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Safe Catering Pack Popular at SHOP Exhibition

The FSAI hosted a stand at the SHOP Exhibition, held in the RDS, Dublin, from 27-29 September. The exhibition attracts those working in the retail and hospitality sectors. The 2011 FSAI stand focused mainly on the food service sector, with the Safe Catering Pack proving extremely popular with visitors to the stand.

'Safe Catering – Your Guide to Making Food Safely' was produced in response to European food hygiene legislation. The legislation stipulates that all food businesses, including caterers, apply food safety management procedures based on the principles of Hazard Analysis and Critical Control Points (HACCP). HACCP was initially designed for the manufacturing sector and did not lend itself easily to food preparation processes with multiple products. Therefore, in order to help businesses comply with this requirement, the FSAI and the Food Standards Agency in Northern Ireland, working in partnership with environmental health officers and representatives of the catering sector, developed this simple jargon-free guide to HACCP. The pack, which was launched in 2009, consists of a DVD, workbook and record books and is ideal for food businesses that have not yet developed their own food safety management system. It is also suitable for businesses who wish to improve their existing system.

Business start-up was also a topic which was discussed with visitors to the FSAI information stand during the course of the exhibition. In relation to food safety, the FSAI can help people understand what they need to do, how they need to go about it and how to comply with the law if they are thinking of setting up a new food outlet or business.

One of the key strategies for the FSAI is to make it easier for food businesses to comply with legislation. Attending exhibitions such as SHOP, facilitates that exchange of information between the FSAI and food businesses, and allows the FSAI to offer expert advice and provide practical tips in the area of food safety.

A competition was run over the three days of the exhibition with a prize of a Safe Catering Pack or Business Start-up Pack for each daily winner.



Sharon Williams, Training Executive, FSAI, looks on as a visitor to the FSAI information stand at SHOP enters the daily competition.

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Sale of Raw Milk for Direct Human Consumption

A proposal by the Minister for Agriculture, Food and the Marine to reintroduce a prohibition on the sale of raw milk (unpasteurised) for direct human consumption has become the subject of public and political debate.

Setting any public policy brings many issues and principles into focus. In this case, apart from it being a public health consideration, banning the sale of raw milk raises matters such as civil liberty, proportionality, an adult's right to eat as they wish or the potential damaging economic effects of a food safety related milk incident or scare on Ireland's important dairy industry.

From the FSAI's viewpoint, we consider this issue purely from our remit's perspective - the protection of public health. Our role is clear - to provide independent scientific advice to Government so that Ministers are better informed when making policy or legislation. Scientific advice is developed using our in-house scientific experts, supported by our Scientific Committee which is composed of external, national independent experts.

While the Authority recognises that the standards of dairy hygiene and animal health have improved greatly in recent years, it is still virtually impossible to produce raw milk under commercial production conditions that can be guaranteed as pathogen free. It is the FSAI's opinion, based on the science and information we have considered, that the risks to human health from drinking raw milk remain real, serious and potentially fatal, even if rare. These risks can be controlled effectively through pasteurisation, which makes the milk safe to drink.

In 2008, the Authority's Scientific Committee published a report entitled "Zoonotic Tuberculosis and Food Safety" in which it reviewed all available data on bovine tuberculosis and transmission to humans. It concluded that the transmission of zoonotic tuberculosis through milk derived from infected herds has, in the past, been a major public health problem. However, it states this issue was largely solved by the introduction of milk pasteurisation and the national programme for the eradication of tuberculosis in cattle. The Scientific Committee recommended that "the sale of unpasteurised milk intended for human consumption, originating from all farm animals, should be prohibited".

Later in 2010, the Scientific Committee reviewed food safety issues associated with the prevention of verocytotoxigenic *Escherichia coli* (VTEC) infections. Highly virulent strains of *Escherichia coli* such as *E. coli*/O157:H7 were only recognised as foodborne pathogens in the past 30 years. These can be present as part of the normal gut flora of healthy cattle and can inadvertently contaminate milk during the milking process. Surveillance studies carried out in Ireland in recent years shows that these pathogens are present in low numbers in raw milk from some farms. Upon evaluating all evidence, the Scientific Committee again concluded that consuming raw milk poses an unacceptable risk to health and recommended that "the public sale of raw milk intended for human consumption in the raw state, originating from cattle, sheep or goats, should be prohibited".

The prevalence of tuberculosis (TB) in cattle herds in Ireland puts us in a different position to most other Member States in the EU where the disease has been eradicated. While the risk of acquiring TB from drinking raw milk is very low, it still exists and the consequences can be devastating. The risk will remain until TB is eradicated from

the national herd. Pasteurisation was introduced as the standard commercial practice and was responsible for breaking the link between drinking milk and tuberculosis. Pasteurisation kills any *Mycobacterium bovis* present in raw milk. It is equally effective against other serious pathogens that may be present in raw milk such as Salmonella, Listeria and Campylobacter.

Various advocates of raw milk consumption claim that there are resulting nutritional and health benefits such as curing asthma and similar afflictions. There is no scientific justification or evidence for promoting the consumption of raw milk as a method of improving our immune systems. Some preliminary studies suggest that the consumption of raw milk may be associated with some health benefits. The scientific data however, to support such claims, is insufficient. In our view the unconfirmed benefits are far outweighed by the potential risks to health. In contrast, the adverse health effects associated with the consumption of unpasteurised milk, especially in people whose immune systems are immature (infants and children) or compromised due to illness or old age, are well documented. The mechanisms, if any, responsible for the perceived beneficial or protective effects are neither identified, nor verified, nor understood.

The FSAI does not recommend that people drink raw milk. We have advised Ministers that the most effective way to protect the population is to prohibit for direct human consumption the sale of unpasteurised milk from all farm animals. European Regulation 853/2004/EC allows Member States to establish national rules to prohibit or restrict the placing on the market of raw milk.

As almost all liquid milk consumed in Ireland is pasteurised, illness associated with its consumption is thankfully very rare. Unpasteurised milk is consumed by some farm families and sporadic cases of illness result. Data from other countries show that outbreaks of illness increase when the numbers consuming raw milk increases and vice versa. Pasteurisation is the most reliable and acceptable method of ensuring that milk is safe to drink. We again reiterate our advice to farm families that they should consider home pasteurisation kits if they wish to consume milk from their own farms. To protect people's health, especially vulnerable groups like young children, the FSAI continues to advise that all milk sold commercially in Ireland should be pasteurised.



Alan Reilly

Alan Reilly
CEO

Scientific Evidence Underpins Recommendations for Healthy Eating Guidelines in Ireland

Over the last two decades, adults, teenagers and children living in Ireland have experienced a dramatic rise in obesity. This brings serious health consequences due to the increased risk of cardiovascular disease (heart disease and stroke), as well as diabetes and some cancers which are associated with being overweight. At the same time, advances in nutritional science indicate that optimal intake levels of vitamins, minerals and

fibre may protect against these long-term diseases.

The world-wide rise in obesity levels coupled with the recognition of the protective effects of optimal nutrient intakes have prompted other countries to completely revise their 'healthy eating guidelines'. These countries now have new 'food guides' which provide for optimal nutrition within the limits of calorie requirements for a healthy weight.

These developments led to the recognition that Ireland's 'food guide' on healthy eating ('food pyramid', 1993–2010) needed

a similar revision, particularly as it was not originally designed to provide specific guidance on calorie requirements. This report incorporates recommendations for completing and implementing newly revised 'healthy eating guidelines' in Ireland.

The report, which is the output of a group of experts, outlines:

- The evaluation of Ireland's 'food pyramid', 1993–2010
- The approaches taken to develop revised 'healthy eating guidelines' for Ireland
- Research carried out on serving sizes
- A summary of work carried out on the affordability of healthy eating and its implications
- Recommendations for further work to complete and implement the revised 'healthy eating guidelines' for Ireland, 2011
- Recommendations for further necessary work to address the needs of other age groups, i.e. pre-school children and older people
- The revised healthy eating advice for different age and gender groups over the age of five years in Ireland.

In summary, the report highlights the need for a revision of the 'food pyramid', and it is hoped that it will facilitate more effective health promotion and disease prevention in Ireland.

This report is available on our website, www.fsai.ie or by contacting our advice-line on 1890 336677.

Two scientific papers, based on the work in this report, have been published this month in an online advance edition of the Public Health Nutrition journal:

Revision of Food-based Dietary Guidelines for Ireland, Phase 1: Evaluation of Ireland's Food Guide.

<http://tinyurl.com/6y3fpk9>

Revision of Food-based Dietary Guidelines for Ireland, Phase 2: Recommendations for Healthy Eating and Affordability.

<http://tinyurl.com/6cktmk2>



Food Safety and Biosecurity Programmes in Singapore

In August, Prof. Alan Reilly, CEO, was invited to participate in the International Advisory Committee of Experts (IACE) of the Agri-Food and Veterinary Authority (AVA) of Singapore to review the Authority's food safety and biosecurity programmes. The review considered a range of issues including strengthening the AVA's food safety control programmes, facilitating its food sourcing and diversification efforts and the Authority's approaches in dealing with emerging issues.

The overall conclusion of the Advisory Committee was that the food safety and biosecurity programmes in Singapore were of the highest standards and are ensuring that consumers are protected.



Pictured at the offices of the Agri-Food and Veterinary Authority are Prof. Alan Reilly, Chief Executive of the FSAI; Ms Tan Poh Hong, Chief Executive of the AVA and Dr Gardner Murray, Chairman of the IACE.

Food for Recovery

O'Donovan Rossa Autumn School on Food Safety

The second O'Donovan Rossa Autumn School on Food Safety was held recently in the headquarters of the Sea-Fisheries Protection Authority (SFPA) in Clonakilty, West Cork, on Friday 30 September and Saturday 1 October 2011.

This meeting brought together the leading national and international experts on food safety from universities, regulatory bodies, food production, retailing, international marketing, and state agencies. On this occasion experts from environmental protection and waste utilisation and management also participated. The theme for this year's school explored how the agri-food and marine sectors can be leveraged to help Ireland turn the economic tide with a vision for these strongly performing sectors in the economy. The school was addressed by Minister of State at the Department of Agriculture, Fisheries and Food, Mr Shane McEntee TD. The Minister highlighted the contribution that the agri-food and marine sectors were having on the Irish economy and paid tribute to the participants and organisers of the school.

Prof. Alan Reilly, CEO, FSAI, chaired a session on 'Waste to Energy'. He stressed the importance of recycling agricultural waste and obtaining optimum value from all agricultural material. Biogas is an

under-utilised resource by the agri-sector and serious consideration needs to be given to developing this as a form of alternative energy.

Eminent food scientists debated pressing industry issues with food producers, regulators, international market experts along with national agency representatives, contributing to a lively two day debate and valuable exchange of views.

The Autumn School was jointly organised by the SFPA, Cork County Council and the UCD Centre for Food Safety, through its network, the Centre for Foodborne Zoonoses.

A large attendance registered for the two-day event and the delegates expressed their full support for this unique meeting forum.

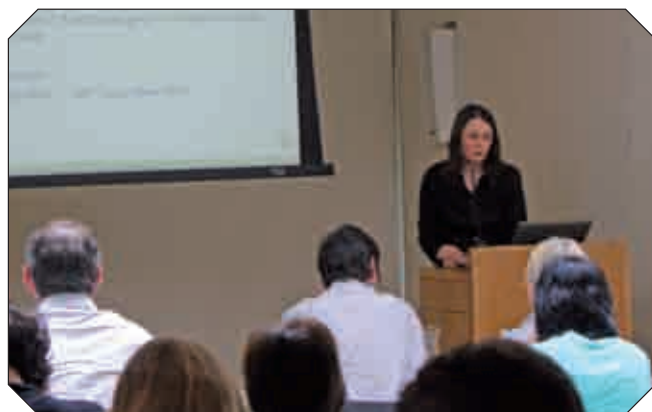


Labelling of Food Contact Materials

The FSAI recently hosted two seminars for official agencies on Food Contact Material (FCM) Labelling. The first took place on 7 September in Dublin and the second on 13 September in Cork. FCMs include all articles and materials intended to come into contact with food e.g. plastic wrapping, utensils, food processing equipment.

The training seminars were provided to support an annual labelling programme undertaken by the Cross-Agency Labelling Working Group. The programme in 2011 focuses on labelling and accompanying documentation for FCMs, specifically plastic food packaging, in food manufacturing businesses under the supervision of the Department of Agriculture, Food and Marine, the Health Service Executive, local authorities and the Sea-Fisheries Protection Authority. Approximately 520 inspections are planned between 12 September and 31 December 2011. A report on the key findings of the survey will be published in 2012.

Key topics covered during the training sessions included the EU and national regulations on FCMs, official controls in Ireland and the survey protocol and questionnaire for inspectors. This survey forms part of a coordinated approach by the FSAI to the enforcement of FCM legislation in both food businesses and food packaging suppliers. The FSAI plans to roll out specialised training on FCMs to the official agencies in 2012, focusing on the detailed requirements of the legislation.



Pictured speaking during the seminars are (photo on left) Dr Michelle Minihan, Contracts Executive, FSAI and (photo on right) Dr Bernard Hegarty, Director of Service Contracts, FSAI.

Pollen from a GM Plant can make Honey GM

The regulation of food and feed consisting of, or containing genetically modified organisms in the EU became even more complex recently when the European Court of Justice (ECJ) ruled on 6 September that the presence in honey of pollen from a GM plant makes that honey “GM” under current EU law. The long-term consequences of this ruling are that such honey may require authorisation under the GM food and feed Regulation (EC No. 1829/2003), while all products containing or consisting of this honey could be subject to GM food labelling laws.

The story began in 2005 when an amateur beekeeper detected DNA from GM maize in honey produced at his hives that were placed near a field trial of Monsanto’s MON 810 GM maize. Though this GM maize (MON 810) has been authorised for food and feed purposes for many years, only the maize kernels are generally considered, and therefore authorised for food purposes which means the pollen, and food containing it may require a separate safety assessment and authorisation.

The Commission argued that because pollen is not actually used in the production of honey it could not be considered an ingredient and thereby falls outside the scope of the GM Food and Feed Regulation.

Bees are essential to pollination and so to find pollen in honey is to be expected. The beekeeper in question took a case to the local German courts to determine whether the presence of small amounts of pollen from a GM plant meant that his honey now required authorisation under EU GM food and feed

legislation. The case was eventually referred to the ECJ as it had possible implications for EU law, with the subsequent ruling coming as a surprise to the European Commission and regulatory authorities across the EU. The Commission argued that because pollen is not actually used in the production of honey it could not be considered an ingredient and thereby falls outside the scope of the GM Food and Feed Regulation. However, the ECJ judged that because pollen is considered a natural component of honey (Directive 2001/110/EC) it must be considered an ingredient and therefore falls within the scope of the Regulation.



The court decision was discussed at a meeting of the Standing Committee for the Food Chain and Animal Health in Brussels on 22 September. The Commission stated that deliberations were ongoing with respect to the judgement itself as well as options for dealing with the problems raised. The Commission acknowledged that there are possible ramifications for the honey trade in the immediate future as the EU imports a sizeable proportion of honey each year, much of it emanating from countries that cultivate GM crops. Therefore, unless a satisfactory resolution is found, the prospect of trade difficulties and/or interaction at WTO level cannot be ruled out.

While there are no safety concerns arising out of this case, the ECJ judgement demonstrates a certain level of ambiguity in the relevant legislation that needs to be addressed. ECJ decisions are immediately binding. However, Member States were advised to use their discretion on this issue until all options for a resolution were examined and a suitable course of action agreed upon.



Wuhan Food and Drug Administration

The FSAI was recently visited by a Chinese delegation from the Wuhan Food and Drug Administration led by Professor Li Yan, Director of the FDA. The group met with the FSAI Chief Executive, Professor Alan Reilly, and staff of the Authority. The Group were particularly interested in risk-based food safety management systems and food controls from farm-to-fork.

*Professor Alan Reilly, CEO, FSAI
and Professor Li Yan, Director of
the Chinese Wuhan FDA.*

Legislation Update

Irish legislation

Alteration of Department Name

Agriculture, Fisheries and Food (Alteration of Name of Department and Title of Minister) Order 2011 (S.I. No. 455 of 2011).

Since 17 October, the name of the Department of State, which, in the Irish language, was An Roinn Talmhaíochta, Iascaigh agus Bia and, in the English language, the Department of Agriculture, Fisheries and Food, has been altered. It is now known as, in the Irish language, An Roinn Talmhaíochta, Bia agus Mara and, in the English language, the Department of Agriculture, Food and the Marine.

Pesticide Residues on Certain Imports

European Communities (Official Controls on the Import of Food of Non-Animal Origin for Pesticide Residues) Regulations 2011 (S.I. No. 426 of 2011).

This Regulation, published by the Department of Agriculture, Food and the Marine, introduces additional levels of controls with regards to pesticide residues on the import of certain food of non-animal origin from specific third countries which are listed in Annex 1 to Regulation (EC) No. 669/2009. Pesticide residues are analysed with multi-residue methods based on GC-MS and LC-MS or with single-residue methods.

EU Legislation

Traceability Requirements for Food of Animal Origin

The recently published Commission Implementing Regulation (EU) No. 931/2011 sets down provisions implementing the traceability requirements of Regulation (EC) No. 178/2002 for food business operators in respect of food of animal origin.

The general principles regarding the traceability of food set out in Article 18 of Regulation (EC) No 178/2002 require that the traceability of food be established at all stages of production, processing and distribution. Food business operators must be able to identify persons from whom they have been supplied with food and must also be able to identify businesses to which their products have been supplied.

This new implementing Regulation lays down certain rules for food of animal origin to ensure the correct application of the requirements set out in Article 18 of Regulation (EC) No 178/2002.

The Regulation applies to food defined as 'unprocessed and processed products' in Article 2(1) of Regulation (EC) No. 852/2004. It does not apply to food which contains products of plant origin together with processed products of animal origin.

This new Regulation will apply from 1 July 2012 and places an obligation on food business operators to ensure that the following information concerning consignments of food of animal origin is made available to the food business operator to whom

the food is supplied and, upon request, to the competent authority:

- (a) an accurate description of the food;
- (b) the volume or quantity of the food;
- (c) the name and address of the food business operator from which the food has been dispatched;



- (d) the name and address of the consignor (owner) if different from the food business operator from which the food has been dispatched;
- (e) the name and address of the food business operator to whom the food is dispatched;
- (f) the name and address of the consignee (owner), if different from the food business operator, to whom the food is dispatched;
- (g) a reference identifying the lot, batch or consignment, as appropriate; and
- (h) the date of dispatch.

The information (a - h) must be updated on a daily basis and as a minimum be kept at least until it can be reasonably assumed that the food has been consumed.

Imports from Japan

With the publication of Commission Regulation (EU) No. 961/2011, the EU has extended to 31 December the control measures adopted on imports of food and feed from Japan following the incident at the Fukushima Daiichi nuclear power plant in March 2011.

The measures require that all feed and food originating in or consigned from 12 prefectures of Japan have to be tested for the presence of iodine-131, caesium-134 and caesium-137 before leaving Japan. At least 10% of the consignments of food or feed imports are also subject to a reinforced testing regime in the EU. Feed and food products from the remaining 35 Japanese prefectures must be accompanied by a declaration stating the prefecture of origin and at least 20% of the consignments are subject to a reinforced testing regime in the EU. The measure is reviewed on a monthly basis.

Proposed European Legislation

Food Labelling

The proposed Regulation on the provision of food information to the consumer which will replace the existing legislation on general food labelling as well as that on nutrition labelling of foodstuffs was adopted by Member States at a Council meeting on **29 September. Once the proposal is signed** by the EU Institutions (EU Commission, the Council and the European Parliament) it will be published in the EU Official Journal.

The Regulation will enter into force on the 20th day following its publication, but producers will

have a three year transitional period to adapt to it. Mandatory nutrition declaration will have to be implemented within a five year period after the Regulation enters into force.

Food Labelling

The proposed amendment to Regulation (EC) No. 853/2004 which lays down rules on frozen food of animal origin intended for human consumption has been forwarded in accordance with the EU legislative procedure to the European Parliament for scrutiny. The European Parliament and Council have until 9 December 2011 to examine the measure. If they do not oppose it then it will be published in the Official Journal and enter into force. It is proposed that the legislation will apply from 1 July 2012

The proposal requires that until the stage at which a food is labelled in accordance with Directive 2000/13/EC (general labelling rules) or used for further processing, food business operators must ensure that in the case of frozen food of animal origin intended for human consumption, the following information is made available to the food business operator to whom the food is supplied and, upon request, to the competent authority:

- (a) the date of production, and
- (b) the date of freezing, if different from the date of production.

Where a food is made from a batch of raw materials with different dates of production and of freezing, the oldest dates of production and/or of freezing, as appropriate, must be made available.

The draft document is available at: <http://register.consilium.europa.eu/pdf/en/11/st14/st14492.en11.pdf>

Food Enzymes – Information for Manufacturers

Food enzymes, other than those used as food additives, have not been specifically regulated at EU level, but they have been regulated as processing aids under the legislation of certain Member States. Differences between national laws concerning the assessment and authorisation of food enzymes may hinder their free movement within the internal market by distorting the rules of competition.

Regulation (EC) No. 1332/2008 on food enzymes harmonises at European Community level the national provisions relating to the use of enzymes in foodstuffs, including such enzymes used as processing aids. The objective of Regulation (EC) No. 1332/2008 is to ensure the smooth operation of the internal market while guaranteeing a high level of protection for human health and consumers. This Regulation will create a list of authorised enzymes, lay down the conditions for the use of food enzymes and define rules for their labelling.

The list of authorised enzymes will be established on the basis of applications for authorisation submitted to the Commission. A period of 24 months shall be allowed for the submission of applications with effect from the entry into force of the implementing measures for Regulation (EC) No. 1331/2008 establishing a common authorisation procedure for food additives, food enzymes and food flavourings. These applications shall be forwarded to the European Food Safety Authority (EFSA) for evaluation of their safety. Only enzymes mentioned in the Community list may then be placed on the market and added to food. The period of 24 months to be allowed for the submission of applications will be from 11 September 2011 to midnight on 11

September 2013. In 2009, EFSA issued guidance on the submission of a dossier on food enzymes for safety evaluation which was followed in 2011 by an explanatory note on the guidance for the submission of a dossier on food enzymes.

Initial discussions have begun at European level in relation to categorisation and labelling of enzymes and the possible approach to be taken when setting up the EU list of authorised enzymes.

Your views please
Your comments and views on the above and its effect on the food enzyme industry in Ireland are invited.

Please send all comments to the following email address:
enzymes@fsai.ie
on or before
18 November 2011.



The following Regulations have been introduced over the last few months in Ireland:

S.I. No. 426 of 2011

European Communities (Official Controls on the Import of Food of Non-Animal Origin for Pesticide Residues) Regulations 2011

S.I. No. 455 of 2011

Agriculture, Fisheries and Food (Alteration of Name of Department and Title of Minister) Order 2011

International Commission on Microbiological Specifications for Food

The International Commission on Microbiological Specifications for Food (ICMSF) is an independent body of food safety professionals from Government, academia and industry. The group is a recognised Non-Governmental Organisation within Codex and works both alone and with other bodies, such as the World Health Organization and the Food and Agriculture Organization of the United Nations, to advise on microbiological standards for food. Each year, ICMSF members meet to draft position papers for peer reviewed journals, discuss new approaches to improve food safety management and write text books to support food safety practice.

In 2010 the ICMSF completed a new text book entitled *Microorganisms in Foods 8: Use of Data for Assessing Process Control and Product Acceptance*, which explains how to use process data to validate control measures and verify HACCP systems. It outlines how process data can be used to ensure processes are in control, including process environments. Part II of the book is dedicated to food commodities and includes common hazards and the points in processes where microbiological testing can be best used to ensure safe food. (Information on the book can be found on the Springer website at: <http://tinyurl.com/6922mnf>).

With Book 8 published, the ICMSF met recently in Melbourne, Australia, and collaborated in a three day conference, 'Securing Global Food Safety', with the Australian Institute of Food Science and Technology. This was followed by a meeting of the ICMSF which concentrated on a revision of a previous book entitled *Microorganisms in Foods 7: Microbiological Testing in Food Safety Management*. The update will include new areas such as how to use new risk management metrics like the Food Safety Objective to develop HACCP systems to control risk.

Information about the work of the ICMSF can be found at the website www.icmsf.org. An excel spreadsheet can be downloaded from the site and used to calculate the performance of sampling plans; a useful resource for anyone setting specifications for raw materials or finished goods in the food industry



Pictured at the recent ICMSF meeting in Melbourne is Dr Wayne Anderson, Director of Food Science and Standards, FSAI (centre, third row from back). Dr Anderson was invited to join the ICMSF in 2008.

Food Hypersensitivity Leaflet

The FSAI has just published a new information leaflet entitled **Food Hypersensitivity: Food Allergy and Intolerance**. The leaflet is designed to answer many of the questions people may have in regard to food allergies and intolerances, collectively known as food hypersensitivities.

Food is one of a number of allergy triggers found in the environment (e.g. pollen, dust, animal dander, latex etc.). A food allergy differs from food intolerance in the type of reaction by the body. Though interpretations can vary, experts in the field consider a food allergy

to be a hypersensitive reaction to a food that is mediated by the immune system, particularly involving IgE antibodies, e.g. reactions to milk, peanut, soya, eggs, but also non-IgE antibodies e.g. gluten hypersensitivity or coeliac disease. An adverse reaction that does not involve the immune system directly is considered food intolerance, e.g. reactions to sulphites or lactose.

In 2004, the European Food Safety Authority estimated that food allergies and intolerances occurred in approximately 1-3% of the EU population and in about 4-6% of children. Though it is generally

accepted that the incidence of food allergies and intolerance in industrialised nations appears to be increasing, determining precise numbers is difficult due to relatively mild symptoms in some cases and the unreliability of self-diagnosis.

Symptoms of food allergies and their onset can vary with the trigger and the individual's sensitivity with some foods able to trigger both an allergic reaction and intolerance (e.g. milk). Because many of the symptoms associated with food allergy or intolerance can have unrelated triggers, medical advice should be sought before taking remedial action, particularly where children are involved.

Many foods and food ingredients can trigger an allergic reaction or intolerance, but only 14 require specific allergen labelling under EU law. Allergens can be declared in the list of ingredients or elsewhere on the packaging. However, current legislation does not require low levels of contaminating food allergens to be included on the food label and does not require food sold loose or by catering establishments to carry an allergen label, which means that people with allergies or intolerance to certain foods need to be vigilant.

In 2009, the FSAI initiated an early warning system for people with food allergies or intolerances, or their guardians, and who have registered with the FSAI. This system enables real-time transfer, via email and SMS text messaging, of information about food allergy issues as the FSAI becomes aware of them. Registration for this resource can be made through our website, www.fsai.ie.



FAQ

Many people contact our advice-line each month to ask questions on a variety of food safety issues. Some questions get asked time and time again – so in each issue of **FSAINEWS**, we will feature a **Frequently Asked Question**. This issue's question is ...

Should eggs be washed if they are dirty?

Eggs for sale at retail level (Grade A) are not permitted to be washed under food law. Only grade B hen eggs may be washed and these cannot be sold at retail, but to other food businesses where they will be processed. These rules only apply to hen eggs.

Washing of eggs is not recommended, because washing may aid the transfer of harmful bacteria from the outside to the inside of the egg. Egg laying poultry (e.g. hens, ducks, geese) can be infected with *Salmonella* and other harmful microorganisms. *Salmonella* bacteria cause sickness, and in some people the illness can be severe and life-threatening. If egg laying poultry are infected with *Salmonella*, they

can shed these bacteria in their faeces. If care is not taken in egg production, then the eggs can become soiled with faeces – and therefore *Salmonella* can be found on the shell.

During washing, the natural barriers in the shell can be compromised and *Salmonella* may pass into the inside of the egg where it has the opportunity to grow. Sometimes, *Salmonella* can grow to very high numbers inside eggs and if these eggs are not cooked thoroughly (e.g. in the case of runny, fried or boiled eggs or in desserts such as meringue or tiramisu) the *Salmonella* survive and can cause consumers to get sick.

Not washing eggs

Salmonella can survive for a long time in dried faeces on the outside of eggs. This presents two risks. Firstly, if eggs are stored incorrectly and condensation forms

on the shell, the water may be sufficient to allow *Salmonella* to pass into the inside of the egg through the pores in the shell. This risk increases over the storage time, as the natural barriers of the egg start to break down with increasing age of the egg. Condensation on the outside of eggs also increases the chance that *Salmonella* on the shell may grow. Secondly, during handling and preparation of dirty eggs, direct hand-to-mouth contamination can occur, or other foods may be cross-contaminated from hands, dirty discarded shells, or during the action of cracking the egg.

Getting egg washing right to avoid all these increased risks is not simple, and for that reason it is much safer not to wash them at all, but to concentrate on good husbandry, and the production of eggs that are clean in the first place.

Food Fraud

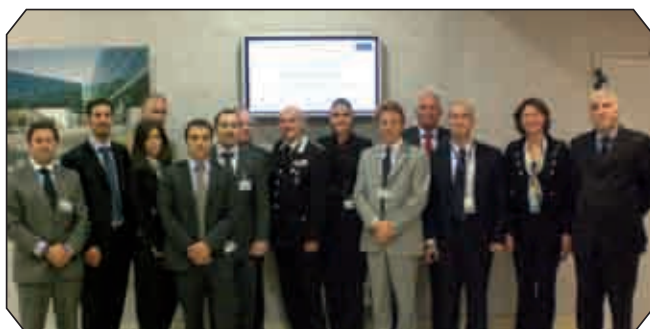
Not all food safety agencies are the same; a fact which is clearly evident in Italy. The Anti-Fraud Squad of the Carabinieri (Military Police) in Italy, is heavily involved in the battle against food fraud. Similarly, units of other food control agencies such as the VWA in the Netherlands and ASAE in Portugal are engaged more regularly in criminal investigations than food inspections. This brings them into regular contact with criminal elements, who are increasingly turning to food fraud as a way of making large profits. The threat of organised crime in the food sector is not something for which traditional food safety authorities such as the FSAI are well equipped, as they are trained to deal with other types of infringements..

The need for cooperation amongst food control agencies in combating food fraud prompted NAS, the healthcare anti-fraud squad of the Carabinieri, to seek EU funding for Project Baccus. It is a two year international project designed to promote and develop coordination,

cooperation and mutual understanding amongst law enforcement agencies in EU regions. Baccus will gain an overview of the different experiences in the EU with the aim of translating best practice and the most useful experiences into common lessons for food safety agencies. The intention is also to run some pilot training programmes, including one in Ireland, and to develop an e-learning platform.

The FSAI was invited to participate in the project which is coordinated by Capt. Sergio Tirrò of NAS in the Carabinieri. The other partners include the VWA and ASAE, as well as two more Italian organisations - Foromez and the Università Campus Bio-Medico di Roma.

The project partners held their first meeting at the Ministry of Health in Rome and were welcomed by Prof. Romano Marabelli, General Director in the Ministry of Health and Brig. Gen. Cosimo Piccinno of NAS of the Carabinieri Military Police.



Project partners pictured at the Baccus kickoff meeting.



Simulation Crisis Management Exercise

One of the largest food safety emergency simulation exercises involving the FSAI took place during September. The exercise, organised by the Food Standards Agency, Northern Ireland, and involving the food authorities in the UK, Northern Ireland and the Republic of Ireland, ran over a three day period and involved hundreds of personnel from many agencies.

The aim of 'Exercise Larkspur' was to rehearse in real time the response to an animal feed related, food safety incident with cross border impacts and implications between Ireland, Northern Ireland and Britain, in order to validate the integration of crisis plans and communications. South of the border, teams from the FSAI, the feed division of the Department of Agriculture, Food and the Marine (DAFM), and the Department of Health took part. The Food Standards Agency, UK, involved many teams in London, Wales, Scotland and Northern Ireland. Many others were drawn from local authorities, laboratories, Government departments, trade associations, farmers' unions and the European Commission. The controllers of the exercise, located in Belfast, played the part of the media and consumer groups. Mock news channels and other media reports were set up on secure locations.

The exercise has been a long time in planning and arose in response to the recommendations of the MacKenzie report into the handling of the 2008 dioxin contamination incident in Northern Ireland. The carefully worked out scenario was based on the detection of cattle feed contaminated with chloramphenicol, in the Republic of Ireland, but shipped to Northern Ireland. Twists were introduced in the form of laboratory reports, media queries, requests for briefings to Ministers and information on hospital admissions. All involved in the exercise

were required to react as if the event was real, follow their standard procedures and deal with everything in real time. Rapid alert notices were therefore drafted and urgent meetings called. The contaminated feed had to be traced forward and backwards. Risk assessments were carried out. Risk management decisions were agreed and press statements issued.

To record the exercise, external observers followed those involved and all files, messages and other communications were copied to the exercise managers. A major concern in all simulations is that information would escape from the virtual emergency exercise and trigger a baseless scare in the real world. For this reason, adherence to the strict rule of play was vital.

Both the FSAI and DAFM have agreed procedures in place for cooperation in the event of an actual food or feed safety crisis. These were well tested over the three days. In November, representatives of all agencies and teams who took part will convene in Belfast to review the event. The aim is to identify what lessons can be learnt from the experience. All emergencies have both predictable and unexpected elements. The exercise will help all participants plan for and manage the former so as to minimise the latter.

FSAI SFPA Regional Workshops

The FSAI in conjunction with the Sea-Fisheries Protection Authority (SFPA) held its annual series of workshops during September. The aim of the workshops was to highlight food safety topics of interest to sea-fishery protection officers (SFPOs) so that the presenters and attendees could discuss the issues in an informal setting.

This year's workshop topics included auditing HACCP, microbiological criteria, enforcement powers and new technologies in food production and monitoring. SFPOs noted that the case study approach to the discussions on HACCP auditing and microbiological criteria was very useful. The workshops were held in Clonakilty, Dublin, Killarney and Sligo.



Attendees at the FSAI SFPA Regional Workshops, 2011 at the FSAI Offices, Dublin.

Food Safety Professional Associations Awards



Recently, Mr Shane McEntee TD, Minister of State at the Department of Agriculture, Food and the Marine addressed the inaugural Food Safety Professional Associations (FSPA) Awards ceremony in Dublin.

The FSPA awards are designed to encourage food businesses to reach for and maintain high standards of food safety, as ultimately, the responsibility for food safety rests primarily with food business operators.

Pictured at the award ceremony are Dr Wayne Anderson, Director of Food Science and Standards, FSAI; Shane McEntee TD, Minister of State at the Department of Agriculture, Food and the Marine; and Lorraine Oman, Chairperson of the Food Safety Professionals Association.

Seminar: Product Shelf-Life and Microbiological Criteria

The safety of foodstuffs is mainly ensured by a preventive approach such as implementation of good hygiene practice and application of procedures based on HACCP principles. Testing against the criteria set down in Regulation (EC) No. 2073/2005 on the Microbiological Criteria for Foodstuffs should be undertaken by food business operators when validating or verifying the correct functioning of systems in place.

Determining the shelf-life of foods is also important for ensuring their microbiological safety. In particular, shelf-life is important for those foods which are perishable, ready-to-eat and/or support the growth of pathogens. The shelf-life of foods depends on a number of factors, particularly the nature of the food itself, the processing it has received and how it is packed and stored.



Since the introduction of Regulation 2073/2005, the FSAI has published a number of documents in relation to various aspects of the legislation including shelf-life and has provided training to the official agencies. However, following an online survey carried out by the FSAI in March 2011, many issues remain in relation to shelf-life and interpretation of the legislation which need to be addressed.

An upcoming seminar, organised by the FSAI in partnership with Teagasc, on product shelf-life and

microbiological criteria will address these issues. The seminar, which will take place in the Teagasc Food Research Centre, Ashtown, on 17 November, will provide presentations from representatives of the European Commission, food industry, laboratories and various official agencies. Parallel afternoon workshops will follow. Participants can

choose to attend a workshop of interest, with relevance to Regulation (EC) No. 2073/2005. The FSAI will provide a workshop for food businesses to assess their own compliance with the requirements of Regulation (EC) No. 2073/2005. Teagasc will also provide a number of other workshop options for participants to attend.

For further information, please email/call Emma at shelflifeseминаr@fsai.ie / 01 8171310. Registration is available online at: www.fsai.ie. A fee of €100 applies per delegate, to include lunch and conference packs.



Would You Like To Help Us?

We are working on new leaflets which advise industry on how to prevent VTEC (verocytotoxigenic *E. coli*) infection. We want to make sure the advice we give is clear and practical, so we'd love to hear your opinion. We are therefore looking for volunteers from the following industries to give us an hour or two of their time to take part in a focus group:

- Preschool childcare (e.g. childminders, crèches, Montessori groups etc.)
- Farming
- Open farms/ petting zoos
- Slaughtering
- Food processing
- Food distribution
- Food retail
- Catering



The focus groups will be held towards the end of the year in our office in Dublin. You only need to attend one session, which will last no more than two hours. Because we want the groups to be informal discussions, we ask that volunteers take part on an individual basis and not as a representative of any professional organisation they might belong to.

If you are interested in taking part, or just want more information, please give us a call on 1890 33 66 77 or email info@fsai.ie

Recent Publications

The following publication were recently produced by the FSAI:

- **Leaflet:** Food Hypersensitivity: Food Allergy and Intolerance.
- **Report:** Scientific Recommendations for Healthy Eating Guidelines in Ireland.

These publications are available on our website at:
www.fsai.ie/resources_publications.html.



Editor: Edel Conway
Contributors: Wayne Anderson, Anne Marie Boland, Helen Crowley, Raymond Ellard, Karl McDonald, Maria Meghan, Pat O'Mahony & Alan Tansey.

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FSAI: Abbey Court, Lower Abbey Street, Dublin 1

Tel: (01) 8171300 **Fax:** (01) 8171301

E-mail: newsletter@fsai.ie **Website:** www.fsai.ie



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