



Port Health - Food Safety Law Enforcement Plan 2025/26

Service Aims and Objectives

Through this plan, the London Port Health Authority (LPHA) aims to ensure compliance with legislation related to imported food and animal feed to protect food safety and animal health. Deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health throughout the London Port Health district.

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the Food Standards Agency (FSA) and the content of this Plan provides the basis upon which the LPHA will be monitored and audited by the FSA.

In this context the LPHA also has responsibility for Food Hygiene and Standards, Imported Food Sampling, Animal Feeding Stuffs and Shellfish Classification.

Food Hygiene and Food Standards Inspections

The Port Health Service undertakes food hygiene and food standards inspections of premises within the Port domain, including Approved premises. The Port is also responsible for the inspection of some fixed craft and moving vessels serving food and drink on the tidal Thames. Food premises airside at London City Airport also come under the Port. LPHA currently regulates 160 food businesses, of which 1 is non-compliant at the start of 25/26.

The number of Food Hygiene/Food Standards inspections undertaken in 2024/25 were 160 for Food Hygiene (including Alternative Enforcement Strategy) and 10 Food Standards.

The City has also entered into a Local Government (Miscellaneous Provisions) Act section 101 agreement with Thurrock Council to exercise Thurrock's functions under the feed and food laws in a section of the Logistics Park **Alternative Enforcement Strategy**.

LPHA received 9 food complaints in 24/25 – 7 for the River/Airport and 2 for the Logistics Park.

The LPHA has also exercised the advice in the Food Law Code of Practice (COP) which allows for an alternative enforcement strategy (AES) for low-risk premises, i.e. Food Hygiene category E based on the COP risk rating.

For 25/26 the Port Health Team have 57 inspections due for Food Hygiene and 13 for Food Standards.

All new registrations will have an initial formal inspection and if rated as an E they will then come under the AES. Under the AES the premises will be due an intervention every 3 years and the intention is that a physical inspection will be carried out every 9 years.

Premises and vessels under the AES will receive a specific questionnaire which will be scrutinised by a competent officer to assess if enough information has been obtained. A follow up telephone call may be necessary. Some premises will receive a follow up visit to

verify information on the questionnaire and visits, if necessary, will take place following complaints, ID notifications, changes of activity/management or non-return of questionnaire.

It is the intention that the larger E rated premises within the Port, which have comprehensive HACCP documentation, such as large-scale storage facilities and milling plants will still have a visit at each due intervention which has resulted in another area of responsibility for LPHA.

Feed and Food Complaints

The Service follows corporate policy in relation to any complaints and we aim to provide a same day response to all consumer complaints on food matters.

Home Authority Principle and Primary Authority Scheme

It is our policy to contact the Primary Authority when we become aware of an importer not conforming with the relevant import regulations. We also try to identify and contact Primary Authorities following adverse sample results.

The Primary Authority database is always examined to check for any partnerships in relation to any food premises that face interventions.

We also provide updates on current issues and offer advice and support in the use of electronic systems such as the IPAFFS system.

Food and Feed Sampling

All samples in respect of Imported Food are taken in accordance with Port Health's Sampling Policy. Details regarding the selection, procurement and preparation of samples are contained in the Service's Sampling Plan.

The main aim of our sampling programme is to proactively detect foods outside specific regulation which may be a threat to public or animal health. In addition, we monitor and sample on a risk basis having regard to information from a range of sources including Border Notifications, FSA / Defra intelligence, previous adverse sample results, new products and random sampling.

POAO is checked at the frequencies set by the Border Operating Model.

Sampling plans will change throughout the year to reflect emerging issues and evidence.

This has resulted in further formal action, including detention and/or destruction of the consignment, for adverse chemical and biological results. Labelling issues are referred to the responsible Trading Standards service at consignment's destination.

Selection of Consignments

The requirement and selection of a consignment for routine sampling is decided officers either during the documentary check process or at the time of the physical examination of the product. Officers can subject any consignment at any stage of the checks to any sampling and laboratory tests if it is considered necessary to ascertain that the consignment meets the import requirements. Officers are either a qualified Chartered/Environmental Health Practitioner or Official Veterinarian.

Information that can be used to help identify and prioritise risks includes:

1. Intelligence obtained from different national and international databases: IPAFFS, EWS
2. Specific priorities and alerts issued by the different Regulators.
3. Local intelligence/professional expertise from results from previous years and type of imports.

The information sources listed above can be used to assess risks. The risk assessment is likely to be a combination of data, judgement and expert knowledge.

The plan specifies the types of products, origin of the products (if relevant) and the analysis or exam required. The sampling plan aims to proactively detect food or feed which may be a danger to public or animal health and to ensure compliance with food standards and relevant legislation. The sampling plan covers food and feed of POAO or NAO. The plan is not fixed, but is reviewed at regular intervals during the year, to adjust it to the fluctuations in trade and the on-going assessment of the existent and emerging risks.

Officers will undertake sampling in accordance with the standards required in the various Codes of Practice, and in compliance with any methodology when specified in the Regulations:

New products should be sampled if possible or where the AO suspects the consignment does not comply with the import conditions.

Feed, Food Safety and Standards promotional work, and other non-official controls interventions

Regular stakeholder events are held to update the trade and discuss current issues. This opportunity is taken to promote the use of Information Technology to speed clearance times.

Feed and Food Safety Incidents

LPHA are committed to responding promptly to all food or feed safety incidents. The Service has arrangements in place to ensure that it is able to respond to Food Alerts issued by the

FSA. Warnings are received electronically, and all urgent Food Alerts receive immediate attention and action where necessary. Out of hours arrangements are in place.

Border Notifications issued by the European Commission are sent to a designated Officer of the GB Competent Authority who is responsible for their distribution amongst LPHA Officers involved in Imported Food Enforcement. LPHA's database, Port Health Interactive Live Information System (PHILIS) can be used to issue reminders when specific products are subject to control.

Organisational Structure

The LPHA employs a range of roles within the Port Health Service, these are outlined below with the numbers on establishment also provided; this might be different at the number employed in those roles at any one time.

- 1 Assistant Director
- 5 Managers
- 9 Team Leaders
- 9 Port Health Officers
- 8 Official Veterinarians
- 10 Senior Port Health Technical Officers
- 33 Port Health Technical Officers (PHTOs)
- 5 Senior Support Assistants
- 12 Support Assistants
- 2 Assistant Accounts Receivable Officers
- 2 Apprentices
- 6 Launch Crew
- 1 Compliance Officer
- 1 Training Officer

2025/26 Sampling Plans

Sampling Plan 25/26 - Products of Animal Origin and Non-Animal Origin (Food & Feed)

The purpose of the plan is to specify the imported Products of Animal Origin (POAO) and Non-Animal Origin (NAO) food/feed that should be sampled for examination and analysis each year.

The plan is devised using a risk-based approach when deciding which tests and products to be sampled, balanced with the requirement of randomisation in the selection of consignments.

The LPHA Imported Food Sampling Policy allows sampling of food and feed to be decided on a local basis according to product type, local knowledge, seasonal variation and historical import records at each individual port.

Deviations from the sampling protocol are permitted to take account of an importer's history of non-compliance with legislative requirements, previous adverse sample results

and intelligence received, for example, from inland local authorities, importers and consumer complaints. Sampling plans are provided in the appendices to this service plan.

NAO Sampling

Appendix 1 provides the plan for NAO food and feed samples being taken this year.

POAO Sampling

Appendix 2 provides the plan for POAO food and feed samples being taken this year.

Fishery Products

Appendix 3 provides the plan for fishery products being taken this year.

Shellfish Sampling

Appendix 4 provides the plan for locally sourced samples of shellfish from the Thames Estuary performed as part of official shellfish controls.

FSA Food Sampling Survey

There is an additional FSA Food Sampling Survey to be carried out for this period, where funding is obtained directly from Central Government. The purpose of this survey is to supplement Local Government food sampling with specific priorities, so foods of national concern can be tested.

Laboratories used by Port Health are listed below:

1. Food Water and Environmental Microbiology Laboratory London 61 Colindale Avenue, London, NW9 5EQ

Telephone: 02083276550

Email: FWEM@ukhsa.gov.uk

2. Kent Scientific Services

8 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4YT Telephone 030004151000

Email : kss@kent.gov.uk

3. Public Analyst Scientific Services (Eurofins UK)

i54 Business Park, Valiant Way, Wolverhampton. WV9 5GB

Telephone 01902627200

Email: info@publicanalystservices.co.uk

4. Centre for Environment, Fisheries and Aquaculture Science (CEFAS) Pakefield Road, Lowestoft, Suffolk, NR33 0HT

Telephone 01502562244

Email : www.cefasc.co.uk/contact-us

Results

When the results are received, they are entered in the City's database Port Health Interactive Live Information System (PHILIS) and UK databases, where appropriate.

For unsatisfactory results, officers will instigate further action which includes:

1. Notifying the food/feed business operator of the failure and issue the appropriate notifications to reject the consignment if still not released for import (for instance in the case of suspicious consignments). The possible options will be destruction or re-export, depending on the assessment of the risk posed by the failure.
2. Notifying the Local Authority of the premises of destination when the consignment was released pending the results, to allow them to take appropriate action for the non-compliant product in circulation.
3. Depending on the failure IPAFFS might trigger the issuing of an emergency notifications.

Appendix 1 - Proposed Imported FNAO NMP – sampling priorities table for 25/26 for food not of animal origin

	High priority
	Medium priority
	Low priority

[Text Wrapping Break]

Nuts & seeds products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Nuts & seeds products	<i>E. coli, Salmonella, Listeria monocytogenes</i>	Potentially ready-to-eat commodities: fresh coconut, nut spreads, sesame seeds, cumin seeds; alfalfa sprouts, all bean sprouts, other sprouted seeds, tahini & halva (from Syria)
High	Nuts & seeds products	<i>Aflatoxins</i>	Almonds (including ground/flour), groundnuts (including spreads/flour), Brazil nuts, pistachios, hazelnuts, walnuts, other tree nuts and mixed nuts, nut spreads and butters, melon seeds (egusi), chia seeds
Medium	Nuts & seeds products	<i>Cyanide (hydrocyanic acid)</i>	Apricot kernels, bitter almonds
Medium	Nuts & seeds products	<i>Undeclared allergens</i>	Nut spreads and butters
Medium	Nuts & seeds products	<i>Pesticide residues</i>	Bean sprouts (mung beans)
Low	Nuts & seeds products	<i>Undeclared sulphites</i>	Coconut (desiccated, dried, flour)

Herbs & spices

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Herbs & spices	<i>Salmonella</i> , <i>Shiga toxin producing E. coli (STEC)</i> , <i>Listeria monocytogenes</i>	Potentially ready-to-eat commodities: paan (betel) leaves, coriander leaves and other herbs (fresh or dried); pepper (black, pink & white), paprika powder, chilli powder, spice mixtures
High	Herbs & spices	<i>Aflatoxins</i>	Nutmeg (whole & ground), paprika, chilli powder
High	Herbs & spices	<i>Sudan dyes</i>	Turmeric (from Bangladesh), crushed pepper (from China), paprika (from Russia), spices and sumac (from Turkey)
Medium	Herbs & spices	Undeclared allergens, colours/dyes or sulphites	Spice mixtures, curry powder
Medium	Herbs & spices	<i>Pyrrolizidine alkaloids (PAHs)</i>	Cumin, oregano (from a number of countries)
Medium	Herbs & spices	<i>Pesticide residues</i>	Tea leaves (especially from India); ginger, coriander roots & leaves, paprika, chilli powder; herbs (from Israel and Cambodia)
Low	Herbs & spices	<i>Benzo(a)pyrene (BaP)</i>	Ginger, oregano

Fruit & vegetables

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Fruit & vegetables	<i>Salmonella</i> , <i>Shiga toxin producing E. coli (STEC)</i> , <i>Listeria monocytogenes</i>	Potentially ready-to-eat commodities: e.g. peppers (sweet or bell), salad leaves, prepared fresh vegetables, enoki mushrooms (especially from China)
High	Fruit & vegetables	<i>Aflatoxins</i>	Dried figs, chilli peppers (fresh or dried)
Medium	Fruit & vegetables	<i>Pesticide residues</i>	Dried beans (from any non-EU country), beans (fresh), yardlong beans, okra, peppers (sweet or bell), chilli peppers (fresh or dried), spinach, vine leaves (from Egypt). Vine fruits/raisins, pomegranates, citrus fruits, mangoes (fresh or dried), prepared fresh fruit, dried dates, bananas (from Ecuador), apples (from India)
Medium	Fruit & vegetables	<i>Norovirus / Hepatitis A</i>	Frozen sweetcorn, frozen raspberries, other small fruit & berries
Low	Fruit & vegetables	<i>Ochratoxin A</i>	Vine fruits/raisins, dried figs
Low	Fruit & vegetables	<i>Cadmium</i>	Avocados & asparagus (from Peru)
Low	Fruit & vegetables	<i>Undeclared sulphites</i>	Dried apricots, dried dates, other dried or candied/mixed fruits
Low	Fruit & vegetables	<i>Iodine</i>	Seaweed and kelp (from China, Japan & Korea)

Other FNAO products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Edible oils	<i>Sudan dyes</i>	Palm oil (from Ivory Coast)
High	Grain products	<i>Sudan dyes</i>	Couscous (from Lebanon), fruit bars (from USA)
Medium	Edible oils	<i>3-MPCD & Pyrrolizidine alkaloids (PAHs)</i>	Palm oil
Medium	Grain products	<i>Pesticide residues</i>	Rice (from India)
Low	Grain products	<i>Ethylene oxide</i>	Noodles (from Vietnam)
Low	Food supplements	<i>Ethylene oxide</i>	Various food supplements (from India)

Appendix 2 - Proposed Imported POAO NMP – sampling priorities table for 25/26 for products of animal origin

This is pending a review by the Food Standards Agency in conjunction with LPHA. This aspect of the service plan will be populated when this work is completed.

**Appendix 3 - Proposed Imported POAO NMP – sampling priorities table for 25/26 for
Fishery Products Monitoring Plan**

<u>Priority</u>	<u>Hazard</u>	<u>Sampling Guidance</u>	<u>Total Samples</u>
High	Salmonella, Vibrio, Listeria monocytogenes	Cooked crustaceans	2
High	Listeria monocytogenes, Clostridium botulinum	Smoked fish	2
High	Veterinary medicine residues	Fish and crustaceans	10
Medium	<i>Cadmium</i>	Fish – wild sardines	1
Medium	Mercury (total mercury and methylmercury)	Fish – wild	6
Medium	<i>Histamine</i>	Fish associated with histidine	5
Medium	<i>Lead</i>	Fish – wild sardines	6
Low	E. coli, Staphylococcus aureus	Imitation crab claws	1
Low	<i>Dioxins/ PCBs</i>	Oily fish only.	2

Total Samples: 35

Appendix 4 - Proposed Shellfish Sampling Plan for 25/26

Sample Site	Species	No of samples	Purpose	Sampled for	Laboratory	Chargeable to LPHA
Brandy Hole	Pacific Oyster	12	Classification	Micro	Colindale	Yes
Paglesham Pool	Pacific Oysters	4	Declassified Dec 2024 quarterly sampling for 2 years	Micro	Colindale	NA
Barling Hall	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Paglesham	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Paglesham	Hard Clams	12	Biotoxin	Biotoxins	CEFAS	No
Rushley Island	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Off Rochford Outfall	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Crouch Approach	Cockles	12	Classification	Micro	Colindale	Yes
Crouch Approach	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
East of Havengore Creek	Cockles	12	Classification	Micro	Colindale	Yes
East of Havengore Creek	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
Phoenix	Cockles	12	Classification	Micro	Colindale	Yes
Phoenix	Cockles	4	Biotoxin	Biotoxins	CEFAS	No
East of Shoebury Buoy	Cockles	12	Classification	Micro	Colindale	Yes
Barton Point	Mussels	12	Classification	Micro	Colindale	Yes
Leigh Foreshore	Cockles	0	Declassified 2024	Micro	Colindale	NA
West of Southend Pier	Pacific Oysters	12	Classification	Micro	Colindale	Yes
West of Southend Pier	Pacific Oysters	8	Biotoxin	Biotoxins	CEFAS	No
East of Southend Pier	Pacific Oysters	12	Classification	Micro	Colindale	Yes
Southend Leisure Centre	Mussels	12	Classification	Micro	Colindale	Yes
Barrow Deep	Native Oysters	12	Classification	Micro	Colindale	Yes
Black Deep	Razor Clams	12	Classification	Micro	Colindale	Yes
Total		228				