



Inspiring Trust, Assuring Safe & Nutritious Food
Ministry of Health and Family Welfare, Government of India

Study Visit Report on UK Food Safety Ecosystem 12-16 February, 2018

Short Report of Study visit on UK Food Safety Ecosystem during 12-16th February, 2018

As a follow up to the discussion on UK-India Ease of Doing Business Partnership on standards & trade facilitation, a team from FSSAI was invited for a study visit to London, UK from 12-02-2018 to 16-02-2018 with the objective of increasing mutual understanding of each other's food control system and identifying possible areas of cooperation. The Indian delegations had the following members:

- (i) Mr Kumar Anil, Advisor (Standards), FSSAI,
- (ii) Mr Rajesh Singh, Director, FSSAI, Regional Office, Kolkata,
- (iii) Ms Veena N Madhavan, Food Safety Commissioner, Kerala,
- (iv) Ms Pritha Ghosh, DD(Training), FSSAI

2. During the visit the delegation met the team of Food Standards Agency, UK at London and visited the port of Felixstowe, laboratory facilities at Public Analyst Scientific Services (PASS), Wolverhampton and Food and Environmental Research Agency (FERA) at Sand Hutton, York. Date-wise visit report is given in succeeding paras.

3. Understanding the Food Safety Ecosystem in UK (12-02-2018)

During the day the working of various agencies/bodies of UK in food safety was explained through presentations. The salient features are as under:

3.1 Food Standards Agency (FSA)

A high level overview of 'Food Standards Agency' (FSA) was presented by Mr Gary Welsh. The delegation learned that in UK, the FSA is primarily responsible at the central Government level for the Feed & Food safety law.

FSA is a Non-Ministerial body established in year 2000 and is responsible for the Food & Feed Safety Law at the Central Govt. Level by proposing legislation, issue orders/regulations, manage food incidents, monitor & audit the businesses.

FSA is answerable to a Board of Directors which is responsible for framing overall strategic direction and accountable to Parliament through the Health Minister.

Policies related to food safety, hygiene and Labelling (Safety & Allergy) is administered by FSA whereas, Nutrition & labelling related to nutrition is being monitored by Department of Health. Other labelling issues are being monitored by Department of Environment, Food and Rural Affairs (DEFRA).

Food Law is being enforced by FSA local authorities (the Councils) through Environmental Health Officers and Trading Standards Officers which covers the whole food chain from primary production to sale to the final consumer.

The motto of FSA is “*Working Towards Food We Can Trust*”. In 2015, a 5-year strategy was published with the objective to ensure:

- i) Food is safe and what it says it is,
- ii) Consumers have access to an affordable diet, and can make informed choices about what we eat, now and in the future, and
- iii) Consumers are informed about the food system, and are empowered to make food choices knowing the facts”.

The 5-year strategy envisages to achieved the above by:

- i) Gathering and using science, evidence and information,
- ii) Using a range of new and existing legislative and non-legislative tools to influence businesses to do what is right for consumers,
- iii) right skills, knowledge and behaviors and are supported by the right systems, tools.

The main functions of the FSA are to:

- Propose Legislation and develop policy
- Issue Emergency Orders and Regulations
- Advise the Ministers on food safety and standards issues
- Monitor and audit
- manage incidents

3.2 Department of Environment, Food and Rural Affairs (DEFRA)

Karen Lepper presented an introduction to Department of Environment, Food and Rural Affairs (DEFRA).

DEFRA is responsible for safeguarding the environment, supporting food and farming industry and sustaining a thriving rural economy. It is also responsible for food information to consumers, including country of origin, labeling, date-marking and ingredients labelling.

DEFRA is the policy and technical lead for a number of commodities including products containing meat, chocolate, coffee, caseins, non-alcoholic drinks, fruit juice, jam and honey, bread and flour, bottled water and spirit drinks.

It is also the national contact point of CODEX which works through other Govt Departments.

DEFRA is responsible for protecting farmed animal welfare including on farms, in transport, at markets and at slaughter. The Animal and Plant Health Agency (APHA) is an executive agency of DEFRA which is responsible for inspecting and monitoring compliance with on-farm animal welfare legislation in Great Britain. Enforcement action for the noncompliance is taken by APHA or Local Authority.

Conditions for trade in animals and animal products within the European Union are harmonized. All all live animals and germinal products travel with a health certificate signed by an official veterinarian confirming that the consignment fulfils the animal and public health requirements of the EU legislation. No health certification is

required for animal products but they should be produced in accordance with EU animal and public health rules. Animal food products and low risk by-products can move freely with a commercial document i.e no check at border. High risk animal by-product require authorization for movement.

Exports from third countries: The UK negotiates market access for animal products on a bilateral basis in most cases. OIE and WTO guidelines are informed on ensuring safe trade in animal commodities. At the end of these negotiations an Export Health Certificate is agreed which is issued by APHA for Great Britain and DEFRA for Northern Ireland. An official veterinarian will check each consignment and check that import conditions have been met.

Import from third world countries: Exporting countries and their establishments must be approved in advance. Health certification must accompany all animal/ animal product imports. These certificates must be signed by an official veterinarian of the competent authority of the exporting third country guaranteeing that the conditions for import into the EU have been met. The importer or their agent pre-notifies a designated Border Inspection Post (BIP) of the consignment's arrival. On arrival, the animal / animal product and accompanying certification must be verified and checked by Official Veterinarians at the BIP.

3.3 Local Authority(LA)

A presentation on the role of local authorities was made by Andy Gangakhedkar highlighting the role of Local Government delivery organisations "Councils The enforcement of food laws is done by the Local Government delivery organizations which are the over 400 Councils.

The LAs through food and feed safety official controls to over 650,000 commercial businesses (FBOs) in the UK covering sectors such as food/feed manufacturers, caterers, restaurants, takeaways, importers/exporters, distributors and approved establishments.

All FBOs are required to register with LA. Businesses having presence under multiple councils have the option of choosing one LA to act as Primary Authority for all its outlets. The main purpose of the arrangement is to have consistency in the delivery of official control between various outlets based around the UK. Nearly 160 primary authority partnerships are currently in operation across the UK for Food Hygiene.

3.4 Food Hygiene Rating System

FSA also run a voluntary food hygiene system through which hygiene ratings are given to eateries (restaurants, takeaways, hospitals, schools) and food shops (supermarkets, butchers, bakeries).

The three elements for such rating are hygienic food handling, cleanliness and management of food safety. Compliance standards rated at the time of inspection on a scale from 0 to 5. These ratings are reviewed at intervals according to the inspection frequency for the category of business, ranging from 6 to 36 months, or longer depending on the risk assessment and type of intervention required.

3.5 Food Safety Incident Management System

FSA also acts as central contact point for food related incidents in UK. It ensures that food and feed not in compliance with food safety and other legislative requirements are removed from the market. FSA also liaise with European Commission through the RASFF system and worldwide through INFOSAN. Based on the level of risk perceived the following actions are taken in the event of a food incident:

- i) Food Alerts,
- ii) Allergy Alerts,
- iii) Issue notifications RASFF and INFOSAN,
- iv) Publish advice/guidelines,
- v) Voluntary restrictions,
- vi) Sampling and analysis of the food,
- vii) Root cause analyses and preventive measures,
- viii) Issue statutory restrictions

Elaborate online system on Horizon Scanning (analyzing global information on risk) which is being used by FSA

3.6 National Food Crime Unit

FSA also works in partnership with other agencies to protect consumers from serious criminal activity that has impact on the safety or authenticity of the food and drink they consume. In case of detection of serious crime by any FBO, the crime unit also checks their tax and dues payment records through which they create profile of such FBO to check if they could be a habitual offenders or it was a bonafide mistake. It helps them in keeping eyes on such FBOs.

4. Understanding of Imports & Export System (13-02-2018)

On second day of visit the Indian delegation visited the Port of Felixstowe which handles over 40% of total UK import/export. Suffolk Coastal Port Health Authority enforces import controls on behalf of DEFRA and FSA. The import controls are split into two types:

- i) Public and Animal Health Controls carried out on products of animal origin,
- ii) Controls over high risk food and feed not of animal origin (including material in contact with food).

All Imports from non-EU countries are subjected to physical checks as per the following criteria:

- i) 100% - live animals,

- ii) 50% - poultry, rabbit, game meat, milk and milk products, eggs, honey (amongst others),
- iii) 20% of fresh meat (other than the above) sealed fish, eggs, lard,
- iv) 1-10% of germinal products.

An early warning system for imported food is also followed by FSA. The system takes information from a variety of sources and has been responsible for the early detection of a number of emerging risks. FSA undertakes this task by:

- i) Analyzing data from the Rapid Alert System for Food and Feed,
- ii) Sharing and analyzing information with other government department in the UK,
- iii) Horizon scanning (collaboration with UK universities and external organizations such as FERA),
- iv) Meeting monthly with a range of policy colleagues to review and agree areas of increasing concern.

FSA shares the outputs of its monthly meetings with ports, industry etc. which enables better targeting of these new signals. After examination and analysis of data available with FSA from various sources it is determined:

- i) Whether a new commodity should be controlled,
- ii) Whether existing controls should be relaxed (good trend) or increased (bad trend),
- iii) Whether an existing control should be discontinued (the risk has been mitigated),
- iv) Whether a safeguard measure should be considered due to ongoing and persistent failures.

If the consignment is compliant it is allowed into the UK to be placed on the market for sale, if not, action is taken by the authorized official at the port of entry which is limited to:

- i) Destruction
- ii) Re-export (provided that the competent authority of the country of re-export is ready to take back the consignment.
- iii) Re-processing, where possible.

The non-compliant is also report to RASFF for informing all other EU Member States that an issue has been identified and providing data on which future decisions about controlling that commodity from that country is taken.

5. Understanding Laboratory System (15 & 16-02-18)

On the third day of the Indian delegation visited the Public Analyst Scientific Services (PASS) at Wolverhampton which is an accredited private laboratory with state of art facility for regular testing. All such labs in UK are required to have at least one qualified Public Analysts who is responsible for issuing test report and passing the

judgement on sample after analysis. Such Public Analyst are graduate in Chemistry along with the knowledge in Regulation. A minimum of three years of experience is also a prerequisite.

Presently there are total 26 Public Analysts working in the UK in 13 Public Analyst Laboratories (10 Public & 3 Private).

On fourth day the delegation visited the Food and Environmental Research Agency (FERA) at Sand Hutton, York. This lab is run by a private body under PPP model. It is a reference laboratory solely responsible for R&D, study & capacity building of the total laboratory network of the country. Major activity of FERA is Proficiency Testing of lab, Horizon Scanning and Training.

6. Horizon Scanning

Many factors inside and outside the food ecosystem could directly and/or indirectly drive the emergence of important food safety hazards, risks and issues. It is important to identify these events at an early stage of the system or preferably prevent their occurrence. FERA has also developed a web based system where all incidences relating to food safety across the globe are collected and placed on a website access to which is available on payment. This system is named as horizon scanning which is a very early warning or early identification system that identifies trends, opportunities or hazards significantly early in their development.

7. Understanding of Capacity Building System

Training policy is being determined by FSA whereas, the implementation is being done at local level. Various types of training undertaken are as under:

7.1 Training of Regulatory Staff at Councils or at Port

It is the responsibility of the employee to get 30 hours of training per year as per Continuous Professional Development(CPD) practices. Each junior officer is attached to a senior officer as mentor who recommends the specific courses suitable for that employee concern.

There are various courses recommended by FSA for their employees. Such courses are being provided by the Commercial Training Providers, European Union (Better Training for Safer Food http://ec.europa.eu/chafea/food/recipe-safer-food-videos_en.html), FSA and DEFRA. Some of them are online training, whereas mostly are face to face training programme of 3 to 5 days' duration.

Senior Management's Training on soft skills like Leadership, Team Management, Planning etc. is done by Civil Service Learning which is the central agency for training of civil servants.

7.2 Training of Laboratory Personnel

It is the responsibility of the respective laboratory for training of the staff whereas the Reference Laboratory mostly takes care of the training on testing, sampling and laboratory practices.

7.3 Training of Food Business Operator

FSA has mandated that, the FBOs get trained themselves on the issues of food safety & concerned regulations according to the food business. Local Authority takes care the training and awareness of the FBOs on demand which is decided by LA. However, there are guidance documents for the FBO as a prescriptive note.

8. Way Forward:

- i) The FSA was open to discuss regarding bilateral agreement with FSSAI where a test report issued by accredited laboratories of both the countries are accepted to each other. This offer may be explored further in consultation with EIC/APEDA.
- ii) We may consider subscribing the software on Horizon Scanning (@2000 Pound Sterling per year). FERA has agreed to give two weeks' free trial of this software.
- iii) Though FSSAI has also initiated the process of hygiene scoring of food businesses, we may adopt the scoring system of Food Safety Hygiene Rating followed by UK with modification suited to our system.
- iv) We may consider establishing a dedicated unit in line with "National Food Crime Unit" of UK to receive complaints around food safety, analysis of the information and response.
- v) Reference Laboratory for research & study on testing methods, standards of the food products, assessment of risks as well as training of laboratory personnel exclusively.
- vi) We may adopt system of Continuous Professional Development(CPD) for capacity building of regulatory officers where 30 hours of mandatory training per year may be given.

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