

Chapter 2: Going Global, food imports and their impact on the standards

Our food system – like our culinary tastes – is resolutely global. Nearly half of what we eat comes into the UK from abroad, and two-thirds of that has in recent years come from the EU.

At a glance

In this chapter, we look at:

- how patterns of UK food imports have changed in recent years
- what we know about the safety standards of our food imports
- what impact our departure from the EU is likely to have on these standards in the future

Introduction

Our food system – like our culinary tastes – is resolutely global. Nearly half of what we eat comes into the UK from abroad, and two-thirds of that has in recent years come from the EU.

These long-standing trading patterns have brought huge diversity and choice to the nation's diet, yet they also present ongoing challenges in terms of making sure the food we import is safe and meets the standards we expect. As consumers grow more conscious of the broader environmental and ethical consequences of their food choices, the facts about where we source our food from and how we maintain standards are increasingly important for maintaining public confidence in our food.

This chapter looks at food standards related to food safety and official controls through the prism of our changing trading relationships with the world.

Current trends in food imports

According to [official figures](#), in 2019 the food and agriculture industry contributed a total of £128.7 billion to the UK economy. For certain food types, domestic producers supply much of what we eat – we are more than 70% self-sufficient in beef, lamb, poultry, hen eggs and cereals, for example [14].

For other commodities, particularly fresh fruit, vegetables and sugar, the UK is more heavily reliant on imported goods. Here, the EU has remained the largest supplier in recent years, though we do source significant quantities of some products from further afield – as shown in figure 17.

Definition of terms

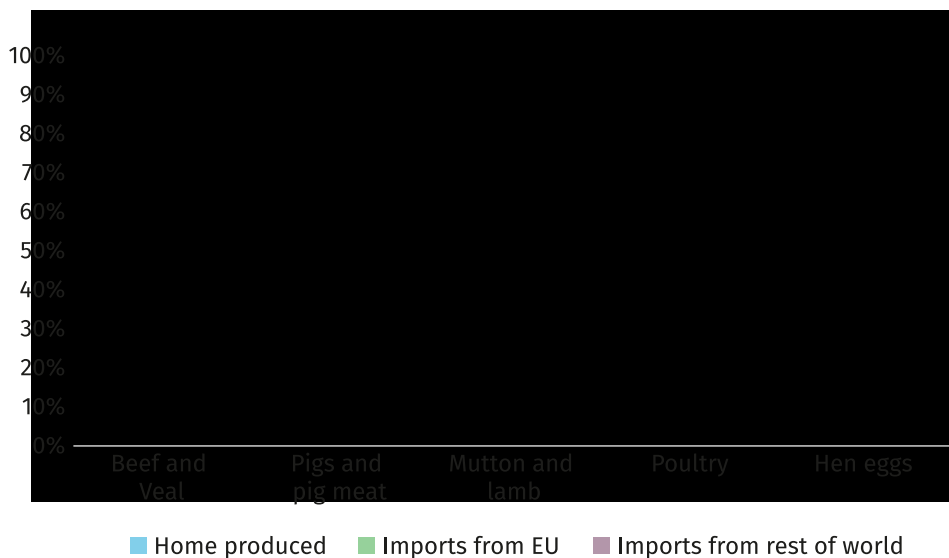
Food is generally split into two types for import control purposes:

- **Products of Animal Origin (POAO).** This includes meat, poultry, fish, shellfish, milk and milk products, eggs and egg products.

- **Food Not of Animal Origin (FNAO) and Feed.** FNAO includes fruit, vegetables, cereals and fungi, and has similar control arrangements to feed.????

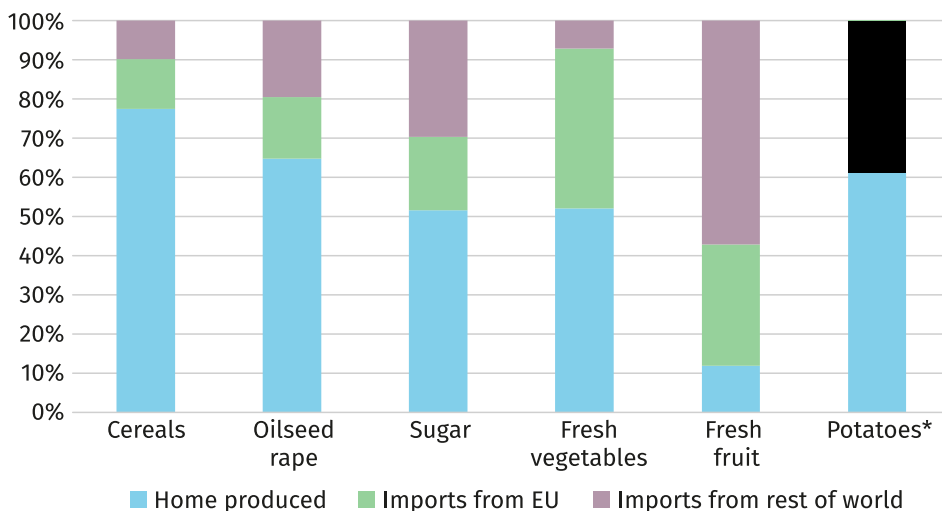
Most of the meat and eggs we consume are produced domestically

Figure 17: Percentage of total UK consumption of major POAO categories



A significant proportion of our fresh fruit and vegetables come from abroad

Figure 18: % of total UK consumption of major FNAO categories



*EU and rest of world data for potato imports is not separated

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The majority of our food imports currently come from EU countries

Figure 19: Percentage of total UK imports sourced from the EU and from other regions, 2017 to 21

Commodity	EU percentage	Other large suppliers (more than 10%)
Pork	99.9%	None
Eggs	99.6%	None
Dairy	96%	None
Beef	91%	None
Other animal	82%	None
Poultry	75%	Asia (19%)
Composite (processed food)	75%	None
FNAO	65%	Latin America and Caribbean (11%)
Other POAO	45%	Asia (43%)
Animal feed	45%	Latin America and Caribbean (30%), North America (10%)
Fish	35%	Asia (26%), Europe, Non-EU (23%)
Lamb	20%	Oceania (77%)

While there has been no immediate or wholesale shift in trading flows following the UK's exit from the EU, there are tentative signs that the balance between EU and non-EU imports and home-grown produce is beginning to change. For example, the proportion of imported fish from the EU fell from 38% in 2019 to 29% in 2021. Lamb and pork imports have also fallen over the same period [15].

One of the reasons for this may be the introduction of EU import controls on British products from January 2021 – the higher costs and paperwork attached to exporting food may have led to more British produce being placed on the domestic market, thereby reducing the demand for imports [16].

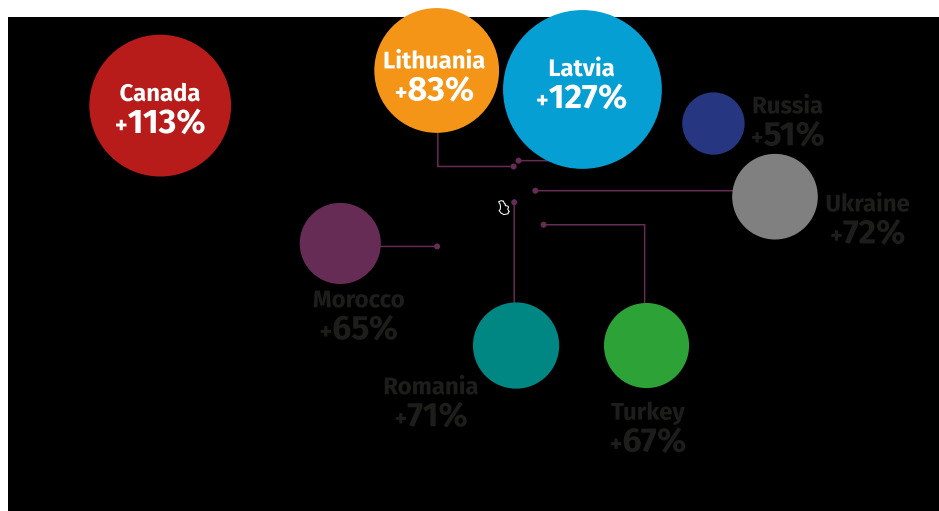
There have also been some notable increases in imports from other countries over the past ten years. We compared imports of products from the five years from January 2012 to December 2016 (pre-referendum) with the five years post-referendum (2017- 2021), for the UK's top 50 importers. Eight countries imported over 50% more food to the UK post-referendum than pre-referendum, as shown in figure 2017.

There was a particular increase in 2018 and 2019 in Canadian poultry and lamb, which has since decreased. Morocco was responsible for a large increase in the volumes of FNAO products imported into the UK. Across the six eastern European countries there were large increases in imports of FNAO products as well as fish, dairy and processed food products. This analysis is preliminary: changes in trading patterns can happen for numerous reasons unrelated to EU Exit, or it could be that changes occurred as part of industry contingency planning ahead of EU Exit. Overall, it is too soon to tell what the long-term impact of the UK's departure will be on import flows.

Notable increases in imports from certain countries over the last decade

Figure 20: Largest % growth in import volumes from 2012-16 to 2017-21

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How safe is imported food?

Around 40 million tonnes of food are imported into the country each year, and the UK has a series of controls in place to ensure these products meet the required safety standards.

All animal products are automatically considered “high-risk” and are subject to specific import controls and border checks (figure 21), except the EU where controls are expected to be applied in 2023. Plant-based imports of food and feed are only considered high-risk if they come from certain countries where specific food or feed safety risks have been identified and need to be controlled.

The main types of import checks carried out on high-risk food and feed include:

- **a mandatory documentary check** – this typically involves the examination of the documents accompanying the consignment, such as an official certificate, analytical report or commercial documents and a comparison of those documents against what was expected [18].
- **an identity check** – this includes a visual inspection of the consignment to verify that it is what it should be. These checks are mandatory for imports of POAO and are conducted at

a specified frequency for high-risk FNAO, which typically may vary between 5% and 50% of consignments. Where official documentation is presented, this will include checking and verifying the documents against the commodity itself

- **physical checks** – this involves a check on the goods themselves including, where appropriate, checks on packaging, the means of transport, labelling and temperature, the sampling for laboratory analysis, testing or diagnosis and any other checks necessary to verify compliance with safety controls. During some physical checks, a sample of food is taken and tested to look for the presence of contaminants, such as microbial pathogens, natural toxins and man-made chemicals, including pesticides and veterinary drug residues.

This report includes data from food import checks carried out by enforcement authorities in 2020 and 2021 [19]. In all, nearly 90,000 high-risk consignments were processed in 2020, rising to over 123,000 in 2021. Compliance rates are set out in figure 21.

Imported food compliance levels have remained fairly stable

Figure 21: % of consignments failing import control checks in Great Britain, 2020 to 2021

Document checks

Checks undertaken	2020	2021
Meat and other animal products (POAO)	1%	1%
Other high risks foods (HRFNAO)	1%	1%
All consignments	1%	1%

Identity checks

Checks undertaken	2020	2021
Meat and other animal products (POAO)	1%	1%
Other high risks foods (HRFNAO)	5%	2%
All consignments	1%	1%

Physical checks

Checks undertaken	2020	2021
Meat and other animal products (POAO)	1%	Not applicable
Other high risks foods (HRFNAO)	6%	4%
All consignments	2%	Not applicable

Sampling checks

Checks undertaken	2020	2021
Meat and other animal products (POAO)	1%	1%
Other high risks foods (HRFNAO)	4%	5%
All consignments	3%	3%

Observation 1: Average failure rates for documentary checks remained stable throughout this period.

This covers a period in which the pandemic had disrupted global food supplies and led the EU to establish temporary measures allowing the import of high-risk food and feed without accompanying export health certification.

Observation 2: Three per cent of the samples taken were non-compliant in both 2020 and 2021, with a higher failure rate among high-risk FNAO than POAO.

Sampling failure rates being higher for imported high-risk FNAO than for POAO is not unexpected. Import controls for HRFNAO allow commodities which we believe present a potential health concern to be temporarily controlled, allowing evidence to be gathered. It is therefore not surprising that sampling failure rates are higher for FNAO, which is only checked where there has previously been evidence of higher risk, compared with POAO, which is all subject to import controls. Most failures are associated with the detection of pesticide residues or aflatoxins [20].

Observation 3: The comparison of data for these periods suggests that safety standards of food exported to Great Britain have remained relatively static overall.

This was a challenging period for food producers with the pandemic putting considerable pressure on global food safety systems. Overall, it is reassuring to see the data remains broadly stable.

The impact of EU departure on import controls

The Protocol on Ireland/Northern Ireland took effect on 1 January 2021. This requires Northern Ireland to apply EU import requirements on any products entering the EU regulatory zone from outside the EU. Technical discussions continue between the EU and UK on the implementation of the Protocol in regard to products moving from Great Britain and Northern Ireland.

The UK's departure from the EU has some important implications for how we uphold the quality and safety of food coming into the country. As a member state, import checks for food entering the UK from non-EU countries were carried out at the first point of entry into the EU, whereas now checks should be carried out at the point of entry into Great Britain (except for foods arriving from Northern Ireland).

While the UK applies safety controls to high-risk food and feed imported from non-EU countries, as we did as part of the EU, the introduction of equivalent controls for EU products is now unlikely to happen before the end of 2023. This means we are not receiving official assurance from the exporting country that those imports meet the UK's high food and feed safety standards. The absence of border checks could affect how we identify and respond to safety risks in future, with additional resource required by the UK to maintain levels of food safety assurance for these imports.

Although the likelihood of food safety incidents being caused by EU imports has been low, member states are not immune from them and this risk could change.

The FSA and FSS believe the continued absence of a fully implemented UK import control regime for EU food and feed reduces our ability to prevent foods that do not meet the UK's high standards being placed on our market.

Source: Professor Susan Jebb (Chair of FSA) and Heather Kelman (Chair of FSS)

The introduction of new requirements for EU exporters to pre-notify all high-risk goods being brought into Great Britain will help mitigate some of these issues. The new requirement took effect in January 2022 and will help the FSA, FSS and local authorities to respond to food safety incidents by allowing products to be traced. Our Food 2021: An annual review of food standards across the UK more quickly. Both organisations have also strengthened their capability and capacity to include surveillance which builds on proven mechanisms to allow them to better detect and respond to risks as they emerge, as we will describe further in the next chapter. However, the FSA and FSS do not believe that together these are a sufficient replacement for the introduction of robust import controls and remain concerned that the current system of import controls is weakened as a result.

The Rapid Alert System for Food and Feed (RASFF)

The RASFF is a notification system operated by the European Commission to exchange information on risks and hazards between member states. Enforcement authorities in EU member states issue Rapid Alert notifications when they detect serious food safety concerns with their own or other member states' products.

These notifications alert member states to serious risks to health in real time and help facilitate an incident response, including by taking action. EU food law also requires member states to communicate and cooperate to resolve food incidents occurring between member states. The UK now has third country access to RASFF, which means we have a less detailed picture of food safety alerts across the EU single market.

Free trade agreements and food standards

As the previous chapter showed, consumer interests today go much deeper than safety standards – the public care deeply about wider issues such as nutrition, affordability, sustainability, environmental impacts and animal welfare.

There is concern across the UK, from consumers, industry, and other stakeholders, that new free trade agreements (FTAs) could affect standards in the UK over time, as reflected in the [National Food Strategy](#) in England, and the Scottish Government's [Vision for Trade](#).

As part of the scrutiny process for ratifying any future trade deal, the UK Government is obliged under the Agriculture Act 2020 to report to Parliament on whether provisions within the FTA maintain statutory protections for human, animal or plant life or health, animal welfare or the environment.

To inform these reports, the UK Government has asked for advice from the FSA, FSS and the newly formed Trade and Agriculture Commission, amongst others. The report assessing the Australian FTA was laid before the UK Parliament on 6 June 2022, and the New Zealand report is expected to be produced in summer 2022.

It should also be noted that the FTAs with Australia and with New Zealand re-affirm the UK's rights and obligations to uphold international food standards under World Trade Organization rules. They also re-affirm the fundamental principle that imports will still have to comply with UK food safety rules.

In summary

- the UK has a long history of importing food from around the world – while there has been no major change in trading patterns since the UK's EU Exit, there are small early signs of import trade patterns evolving
- although the global food system was disrupted by the pandemic, the level of compliance with import checks has remained broadly stable, suggesting that there has not been any significant fall in international food safety standards so far
- while import controls have been successfully put in place for high-risk goods from non-EU countries, the continued delay in establishing equivalent controls for EU products reduces our ability to prevent foods that do not meet the UK's high standards being placed on our market
- new free trade agreements are being signed but at the time of writing have yet to be ratified and take effect. The FSA and FSS are contributing to official government assessments of whether there are sufficient safeguards in the agreements to maintain statutory protections for human, animal or plant health, animal welfare and the environment