand the range of follow up work that LAs may take to deal with the problems they identify. The work of the LACORS Co-ordinator to assess the follow up action from this year's project will be a useful start in evaluating not only how this programme deals with the immediate problems, but also how it may be developed in the future to address underlying issues which may arise.