

A National Infant Feeding Policy for Ireland

Scientific Recommendations for a National Infant Feeding Policy in Ireland, a scientific report recently published by the FSAI, highlights a number of key concerns with current infant feeding trends and outlines specific actions and advice to improve the nutritional diet of mums-to-be and infants from birth to one year. The report is based on research into infant feeding practices in Ireland and the latest international scientific opinion. It states that emerging evidence worldwide shows good nutrition during pregnancy and throughout an infant's first year can have a significant positive impact on health throughout a person's life.

A guide for healthcare professionals, *Best Practice for Infant Feeding in Ireland*, was also published recently, and outlines the practicalities of putting best infant feeding guidelines into practice. The development of this guide was one of the key recommendations made by the Expert Working Group who compiled the scientific report. It will be an invaluable resource for all healthcare professionals who have a role in providing advice to women before they become pregnant and while they are pregnant. It will also guide parents on all aspects of food and nutrition for babies from birth through the first year of life.

In Ireland, breastfeeding rates continue to remain low and this new report provides guidance on how to address new and emerging issues such as the need to supplement all infants from birth with vitamin D to prevent rickets and special guidance on the safe preparation of powdered infant formulae to prevent foodborne illness. The weaning of infants from milk to solid food is also found to be an area that needs particular attention, as an estimated 71% of babies are being weaned onto solid foods too early. In addition, the spiralling prevalence of childhood obesity, now known to affect toddlers, has its origins in poor infant feeding practices. This new report and the accompanying guide for healthcare professionals addresses all of these issues.

Both publications are freely available from our website, www.fsai.ie, or by contacting our advice-line on 1890 336677.



Pictured at the launch of the scientific report are (l-r): Neerja Murphy age 11 months; Lena Paruszewski Parra age 9 months; Felicity Ryan, FSAI, with Kate Sewell age 3 months and John Cowley age 7 months.

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Supplement: EFSA – Keeping Europe's Food Safe for 10 Years

Food Safety and Ireland's Presidency of the European Union

For the first six months of the New Year, Ireland will find itself centre stage in European affairs as it begins its Presidency of the Council of the European Union. This will be Ireland's 7th Presidency since joining in 1973, and will coincide with the 40th anniversary of our accession to the EU. It will be a busy time for Ministers and their departments. Estimates of the scale of activity predict that chairing meetings of ministers and staff from the 27 Member States will see at least 15,000 delegates attending about 180 events, many of which will take place in Dublin Castle. A highlight of our last Presidency in 2004 was a ceremony to mark the membership of ten new Member States. This time, however, we just miss out, as the latest and 28th member, Croatia, will not officially join until July 2013.

Ireland will take over from current hosts Cyprus and will also work with Lithuania and Greece who are next in line for the Presidency. It will be a challenging period, but one which presents an opportunity to boost our reputation and further cement the economic and political relationships in the EU, whose population now tops 500 million. Whether political or technical, the role of the Presidency is to meet and deal with each challenge, finding compromises as necessary and keep the European project on track.

The headline issues during the next six months will most likely feature financial stability, the EU budget 2014-2020, the crucial Common Agricultural Policy, the Common Fisheries Policy and Horizon 2020 (the EU's future framework programme for research and innovation). Nonetheless, food control and food safety will be a strong feature of the work of the Presidency. Both the Department of Health and the Department of Agriculture, Food and the Marine will play key roles in Council, negotiating a wide range of food safety related legislation. They will also lead the EU Member States during various meetings of the Codex Alimentarius, where standards and guidance for international trade in food on a global level are developed and agreed. In all of these tasks, the FSAI will provide technical and scientific input and support.

Some important legislation will be on the agenda. A major proposal is the revision of Regulation EC No. 882/2004 on official controls. Its scope is to be extended to cover plant health, seeds and plant reproductive material. The proposal also contains some controversial aspects such as the calculation and publication of the cost of food safety inspection, sampling and other controls. Moreover, it is proposed to obtain full recovery of these costs from food businesses, although there is some leeway in the case of small businesses with less than ten staff and restricted turnover. Other aspects of the proposal include the provision of a report to a food business operator following every inspection, more transparency for the public on outcomes of official controls, requirements for distance selling, audits of laboratories and empowering the Commission to make additional sector specific rules.

The hygiene rules are up for discussion with proposals on ante- and post-mortem as well as *Trichinella* testing for pigs. EU rules on novel foods which date from 1997 are also up for negotiation; the aim being to protect consumers while at the same time improving access to the market for new and innovative foods. This is likely to impact on the area of nanotechnology, which is used in more and more applications and which poses challenges in ensuring appropriate risk assessments and risk management. Proposals for rules on foods from cloned animals are in preparation, but may well fall to the Presidency after Ireland. Some clarifications on the new food information regulation, or put simply, food labelling, might well become Ireland's responsibility.

Complex talks are expected on regulations on foods for particular nutritional uses, the so-called PARNUTS regulation, where a new framework regulation is in hand which deals with food for vulnerable groups of the population, including infants and toddlers. Work is planned for a new regulation on erucic acid, the purpose of which is to protect consumers from its possible negative effects in oils and fats.

Food control and food safety will be a strong feature of the work of the Presidency.

Ireland, through the FSAI, will also play host to a number of meetings of the European Food Safety Authority (EFSA), who's Advisory Forum, the main platform for EFSA to interact with the Member States, will meet in Dublin in March and consider its research needs and multi-annual plan for 2014-2016. Other EFSA meetings to take place in Dublin will include the National Focal Points and the Advisory Forum Working Group on Communications. An emerging group following the many organisational changes in food control in the Member States is the Heads of National Food Safety Agencies. Agreement has just been reached to formalise this group and a meeting will be scheduled and hosted by the FSAI.

Clearly, the work of the EU in relation to food safety and food controls continues apace. Making progress requires diplomacy, tenacity and vision, as well as social and scientific skills. Ireland's public service is not without experience and capability in these areas. We look forward to the challenges and the opportunity to make a worthwhile contribution to improving standards and levels of protection of all citizens.



A handwritten signature in blue ink that reads "Alan Reilly".

Alan Reilly
Chief Executive

Human Library at the FSAI

The FSAI ran a 'Human Library' on Tuesday 13 November, as part of Library Ireland Week 2012. The day-long event was designed to give small food businesses an opportunity to meet one-to-one with food safety experts who acted as 'human books' providing advice across a range of food safety areas.

Experts answered questions on key issues facing food businesses such as food labelling requirements, displaying calories on menus, best practice for food hygiene, staff training and steps involved in starting up a new food business. Food businesses had the opportunity to visit the 'human library' and meet face-to-face with one of our experts to go through any issues or questions they may have had in relation to food safety practices in their business.

The event was organised in conjunction with the FSAI's in-house library resource located on Lower Abbey Street, which contains a wide range of books, journals, videos and online databases related to food safety and hygiene. The information centre is open to the food industry, staff of government agencies, researchers and the general public.



Helen Crowley, FSAI, who acted as a 'human book' at the event is pictured here with visitor Louis Ryan.

Advice-line Evaluation

The FSAI advice-line provides a vital link to the food industry and to consumers in relation to all food safety issues. The food industry contacts our information line largely in relation to FSAI publications, legislation, labelling and training requirements. The advice-line also acts as a starting point for consumers who wish to make a complaint about a food premises or a food that they have purchased.

We constantly strive to better the service we provide to our customers. To this end, we have published a Customer Charter in which we outline the level of service that can be expected by our customers. It is important to us that in order to provide a service which meets the requirements of our customers and helps to fulfil our mission, that we receive feedback from users of the service on a regular basis. We therefore carry out evaluations of our advice-line service every two years and appreciate any feedback received.

Our most recent advice-line evaluation was carried out from August to October this year, by The Research Perspective Ltd. The evaluation was carried out in two parts: 1) a survey of advice-line users looking at phone and email contact and 2) a mystery shopper exercise whereby

the advice-line was contacted by external agents using 30 different scenarios.

The evaluation focused on assessing the service experience of recent users of the advice-line, both telephone and email query service, and measuring the service against the criteria set out in the Customer Charter. Response rates to the surveys were good and above the required thresholds to ensure results are reliable.

The main findings of the evaluation were as follows:

- The advice-line and email service were highly rated by users
- Overall satisfaction was good (82%)
- Most users would use the service again (88%)
- First call resolution was considered good at 89%. Where more than one call was required, 8% were resolved within a second call
- The length of time spent on the phone was deemed reasonable by most callers (95%)
- Most customer charter metrics were achieved for most users of both services with scores over 80%. Ratings for the agent who dealt with the queries were high across all metrics
- However, it was noted that where content of query responses was good in general, there is a challenge to be addressed in terms of engaging with the specifics of the query
- Email responses need to be reviewed and improved in terms of specific query responses.

The full report on this evaluation is available on our website at: <http://bit.ly/TFvARL>. A copy of our Customer Charter is available to download at: <http://www.fsai.ie/about/index.asp#customer>.

Our advice-line can be contacted on 1890 33 66 77 or at info@fsai.ie, and operates from 9am to 5pm daily.



Elaine Connolly, Advice-line Assistant, FSAI.

New EU Food Information Regulations

Upcoming changes under EU food information regulations (Regulation No. (EU) 1169/2011) will have a significant impact on how food businesses communicate with consumers. The new food information rules will overhaul labelling and advertising rules that have been in place since 2000 and will ensure consumers have the information needed to help them make more informed choices about the food they purchase.

The new regulation extends beyond food labelling to cover activities concerning the provision of food information to consumers, including by means of internet marketing. It applies to food businesses at all stages of the food chain and addresses diverse issues such as font size, allergen labelling of non-prepacked foods, nutrition declaration, front of pack labelling and origin labelling.

The new rules recognise that the food label itself is not the only means of communicating information on food to consumers. Today, the functionality of the internet offers greater possibilities for consumers to access information either via advertising or by supporting websites. Social media is being exploited to extol the virtues of products through increasingly sophisticated marketing methods. This offers new challenges for the legislation and the authorities trying to enforce it.

Businesses are encouraged to familiarise themselves with the new regulatory requirements, including timelines for implementation. The booklet: *Overview of Changes to Food Labelling Introduced under the New Food Information Regulation* is available to download from the FSAI website at www.fsai.ie.

Regulation No. (EU) 1169/2011 will apply from 13 December 2014, with the exception of requirements for mandatory nutrition declaration, which will apply from 13 December 2016, and specific requirements regarding the designation of minced meat, which will apply from 1 January 2014.

The Main Principles of Regulation No. (EU) 1169/2011 are as follows:

Fair Information Practices

While maintaining the core objective of the current rules that food information must not be misleading, the new Regulation expands on the ways in which food information could be considered misleading, including:

- by suggesting that the food possesses special characteristics when in fact all similar foods possess such characteristics, in particular by specifically emphasising the presence or absence of certain ingredients and/or nutrients
- by suggesting, by means of the appearance, the description or pictorial representations, the presence of a particular food or an ingredient, while in reality, a component naturally present or an ingredient normally used in that food has been substituted with a different component or a different ingredient

Mandatory Food Information

The regulation stipulates that mandatory food information must be marked in a conspicuous place in such a way as to be easily visible, clearly legible and, where appropriate, indelible. It must not in any way be hidden, obscured, detracted from or interrupted by any other written or pictorial matter or any other intervening material. Voluntary food information must not be displayed to the detriment of the space available for mandatory food information.

The list of mandatory information which should be provided for all foods set out in the current rules is maintained in the new Regulation, e.g. product name, list of ingredients, net weight, date of minimum durability etc. However, certain particulars in this list have been extended and others which are currently provided on a voluntary basis will be mandatory under the new rules, e.g. nutrition labelling, origin labelling for certain meats. Additional mandatory indications for specific types or categories of foods are set out, the majority of which already exist in current legislation, e.g. statements regarding the presence of sweeteners, foods containing glycyrrhizic acid, foods packaged in certain gases etc. However, some of the current mandatory statements have been amended and these include beverages with high caffeine content and foods containing aspartame/aspartame-acesulfame salt.

Same Field of Vision

Under the new Regulation, the name of the product, the net quantity of food and the actual alcoholic strength by volume for beverages containing more than 1.2% by volume of alcohol must appear in the same field of vision. The requirement to include date of minimum durability in the same field of vision, which is a requirement under the current rules, has been removed.



Emma Reinhardt, FSAI, is pictured here at the labelling seminar

Product Name

The Regulation introduces additional requirements regarding the product name with specific indications required to accompany the product name where relevant. Specific provisions include requirements regarding: foods that have been frozen before sale and which are sold defrosted; meat products and meat preparations which have the appearance of a cut/joint of meat to which water is added and where the water is more than 5% of the weight of the finished product; meat products, meat preparations and fishery products which give the impression they are made from a whole cut of meat but consist of different pieces combined; foods for which substitute ingredients are used.

Refined Oils and Fats - Vegetable Origin

The Regulation allows for the grouping together of refined oils and fats of vegetable origin in the list of ingredients under the designation 'vegetable oils' or 'vegetable fats' as appropriate, which must be followed immediately by a list of indications of specific vegetable origin. It may be followed by the phrase 'in varying proportions'. If grouped together, vegetable oils or vegetable fats must be included in the list of ingredients in descending order of weight, on the basis of the total weight of the vegetable oils or vegetable fat present. The expression 'fully hydrogenated' or 'partly hydrogenated', as appropriate, must accompany the indication of hydrogenated oil or fat.

Refined Oils and Fats - Animal Origin

The indication 'oil' or 'fat' of animal origin must appear with either the adjective 'animal', or the indication of specific animal origin. The expression 'fully hydrogenated' or 'partly hydrogenated', as appropriate, must accompany the indication of hydrogenated oil or fat.

Allergens

Currently, all pre-packaged food products must indicate on the label the use in their product of specific ingredients which the EU has identified as causing allergenic reactions in certain people or to which individuals can be intolerant. This list of substances remains the same; however, under the new rules, they will have to be indicated in the list of ingredients and the name of the substance must be emphasised through a typeset that clearly distinguishes it from the rest of the list of ingredients, e.g. by means of the font, style or background colour.

For pre-packaged foods which are exempt from the requirement to provide a list of ingredients, e.g. alcohol, the indication on the label must comprise of the word 'contains' followed by the name of the substance or product. Under the new rules, the requirement to highlight the use of any of these substances in the production of a foodstuff has been extended to foods sold loose such as food in restaurants, 'take-aways', canteens and deli counters etc. Rules on the means by which this information must be made available to the consumer for foods sold loose, must be introduced by each Member State.

Nutrition Declaration

Currently, the provision of nutrition information is voluntary unless a nutrition-related claim is made when the declaration then becomes mandatory. From 13th December, 2016, nutrition information will be mandatory for most pre-packaged foodstuffs. For food businesses who provide nutrition information on a voluntary basis between 13th December, 2014 and 13th December, 2016, the declaration must comply with the new Regulation.



Dr Wayne Anderson and Anne Marie Boland, both of the FSAI, consider food labels at the seminar

There are a number of foodstuffs which are exempt from the mandatory requirement to provide nutrition information and include unprocessed products that comprise a single ingredient or category of ingredients, herbs, spices, salt and chewing gums. Also included in the exemption is food, including handcrafted food directly supplied by the manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer.

All components of the mandatory nutrition declaration should be in the same field of vision on the foodstuff packaging.

Date of Minimum Durability

In the case of foods which, from a microbiological point of view, are highly perishable and are therefore likely after a short period to constitute an immediate danger to human health, the date of minimum durability must be replaced by the 'use-by' date. Under the new Regulation, once the 'use-by' date has passed, a food is deemed to be unsafe. The Regulation also requires an indication of the date of freezing or the date of first freezing for frozen meat, frozen meat preparations and frozen unprocessed fishery products.

Country of Origin

Country of origin labelling is currently mandatory for certain products such as beef, fish, honey, olive oil and fresh fruit and vegetables. In other cases, it currently only becomes mandatory when its absence might mislead consumers as to the true origin of the product. Under the new rules, the mandatory indication of country of origin or place of provenance is extended to the meat of pigs, sheep, goats and poultry.

Following an impact assessment on the introduction of such rules, the EU Commission is required to introduce legislation setting out how origin will be determined and how this information must be indicated. The European Commission must introduce these rules by 13th December, 2013.

In addition, the new Regulation requires the EU Commission to set out rules where the country of origin or the place of provenance of a food is given and where it is not the same as that of its primary ingredient (defined as representing more than 50% of the food). These rules will require that the country of origin or place of provenance of the primary ingredient must (i) also be given; or (ii) be indicated as being different to that of the food.

See our website at: <http://bit.ly/TrsoXM> for further information and seminar presentations.

Health Claims Update

From 14 December this year, the only Article 13 (general health) claims which are legally permitted for use on foods and food supplements are those listed in the Annex of Regulation (EU) No 432/2012 as well as those currently 'on hold'.

A full list of approved Article 13 claims was to be published by January 2010, however, there were significant delays. In May 2012, Regulation (EU) No 432/2012 was published which lists 222 approved Article 13 claims and their conditions of use. This is only a partial list. There are 2,235 Article 13 claims for which the assessment by EFSA or the consideration by the Commission has yet to be finalised. These are considered to be 'on hold' and the majority of these claims 'on hold' relate to botanical substances.

To date 1,719 Article 13 claims have been rejected. The EU Register of claims lists all permitted claims and their conditions of use as well as all rejected claims. It can be viewed at <http://bit.ly/R41ic1>.

The ID codes for Article 13 claims which are on hold are listed on the European Commission website and can be viewed at <http://bit.ly/VhUnHO>. To find out what claim a particular ID code relates to, food businesses must check the database of health claims located on EFSA's website at <http://bit.ly/UDtlyc>.

SFPA Regional Workshops

The FSAI coordinated a series of regional workshops during September and October with sea-fisheries protection officers (SFPOs) from the Sea-Fisheries Protection Authority (SFPA). The SFPA enforces food safety legislation, on behalf of the FSAI, in relation to fish and live bivalve molluscs in approved establishments, fishing vessels and shellfish production areas.

The aim of the workshops was to highlight food safety topics of importance to the SFPOs. This year, topics included seafood labelling, assuring seafood safety (the Marine Institute (MI) Contaminants and Residues Programmes), shellfish monitoring, the Food Safety Manual Programme of An Bord Iascaigh Mhara (BIM), the EU rapid alert system for food and feed and handling of food incidents. In addition to speakers from the FSAI and the SFPA, the sessions benefitted greatly with presentations from experts from the MI and BIM. The workshops were held in SFPA Port Offices or other suitable venues nearby, to best facilitate SFPOs.



Pictured at the Dunmore East regional workshop in September were (l-r): Back row: Liam Kennedy, Alan Mullery and Damian Allen of the SFPA; Vicky Lyons, BIM; Maria Meghan, FSAI; and Adrienne Patterson, SFPA. Front Row: Gavin Kierse, Eugene Wallace and Aileen O'Sullivan of the SFPA

National Seminar with the Local Authority Veterinary Service

The FSAI held a national seminar for local authority veterinary inspectors on 8 November last in the Clarion hotel, IFSC. The seminar was attended largely by local authority veterinary inspectors engaged in official controls on behalf of the FSAI.

Dr Martin Blake, Department of Agriculture, Food and the Marine (DAFM), provided the opening presentation and gave an update on Regulation 1099/2009/EC on the protection of animals in slaughterhouses, which applies from 1 January 2013. Details were outlined on how the new legislation will be implemented across all slaughterhouses. Updates were also provided on the new Animal Health and Welfare Bill and the Veterinary Practice Amendment Act.

Pablo Romero Barrios of the European Food Safety Authority (EFSA) spoke in detail on the review of meat inspections carried out on pork, poultry and other species, and the scientific opinion and technical assistance that EFSA will provide to the European Commission by 2013 on this topic. Sabine Juelicher of the Food and Veterinary Office (FVO) presented on EU provisions for flexibility in the 'hygiene package' and provided information on the FVO mission series relating to this



Pictured are (l-r) Sinead Murphy, FSAI; John Matthews, FSAI; Pablo Romero Barrios, EFSA; Sharon Williams, FSAI; Sabine Juelicher, FVO; Martin Blake, DAFM; Dan Crowley, Cork County Council and Pat Farrell, FSAI.

flexibility. The presentation highlighted best practices and examples of on the spot applications for flexibility.

Robert Huey from the Department of Agriculture and Rural Development, Northern Ireland, spoke on 'One Health' and how it may be applied in the everyday work of the local authority veterinary inspector. Finally, Dan Crowley, Cork County Council, discussed the local authority microbiological sampling programme for 2012 and highlighted the main process issues and how these could be resolved by all local authorities.

EFSA – Keeping Europe's Food Safe for 10 Years

The European Food Safety Authority (EFSA) was established in 2002, following a series of food crises in Europe, as part of a major overhaul of the European Union's approach to protecting its citizens from possible risks associated with the food chain.

Working Together

Scientific cooperation between EFSA and EU Member States is a central pillar of EFSA's Founding Regulation and has therefore been a cornerstone of the Authority's activities since it was set up in 2002. The Advisory Forum and Focal Points are key vehicles for data and information exchange, consultation, and work-sharing between EFSA and Member States.

Advisory Forum

EFSA's Advisory Forum connects EFSA with the national food safety authorities of all EU Member States. The Advisory Forum advises EFSA on scientific matters, its work programme and priorities, and helps the Authority to address emerging risk issues as early as possible. With EFSA in the role of "enabler", the Forum provides a valuable risk assessment "umbrella" for Member States, allowing them to concentrate their energies on national priorities and reducing duplication of effort. Members use the Forum to advise EFSA on scientific matters, its work programme and priorities, and to address emerging risk issues as early as possible.

Advisory Forum members represent each national body responsible for risk assessment in the EU. Professor Alan Reilly, CEO, FSAI represents Ireland on the Advisory Forum.

National Focal Point

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 the focal point is to keep EFSA and Advisory Forum members informed of national risk assessment and scientific



developments. The network of focal points coordinate communications with risk assessment institutes in the Member States and are closely involved in work programmes conducted by EFSA and by national authorities.

Scientific Excellence

EFSA's scientific advice has been supporting the European food safety system for 10 years. Since it became operational, the Authority has published more than 2,500 scientific outputs that have been used by the European Commission, Member States and the European Parliament as the basis for risk management measures and policy initiatives.

EFSA's Scientific Committee and Panels are composed of highly qualified experts in scientific risk assessment, with a wide variety of expertise allowing EFSA to address all aspects of its remit: from food and feed safety to nutrition, animal health and welfare, plant protection and plant health. Members of EFSA's Scientific Committee and Panels are appointed through a rigorous selection

procedure on the basis of proven scientific excellence. The scientists work for EFSA in an independent capacity bringing their expertise and experience from a diverse range of backgrounds together in a joint assessment result.

The current Irish members of EFSA's Scientific Committee and Panels are as follows:

- Dr Declan Bolton, Principal Research Officer, Teagasc, is a member of the Scientific Panel on Biological Hazards
- Dr John Griffin, Senior Superintending Veterinary Inspector, Department of Agriculture, Food and the Marine, is Vice-Chair of the Scientific Panel on Biological Hazards
- Dr Michael O'Keeffe, Residue Specialist, is a member of the Scientific Panel on Contaminants in the Food Chain
- Dr Iona Pratt, Consultant Toxicologist, FSAI, is Chair of the Scientific Panel on Food Contact Materials, Flavourings, Enzymes and Processing Aids and a member of the EFSA Scientific Committee

Protecting European Consumers

Europeans enjoy one of the highest levels of food safety in the world. Helping to ensure safe food for a community that now numbers nearly 500 million citizens has been achieved through the continued commitment and innovation of the EU institutions and its independent agencies. Over the past 10 years EFSA has underpinned the EU's decisions on food safety through its extensive scientific work, which is grounded in the most up-to-date knowledge, methodologies and data.

EFSA's scientific remit covers the full range of consumers' "farm to fork" concerns and the work of its experts has been at the core of the EU's success in tackling many issues.

EFSA @ 10

The year 2002 was a pivotal one in the history of European food safety, with the establishment of the European Food Safety Authority and the enactment of the General Food Law which heralded a new evidence-based era for policy makers.

If we turn back the clock to the dawn of the new millennium, European food safety was in a much different place. A string of food crises had eroded popular faith in the ability of Europe's leaders to ensure the food that reached consumers' plates was safe. Those in power were left with much to do to win back the trust of an increasingly wary population. The most dramatic issue was of course BSE but there was also significant public concern about a range of other food safety-related issues such as Salmonella, dioxins, and the use of chemicals in the food chain. Decisive action was called for and the European legislator did not fail.

Following the European Commission's influential White Paper on Food Safety in 2000, the General Food Law ushered in a new food safety paradigm for Europe with consumer protection at its heart. The single

most critical change it introduced was the separation of risk assessment from risk management, thereby putting science at the centre of decision making. In this new food safety system, cooperation was recognised as a key tool in protecting consumers, considering that many of today's food safety problems are global in nature and that the food chain is only as strong as its weakest link. The General Food Law has enabled cooperation in an unprecedented manner and Europe has made significant progress over the past decade thanks in large part to the close bonds that EFSA and the Member States have built. In parallel, the investment made in risk assessment has increased at both the national and European levels. And we are reaping the benefits with significant progress in a number of key public health areas.

For example, the number of BSE cases in Europe has dropped from more than 2000 in 2002 to just 28 in 2011. The coordinated, evidence-based approach to curtailing BSE has proven successful both in terms of reducing the prevalence of the disease as well as in restoring consumer confidence. In contrast with the public anxiety about Creutzfeldt-Jakob disease in the late '90s, a 2010 survey showed that only 2% of EU consumers considered BSE to be a possible risk associated with food.

Of course Europe cannot be complacent; the Commission's TSE Roadmap outlines the future measures that must be taken to

ensure that there is no re-emergence. EFSA's scientific advice will remain a central pillar of that process. Europe is making significant progress on a number of other fronts; for example the ongoing reduction in human Salmonella cases, which have been halved in the EU in the period 2004 to 2009, shows what coordinated control programmes can achieve.

From a consumer protection perspective, a significant part of EFSA's work programme in recent years has been devoted to assessing health and nutrition claims. The assessment of over 3000 claims has culminated in the approval of a list of permitted health claims by the Commission earlier this year. In practice this means that unsubstantiated claims will be removed from products by the end of this year, thus ensuring that European consumers are not exposed to possible misleading claims.

The exchange of information and data on food safety has been bolstered over the past decade. Thanks to the willingness of Member States to share the data from their national control systems, EFSA is able to monitor and analyse data on a wide range of contaminants including for example veterinary drug residues, dioxins, antimicrobial resistance and pesticide residues. This monitoring and analysis of data is an important tool in protecting European public health in an area which we know is of concern to citizens.

Joint Conference to Celebrate EFSA's Anniversary

The FSAI and EFSA jointly hosted an international conference in Dublin in October. The conference, to mark EFSA's 10th anniversary, brought together EU regulatory and parliamentary representatives, together with stakeholders in the food

chain, to discuss the current state of food safety in Europe and to examine emerging threats and risks.

The conference was opened by Simon Coveney, T.D., Minister for Agriculture, Food and the Marine. It provided an opportunity to look back over the past ten years on the evolution of food safety in the EU, to assess current matters and to look forward to what food safety issues may be on the menu in 2022. Prof. Alan Reilly, Chief Executive of

the FSAI, welcomed the progress made by European food regulators over the last ten years, particularly the role played by EFSA in times of food crises, providing rapid responses to Member States in the form of scientific expertise and evaluation. He stated that closer cooperation and coordination of activities is key to ensuring the safety of Europe's food chain. This has been central to EFSA's mission, providing the highest possible standards of independent scientific advice and risk assessments.

EFSA – Keeping Europe's Food Safe for 10 Years

Eurobarometer surveys have consistently shown over the years that consumers perceive the presence of chemical residues in foods as a serious risk to their health.

A crisis in one Member State can overnight become a priority for all. Together, EFSA and the Member States have developed crisis preparedness procedures over the past decade and tested them annually to ensure they are fit for purpose. Moreover, they are put into practice in real-life situations on a number of occasions every year. While each crisis situation is unique, the importance of effective communication is common to all. When one considers the diversity of the European population and the different regional perceptions of risk, it is not an easy task. As the complexity of risk assessment increases, EFSA is challenged to communicate the uncertainties and limitations of our risk assessments and to contextualise risk. To do so, we rely on close collaboration with the national agencies and we are very grateful to the communication staff at the FSAI for their valued input.

Europe can take pride in its achievements, yet it is clear that there are challenges ahead associated with factors such as the ongoing liberalisation of food trade, the sustainability of our food production systems, global

population growth, the obesity epidemic, urbanisation, ageing populations, climate change, new technologies, new legislation, and the interaction between science and society. Risk assessment itself is becoming more complex as we increasingly have to address multiple chemical exposures, multiple risks, environmental impacts and assess benefit as well as risk. Ironically, while there is a lack of data for some risk assessments, in other cases improved analytical techniques are generating vastly more data which we must analyse.

Future challenges were high on the agenda of two events that EFSA organised in Parma recently to mark its tenth anniversary. The first of these events entitled *Challenging boundaries in risk assessment – sharing experiences* took place on November 7-8 and brought together more than 600 experts from around the world to look at the challenges facing regulatory science from a multidisciplinary perspective. The presentations and debate that took place will help to keep EFSA at the forefront of the science of risk assessment in the coming years and they are available on our website.

Less than a week later, the second event which was co-organised with the Commission's DG Health

& Consumers provided a platform for stakeholders and partner institutions to contribute their vision for EFSA's future. It built on the outcomes of the second external evaluation of EFSA which was published in September and the discussions will help the Authority's Management Board to formulate its recommendations for the ongoing development of the organization. The video recording of the entire event is also available on the EFSA website.

The Food Safety Authority of Ireland has been a strong supporter of EFSA's work from the outset. Ireland's willingness to share its highest level expertise with the rest of Europe means it has played a prominent role in shaping Europe's food safety system. I would like to thank Alan and all the staff of the FSAI for their invaluable ongoing support for EFSA's work.

Catherine Geslain-Lanéelle
Executive Director, EFSA



Delegates at the conference to mark the occasion of EFSA's 10th anniversary



Pictured at the conference are (l-r): Prof. Alan Reilly, Chief Executive of the FSAI; Ms Catherine Geslain-Lanéelle, Executive Director of EFSA and Simon Coveney, T.D., Minister for Agriculture, Food and the Marine

EFSA – Keeping Europe's Food Safe for 10 Years

EFSA's Timeline





Pictured at the seminar on food flavouring legislation were (l-r): Dr Rhodri Evans, Chief Specialist Chemical Safety, FSAI; Dr Iona Pratt, Consultant Toxicologist, FSAI; Joy Hardinge, AJH Consulting, UK and Anne Marie Boland, Senior Technical Executive in Regulatory Affairs, FSAI

Seminar on Food Flavouring Legislation

At a seminar on 31 October last, food business operators and enforcement officers had an opportunity to get a real understanding of the regulatory controls on the use of flavourings in food. The seminar addressed issues surrounding flavourings for use in food, including the legislation by which they are regulated and the labelling rules related to food to which flavourings have been added. Speakers focused on the topics such as legislation and safety assessment, application and use, labelling and enforcement.

A guidance document, Guidance on Flavourings, 2012 was launched at the seminar and is available on our website at www.fsai.ie.

Food Fraud Task Force

FSAI's recently established Food Fraud Task Force met for the first time on 16 October. Presentations on the day were delivered by the FSAI; Suzanne Boyd, Head of Incidents, Standards and Science, FSAI and Detective Alan Toft, National Bureau of Criminal Investigation. Suggestions for future work programmes were discussed, including strategies for increasing food fraud awareness; sharing food fraud case information; establishing training needs and examination of internet sales.



Pictured are members of the Food Fraud Task Force at its inaugural meeting in October

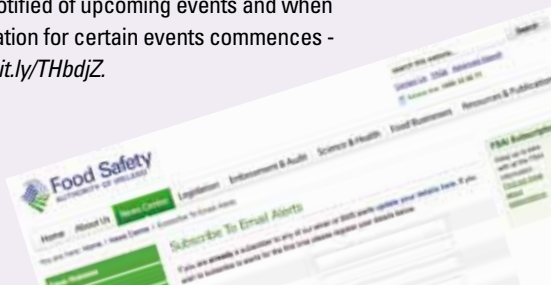
Auditing Food Safety Management Systems

The FSAI held a one day training workshop in October on auditing food safety management systems for Local Authority veterinary inspectors. This workshop followed on from a series of workshops delivered in 2011 to Department of Agriculture, Food and the Marine veterinary inspectors and another delivered to sea-fishery protection officers in September this year.

The aim of these workshops was to provide attendees with the knowledge and skills for auditing food safety management systems. As part of the workshop, attendees conducted a desktop audit of a food safety management system and evaluated the HACCP based procedures presented in a case study.

Events

Subscribe to the events section on our website in order to be notified of upcoming events and when registration for certain events commences - <http://bit.ly/THbdjZ>.



Date for your Diary:

CATEX 2013

Visit the FSAI's information stand at Stand G22.

Date: 19-21 February

Location: RDS, Dublin

Who should attend: Those working in the food service and allied sectors.

For further information see www.catexexhibition.com



Legislation Update

EU Legislation

New Food Additive

Commission Regulation (EU) No. 1049/2012 of 8 November 2012 regarding the use of polyglycitol syrup in several food categories and Commission Regulation (EU) No. 1050/2012 regarding its specification have been published in the EU Official Journal.

Annex II to Regulation (EC) No. 1333/2008 lays down an EU list of food additives approved for use in foods and their conditions of use. Regulation (EU) No. 1049/2012 amends this Annex following an application for the authorisation of the use of polyglycitol syrup in several food categories. Following evaluation by the European Food Safety Authority, its use has been authorised in the food categories applied for and it has been assigned E964 as its E-number.

The use of polyglycitol syrup in the food categories has been authorised for use in the categories specified in the Annex to Regulation (EU) No. 1049/2012 from 29 November 2012.

Nutrition Claims

Commission Regulation (EU) No. 1047/2012 amending Regulation (EC) No. 1924/2006 regarding nutrition claims has been published in the EU Official Journal. Regulation (EC) No. 1924/2006 provides that nutrition claims made on foods are only permitted if they are listed in the Annex to that Regulation. This amending Regulation introduces new nutrition claims to the list of permitted nutrition claims and modifies the conditions of use of certain claims already permitted by Regulation (EC) No. 1924/2006.

■ No Added Sodium/Salt'

The claim stating that salt/sodium has not been added to a particular food product is currently not permitted. However, it is recognised that as new technology has developed and scientific advice on salt has become generally accepted, manufacturers are making efforts to produce more products without addition of salt where technologically feasible. Given the particular interest from a health point of view to encourage such innovation, this amending Regulation makes it possible for manufacturers to use a 'no added sodium/salt' claim where the product does not contain any added sodium/salt or any other ingredient containing added sodium/salt and the product contains no more than 0.12g sodium, or the equivalent value for salt, per 100g or 100ml.

■ 'Reduced Saturated Fat'

Reduction in saturated fat is only beneficial when it is not substituted or when it is substituted by unsaturated fat. Substitution of saturated fat by trans-fatty acids is not beneficial for health and therefore the conditions of use of the nutrition claim referring to the reduction of saturated fat is designed to avoid substitution by trans-fatty acids.

The claim 'reduced saturated fat' claim may only be made

- (a) if the sum of saturated fatty acids and of trans-fatty acids in the product bearing the claim is at least 30% less than the sum of saturated fatty acids and of

trans-fatty acids in a similar product; and

- (b) if the content in trans-fatty acids in the product bearing the claim is equal to or less than in a similar product.

■ 'Reduced Sugars'

This amending Regulation sets the conditions for a claim stating that sugars have been reduced. Under current conditions, sugars reduction can be claimed even when sugars are replaced by fat, leading to a reformulated product higher in energy. This amending Regulation requires that the energy of the food must not increase after reformulation if using a 'reduced sugars' claim. The claim 'reduced sugars' may only be used if the amount of energy of the product bearing the claim is equal to or less than the amount of energy in a similar product.

Products placed on the market prior to 1 June 2014 which do not comply with the requirements of Regulation (EC) No. 1924/2006 as amended by this Regulation may be marketed until the stocks are exhausted.

Food Information Regulation and Origin Labelling

Regulation (EU) No. 1169/2011 on the provision of food information to the consumer will apply from 14 December 2014. The Regulation introduces a number of provisions on origin labelling of foods and it places an obligation on the EU Commission to adopt by 13 December 2013 implementing rules for voluntary origin indications as well country of origin or place of provenance of unprocessed meat of pigs, poultry, sheep and goats. There is also an obligation on the EU Commission to submit a report on the mandatory indication of country of origin or place of provenance of unprocessed meat as a meat ingredient to the European Parliament and Council.

The EU Commission had issued a call for tenders earlier in the year regarding the above studies and contracts were signed in September and October.

■ **Origin Labelling For Unprocessed Meat**

The main objective of this study is to examine and compare different options for implementing origin labelling for fresh and frozen meat (including minced meat and cuts) of pigs, poultry, sheep and goats, with the aim of giving appropriate origin information to consumers, whilst not causing disproportionate burdens on the meat supply chain, trade, consumers and the administration. The study aims to assess the feasibility and costs of different geographical levels for expressing the provenance of the meat:

EU (or non-EU/third country), country (Member State or third country), a smaller administrative area, or a combination of these. The contract was awarded in October 2013 and will run for nine months. Results should be available by mid 2013. Details on the terms of reference for the study are available on the Europa website at <http://bit.ly/HQou69>.

■ **Voluntary Origin Labelling and Mandatory Indication of Country of Origin or Place of Provenance of Meat Used as an Ingredient**

The European Commission has signed an agreement with an external company to conduct an external study on the application of rules on 'voluntary origin' labelling of foods and on the mandatory indication of country of origin or place of provenance of meat used as an ingredient. The

study has the following objectives:

- To assess the impact of different options of implementing voluntary origin labelling rules and
- To assess the need for the consumer to be informed regarding the origin of meat ingredients; and
- To assess the feasibility of providing mandatory indication of country of origin or place of provenance of meat as an ingredient

The terms of reference for the study can be viewed at <http://bit.ly/11wwhiQ>.

The main phase of the study is expected to take place between November 2012 and January 2013 with draft results available for voluntary origin labelling of foods in February 2013 and with regard to mandatory origin labelling for meat ingredients in May 2012.

EU Guidance With Regard to Setting Tolerances for Nutrient Values Declared on a Label

Work on an EU document which provides guidance to both food businesses and enforcement officials on tolerances for nutrition labelling purposes is nearing completion. Tolerances mean the acceptable differences between

the nutrient values declared on a label and those established in the course of an official control. Tolerances for nutrition labelling are important as it is not possible for foods to always contain the exact nutrient levels labelled due for example to natural variations in raw ingredients, effect of processing, storage conditions and time etc. Taking these variations into consideration the draft document is divided into the following sections:

- Tolerances for nutrient declarations on food
- Tolerances for vitamins and minerals in food supplements
- Tolerances for controlling the compliance levels of nutrients and other substances with levels specified in Regulation 1924/2006/EC and for controlling the levels of vitamins and minerals when added to foods according to Regulation 1925/2006/EC

There is also a section on rounding guidelines for nutrition declaration for foods.

The EU Commission hopes to have the final document available on its website by the end of December 2012. Once it is published it will also be available on our website, www.fsai.ie.

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

S.I. 371 of 2012

European Communities (Equine) (Amendment) Regulations, 2012

S.I. No. 374 of 2012

European Communities (Import of Personal Consignments of Products of Animal Origin) Regulations, 2012

S.I. No 418 of 2012

European Communities (Official Controls on the Import of Food of Non-Animal Origin for Pesticide Residues) (Amendment) (No. 4) Regulations, 2012

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 FSAI NEWS, we will feature a Frequently Asked Question. This issue's question is ...

Why do I Need to Know if I'm Manufacturing or Producing a Ready-to-Eat Food?

Microbiological criteria for food are laid down in Commission Regulation (EC) No. 2073/2005 on microbiological criteria for foodstuffs. Some of these criteria are applicable to ready-to-eat foods. This is why food business operators must determine if the food they manufacture or produce is ready-to-eat when placed on the market. Food business operators must make this decision when developing their food safety management system based on the principles of HACCP.

How do I Decide if I am producing a Ready-to-Eat Food?

The Regulation defines a ready-to-eat food as: *"food intended by the producer or the manufacturer for direct human consumption without the need for cooking or other processing effective to eliminate or reduce to an acceptable level micro-organisms of concern."*

In determining whether a food is ready-to-eat or not, the manufacturer or producer must consider whether the food will be:

1) cooked, 2) reheated, or 3) processed before consumption in a way that will eliminate or reduce to an acceptable level microorganisms of concern. See *Figure 1: Decision Tree*

1) Food Intended to be Cooked

A food which the manufacturer or producer intends to be cooked before consumption is not considered ready-to-eat when placed on the market, if it is labelled with cooking instructions (time/temperature combination) which have been validated to ensure the microorganisms of concern will be eliminated or reduced to an acceptable level. For some foods ambiguity could arise over whether they need to be cooked or not. These foods should be



considered ready-to-eat unless cooking instructions are provided, regardless of whether they are sold loose or pre-packaged. See 'Labelling Cooking Instruction'.

2) Food Intended to be Reheated

If the manufacturer or processor intends reheating to be carried out for palatability purposes, rather than to eliminate microbiological risk, this food (whether pre-packaged or loose) is considered ready-to-eat when placed on the market.

3) Foods Intended for Further Processing

If the manufacturer intends the food to go for further processing in the food chain which would be effective to eliminate or reduce to an acceptable

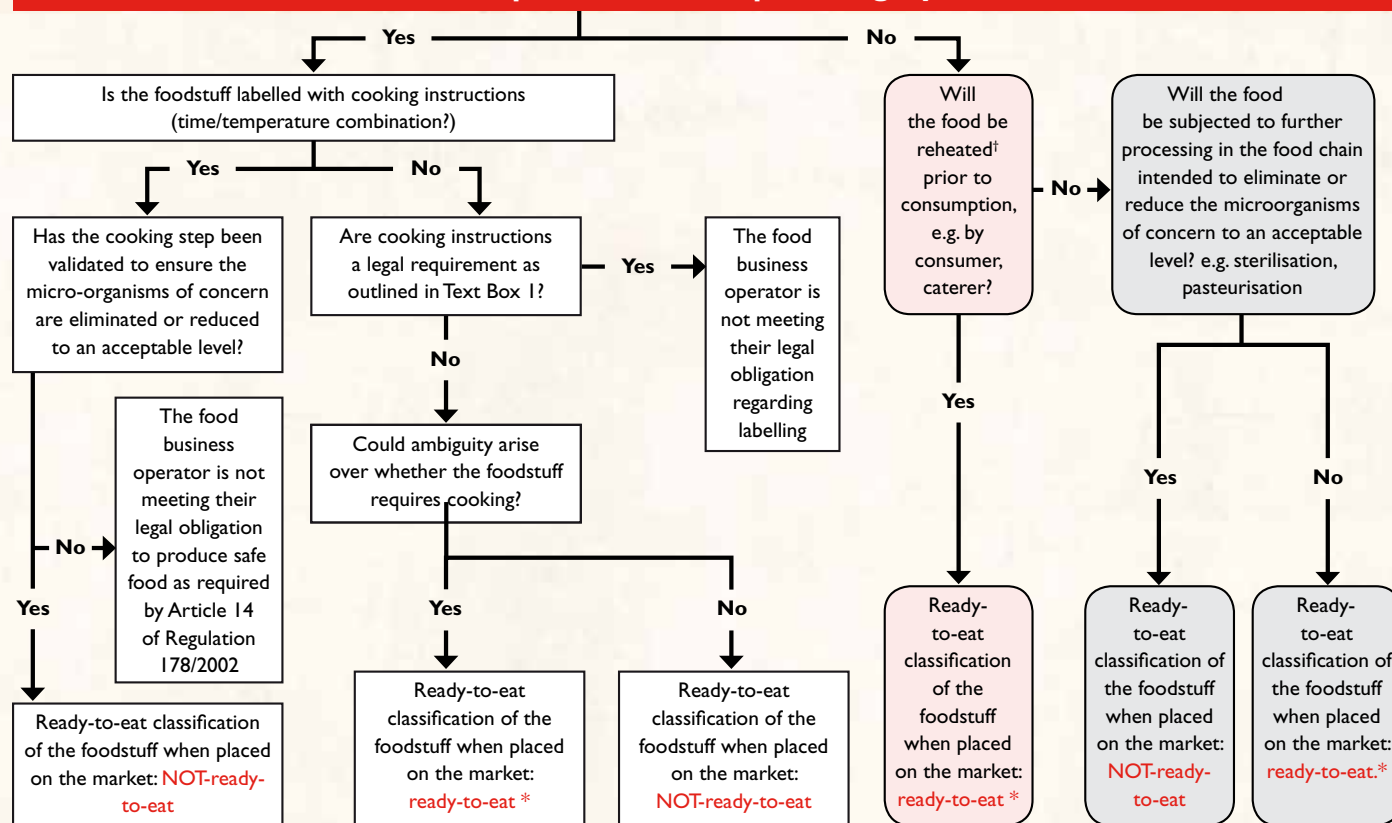
level the microorganisms of concern (for example, sterilisation or pasteurisation) this food would not be considered ready-to-eat when placed on the market.

In Addition

There are environmental monitoring requirements for food business operators that manufacture ready-to-eat foods that may pose a *Listeria monocytogenes* risk for public health.

Furthermore, the requirements for determining an appropriate shelf-life are particularly important for ready-to-eat foods that are able to support the growth of *L. monocytogenes* and that may pose a *L. monocytogenes* risk for public health. See 'Regulation and Guidance' for details on page 11.

Will the food be cooked prior to consumption, e.g. by consumer, caterer etc?



† Reheating conducted for palatability purposes and not for the elimination of microbiological risk.

* Where a foodstuff is classified as ready-to-eat, the manufacturer must ensure the foodstuff complies with the relevant food safety criterion for *L. monocytogenes*.

Figure1: Decision Tree

Labelling Cooking Instructions

There is a legal requirement to label cooking instructions on:

- 1) Minced meat, meat preparations and meat products, from all animal species other than poultry, intended to be eaten cooked.** Article 6 of Commission Regulation (EC) No. 2073/2005 states that these foods must be clearly labelled by the manufacturer to inform the consumer of the need for thorough cooking prior to consumption. This requirement applies whether the food is sold loose or pre-packaged. For foods sold loose, the instruction can be supplied by way of a notice at the point of sale.
- 2) Pre-packaged food that is intended to be cooked before consumption.** Article 11 of Directive 2000/13/EC (relating to the labelling, presentation and advertising of foodstuffs) requires that instructions for use of a foodstuff shall be indicated in such a way as to enable appropriate use to be made thereof. For example, if a food is intended to be cooked before consumption, cooking instructions must be provided.

Although this legal requirement does not apply to foods sold loose (notwithstanding Point 1) it is strongly recommended that cooking instructions are provided, particularly for foods where there may ambiguity over whether cooking is required or not. These cooking instructions could be provided through point of sale notices (when food is sold to the consumer) or on the accompanying documentation (when food is sold on to another food business).

Regulation and Guidance

- Commission Regulation (EC) 2073 is available at: <http://bit.ly/11MeXFP>
- FSAI's Guidance Note 26 for food business operators on the implementation of the Commission Regulation (EC) 2073/2005 is available at: <http://bit.ly/wktoxB>
- FSAI's Guidance Note 18 on validation of product shelf-life (revision 1) is available at: <http://bit.ly/RyJ6Y7>
- Guidelines on sampling the food processing area and equipment for the detection of *Listeria monocytogenes* are available at: <http://bit.ly/SDiF1L>

For further information, please contact our Advice-Line on 1890 33 66 77 or info@fsai.ie.

Recent Publications

The following publications were recently produced by the FSAI:

- Audit of Official Control - Imports of Food of Non-animal Origin and Corrective Action Plan
- Food Supplements Aide Memoire and Checklist
- Guidance Note No. 6: Infant Formula Labelling (Revision)
- Safe Catering Pack (Revision)
- Audit of Catering Establishments to Assess Food Allergen Controls
- Guidance on Flavourings
- Scientific Recommendations for a National Infant Feeding Policy, 2nd Edition
- Best Practice for Infant Feeding in Ireland – A Guide For Healthcare Professionals
- Audit of Official Controls Carried Out at Local Authority Approved Slaughterhouses (Reports for Clare, Galway, Kildare, Kerry and South Tipperary)
- *E. coli* – How to Reduce the Risk from Your Farm

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



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www.facebook.com/FSAI

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. If you think there is someone else in your organisation who would benefit from receiving a copy please fill in the form below. You can also use this form to change your own mailing details.

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OR email requested changes to oeustace@fsai.ie