



first meeting of national focal points and efsa

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The national Focal Points are considered EFSA's 'ambassadors' in the Member States. In Ireland, the FSAI is named as the national Focal Point. They serve as relay contacts between risk managers, national authorities, research institutes, stakeholders and consumers in the Member States and ensure the adequate and timely two-way exchange of all relevant information. The role of such Focal Points is also to keep EFSA and Advisory Forum members informed of national risk assessment and scientific developments. The network of Focal Points will coordinate communications with risk assessment institutes in the Member States and will be closely involved in work programmes conducted by EFSA and by national authorities.

The first meeting of the Focal Points and EFSA took place in Parma on 5 and 6 March last. The main purpose of the meeting was to introduce EFSA and the national Focal Points and to discuss further

cooperation. EFSA's work was presented by senior EFSA management and the Focal Points exchanged experiences on the work they have undertaken so far.

Catherine Geslain-Lanéelle, Executive Director of EFSA, opened the meeting and stated that 21 Focal Point agreements had been signed to date; all agreements are expected to be signed by summer. Bernhard Berger, Head of the Scientific Cooperation Unit, stressed the need for scientific cooperation and outlined the milestones achieved so far. Key areas of discussion included work under Article 36 of EFSA's Founding Regulation and setting up a Europe-wide database of scientific experts. Arrangements are in place for organising regular meetings between EFSA and the Focal Points.

Pictured signing the Focal Point agreement between the FSAI and EFSA are Mr Alan Reilly, Deputy CEO, FSAI and Ms Catherine Geslain-Lanéelle, Executive Director, EFSA.



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cryptosporidium

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In light of recent *Cryptosporidium* water contamination incidents, the FSAI has produced a booklet which aims to assist food businesses to protect their customers' health in the event of any future incidents. It outlines specific steps in a food business that should be taken if a drinking water supply is contaminated with *Cryptosporidium* and a 'Boil Water Notice' has been issued by the local authority.

Cryptosporidium is a microscopic parasite which causes cryptosporidiosis - a common form of gastroenteritis. It can be particularly serious for young children, older people, pregnant women and those already suffering an illness. Watery diarrhoea is the most common symptom of cryptosporidiosis, but symptoms can be severe in people with weakened immune systems. Symptoms appear two to ten days after a person becomes infected and usually persist for about two weeks. Drinking water contaminated with *Cryptosporidium* has caused large outbreaks of cryptosporidiosis. However, *Cryptosporidium* can also be spread by eating contaminated food, person-to-person contact e.g. changing nappies, contact with infected animals or by swallowing contaminated recreational water.

In 2007, there were 605 reported cases of cryptosporidiosis, compared with 367 cases in 2006, according to provisional data from the Health Protection Surveillance Centre. The increase in cases in 2007, due to the outbreak in Galway, shows how a single outbreak can significantly compromise people's health.

Food business operators are legally responsible for producing safe food. The definition of food includes any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment. As contaminated water or ice can cause a food hazard (if used as an ingredient, a processing aid, a coolant, or for washing and rinsing food and food contact surfaces), food business operators are responsible for ensuring the safety and quality of the drinking water used in their operations. Food businesses must have an adequate supply of potable water, to ensure food is not contaminated during processing and preparation. Potable water means water which complies with the standards of the European Communities (Drinking Water) (No. 2) Regulations, 2007 (S.I. No. 278 of 2007) which gives effect to Council Directives 98/83/EC and 2000/60/EC.

Most food businesses get their water from public water supplies and they should access data on the quality of these supplies from their local authority and the Environmental Protection Agency (EPA). Those who take their water from a private source are directly responsible for ensuring the safety of the water they use and in those situations, in the interest of their customers, those businesses should regularly test the water to ensure that it meets all regulatory requirements. If water used in a food business is not safe, then the food business operator must take the necessary remedial action.

If a drinking water supply is contaminated, or suspected of being contaminated, with *Cryptosporidium*, a 'Boil Water Notice' may be issued by the water supplier. Boil water notices generally inform users of a water supply that water must be boiled before using it for:

- drinking and preparing drinks made with water
- preparing foods that will not be cooked before eating
- brushing teeth
- making ice.

Food businesses use large volumes of drinking water in their daily work and a boil water notice can have serious practical implications on their operations. During a boil water notice for *Cryptosporidium*, food businesses, in the interest of public health, should consider a number of issues:

- When the contamination occurred and if any food was prepared using potentially contaminated water or ice.
- Identify food that has been contaminated which should be disposed of, reprocessed or recalled.
- Identify processes in their operation for which the water must first be boiled or treated to remove or inactivate *Cryptosporidium*.
- Remind staff of the importance of complying with a boil water notice, of practicing good personal hygiene and of their responsibility to produce safe food. Further training or supervision may be required.
- Inform the competent authority (local authority/Health Service Executive or FSAI) if any potentially contaminated food product has made its way into the food chain.
- Consider installing other methods of purifying the water such as filtration and ultraviolet light in the event that boiling water may not be practical for large food operations.
- Ensure that if they are buying in ice, it is made from a water supply that is not subject to a boil water notice.

The guidance booklet, *Cryptosporidium - Protecting Your Food Business* is available on our website (www.fsai.ie) or by contacting our advice-line on 1890 33 66 77.

prosecution for mislabelling of beef and poultry

On 6 March last, a meat company was successfully prosecuted for breaches of labelling legislation. M & G Butchers Limited and two of its directors, Mr Glen Duggan and Mr Michael Dunne each entered a plea of guilty to three charges. They admitted that M & G Butchers Limited, Ballymount, Dublin, had been in breach of both the general labelling and the beef labelling legislation.

The company was supplying beef labelled as Irish to its customers, however, the beef had originated in Brazil. Other beef products supplied by the company and labelled as Irish originated in Holland. The company also supplied poultry labelled as Irish that originally came from Poland. South Dublin County Council took the case as official agents of the FSAI. The FSAI worked closely with the County Council to bring this case to court and wish to commend it for taking this action.

“During the course of the audit a significant amount of product was discovered with incorrect labelling and traceability information”

The breaches of legislation came to light during the course of a labelling and traceability investigation carried out by Pat Farrell and Donal Cousins, Audit Managers, FSAI. The FSAI carried out a nationwide labelling and traceability audit, and in this instance, as a result of tracing meat products from a catering outlet, the investigating team in conjunction with veterinary inspectors of the South Dublin County Council, audited M & G Butchers on 17 November 2006.

The audit team discovered there were systematic failures between reconciling product documentation with the actual labels on the products. As a result of the audit, the company voluntarily destroyed approximately €61,000 worth of meat products. It did this because the source of the product could not be authenticated due to the lack of traceability information available, and therefore could not be released into the food chain.

court hearing

During the court hearing, Mr Farrell explained to the court why the FSAI was concerned to such a degree with regards to the mislabelling of the meat products. He stated that there were two aspects that gave rise to this concern:

- **Consumer Interest:** When a product is of Brazilian origin, it is cheaper to buy than a product of Irish origin. Therefore, consumers are being misled in the sense that they are paying higher prices for meat that they think is Irish but is actually Brazilian.
- **Traceability:** When meat is slaughtered and/or cut in a particular premises and then mislabelled as being slaughtered and/or cut in a different premises, traceability difficulties and problems in relation to product recall would arise if there was a public health issue in relation to the meat product.

In his summing up of the case, Judge Clyne noted that it is inevitable that mistakes are made and the mistakes made by M & G

Butchers Ltd. were clearly identified to the court. Serious issues had arisen in respect of the mislabelling of the meat products as being of Irish origin. This would be misleading to the consumer, who would expect to pay different prices depending on the origin of the meat. More important, he noted, is the traceability issue where public health would be at serious risk. The correct labelling was not applied to the products to show their correct country of origin. Such mislabelling of product would cause great expense to the consumer in circumstances where the product could not be traced and this could have had catastrophic consequences.

“The successful outcome of this case should send a warning to the food industry that nothing less than full compliance with the law will be tolerated”

Judge Clyne noted that these offences were criminal in nature but civil in matter, and as a result, there was no question of looking at a custodial sentence for the directors. He stated that as the directors had never been before the Court previously and had entered guilty pleas, he hoped that they had learnt their lesson. The Judge applied the benefit of the Probation Act to the company and the directors. M & G Butchers Limited and its directors agreed to make a €12,000 donation to St. Vincent de Paul and pay costs of €1,500 to South Dublin County Council.

The court ruling should also provide reassurance to consumers that illegal labelling of foodstuffs will not be accepted.





examination of the microbiological status of food

background

All food businesses have a legal obligation to produce safe food. Food safety is primarily achieved through a preventative approach such as the implementation of a food safety management system based on the principles of Hazard Analysis and Critical Control Point (HACCP) and good hygiene practice (GHP), both of which are legal requirements.

Good cleaning practices are prerequisites to the implementation of a HACCP system. They are important for both food contact surfaces (e.g. equipment, worktops, chopping boards, utensils, containers) and non food contact surfaces (e.g. floors, ceilings, drains) to prevent the build up of food debris and microorganisms which could directly or indirectly contaminate food. Good cleaning practices are particularly important in premises handling ready-to-eat (RTE) foods, as these foods are consumed without further cooking or processing, to eliminate or reduce microorganisms to a safe level. In all food businesses, cleaning practices should be outlined in a cleaning schedule and cleaning records should be maintained.

The effectiveness of cleaning practices can be monitored and/or verified by environmental sampling. Under Commission Regulation (EC) No. 2073/2005 on Microbiological Criteria for Foodstuffs, environmental sampling must be undertaken in:

- (i) premises producing RTE foods which may pose a risk of *L. monocytogenes* and
- (ii) premises producing dried infant formula or dried foods for special medical purposes intended for infants below six months which pose a risk of *Enterobacter sakazakii* (in these premises the processing environment and equipment should be sampled for *Enterobacteriaceae*).

In other premises, environmental sampling should be carried out as necessary.

The Regulation does not specify criteria for the acceptable level of microorganisms on surfaces. Rather, environmental sampling should be used as a tool by food business operators to ensure the foodstuffs under their control meet the relevant process hygiene and food safety criteria. (A process hygiene criterion indicates the acceptable functioning of the production process. A food safety criterion defines the acceptability of a product or a batch of foodstuffs. It is applicable to products placed on the market and throughout their shelf life.)

aim

The aim of this study was to examine the hygiene of food preparation surfaces in premises preparing sandwiches at the point of sale using aerobic colony count (ACC) and *E. coli* as hygiene indicators.

methodology

This survey was carried out over a six month period, i.e. July-December 2006. Swabs were obtained by environmental health officers (EHOs) from food preparation surfaces (i.e. chopping board and worktop surfaces) in premises preparing sandwiches at the point of sale (e.g. delicatessens, bagel bars, etc). The food preparation surfaces were in use at the time of swabbing. Two swabs were obtained in each premises.

The swabs were analysed in one of the seven Official Food Microbiology Laboratories (OFMLs) using approved/standard methods. Enumeration tests were carried out for:

- Aerobic Colony Count (ACC)
- *Escherichia coli*

Information relating to i) the food preparation surfaces, and ii) cleaning practices in the premises, were captured on a questionnaire by the EHO at the time of sampling. Results were analysed using the Chi squared test (SPSS version 14.0).

results and discussion

A total of 2,320 environmental swabs were considered for this report. The swabs were obtained from worktop surfaces (54.2%, n=1,258) and chopping boards (44.5%, n=1,032). The surface type was not specified for a small number of swabs (1.3%, n=30). The following were the main findings:

- *E. coli* counts ≥ 1 cfu/cm² were detected on only 1.2% (27/2320) of food preparation surfaces.
- ACC counts $\geq 10^3$ cfu/cm² were detected on 15.6% (364/2320) of food preparation surfaces (Figure 1). Other studies have associated ACC counts $> 10^3$ cfu/cm² with poor hygiene practices.
 - The type of food preparation surface had a significant effect on the ACC counts. ACC counts $\geq 10^3$ cfu/cm² were detected on 20.7% (n=259) of swabs from chopping boards compared with 9.6% (n=98) of swabs from worktop surfaces.
 - In relation to chopping boards, the following parameters had a significant effect on the ACC counts:
 - i) specific use (i.e. RTE food only/ RTE and raw food)
 - ii) surface condition (smooth/rough)
 - iii) surface appearance (clean/dirty)
 - iv) presence of moisture (wet/dry).

Cleaning schedules were in place in 88% (843/958) of premises and were documented in 86.7% (731/843) of these premises. Documentation included details of the cleaning procedure (66.1% of premises, 483/731) and the cleaning frequency (78.2% of premises, 572/731).

No correlation was found between the presence/absence of cleaning schedules and ACC count; however, it should be noted that the absence of a cleaning schedule does not imply poor cleaning and hygiene practices. Despite this, the importance of cleaning schedules should not be underestimated.

Food preparation surfaces

(particularly in businesses with a high turnover of staff) and although a cleaning schedule is not an explicit legal requirement it is considered best practice. Irish Standard 340:2007 (Hygiene in the Catering Sector), recommends that a detailed cleaning schedule defining the following should be in place:

- item/area to be cleaned
- equipment to be used and its method of operation
- cleaning agent to be used and its concentration and contact time
- frequency of cleaning
- person responsible for cleaning.

It also recommends that a suitably trained and/or qualified person should be responsible for checking that cleaning has been carried out to the required standard. Annex 1 of the Standard provides sample cleaning schedules and cleaning records. Similar recommendations are made in Irish Standard 341:2007 (Hygiene in Food Retailing and Wholesaling).

Few standards have been published on the acceptable level of microorganisms on food preparation surfaces. This is because many factors (including the level of microorganisms on food, the availability of nutrients, the presence of preservatives and the environmental temperature) influence the microbial surface population prior to cleaning and the design and performance of the sanitation programme will determine the levels after cleaning. As these factors differ for every establishment, a common standard is hard to set. However, as a guideline ACC counts $\geq 10^3$ cfu/cm² appear to be a

suitable cut-off point between acceptable and unacceptable surface hygiene for the food preparation surfaces examined in this survey (the applicability of this guideline to other types of food preparation surfaces cannot be assumed). Where appropriate, swabbing can be used in conjunction with other inspection activities to draw a complete picture of the hygiene of a food premises.

The full report of this survey is available on our website at:

<http://tinyurl.com/26p2hb>

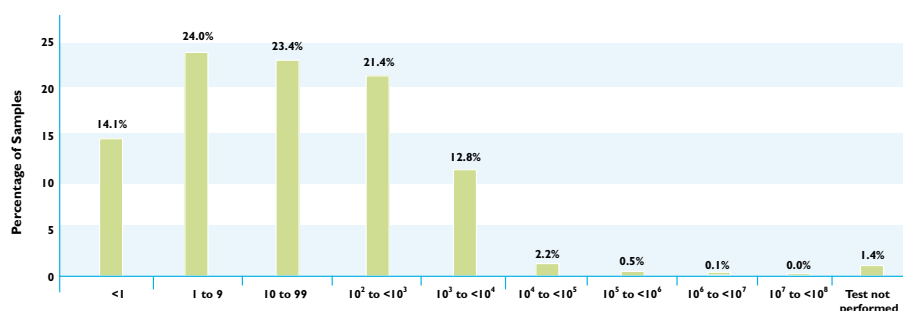


Figure 1: ACC results for chopping boards and worktops (n=2,320)

gm food survey, 2007

The FSAI, as the Competent Authority in Ireland responsible for enforcing EU and national GM (Genetically Modified) food legislation, regularly surveys the Irish market to ensure that only EU-authorized GM food is on the market and that it is labelled appropriately.

The 2007 survey, recently published, states that of the 97 samples analysed, 13 (13%) were found to contain low levels of Roundup Ready GM soya, which is authorised within the EU. None of the GM ingredients constituted greater than 0.9% of the total ingredients and therefore GM labelling was not required, provided that the relevant food business operators were able to demonstrate that the low level presence of Roundup Ready soya was adventitious or technically unavoidable. GM maize or GM rice were not detected in any of the samples.

Of the 436 food samples tested between 2000 and 2007, 88 (20%) were found to contain low levels of GM ingredients

(Figure 1). With the exception of unauthorised GM rice (LLRICE601) identified in products from the USA in 2006, all of the GM ingredients identified in the FSAI surveys were authorised for use within the EU and present in the foods at levels below the labelling threshold.

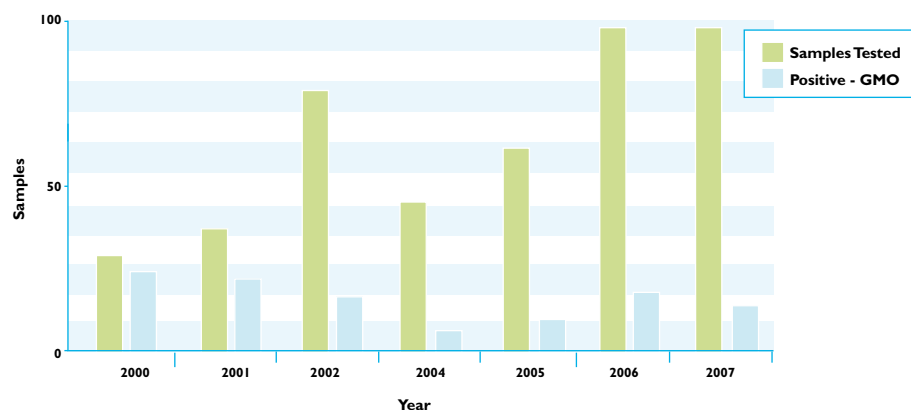
In December 2007, the majority of Member States in the EU voted in favour of amending Commission Decision 2006/601/EC on

emergency measures regarding the presence of illegal GM rice LLRICE601 in rice products from the US. As a result of the systems now in place in the US, EU Member States will no longer be required to test certain rice imports at the point of entry, and export certification will suffice.

Further details of this survey can be viewed on our website at:

<http://tinyurl.com/3yedbl>

Figure 1: FSAI GM survey results, 2000 - 2007



international workshop on shellfish safety

An international workshop entitled 'Taxonomy and Ecology of Harmful Algae and Study of Biotoxins' was held at the United Nations Educational, Scientific and Cultural Organization (UNESCO) Microbial Resources Center (MIRCEN), Department of Fishery Microbiology, College of Fisheries, Mangalore, India, from 21 to 25 January this year.

The workshop was jointly sponsored by the US Food and Agriculture Organization (FAO), the Swedish International Agency (SIDA) and UNESCO MIRCEN, and was attended by over 30 participants from a number of countries including Ireland, India, Sweden, Denmark, Vietnam, Malaysia, Thailand, Morocco, China and Japan.

The objective of the conference was to provide and share information between participants on a variety of topics centered

on shellfish safety, with particular regard to harmful algae and biotoxins, through a series of presentations in conjunction with parallel practical sessions.

The conference was opened and participants welcomed by Dr Indrani Karunasagar, workshop coordinator and director of MIRCEN. Amongst the conference speakers was Mr Dave Clarke from the Marine Institute, Galway, who presented on the effectiveness of monitoring programmes, the

factors required for successful monitoring, and the design of comprehensive monitoring programmes including sampling, analysis, evaluation and dissemination of results, implementation of regulatory actions and action plans.

The conference concluded with participants from each country reporting on the current status of biotoxin monitoring and occurrence in their respective countries.

Pictured here are delegates attending parallel practical sessions which were conducted in MIRCEN's laboratory facilities by its researchers and analytical staff.



food safety in catalonia

Food Safety in Catalonia: A Reflection on the Integrated Public Intervention Model was the title of a seminar which took place in Barcelona on 28 February to launch the Food Safety Plan of Catalonia 2007-2013.

In setting up the Catalan Food Safety Agency, the guidelines of the Food and Agriculture Organization (FAO) and the World Health Organization (WHO) for strengthening national food control systems were followed. These guidelines are intended to help Government bodies to establish national food control systems and to promote effective collaboration between all of the sectors involved in the management and control of food safety and quality.

The Catalan Food Safety Agency applies an integrated food safety system that ensures effective collaboration and coordination among all organisations involved in food control from 'farm to fork'.

The seminar offered an opportunity to discuss strengths and weakness of different models for organising food safety control systems at national and regional level. The

advantages of the integrated system and its adaptation to the specific situation of Catalonia were highlighted by Mr Eduard Mata, the Director of the Catalan Food Safety Agency. Mr Alan Reilly, Deputy CEO,

FSAI, presented on 'Models of Intervention in Food Safety'. Attendees at the conference included professionals responsible for food safety both within Government agencies and the private sector.



Pictured here is Mr Eduard Mata, Director of the Catalan Food Safety Agency with Mr Alan Reilly, Deputy CEO, FSAI.



updated report on zoonotic tuberculosis and food safety

The Scientific Committee first provided an opinion on zoonotic tuberculosis and food safety in 2003. The second edition of this opinion was prepared by the Microbiology Sub-committee and adopted by the Scientific Committee in 2008. This new document contains updated information on tuberculosis caused by bacteria that are collectively referred to as the *Mycobacterium tuberculosis* complex (MTBC) and include *Mycobacterium bovis*.

M. bovis, which causes tuberculosis in cattle and some other ruminant animals can also cause tuberculosis in man. The primary means of foodborne transmission is via meat, milk and dairy products. However, it is true to say that today, infection rates are low (approximately 2% per annum of culture positive isolates of the MTBC from human tuberculosis cases). This low human infection rate is predominantly due to the pasteurisation of milk and the rigorous meat inspection processes, because *M. bovis* is still a major problem in the Irish dairy and cattle industries where approximately 10,000 herds are restricted each year due to the diagnosis of tuberculosis.

conclusions

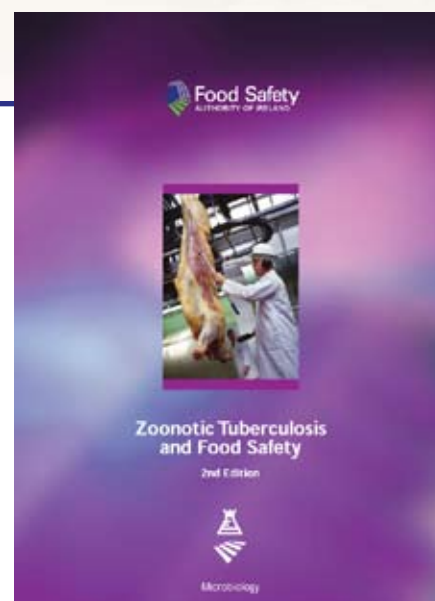
Following consideration of the hazards and hazard control systems practiced in Ireland the Scientific Committee concluded:

1. Current information shows that human zoonotic tuberculosis is uncommon in Ireland.
2. Transmission of zoonotic tuberculosis through milk derived from infected herds has, in the past, been a major public health problem that was largely solved by the introduction of milk pasteurisation and the programme for the eradication of tuberculosis in cattle. Therefore, there are grounds for concern regarding the continuing consumption of unpasteurised milk and dairy products derived from unpasteurised milk.
3. Transmission of *M. bovis* to humans through the consumption of meat has not been documented as a public health concern during surveillance for tuberculosis in many countries over a number of decades. The risk, if any, from the consumption of meat sold as meat for human consumption following official controls conducted by the Competent Authority in abattoirs in Ireland is very low.

recommendations

The Scientific Committee therefore made the following recommendations:

- Efforts should continue to control or eliminate tuberculosis in cattle and other animals used for food production as this may be expected to reduce or eliminate the ultimate source of *M. bovis* infection.
- The critical role of effective, well-controlled pasteurisation in ensuring the safety of milk and dairy products must be continually emphasised and the effectiveness of the pasteurisation process in individual plants should be closely monitored.
- Milk intended to be consumed, or to be further processed, without prior heat treatment, i.e. pasteurisation or equivalent heat treatment, should come from registered herds or flocks that are subject to an official tuberculosis control plan. In the case of cattle, the control plan should include herd inspection and herd testing for tuberculosis every six months to minimise the risk of delay in detecting infected animals. Likewise, goat herds and sheep flocks kept for milk production should be subject to an official tuberculosis control plan that addresses public health concerns in terms of food safety.
- Cheese manufacturers producing cheese from unpasteurised milk should be required to source milk only from registered herds or flocks that are subject to an official tuberculosis control plan.
- Upon detection of tuberculosis in a herd or flock, all cheese made from unpasteurised milk originating from that herd or flock since the most recent herd or flock inspection or negative herd tuberculin test should be regarded as unsuitable for human consumption.
- The practice of informing farmers and farm families of the particular risks associated with the consumption of milk from tuberculosis-positive herds should continue.
- When private domestic consumption of milk, produced on the farm, is practiced by farm families, the use of effective and well-maintained small-scale pasteurisation units is recommended.



- Dairy farmers, cheesemakers, their families and visitors to their premises should be advised about the risks associated with the consumption of unpasteurised milk from any animal species.
- At risk population groups should be alerted to the risks associated with drinking unpasteurised milk and consuming dairy products made from unpasteurised milk.
- The sale of unpasteurised milk intended for human consumption, originating from all farm animals, should be prohibited.
- The current policy with respect to the controls on the use of beef from tuberculin reactor cattle should continue.
- Auditing of the *ante*- and *post-mortem* inspection of carcasses at abattoirs so as to verify compliance with EU legislation regarding the control and removal, from the food chain, of carcasses or parts thereof, considered unfit for human consumption because of the presence of tuberculosis, or for other reasons, is recommended.

In issuing this new opinion, the Scientific Committee and the Microbiology Sub-committee were conscious of discussions following publication of their earlier advice in 2003, particularly in relation to the hazard of transmission of *Mycobacterium bovis* to humans through consumption of cheeses made from unpasteurised milk taken from infected herds. The new report is intended to be unambiguous and clear in its recommendations.

Copies of "Zoonotic Tuberculosis and Food Safety 2nd Ed." are available on request by calling our advice-line on 1890 33 66 77 or on our website at www.fsai.ie.



nutrition labelling - what does it mean?

Nutrition labelling is being revised at European level but in the meantime interpreting food labels in Ireland can be confusing. Health conscious people in Ireland now face up to three different nutrition labelling systems on foods.

Firstly, they might negotiate the GDAs (Guideline Daily Amounts) and Traffic Light systems to choose a food that fits in with their intake goals for fat, sugar, salt and calories.

Then they must deal with the '100g/100ml challenge'.

'Just how many bowls of cereal are in 100g?'

'Is 100ml really only half a glass?'

Finally, for those seeking information on vitamins and minerals, there are the 'mg' (milligrams) and 'µg' (micrograms) to contend with.

'How many 'µg' of vitamin D is enough to provide for growing children?'

'How many 'mg' of calcium is optimal to prevent brittle bones in the over 50s?'



Some simple tools to help consumers cope with the complexity of current nutrition labelling of food are crucial. The RDA (Recommended Dietary Allowance or Recommended Daily Amount) is one of the most valuable tools for Irish consumers. The RDA represents the intake level that meets the requirements of nearly all (97-98%) healthy individuals. Because the RDAs are set to cover the needs of people with quite high requirements, they serve as a useful guide for daily intake by individuals, and should not be exceeded. The RDAs were first introduced in 1941 and, ever since, have been regularly reviewed and

updated to reflect changes in the field of nutritional science. The current RDA levels for nutrient intakes go well beyond 'preventing deficiency' - they now represent optimal intake levels that prevent diet-related chronic diseases.

The RDAs on labels can help consumers figure out how many 'µg' and 'mg' of vitamins and minerals they need to take. It is a legal labelling requirement that information on the amounts of vitamins and minerals in foods and supplements must also be expressed as a percentage of the RDA. The RDA levels for nutrients vary according to age and sex, to cover the variation in human needs due to growth and physiology. However, for food labels, a simplified version of the RDA levels is used to guide consumers in general and is based on an average adult's daily requirements (2,000 calorie diet).

There is no doubt that consumers must engage in an uphill battle when it comes to making sense of current food labels. Nonetheless, the RDAs can provide some guidance on how the amounts of vitamins and minerals added to fortified foods relate to their requirements. Twenty years ago in Ireland only a limited range of breakfast cereals were fortified. Now, the range and number of fortified foods has expanded so much that Irish consumers can choose fortified versions of yogurt, milk, fat spreads, fruit juice, bread, soup and even confectionery.

Most of the vitamins and minerals added to fortified foods are well known for their nutritional benefits, e.g. folic acid, vitamin C, calcium etc. However, the synthetic forms of vitamins and minerals that are added to fortified foods and supplements are quite different to the forms found naturally in food. Synthetic forms are much more easily absorbed by the body. This can be a good thing and a bad thing. Even low amounts of added vitamins will be available for use by the body, but, there is a risk of consuming too much. Consumers will notice that usually only a small amount of the RDA is added to fortified foods. This is to protect people who may consume a lot of a particular type of food from overexposure to added nutrients. On the other hand consumers will find that supplements most often provide 100% of the RDA. This can

be justified because supplement doses are clearly defined for the consumer, e.g. 'take one capsule daily'.



Taking excessive amounts of vitamins and minerals affects people differently. The story of beta carotene (a form of vitamin A) highlights the risks that exist for some people. Many studies indicated that beta carotene was protective against heart disease and cancer. A trial involving over 18,000 smokers (a high risk group for cancer) was initiated to prove beyond doubt the benefits of high intakes of beta carotene. This trial was stopped early because there was an increased rate of ill health and deaths due to cancer and heart disease among people taking beta carotene. Further scientific research demonstrated that high doses of beta carotene are very harmful for smokers or people who have been exposed to asbestos. The reality is that the general public is made up of various groups of people - smokers, people on medication, women during the first few weeks of pregnancy, people with heart disease or cancer etc. This example shows how the safety of excessive amounts of nutrients cannot be guaranteed for everyone.

While some people consider the RDA level is not sufficient, the reality is that the RDA represents the optimal level that can be safely promoted for the vast majority of people. European regulations are being developed to deal with confusing nutrition labelling, but in the meantime consumers should continue with the RDA.

food safety crisis planning at the fsai

Surprise, fear, confusion and panic are not words which would normally be associated with the FSAI or the official agencies. However, when it comes to food safety emergencies, these are some of the characteristics which are shared. Having robust, detailed and tested emergency plans in place is the only way to minimise the impact that a serious food safety incident will have on consumers' health and consumers' confidence in the safety of the food supply.

There are already a number of plans in place at national and EU level which will be activated when a crisis situation arises. These have a clear legal basis and the development of the plans builds on the experience of dealing with complex, serious food safety emergencies such as the Belgian dioxin crisis of 1999. In that incident, there was a lack of coordinated response which led to confusion over which products were affected. The result was unnecessary restriction in the trade of unaffected products, but more importantly, loss of confidence by consumers in those who were responsible for protecting their health.

legal basis for contingency plans

The 'General Food Law' Regulation EC No. 178/2002 provides not only the framework for food safety controls, but also a number of specific requirements relating to emergency situations. The recitals to the Regulation state:

"Recent food safety incidents have demonstrated the need to establish appropriate measures in emergency situations ensuring that all foods, whatever their type and origin, and all feed should be subject to common measures in the event of a serious risk to human health, animal health or the environment. Such a comprehensive approach to emergency food safety measures should allow effective action to be taken and avoid artificial disparities in the treatment of a serious risk in relation to food or feed."

Recent food crises have also shown the benefits to the Commission of having properly adapted, more rapid procedures for crisis management. These organizational procedures should make it possible to improve coordination of effort and to determine the most effective measures on the basis of the best scientific information. Therefore, revised procedures should take into account the [European Food Safety] Authority's responsibilities and should provide for its scientific and technical assistance in the form of advice in the event of a food crisis."

Specific articles in Chapter IV (Rapid Alert System, Crisis Management and Emergencies) set out the key functions and requirements for dealing with managing emergencies. These include the operation of the Rapid Alert System for Food and Feed (RASFF) and the development of a crisis plan by the Commission (Commission Decision 2004/478/EC).

The plan is devised primarily to deal with situations where there is a serious risk to human health and a number of Member States are involved in the production, distribution or sale of potentially affected food and there is a need for overall coordination. In such circumstances, the European Food Safety Authority is responsible for providing risk assessment information and the RASFF is the means of communication.

official food control

There is a need to ensure that at national level there is also the same degree of preparedness for dealing with incidents of such severity or complexity that the normal arrangements are not able to manage them. This has also been provided for in European Regulation, as there are provisions contained within the Official Controls Regulation (EC) No. 882/2004 which require Member States to have "operational contingency plans in place which they are prepared to operate in the event of an emergency. The contingency plans must set out measures to be implemented without delay when feed or food is found to pose a serious risk to humans or animals either directly or through the environment. The plans must also specify the administrative authorities to be engaged, their powers and responsibilities and channels and procedures for sharing information between the relevant parties."

fsai crisis plan

The FSAI has a general crisis plan which will be activated in the event of the Commissions plan being activated. This plan sets out how the FSAI will establish a crisis team and how the team will operate. There are other circumstances where the plan will be activated, such as a large scale food incident which needs central coordination. The plan, therefore, also has to work in conjunction with other plans from a number of different agencies. A good example would be in the event of a nuclear accident. The Department of Environment, Heritage and Local Government has a detailed plan for such a situation, the National Emergency Plan for Nuclear Accidents (<http://tinyurl.com/5t24z6>). Under the arrangements of this plan, once activated, a multi-departmental team will be established, the Emergency Response Coordination Committee. This Committee, which considers the technical assessment of the actual and potential consequences of the accident and advice on what counter measures should be implemented, includes representatives of the Department of Agriculture, Fisheries and Food (DAFF) and the FSAI who have responsibility for food contamination issues. DAFF also has a range of specific plans for dealing with not only animal health, but also a plan for products of animal origin.

The FSAI will be continuing to work with the other official agencies to ensure there are similar contingency plans in place for other sectors of the food chain, ensuring that whatever food safety emergency occurs, Ireland will be prepared to respond in an efficient, coordinated manner.

legislation update

irish legislation

European Communities (Additives, Colours and Sweeteners in Foodstuffs) (Amendment) Regulations, 2008 (S.I. No. 34 of 2008)

These Regulations amend the European Communities (Additives, Colours and Sweeteners in Foodstuffs) Regulations, 2000 (S.I. No. 437 of 2000) by giving effect to Directive 2006/52/EC of 5 July 2006 insofar as it amends Directive 94/35/EC on sweeteners for use in foodstuffs.

Directive 2006/52/EC amends the Annex to Directive 94/35/EC as follows:

- in the first column of the row for E 420 to E 967, 'E 968' is added;
- in the second column of the row for E 420 to E 967, 'Erythritol' is added.

Products complying with Directive 2006/52/EC may be used and placed on the market from the date the Regulations are signed by the Minister (i.e. 19 February 2008).

Products placed on the market or labelled before 15 August 2008, which do not comply with the provisions of Directive 2006/52/EC relating to sweeteners, may be marketed until stocks are exhausted.

European Communities (Additives, Colours and Sweeteners in Foodstuffs) (Amendment) (No. 2) Regulations, 2008 (S.I. No. 59 of 2008)

These Regulations amend the European Communities (Additives, Colours and Sweeteners in Foodstuffs) Regulations, 2000 (S.I. No. 437 of 2000) by giving effect to Commission Directive 2006/128/EC of 8 December 2006, amending and correcting Directive 95/31/EC, laying down specific criteria of purity concerning sweeteners for use in foodstuffs.

Commission Directive 2006/128/EC amends and corrects the Annex to Directive 95/31/EC by inserting:

- text concerning E 968 erythritol after E 967 xylitol
- replacement text concerning the following:
 - E 954 saccharin and its Na, K and Ca salts
 - E 955 sucralose
 - E 962 salt of aspartame-acesulfame
 - E 965 (i) maltitol
 - E 965 (ii) maltitol syrup
 - E 966 lactitol

This S.I. came into effect on 5 March 2008.

European Communities (Food Additives other than Colours and Sweeteners) (Amendment) Regulations, 2008 (S.I. No. 40 of 2008)

These Regulations amend the European Communities (Food Additives other than Colours and Sweeteners) Regulations, 2004 (S.I. No. 58 of 2004) by giving effect to Directive 2006/52/EC of 5 July 2006, insofar as it amends Directive 95/2/EC on food additives other than colours and sweeteners.

Directive 2006/52/EC amends Annexes I to VI to Directive 95/2/EC.

S.I. No. 40 of 2008 comes into operation on 15 August 2008, however, products complying with Directive 2006/52/EC may be used and placed on the market from the date that S.I. No. 40 of 2008 was signed by the Minister (i.e. 22 February 2008).

Products placed on the market or labelled before 15 August 2008, which do not comply with the provisions of Directive 2006/52/EC relating to food additives other than colours and sweeteners may be marketed until stocks are exhausted.

Electronic copies of the Statutory Instruments can be accessed on our website at: www.fsai.ie/legislation



open consultation

There is currently one open consultation on our website:

National Rules for Small Quantities of Wild Game and Wild Game Meat

It is proposed to introduce national legislation governing the direct supply by the hunter of small quantities of wild game (as primary product) and wild game meat to the final consumer or to local retail establishments directly supplying the final consumer.

The proposed national legislation sets out the scope of activities that will be permitted under the rules including definitions for 'small quantities' and 'local'. General hygiene requirements are outlined as well as specific training requirements for persons who

hunt wild game with a view to placing it on the market for human consumption.

The FSAI welcome your views on these proposed national rules and in particular, invite you to submit your comments in relation to the scope and definitions contained therein.

This consultation and further details are available at www.fsai.ie/consultations.

Comments and views on this consultation should be submitted by **5pm on Wednesday, 4 June 2008**, as follows - email: consultation@fsai.ie; fax: +353 1 8171301; or post: Consultations, Food Safety Authority of Ireland, Abbey Court, Lower Abbey Street, Dublin 1.

european legislation

materials and articles in contact with food: recycled plastic materials and articles

Commission Regulation (EC) No. 282/2008 (OJ L86, p9, 28/03/2008) of 27 March 2008 on recycled plastic materials and articles intended to come into contact with foods and amending Regulation (EC) No. 2023/2006.

Commission Regulation (EC) No. 282/2008 applies to the plastic materials and articles and parts thereof which contain recycled plastic and are intended to come into contact with foodstuffs as referred to in Article 1 of Directive 2002/72/EC. The plastic materials and articles that fall within the scope of the Regulation also remain subject to the requirements of Directive 2002/72/EC.

Commission Regulation (EC) No. 282/2008 does not apply to the following recycled plastic materials and articles, provided that they have been manufactured according to good manufacturing practice, as laid down in Regulation (EC) No. 2023/2006:

- recycled plastic materials and articles made with monomers and starting substances, derived from chemical depolymerization of plastic materials and articles;
- recycled plastic materials and articles made from unused plastic production off-cuts and/or process scraps in compliance with Directive 2002/72/EC, that are recycled within the manufacturing site or are used at another site;
- recycled plastic materials and articles in which the recycled plastic is used behind a plastic functional barrier, as specified in Directive 2002/72/EC.

Commission Regulation (EC) No. 282/2008 lists the requirements for recycled plastic materials and articles to be used in food contact materials as well as the conditions that a recycling process must meet in order to be authorised. A safety assessment of the recycling process will be carried out by the European Food Safety Authority following the submission of an application for approval.

The European Commission will establish and maintain a Community register of authorised recycling processes which will be publicly available and will contain the information set out in Article 6(3) of Commission Regulation (EC) No. 282/2008.

Voluntary self-declaration of the recycled content in recycled plastic materials and articles must follow the rules laid down in ISO 14021:1999 or equivalent.

The Regulation can be accessed on our website at: <http://tinyurl.com/2u59f2>

revision of food labelling legislation

The European Commission recently adopted a proposal which aims to modernise and improve food labelling legislation. The proposal titled - 'Regulation on the provision of food information to consumers' merges and amends two areas of labelling, namely, general food labelling (Directive 2000/13/EC) and nutrition labelling (Directive 90/496/EEC). The content of the proposed Regulation includes:

- a mandatory nutritional declaration with a requirement that certain nutrients appear in the principal field of vision (i.e. front of pack) for most pre-packaged processed foods
- a minimum font size (3mm) for mandatory information
- the extension of the current requirement to label EU identified allergens to non-prepackaged foods including foods sold in restaurants and other catering establishments
- a requirement that beverages with an alcohol content greater than 1.2% by volume of alcohol provide a list of ingredients (this requirement will not apply to wine, beer and spirits as defined in specified legislation)
- an indication of the country of origin or place of provenance is mandatory where failure to indicate this might mislead the consumer to a material degree as to the true country of origin, however, if country of origin/place of provenance is declared, and where the country of origin/place of provenance of the food product is not the same as the one of its primary ingredient(s), the country of origin/place of provenance of those ingredient(s) must also be given.

The proposal can be accessed on the EU website at: <http://tinyurl.com/3coz6w>



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

S.I. No. 2 of 2008 European Communities (Foot and Mouth Disease) (Restriction on Imports from Cyprus) (Amendment) Regulations, 2008

S.I. No. 3 of 2008 European Communities (Foot and Mouth Disease) (Restriction on Imports from the United Kingdom) (No.2) Regulations, 2008

S.I. No. 7 of 2008 European Communities (Avian Influenza) (Precautionary Measures) Regulations, 2008

S.I. No. 17 of 2008 European Communities (Avian Influenza) (Control on Imports) Regulations, 2008

S.I. No. 32 of 2008 European Communities (Foot and Mouth Disease) (Restriction on Imports from Cyprus) (Amendment) (No. 3) Regulations, 2008

S.I. No. 34 of 2008 European Communities (Additives, Colours and Sweeteners in Foodstuffs) (Amendment) Regulations, 2008

S.I. No. 37 of 2008 European Communities (Pesticide Residues) (Amendment) Regulations, 2008

S.I. No. 40 of 2008 European Communities (Food Additives other than Colours and Sweeteners) (Amendment) Regulations, 2008

S.I. No. 42 of 2008 Diseases of Animals Act 1966 (Registration of Poultry Premises) Order, 2008



mailing list

fsainews is a resource for all public health professionals, researchers, food scientists, food hygienists and quality control personnel working in food safety. We would like to ensure that anyone who may find it useful receives a copy.

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food safety competition 2008



The FSAI is preparing for its annual competition for the best food safety related project at both degree and diploma levels in all Irish third level colleges.

Students from universities, institutes of technology and colleges are invited to put forward their final year project for entry into this competition.

To enter, students must submit a one page abstract of his/her project to the FSAI before **Monday 26 May 2008**, indicating whether the project is degree or diploma level. The project abstracts will be assessed and finalists will be short-listed. The finalists will then be invited to present their projects to a panel of judges on 12 June.

For further information, please contact the FSAI advice-line on 1890 33 66 77 or by email at: info@fsai.ie

recent publications

The following publications have recently been produced by the FSAI:

- Report: Multi-Agency National Control Plan
- Booklet: Cryptosporidium - Protecting Your Food Business
- Report: Zoonotic Tuberculosis and Food Safety (2nd edition)

The publications are available on our website at www.fsai.ie/publications.

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