



**Achieving a Step Change  
Improvement in the Enforcement of  
Imported Food Controls**

**Summary of Work carried out 2003/4**

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## FOREWORD

Following a Cabinet Office report in November 2002 which highlighted deficiencies in UK imported food controls the Food Standards Agency was asked to lead a project to secure a Step Change improvement in the co-ordination and delivery of local authority inspection of imported foodstuffs by March 2004. A new Imported Food Division took forward a range of action to help secure the necessary improvements. It was recognised that the task could not be completed without the full co-operation of other government departments, local and port health authorities and other enforcement bodies. As such a Step Change Project Group, which included relevant Government and local authority stakeholders, was used to oversee the necessary activities.

On 17 June 2004 Sir John Krebs (Chairman of the Food Standards Agency) and Lord Whitty (Minister at Department of Environment, Food & Rural Affairs), wrote to local authorities informing them that Government Ministers reviewing the work agreed that a Step Change improvement in controls had been achieved.

It was agreed that the Agency would produce a summary report to the Project Group summarising the main activities of the Step Change initiative during 2003/4 together with key achievements. The attached report will be made available to the Project Group, and will be placed on the Agency website ([www.food.gov.uk](http://www.food.gov.uk)) for access by stakeholders.

The Agency would like to thank colleagues in other Government Departments for helping to achieve this work but most of all our thanks go to LAs and PHAs for all their hard work in achieving the Step Change. We look forward to continued close working with all enforcement colleagues and continued protection of public health.

**DAVID STATHAM**

## **1. INTRODUCTION**

1.1 This report summarises the action taken by the Food Standards Agency (FSA), other Government Departments and local authorities to deliver a Step Change improvement in co-ordination and delivery of local authority inspections on imported foodstuffs and animal products during 2003-04.

## 2. BACKGROUND AND APPROACH

2.1 The outbreak of foot and mouth disease (FMD) in 2001 highlighted the importance of preventing illegal imports of contaminated meat. Whilst FMD is not a public health issue, stakeholders expressed general concern about UK controls on food imports at seaports and airports, and whether these were sufficient to ensure the safety of imported food in terms of public, animal and plant health.

2.2 A Government Report on the Organisation of Import Controls<sup>1</sup> recommended that:

(a) all activity against smuggling of meat, animal products, fish and plant matter be brought together under the control of Her Majesty's Customs & Excise (Customs).

(b) there should be a substantial improvement in co-ordination between the main control agencies (including the agriculture departments, the FSA and local authorities) and between these agencies and Customs.

2.3 The Government also concluded that there was a strong case for a single agency to oversee all aspects of the management of legal trade in animal, plant and other food products, but that local authorities and port health authorities should first be given the opportunity to deliver a Step Change improvement in their performance. The FSA was given the task of co-ordinating this Step Change project to improve the co-ordination and delivery of local authority inspections on imported foodstuffs and animal products within one year (from 1 April 2003 to 31 March 2004). The position would then be reviewed. The Agency had already agreed a ten point action plan to make improvements in the effectiveness of enforcement of imported food

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<sup>1</sup> The Organisation of the Government's Controls of Imports of Animals, Fish, Plants and their Products. Cabinet Office. November 2002.

controls (Annex 1). Action on the Step Change has been taken forward in a way that is consistent with the ten point plan.

2.4 A Ministerial Committee for Illegal Imports was established to co-ordinate policy on imports of animals, plants, fish and their products. Ministers agreed criteria to evaluate the success of the first year of the Step Change (Annex 2). These criteria built on the key areas requiring improvement identified in the Cabinet Office Report. Local Authorities were informed of these agreed criteria early in 2004. The criteria addressed the following themes:

Capacity building	training, guidance and access to information
Checks	audits and monitoring conducted by the Agency
Controls	enforcement action and sampling at borders and inland
Co-ordination	communication between interested parties

2.5 Successful delivery of the Step Change was dependent on close liaison between the FSA, other government departments, enforcement bodies, the Association of Port Health Authorities (APHA) and the Local Authorities Co-ordinators of Regulatory Services (LACORS). There were particularly close links with the Government's Action Plan on Illegal Imports, run by Defra.

2.6 The FSA set up a stakeholder group in December 2002 to inform the development of the work plan, help deliver the necessary changes, and to ensure a co-ordinated approach. The Step Change Stakeholder Project Group<sup>2</sup> met nine times between December 2002 and July 2004.

2.7 Action to deliver the Step Change has been taken throughout the UK involving close co-operation with the FSA's Executive Offices in Scotland, Wales and Northern Ireland.

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<sup>2</sup> Comprising representatives from FSA Executive Offices in Scotland, Wales and Northern Ireland, Defra, Her Majesty's Customs & Excise, Association of Port Health Authorities, LACORS, and the main UK sea ports and airports.

2.8 The Cabinet Office report recommended collecting baseline data on the activities of local authorities at ports and airports relating to imported food. The Step Change Project Group concluded that baseline data on imported food activity would need to be collected from all local authorities, including “inland” authorities without ports prior to the Step Change initiative in order to provide baseline data against which improvements could be measured.

2.9 Therefore baseline data were collected in 2003 to identify pre-Step Change enforcement activity on local authority imported food controls. A follow-up survey was conducted in April 2004 to measure the changes, which had taken place.

### 3. CAPACITY BUILDING

#### 3.1 Training Programme

3.1.1 Considerable emphasis was placed on training enforcement officers from inland local authorities during 2003/04 because the baseline survey results suggested that many did not recognise the important role they had in ensuring the safety of food imports. The training for “inland” LA staff provided comprehensive information on import controls, roles and responsibilities of enforcement agencies, and practical enforcement advice. By end of May 2004, 58 training courses had been held and 466 local authorities had attended resulting in training being provided to officers in all but one UK authority. It is evident that this training has heightened awareness of the need to consider imported food as part of the routine checks made by enforcement officers. Baseline data collected in April 2004 indicated that half of local authorities have already cascaded this training within the authority.

Step Change Evaluation Criteria	Achievement	Criteria Met/Not met
Enforcement officers improve awareness of imported food controls, as shown by: <ul style="list-style-type: none"><li>• 100% of Local Authorities have staff trained on imported food controls by 31 March 2004</li><li>• 90% of attendees rate the training courses as excellent</li></ul>	Officers in 99.75% of UK local authorities including County Councils were trained by 14 May.  96% of authorities rated the courses as excellent or equivalent top mark.	Met

3.1.2 A resource pack containing detailed reference material supported the training and was issued to each delegate. It was updated during the Step Change year, to reflect feedback from users and developments in imported

food controls. This has now been made available on the Agency website ([http://www.food.gov.uk/enforcement/imports/enforce\\_authorities/latraining](http://www.food.gov.uk/enforcement/imports/enforce_authorities/latraining))

3.1.3 Similar training was delivered to enforcement officers in the Republic of Ireland and Northern Ireland. This cross-border initiative, involving the Food Standards Agency (in London and Northern Ireland) and the Food Safety Authority of Ireland, also helped to improve links between enforcement officers throughout Ireland and initiate a cross agency forum for intelligence gathering and problem solving.

3.1.4 Specific training has been provided in conjunction with Defra and Scottish Executive Environment & Rural Affairs Department (SEERAD) to ensure that personnel working at Border Inspection Posts (the legal route through which all products of animal origin must be imported from third countries into the EU) were kept up to date with Step Change and legislative developments (such as the change in role for Customs Officers in dealing with illegal imports of products of animal origin (POAO) in passenger luggage).

3.1.5 A five-day residential programme for local authority enforcement officers who act as UK Official Fish Inspectors was also developed and piloted during the Step Change year. The course covered detailed legal, technical and practical elements on imported fishery products and further courses are planned for 2004/05.

3.1.6 Officials from the Food Standards Agency also helped Defra to deliver training to Official Veterinary Surgeons at Border Inspection Posts.

## **3.2 Authorisations**

3.2.1 Baseline data for 2003 indicated that not all local authorities had authorised enforcement officers under imported food legislation to enable them to take effective action on non compliant foods. As a result of the training and further guidance provided during the year there was a significant increase seen in the number of officers authorised. All inland local authorities

have at least one officer authorised under the Food Safety Act 1990 and there was a 102% increase in numbers authorised under the Imported Food Regulations 1997 to handle food not of animal origin. A 113% increase was seen in those authorised under the Products of Animal Origin (Third Country Import) England 2003 Regulations as shown by 2004 baseline data.

Step Change Evaluation Criteria	Achievement		Criteria Met/Not met
100% of inland Local Authorities have at least one officer authorised to take action on illegal imports by 31 March 2004	Inland local authorities with staff authorised under the Food Safety Act and therefore able to take action on illegal imports		
	2002/03 97%  Based on 277 local authorities, replying in both 2002/03 and 2003/04	2003/04 100%  Based on 338 local authorities replying in 2003/04	

### 3.3 Enquiry point

3.3.1 The Food Standards Agency set up and publicised an imported food single enquiry point in September 2003 to provide advice on imported food issues to members of the public, enforcement officers and the trade.

3.3.2 This was in recognition of the wide range of food safety and food standards legislation applicable to food imports, and that responsibilities and knowledge may be located in different parts of the Agency. The enquiry point covers England and Wales. It is staffed during Agency working hours, with an answerphone and email box to take messages at other times. Food Standards Agency Scotland and Northern Ireland have provided separate contact points where enforcement arrangements may be slightly different to England and Wales. Contact details are given in Annex 3.

3.3.3 Use of the enquiry point has increased substantially since its establishment and all service response targets have been met. The service will continue to be monitored and reviewed.

Step Change Evaluation Criteria	Achievement	Criteria Met/Not met
FSA central enquiry point is available to all Local Authorities and queries are answered within a 5 working day target, leading to an increase in usage of the enquiry point to assist consistent enforcement.	<p>The target for answering enforcement queries is being achieved. Urgent enquiries are generally dealt with within 24 hours.</p> <p>Usage of the Imported Food Helpline email box and phone line has increased three-fold from November 03 to March 04 (increase from 61 to 188 emails and phone calls).</p>	Met

### 3.4 Website section

3.4.1 To improve access to information about imported food, a dedicated section on the Agency's website was launched on 30 September 2003, [www.food.gov.uk/imports](http://www.food.gov.uk/imports). It includes information and advice on UK imported food controls for:

- the public about bringing back food for personal use from another country
- businesses wishing to import food
- enforcement officers at local authorities and port health authorities.
- links to other government department websites on import issues.

3.4.2 The new section attracted over 57,000 visits in the section's first six months and more than 6,000 downloads.

3.4.3 The content and design of the section is regularly reviewed to ensure relevant, up to date information and services are available to users.

## 4. CONTROLS

### 4.1 Sampling and Surveillance

#### *LA Work*

4.1.1 Sampling and checking imported food is one of the key mechanisms to detect and control non-compliant food imports. The Agency has therefore encouraged inland authorities to give greater emphasis to the sampling and surveillance of imported food as part of their routine inspection programmes. To help promote this activity and encourage longer term inclusion of imported food sampling on local agendas the Agency has provided specific additional funding to authorities. As a result of this focus a significant increase has been seen in the numbers of imported food samples.

4.1.2 In the year to March 2003, 7340 samples were identified by local authorities and port health authorities as being taken from imported foods. This increased to 29,000 samples during the year to March 2004. Much of this increase was on products not of animal origin where the number of samples taken increased from 3290 to 11,200 in the same period.

Step Change Evaluation Criteria	Achievement		Criteria Met/ Not met
Local Authorities and Port Health Authorities increase sampling and surveillance levels in 2003-04 by 15% compared to pre-April 2003 levels, particularly on food products not of animal origin.	<b>Number of samples taken</b>		Met
	<b>2002/03</b>	<b>2003/04</b>	
	POAO: 4050 FNAO: 3290	POAO: 17 200 FNAO: 11 800	

POAO – products of animal origin

FNAO – food products not of animal origin

### *FSA Funded Work*

4.1.3 To emphasise the importance of imported food as a local issue, PHAs and local authorities were invited to apply additional funding for imported food sampling and surveillance and £600,000 was provided to over 100 authorities to take forward surveillance, a wide variety of sampling and analysis. The overarching objective set was that work undertaken should improve overall food sampling and surveillance for imported food generally and provide better information to assist in future targeting of sampling programmes, utilising local knowledge about imported food in the process.

4.1.4 The sampling and surveillance work was carried out between November 2003 and March 2004 and overall, 4,427 samples were taken with the funding, of which 12 per cent were found to be unsatisfactory with problems ranging from relatively minor and easily addressed labelling issues, to more serious findings. Some of this activity resulted in national Food Hazard Warnings with potentially unsafe foods being taken off the market, thus reducing risk to consumers.

4.1.5 Inland authorities visited 822 food premises as part of their work for this project, ranging from small retailers up to large manufacturers and importers, examining imported foods on sale and the in-house control arrangements.

4.1.6 Port health authorities and local authorities are now taking forward appropriate follow up on all the unsatisfactory samples. The activity reports received from all the authorities that took part have been collated and a LACORS/Agency Sampling Co-ordination Working Group is helping to co-ordinate action.

4.1.7 A specific London-wide survey of food importers was also funded by the Agency during February and March 2004. London Boroughs visited importers in their area to assess the processes in place and the knowledge of the importers about import controls and where to get advice. 22 of the 33 London Boroughs took part in the project. The results indicated the often poor

control arrangements in place and lack of knowledge of importers, and the importance of local authorities being aware of importers operating in their areas. Work will continue in 2004 on ways the Agency can assist local authorities to help support the needs of importers.

## 4.2 Enforcement Activity

4.2.1 As a result of the increased emphasis placed on imported food controls, the increased knowledge within inland Local Authorities of their role, and improvements in the guidance to authorities, enforcement activity has increased. Baseline data of enforcement activity by UK inland local authorities<sup>3</sup> measured numbers of seizures, voluntary surrenders, prosecutions, cautions, and notices served relating to imported food.

Step Change Evaluation Criteria	Achievement		Criteria Met/Not met
Local Authorities and Port Health Authorities increase other enforcement activity (notices served, seizures etc) by 15% in 2003-04 compared to pre-April 2003 levels.	<b>Enforcement activity by UK inland local authorities<sup>4</sup> (total numbers of Notices served, FNAO seizures, prosecutions and voluntary surrenders)</b>		
	<b>2002/03</b> 95	<b>2003/04</b> 132 (39% increase)	Met

## 4.3 Guidance

4.3.1 Statutory guidance on imported food and feed controls was issued by the FSA in June 2004, following public consultation. It is available at <http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/importedfoodfeedcontrols>. The

<sup>3</sup>Ports of entry for food not included in order to exclude the effect of the transfer of responsibility of smuggled POAO to Customs.

<sup>4</sup>Ports of entry for food not included in order to exclude the effect of the transfer of responsibility of smuggled POAO to Customs.

guidance aims to facilitate consistent and effective enforcement by local authorities both inland and at ports of entry and has been well-received by local authorities and ports. It clarifies the local authority imported food controls, which need to be in place, and underpins the Agency's monitoring and audit of local authority arrangements.

4.3.2 The guidance incorporates information from good practice guides contained in: the Syniad/APHA/FSA national benchmarking study into the port health function<sup>5</sup>; the Agency's imported food training resource pack; and comments from a public consultation exercise with stakeholders. It includes sections on:

- service planning
- documented policies and procedures
- authorisation of officers
- records
- reporting
- liaison
- examination
- sampling
- enforcement
- illegal imports.

Reference is also made to other relevant guidance for local authorities produced by DEFRA and LACORS.

#### **4.4 EU Regulation on Official Feed and Food Controls**

4.4.1 In February 2003, the European Commission issued a proposal for a regulation on official feed and food controls. The proposal covered official controls of all EU feed and food products and products exported to or

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<sup>5</sup> Syniad Benchmarking Centre: '*Benchmarking the Port Health Function*' [November 2002]. Specifically, reference should be made to '*Port Health Good Practice Guide No. 2: Control of Imported Food Not of Animal Origin*'. The full document is available from the Agency's website at: [http://www.food.gov.uk/enforcement/imports/enforce\\_authorities/benchmarking](http://www.food.gov.uk/enforcement/imports/enforce_authorities/benchmarking)

imported from third countries to create a more comprehensive, consistent and integrated 'farm to table' approach for control systems.

4.4.2 The negotiations on the proposal progressed well during 2003/4 with agreement reached in April 2004. The new provisions will apply from 1 January 2006 with the exception of those on financing which will apply from 1 January 2007.

4.4.3 In line with the aims of the Step Change project, the UK successfully pressed for a mandatory requirement for prior notification of consignments of 'high risk' feed and food of non-animal origin imports and for controls on such products to be undertaken at designated ports only. The Regulation covers the financing of official controls and this was a very contentious issue during the negotiations. With regard to import controls for 'high risk' FNAO, the compromise agreed is that fees *may* be established when these products are identified through EU comitology arrangements. This means that the introduction of mandatory fees for these import controls will be considered on a case by case basis.

## **5. CHECKS BY FSA**

### **5.1 Framework Agreement**

5.1.1 Following agreement with the FSA's stakeholder Framework Agreement Sub Group, changes were made to the food law enforcement Standard which forms part of the Agency's Framework Agreement with local authorities. The changes clarified the Agency's expectations on the planning and delivery of local food law enforcement arrangements relating to imported food controls, including those operating at UK ports of entry.

### **5.2 Audit**

5.2.1 The Agency has carried out a programme of focused audits of local authorities and port health authorities looking specifically at their arrangements for controls on imported food of non-animal origin from countries outside the EU.

5.2.2 The audit programme of 20 enforcement authorities (plus two pilot audits) included all major English sea and air ports where foods of non-animal origin are imported, and inland authorities with imported food enforcement responsibilities at Enhanced Remote Transit Sheds<sup>6</sup>. A further three enforcement authorities with major ports in Scotland, Northern Ireland and Wales were visited.

5.2.3 Audited authorities have developed action plans, agreed with the FSA, to address deficiencies and areas for improvement found. These action plans are being monitored by the Agency to ensure that effective risk based controls are implemented at all ports audited, and a programme of return visits will be carried out where relevant to assess progress.

5.2.4 A separate summary report of the imported food audit and main findings is available on the FSA Website at [http://www.food.gov.uk/enforcement/auditscheme/importedfood\\_auditprog/importssummaryreport](http://www.food.gov.uk/enforcement/auditscheme/importedfood_auditprog/importssummaryreport)

Step Change Evaluation Criteria	Achievement	Criteria Met/Not met
<p>As a result of FSA audits at all main UK ports of entry for food, relevant enforcement authorities agree action plans with the FSA to improve arrangements for controls on imported food not of animal origin.</p> <p>All ports meet benchmark standards relevant to imported food when action plans checked within 6 months of Agency audit report.</p>	<p>A programme of 22 audits (including two pilots) representing all main UK ports of entry for food in England has been completed. Food import control arrangements have also been incorporated into a further 3 audits in Scotland, Wales and Northern Ireland.</p> <p>Action plans have been agreed with all 22 of the authorities audited in the imported food programme.</p>	<p>Met</p>

5.2.5 The audits have confirmed that sea ports have the means to identify higher risk foods and that established and effective risk-based controls are generally being implemented at all the major sea ports.

5.2.6 Most of the smaller sea ports that receive non-animal food imports do so on an infrequent basis. The effectiveness of these enforcement authorities is therefore dependent on their ability to identify arrivals and to respond appropriately when necessary. Whilst high risk foods subject to specific control measures e.g. nuts, are generally being properly dealt with, the audits

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<sup>6</sup> An Enhanced Remote Transit Shed is a Customs approved facility where imported goods are held in temporary storage pending release for free circulation or warehousing.

have resulted in some recommendations that will secure better identification and tighter enforcement controls.

5.2.7 Airports present a more difficult area of enforcement. This is due to the rapid throughput and the attendant difficulties in identifying relevant food consignments and being able to respond before consignments are moved to Enhanced Remote Transit Sheds and into free circulation. However, the enforcement authorities at most airports have developed systems to ensure that they are alerted to arrivals of consignments and have arrangements in place to provide an appropriate response, proportionate to the volume of trade and the level of potential risk. Some of the airports with lower levels of trade have only recently begun to implement sufficiently robust control arrangements.

## **6. CO-ORDINATION**

### **6.1 IT Systems**

6.1.1 A scoping study at UK ports was conducted in summer 2003, as part of which eight Border Inspection Posts (BIPs) at seaports and airports were visited and questionnaire responses were obtained from the other BIPs. The study considered how IT systems and current best practice could be used to help improve consistency and co-ordination of imported food control enforcement, whilst benefitting legitimate trade. The exercise reviewed various current IT systems and associated documentation and it analysed user requirements.

6.1.2 The study recommended the development of three IT systems: a manifest control system, a common information management system for ports, and a central information resource on imported food controls.

6.1.3 The first system being taken forward is the central information resource, developed as a database, providing detailed information on imported food legislation and guidance (for which FSA has policy responsibility). Although initially aimed at enforcement officers, it has potential for wider use, enabling users to search for specific products and countries of origin and retrieve all relevant legislation, guidance and import criteria (specified as the import requirements in any selected piece of legislation).

6.1.4 A prototype is being piloted at 12 UK ports over the summer of 2004.

<b>Step Change Evaluation Criteria</b>	<b>Achievement</b>	<b>Criteria Met/Not met</b>
FSA establishes a database prototype, by 31 March 2004, providing authoritative up to date technical information on imported food controls, initially to enforcement officers.	Prototype was developed and demonstrated to key enforcement stakeholders, with positive feedback by the deadline. Piloting of the prototype began July 2004.	Met

6.1.5 In addition the Agency is working with Customs to access data on imported consignments of food for use by port health officers.

## **6.2 Views of trade**

6.2.1 An agreed success criteria for the Step Change project was to deliver a positive impact on legitimate trade by helping to ensure consistency in enforcement activity, particularly at ports, and by improving traders' access to information on imported food controls.

6.2.2 A telephone survey was carried out in April 2004 on a sample of 200 food importers and agents using UK ports to canvass their views on whether improvements had been seen during the Step Change year. Overall, a large majority of respondents rated local and port health authorities as providing a good service with 57% thinking arrangements had improved.

6.2.3 Meetings with organisations representing importers and agents (SITPRO, BIFA, BPA) have indicated support for the Step Change work and have not identified any particular problems.

Step Change Evaluation Criteria	Achievement	Criteria Met/Not met
<p>A majority of food importers/agents recognise that the Step Change has improved consistency and facilitates legitimate trade (as determined by a survey in April 2004).</p>	<p>From the April phone survey:</p> <ul style="list-style-type: none"> <li>• 85% of UK agents and importers thought that port health authorities had a very good or fairly good knowledge of imported food controls</li> <li>• 86% thought that local authorities were very good or fairly good at enforcing import controls</li> <li>• 68% thought that authorities had a very good or fairly good appreciation of the needs of importers and agents</li> </ul> <p>57% of UK agents and importers thought that the imported food service had improved over the last year.</p>	<p>Met</p>

### 6.3 Heathrow

6.3.1 The FSA's ten point plan recommended the improvement of the local administration arrangements for Heathrow, because the airport currently comes within the geographical area of four local authorities – Hillingdon, Hounslow, Slough and Spelthorne. Improvements would aim to achieve greater consistency by clarifying roles and responsibilities, and better co-ordination of enforcement in the Heathrow area.

6.3.2 The FSA is discussing ways to achieve this with the four local authorities. Options range from continuing as currently but with more clearly defined liaison arrangements, to designating a single local authority to have imported food responsibility for the whole Heathrow area.

## **7. OTHER WORK**

### **7.1 Illegal Imports of POAO**

7.1.1 A range of other work has been taken forward by Defra and HM Customs and Excise to tackle illegal imports of products of animal origin. A summary report on this work is available on the Defra website at <http://www.defra.gov.uk/animalh/illegali/pdf/annual-review04.pdf>

### **7.2 Legal imports of POAO**

7.2.1 Compliance at Border Inspection Posts (BIPs) has improved since the State Veterinary Service set up a programme of regular visits to check facilities and monitor procedures. The SVS set and monitor deadlines to correct deficiencies and offer advice to port operators and port health authorities who are responsible for the operation and facilities at BIPs in accordance with EU & UK legislation. There are now better but fewer BIPs since eight BIPs decided not to upgrade their facilities and stopped handling animal products during 2003.

### **7.3 Association of Port Health Authorities (APHA)**

7.3.1 During the Step Change project year APHA has worked closely with the Agency to help improve co-ordination and effectiveness of the imported food inspection service provided by Port Health Authorities and Local Authorities.

7.3.2 A Step Change Project Officer at APHA was recruited in 2003 (with funding from the FSA) to help take forward specific Step Change initiatives at ports. There were three priority areas: co-ordination and communication;

consistency; and the development of the Association to complement the Step Change. Activities were designed to build on the work of the FSA.

7.3.3 Drawing on the earlier national benchmarking study into the port health functions, APHA has developed good practice guides which set out the minimum standards expected of all sea and airports. From this, performance indicators are to be developed and benchmarking groups established which will help ensure that appropriate control arrangements are in place at all UK points of entry, including small ports receiving limited or infrequent food imports.

7.3.4 APHA has strong links with member authorities working at the larger sea and airports. To help improve UK control arrangements APHA has been keen to strengthen the links with smaller ports. As part of the project, arrangements are being developed to work with the smaller ports on a regional basis. A network of regional groups of small ports is being developed to link with the other enforcement agencies in each area thereby helping to deliver the improvements in co-ordination.

7.3.5 The Step Change work has in practice provided a good platform for APHA to review its activities on imported food controls and other port health functions as well as to improve links with other organisations and agencies in the field. The Association will be continuing this improvement programme into 2004/05.

## **7.4 LACORS**

7.4.1 LACORS has been working closely with central Government, APHA and the Local Government Association to help secure improvement in local authority imported food controls. In particular it has provided administrative support for the imported food training programme. LACORS also assisted the Agency in co-ordinating and promoting additional sampling programmes specifically targeted at imported food.

7.4.2 Information on imported food matters is provided to local authority officers via the LACORS website. This includes central guidance, links to relevant legislation and advice provided by other bodies such as the FSA and Defra, and guidance on specific products. Positive feedback on this information has been received from local authority officers.

7.4.3 LACORS has also produced general authorisation guidance to local authority officers in regulatory services, highlighting the importance of ensuring proper authorisation of local authority officers.

## **8. NEXT STEPS**

### **8.1 Results of the Step Change**

8.1.1 Progress on the Step Change initiative was reported to Ministers in May 2004. They agreed that the evaluation success criteria for the first year of the Step Change had been met, and that a single agency to oversee imported food controls was not necessary, although progress should be kept under review. The FSA Chairman and Defra Minister Lord Whitty wrote to local authorities in England on 17 June 2004 to commend their work, and encourage them to continue to improve their effective enforcement of imported food controls. Letters were also sent to authorities in Scotland, Wales and Northern Ireland.

### **8.2 Maintaining the Step Change**

8.2.1 There is evidence from the survey of local authorities carried out in April 2004 that the Step Change funding of training, sampling and better central co-ordination has enhanced local authority capacity in this area, and will result in sustained improvements in imported food controls.

8.2.2 FSA activity to provide additional training on imported food controls for enforcement officers and additional funding to encourage increased local authority sampling and surveillance of imported food will continue during 2004/5. The Agency will also be working closely with other Government Departments to further develop IT systems to assist enforcement and trade users. Discussions are also taking place regarding the possible future transfer of responsibilities for the operation of the veterinary checks regime at BIPs for products of animal origin, from Defra to the Agency.

## 10 Point Plan

In October 2001 the Agency Board approved a paper on food imports which contained ten recommendations for changes and improvements.

The ten recommendations were:

1. Bring imports of products of animal origin under the Agency.
2. Improve liaison with enforcement authorities and central government on food safety.
3. Establish an electronic information database for port health authorities with relevant local authority access.
4. Revise guidance for port health authorities and local authorities.
5. Improve training of port health officers.
6. Fund for specific sampling and monitoring.
7. Improve local authority administration for Heathrow.
8. Increase powers for port health officers over personal imports.
9. Restrict points of entry to UK for products which are not of animal origin.
10. Consider introduction of prior notification of imports of products which are not of animal origin.

## Step Change evaluation criteria

### Controls

- Local Authorities and Port Health Authorities increase sampling and surveillance levels in 2003-04 by 15% compared to pre-April 2003 levels, particularly on food products not of animal origin.
- Local Authorities and Port Health Authorities increase other enforcement activity (notices served, seizures etc) by 15% in 2003-04 compared to pre-April 2003 levels.

### Capacity-building

- Enforcement officers improve awareness of imported food controls, as shown by:
  - 100% of Local Authorities have staff trained on imported food controls by 31 March 2004 and 90% of attendees rate the training courses as excellent
  - 100% of inland Local Authorities have at least one officer authorised to take action on illegal imports by 31 March 2004
  - FSA central enquiry point is available to all Local Authorities and queries are answered within a 5 working day target, leading to an increase in usage of the enquiry point to assist consistent enforcement.

### Checks by FSA

- As a result of FSA audits at all main UK ports of entry for food, relevant enforcement authorities agree action plans with the FSA to improve arrangements for controls on imported food not of animal origin. All ports meet benchmark standards<sup>7</sup> relevant to imported food when action plans are checked within 6 months of Agency audit.

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<sup>7</sup> Guides published in *Benchmarking the Port Health Function*, November 2002, produced by Syniad Benchmarking Centre.

### Co-ordination

- FSA establishes a database prototype, by 31 March 2004, providing authoritative up to date technical information on imported food controls, initially to enforcement officers.

Majority of food importers/agents recognise that the Step Change has improved consistency and facilitates legitimate trade (as determined by a survey in April 2004).

**Contact Details for the FSA's Imported Food Enquiry Service**

Imported Food Enquiry Point Contact Point (England and Wales):

Telephone: 020 7276 8018  
Fax: 020 7276 8024  
Email address: [imported.food@foodstandards.gsi.gov.uk](mailto:imported.food@foodstandards.gsi.gov.uk)

Contact Details in Food Standards Agency-Scotland and Food Standards Agency-Northern Ireland

Scotland Contact Neil Leitch  
Telephone Number 01224 285 194  
Email Address [neil.leitch@foodstandards.gsi.gov.uk](mailto:neil.leitch@foodstandards.gsi.gov.uk)

Northern Ireland Contact Miss Maria Jennings  
Telephone Number 028 9041 7714  
Email Address [maria.jennings@foodstandards.gsi.gov.uk](mailto:maria.jennings@foodstandards.gsi.gov.uk)

Imported Food section of the Agency's website: [www.food.gov.uk/imports](http://www.food.gov.uk/imports)

<b>Authorities Selected for Audit</b>
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<b>Local authority</b>	<b>Port of entry/reason for audit</b> (Ports <i>italicised</i> indicate designated ports of entry for high risk foods subject to EU and domestic emergency control provisions)
Belfast City Council	<i>Port of Belfast</i>
Bristol Port Health Authority	Bristol Ports of Avonmouth, Portishead, Royal Portbury & Bristol City
Crawley Borough Council	<i>London Gatwick Airport</i>
Dover District Council & Port Health Authority	<i>Port of Dover</i>
Hull & Goole Port Health Authority	<i>Ports of Hull &amp; Goole</i>
Leeds City Council	Leeds Bradford International Airport
London Borough of Hillingdon	<i>London Heathrow Airport</i>
London Borough of Hounslow	<i>London Heathrow Airport</i>
London Port Health Authority*	<i>Port of London (Thamesport)</i>
Luton Borough Council*	London Luton Airport
Manchester City Council	<i>Manchester Airport</i>
Mersey Port Health Authority	<i>Port of Liverpool &amp; Liverpool John Lennon Airport</i>
North East Lincolnshire Port Health Authority	<i>Ports of Immingham &amp; Grimsby<sup>†</sup></i>
North West Leicestershire District Council	East Midlands Airport
Pembrokeshire County Borough Council	Port of Milford Haven and imported food warehouses/distributors
Portsmouth Port Health Authority	Portsmouth Commercial Port and Ferry Port
Renfrewshire Council	Glasgow Airport
River Tees Port Health Authority	Teesport
Shepway District Council & Port Health Authority	Folkestone Harbour & Lydd Airport
Solihull Metropolitan Borough Council	Birmingham International Airport
Southampton City Council	<i>Southampton Port &amp; Southampton Airport</i>
Suffolk Coastal Port Health Authority	<i>Port of Felixstowe</i>
Tendring District Council	<i>Harwich International Port</i>
Thurrock Council	Inland Authority with enhanced remote transit sheds
Uttlesford District Council	<i>London Stansted Airport</i>

\* Pilot audits - audit reports not published.

† Port of Grimsby designated after the date of audit.

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Contact details:

Imported Food Division  
Room 115B  
Food Standards Agency  
125 Kingsway  
London WC2B 6NH

Tel: 020 7276 8018

Email: [imported.food@foodstandards.gsi.gov.uk](mailto:imported.food@foodstandards.gsi.gov.uk)