

Our Food 2022: Going global

This chapter looks at where we sourced our food and feed in 2022, and what impact the disruption to the food system may have had on food standards.

The standards of imported food and feed

At a glance

In this chapter, we look at:

- our pattern of food imports and how this changed during 2022
- the safety of our imports based on data collected at the border
- free trade agreements as the UK develops new formal trading partnerships

Introduction

Food is a global business. Sophisticated trading networks support the wide range and availability of fresh produce in our shops and provide food companies with affordable access to the raw commodities – including grain, cooking oil, sugar and salt – necessary to produce manufactured goods.

Yet with more than two-fifths (42%) [\(footnote 1\)](#) of our food coming from overseas, any disruption to imports can have serious consequences for both consumers and the businesses that depend upon stable access to global food supplies. Equally, the UK's trading partners must have confidence in the food we export, including in the ingredients we may have imported for producing food within the UK. Upholding the safety and standards of imported foods is therefore hugely important.

This chapter looks at where we sourced our food and feed in 2022, and what impact the disruption to the food system may have had on food standards. It sets out the checks that regulators have carried out on imported food, what they have found, and what new protections are put in place as a result of leaving the EU. We also examine what our border control data can tell us about whether the overall safety and authenticity of our imported food is being maintained.

The changing landscape of food and feed imports

Imports remained important to the UK food sector in 2022, as volumes returned to pre-pandemic levels. A total of 2.18 million more tonnes of imported food and feed came into the country during 2022 compared to the previous year (a 5.6% increase), bringing our imports back in line with the average volumes seen over the previous seven years (figures 13 and 14) [\(footnote 2\)](#).

Figure 13: Total UK import volumes of all food and feed over time, 2014-22

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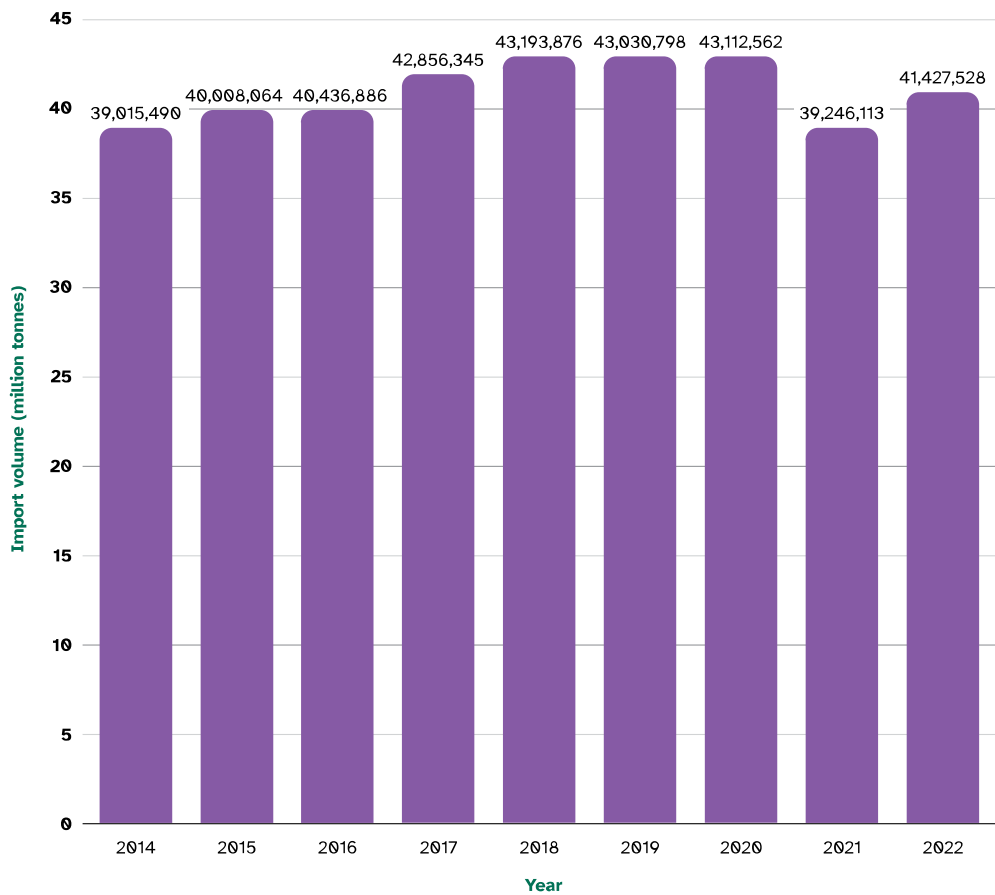
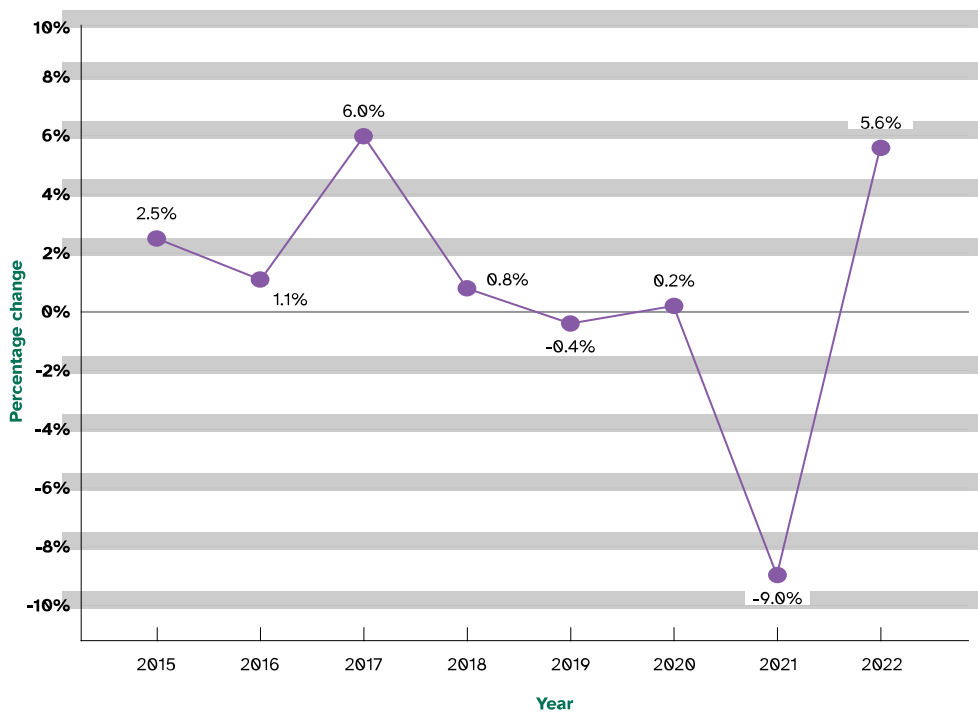


Figure 14: Yearly percentage change in total UK import volumes

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We also continue to source most of our food and feed from many of the same countries as before the pandemic. There has been little change in the top 10 countries the UK imports from (figure 15), the only exception being some fluctuation in trade with South American partners.

Further down the list, however, there is greater volatility. Figure 16 shows that the conflict in Ukraine has almost entirely reversed the increases in Russian and Ukrainian imports seen since 2014. Coupled with decreased imports from Latvia and Lithuania, in all, the UK imported around a million tonnes less food and feed products from these four countries in 2022 than it did in 2021.

Figure 15: Top 10 countries by import volumes for 2022

Country Name	Volume of imports 2022 (million kg)	Year-on-year change	2022 ranking*	Difference in ranking
Netherlands	5,521	33%	1 (1)	No change
France	3,769	26%	2 (3)	+1
Ireland	3,349	-3%	3 (2)	-1
Belgium	2,875	24%	4 (5)	+1
Spain	2,467	-3%	5 (4)	-1
Germany	2,077	-1%	6 (6)	No change
Italy	2,038	-1%	7 (8)	+1
Brazil	1,784	65%	8 (13)	+5
Poland	1,617	2%	9 (9)	No change
Argentina	1,523	-26%	10 (7)	-3

* 2021's ranking is in brackets.

** Imports from the Netherlands reflect the effect of Rotterdam as a global hub for transporting goods.

Figure 16: Changes in import values across selected countries

Country name (ranking)	Volume of imports 2021 (million kg)	Volume of imports 2022 (million kg)	Volume percentage change from 2021 to 2022	Pre-war growth in imports (2014 to 2021)
Bulgaria (46)	70	119	70%	120%
Estonia (62)	133	44	-67%	84%
Latvia (35)	296	169	-43%	41%
Lithuania (30)	347	248	-29%	96%
Romania (19)	102	451	340%	8%
Russia (55)	173	70	-60%	16%
Turkey (16)	555	562	1%	49%
Ukraine	1,175	474	-60%	87%

By contrast, there have been some sharp rises in imports from other South Eastern European countries, albeit from a lower base, including a 340% increase in import volumes from Romania and a 70% increase in those from Bulgaria compared to the previous year. This has elevated Romania from being our 48th largest import country in 2021 to one of the UK's top 20 biggest food suppliers in 2022 (currently 19th) (figure 16). It is usual to see a certain degree of volatility in the flow of goods into the UK as importers react to changing market conditions.

Commodity changes

Our food import data is broken down into three main commodity types: Products of Animal Origin (POAO), which includes meat, eggs, fish and dairy; Food Not of Animal Origin (FNAO), which includes beverages, cereals, vegetables and fruit; and Animal Feed. In general, we assign a higher level of food safety risk to POAO, although there are still risks from FNAO, such as aflatoxins in nuts.

Figure 17 shows the total volume of imports in 2022 split by these categories. It shows that FNAO makes up the bulk of our food imports by weight, while POAO and feed imports are similar to each other by weight. We import a higher proportion of POAO from the EU than FNAO or Feed, although the EU provides more than half of each group.

Figure 17: Total volume of imports split by main categories of POAO, FNAO and animal feed

Import Category	Total in 2022 (tonnes)	Volume change 2019-2022	Volume change 2021-2022	EU proportion 2022
Products of Animal Origin (POAO)	7,000,000	-5%	10%	80%
Food Not of Animal Origin (FNAO)	29,000,000	-1%	7%	64%
Feed	6,000,000	-13%	-7%	51%
Grand Total	42,000,000	-4%	6%	65%

Note: two reference points have been included in the table above to provide a relative snapshot of comparable change against what could be considered a more stable period (2019), followed by year-on-year change (2021) which would have seen the impacts of the UK's departure from the EU and the pandemic.

How safe is imported food and feed?

The food we import must be safe. This is one of the reasons why having effective border controls for all imported foods, including those sourced from EU member states, is critical. As we have seen, the EU still accounts for two-thirds of all food and feed imports, and 80% of all meat and other products of animal origin (figure 17).

All food and feed imported from outside the EU is subject to a series of checks to make sure it is safe. The type of checks carried out depends on the type of product and the level of risk it may pose to public, animal and plant health.

Currently, all food and feed of animal origin coming from outside the EU is subject to documentary checks (which confirm that appropriate documentation is supplied) and identity checks (which confirm that the product matches the documentation). Additional physical checks are carried out randomly on a pre-defined percentage.

FNAO are generally considered to be low risk. When specific risks are identified – for example, if sampling identifies a typical risk from a specific country or on a specific commodity that requires additional controls to be imposed – they will be classified as high-risk and will be subject to appropriate controls.

Under current operating arrangements for Northern Ireland, food and feed products imported into Northern Ireland will continue to follow EU rules. From Autumn 2023, the Windsor Framework will allow GB standards for public health, marketing (including labelling) and organics to apply for prepacked retail goods moved via a new Northern Ireland retail movement scheme and placed on the Northern Ireland market. Therefore, goods moving via this route containing products subject to import controls in GB will be able to be placed on the Northern Ireland market.

Figure 18 shows the vast majority of non-EU goods were compliant across these three checks (documentary, identity and physical), with no obvious changes against these measures. This suggests that the risk to consumers from non-compliant consignments from non-EU countries had not increased.

The situation is less clear for products coming in from EU member states. Until the new import rules defined by the Border Target Operating Model are phased in, border controls are not being

applied to EU-origin products entering the UK - although a new requirement for importers to pre-notify border authorities of consignments of high-risk goods (from all EU countries except Ireland) was introduced on 1 January 2022.

For the period covered by this report, therefore, there continued to be no import controls routinely applied at the border for EU food and feed products and, although the probability of any significant increase in risk is low, this means that FSA and FSS are not able to say how the food safety risk from EU products has changed in recent years.

Figure 18: Percentage of rest of world consignments failing import checks in Great Britain, 2021-22

Documentary checks

Consignment type	2021	2022
Meat and other animal products (POAO)	0.91%	0.91%
Other high risk foods (HRFANO)	0.54%	0.31%
All consignments	0.84%	0.78%

Identity checks

Consignment type	2021	2022
Meat and other animal products (POAO)	0.84%	0.63%
Other high risk foods (HRFANO)	1.94%	1.16%
All consignments	0.87%	0.65%

Physical checks

Consignment type	2021	2022
Meat and other animal products (POAO)	Not available*	Not available*
Other high risk foods (HRFANO)	4.31%	2.60%
All consignments	(NA)	(NA)

Sampling (as part of a physical check)

Consignment type	2021	2022
Meat and other animal products (POAO)	0.99%	0.93%**
Other high risk foods (HRFANO)	4.78%	4.13%
All consignments	2.76%	2.44%

* Since leaving the EU and moving to the import of products, animals, food and feed system (IPAFFS), the functionality of the system records only the outcome of sampling checks undertaken which accounts for the figures as seen above

** 21 Results pending out of over 1,000.

Changes to designation of high-risk food and feed not of animal origin

As already mentioned, the UK takes a risk-based approach when it comes to border checks of imported food. All animal products are subject to checks as well as some food of non-animal origin. Certain non-animal origin products may pose a public health risk due to potential

contamination with pesticides, naturally occurring toxins (aflatoxins), heavy metals or harmful microbes such as Salmonella. These risks can change quickly due to weather conditions, farming practices and production techniques, and vary between different countries of origin.

The UK's departure from the EU means that FSA and FSS now have responsibilities to target specific risks to consumers by assessing and amending the list of High-Risk Food Not of Animal Origin (HRFNAO) in GB. We have conducted new analysis to help make the list more relevant to the food we eat and our own assessment of the risks they carry.

As a result, during 2022, FSA and FSS advised ministers to add five new product types to the existing list of HRFNAOs and to increase check levels on 13 more. Several of the additions to the list were due to concerns about the presence of pesticide residues, which may partly be due to the excessively dry conditions experienced in some countries leaving more residue on crops.

Extending the range of HRFNAO commodities that we control at the border increases our knowledge of the exporting countries' compliance with our food safety requirements and can be used in any future risk assessments we might undertake. It also sends a powerful message to exporting countries that our controls are robust and that we will target non-compliant imports at the border.

FSA and FSS also advised ministers that three products should be removed from the list entirely following a risk assessment which showed they are compliant and no longer pose a risk to public health. In addition, we have reduced inspection checks on five other products as the risks associated with them were now less likely to cause harm. These are described in figure 19.

Figure 19: Changes to designation of high-risk foods

Imported HRFNAO commodities that have been risk assessed and removed from control at the border as they are compliant with imported food safety requirements and no longer a risk to public health

Commodity	Country	Hazard
Goji berries	China	Pesticide residues
Dried grapes	Turkey	Ochratoxin A
Pistachios	USA	Aflatoxins

Imported HRFNAO commodities that remain under control, but we have noted a declining risk/ improvements in compliance with imported food safety requirements

Commodity	Country	Hazard
Groundnuts	Brazil	Aflatoxins
Groundnuts	China	Aflatoxins
Hazelnuts	Turkey	Aflatoxins
Betel leaves (Piper betle)	Bangladesh	Salmonella
Hazelnuts	Georgia	Aflatoxins

Imported FNAO commodities that have been identified through our surveillance intelligence systems as presenting a risk to public health and have been brought under control at the border for the first time

Commodity	Country	Hazard
Groundnuts	Brazil	Pesticide residues
Lemons	Turkey	Pesticide residues

Commodity	Country	Hazard
Betel leaves (Piper betle)	Thailand	<i>Salmonella</i>
Peppers of the Capsicum species (other than sweet)	Turkey	Pesticide residues
Sesamum seeds	Uganda	<i>Salmonella</i>

Imported HRFNAO commodities that have had controls increased at the border due to increased non-compliance / risk to public health Commodities that are moved into Annex 2 have additional import requirements attached to them, the commodity must be accompanied by an Export Health Certificate and subject to laboratory testing to indicate compliance with GB food safety requirements

Commodity	Country	Hazard
Black pepper (Piper nigrum)	Brazil	<i>Salmonella</i>
Peppers of the Capsicum species (other than sweet)	Thailand	Pesticide residues
Okra	India	Pesticide residues
Oranges	Turkey	Pesticide residues
Mandarins, clementine, Wilkings (mandarin variety) and similar citrus hybrids	Turkey	Pesticide residues
Jackfruit	Malaysia	Pesticide residues
Peppers of the Capsicum species (other than sweet)	Uganda	Pesticide residues
Sweet Peppers (Capsicum annum)	Turkey	Pesticide residues
Sesamum seeds	Sudan	<i>Salmonella</i>
Vine leaves	Turkey	Pesticide residues
Sesamum seeds	Ethiopia	<i>Salmonella</i>
Peppers of the Capsicum species (other than sweet)	Sri Lanka	Aflatoxins
Groundnuts	India	Aflatoxins

Border notifications and Intensified Official Controls

The UK's departure from the EU has also changed what happens when there is a breach in import food standards. When a consignment of a product has failed its checks, the UK issues an alert to enforcement authorities to target similar imports. A total of 326 border notifications were issued in 2022, the first year since this new system was put into practice, summarised below.

Top four reasons for Border Notification Failures

- 126 related to either documentary/identity failure
- 33 related to physical failures (such as spoilage, a different commodity identified to that described on import certificate or on IPAFFS, or extraneous matter)
- 58 related to mycotoxin (aflatoxin and ochratoxin failures)
- 29 related to pesticide failures

For imported animal products, if border officials find there are repeated or serious breaches in GB's import requirements, future consignments from the food business involved may be subject to intensified official controls (IOC). Under these rules, imports of all consignments from an establishment subject to an IOC would be subject to physical check until the IOC is lifted. FSA notifies the authorities in the country of concern, so that they may take action to resolve the problem.

Overall, non-EU imports have remained largely compliant with import checks compared with last year This suggests there has not been any significant fall in the

safety of our imports, though the picture remains limited without similar controls on EU imports. Our border notification system and ability to apply intensified controls enhances our ability to target specific risks and areas of non-compliance to protect UK consumers from harm.

In 2022, the IOC process was used on 11 occasions due to repeated or serious threats to public health. Of the 11 IOCs created:

- Five were specific to poultry establishments in Brazil due to products being contaminated with Salmonella
- Three were related to veterinary medicine residue failures in establishments from Bangladesh, India and Vietnam
- A failure for *Gyrodactylus salaris* (parasitic worms) from an establishment in Morocco
- Sulphur dioxide failure (in edible gelatine) from an establishment in Pakistan
- A species verification failure (physical check contradicts the health certification) from an establishment in China.

2022 was the first full year of the IOC process and so comparable data is not yet available.

Free Trade Agreements and health protection

As the UK develops new formal trading partnerships with countries outside the EU, it is important that statutory protections are in place to uphold the safety standards of food imported under these Free Trade Agreements (FTAs).

The UK has already signed new FTAs with Australia (in December 2021) and New Zealand (February 2022) which came into force in early 2023. Section 42 of the Agriculture Act 2020 requires the UK Government to explain if the protections for agricultural products set out in UK law are maintained.

As part of this, FSA and FSS were asked to examine if both FTAs maintained UK food safety protections. Broader issues relating to the FTAs which are outside of the remit of FSA and FSS (such as tariffs and the potential impact on trade flows over time) were not within the requested scope of our advice: the mandated focus of our report was human health statutory protections.

We looked at whether changes to the UK food regulatory system were needed to comply with the FTA, and if there would be an impact on the UK government and devolved administrations to regulate in areas of food safety and nutrition (defined as: nutrition and health claims; vitamins, minerals and certain other substances; food supplements; and foods for specific groups).

Both FSA and FSS concluded that the FTAs with Australia and New Zealand did uphold food safety protections for the consumer. Additionally, for the New Zealand agreement, we assessed whether it maintained UK nutrition requirements and concluded that it did. We will continue to scrutinise any future agreements and these assessments will continue to include consideration of nutrition statutory protections.

Understanding food production standards

FSA and FSS also recognise that consumers are interested in understanding the production standards of imported foods, including their environmental and animal welfare standards.

To support this, the FSA recently commissioned the food consultancy ADAS to identify measurable metrics and data sources for imported food production standards that might be used to give the public a fuller picture.

However, the ADAS report highlighted:

- a general lack of publicly available data and issues with the quality of the limited data available
- a lack of measurable metrics or clear approaches to measure or monitor them
- the absence of frameworks to evaluate production standards.

Although the current system of border checks gives us assurance on food safety, there is no similar system for food production standards. Being able to assess the production standards, like animal welfare or environmental standards, of imported food on a comparable basis to UK food, is essential if we as watchdogs are to be able to assess whether the food standards of the food the UK consumes has been maintained.

The report's findings suggest these areas require further attention and will be something we continue to explore - while also continuing to cooperate with partners across government to make sure consumer interests are recognised.

In summary

The volume of food imported into the UK broadly returned to average volumes in 2022 following a reduction in 2021. However, a combination of factors has disrupted patterns of food supply, reducing the amount imported from Ukraine, Russia, Latvia, and Lithuania in particular. Other countries such as Romania and Bulgaria have experienced significant rises in trading volumes.

For non-EU goods that are subject to GB border checks, the vast majority of goods were compliant with import controls, suggesting that there has not been any significant overall fall in food safety standards. However, Britain has expanded the number of designated high-risk goods during 2022 and issued IOCs in certain cases to reflect the increased risks associated with selected products from certain countries. It is essential that the UK implements robust controls set out in the Border Target Operating Model quickly to ensure we have similar assurance for food imported from the EU.

Two new FTAs have been signed and will begin to take effect from 2023. FSA and FSS have contributed to official government assessments of whether these agreements maintain statutory protections for human, animal or plant health, animal welfare and the environment, and have concluded that the new FTAs do so. We will continue to scrutinise any future agreements.

The FSA commissioned a report looking at how it might identify and gather better information on imported food production standards. This underlined the lack of available data, which makes an assessment of the production standards of imported food impossible to undertake. FSA and FSS will continue to explore how to overcome this challenge. However, until then, we cannot offer any data-led assessment of the animal welfare, environmental or other production standards of imported foods.

1. [Defra Food Statistics Pocketbook - Origins of Food Consumed in the UK 2021.](#)
2. [HM Revenue and Customs - UK trade data.](#)