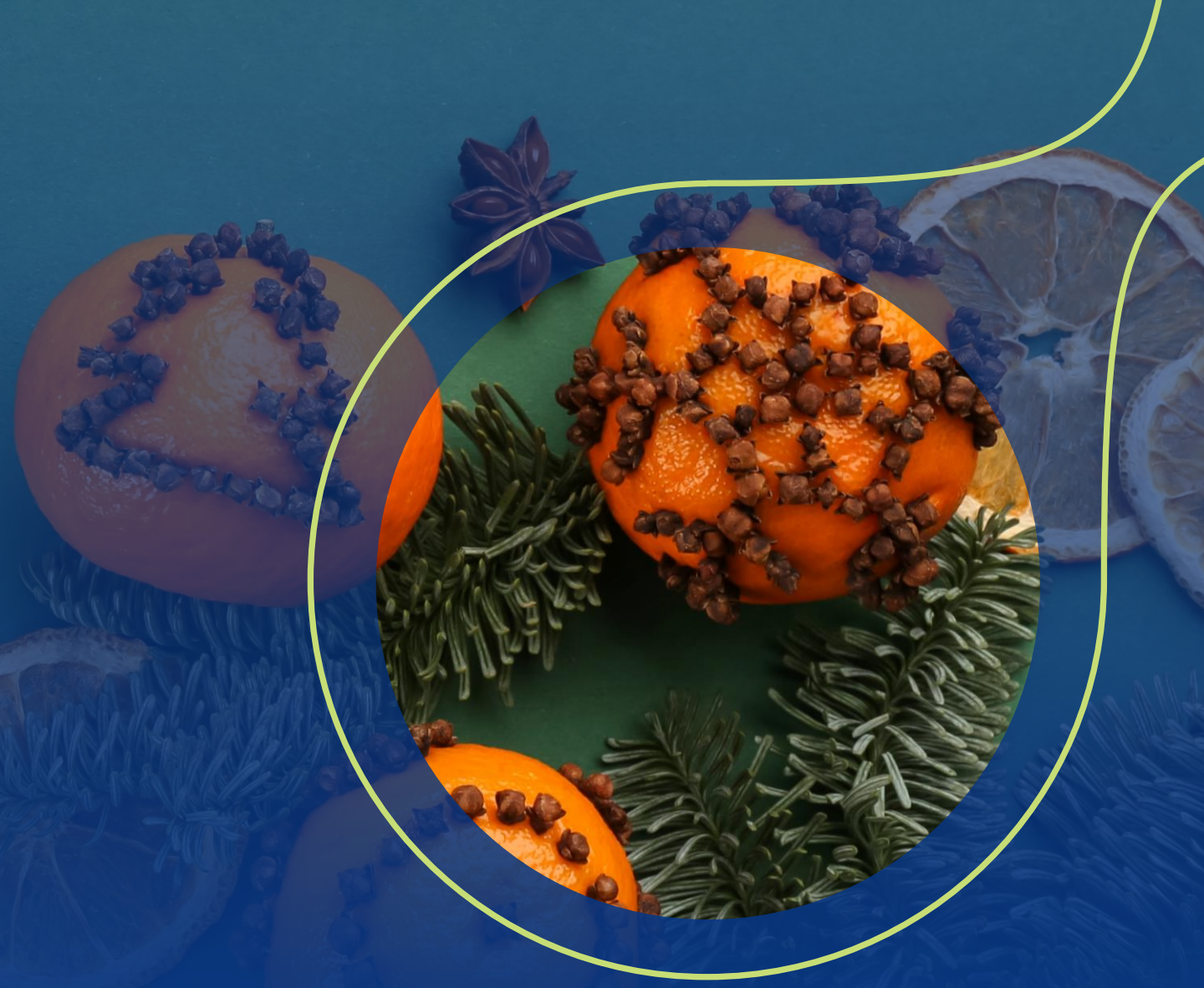

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Food
Risk Insights

Eurofins Food Testing Ireland Ltd

Issue 16 | December 2025

In Focus

Emerging issues, trends and legislative changes

Welcome to the December 2025 food risk insights from Eurofins Food Testing UK Ltd.'s Compliance and Risk Management Team. This edition features the latest outbreaks, allergy risks and a round-up of some of the key topics and legislative updates from 2025.

We are here to offer expert advice and support; to help you manage the ever-evolving risks faced by food businesses.

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Infant botulism outbreak

Two more babies have been included in the patient total for an outbreak of infant botulism linked to ByHeart's powdered infant formula in the USA. According to the US Food and Drug Administration (FDA), 39 infants across 18 states are now affected, all of whom have required hospital care.

The FDA has released further reports from its inspections of ByHeart's infant formula facilities. Although partially redacted, the documents reveal persistent contamination and maintenance issues at one of the company's plants, as well as numerous consumer complaints regarding ByHeart's formula.

Infant botulism is caused when *Clostridium botulinum* spores ingested by a baby grow in their intestines. Progression of symptoms is slow, such as constipation, poor feeding, loss of head control, difficulty swallowing and breathing difficulties, as it is caused by sporulation and toxin production in the infant's intestinal tract rather than toxins direct from the food causing botulism.

In older children and adults, this growth in the gut doesn't usually happen due to a more developed immune system and gut microbiome. Cases of botulism in adults are almost always due to consumption of powerful botulinum neurotoxins pre-made in foods without adequate controls.

This outbreak is the first time cases of infant botulism have been associated with dried infant formula.

Botulinum spores, which are heat resistant and commonly found in the environment, can survive many of the processing controls which reduce pathogens. Normal thorough cooking will kill vegetative cells of *Clostridium botulinum* (*Cl. botulinum)* bacteria but not its spore form. A more severe heat process equivalent to a 90 °C core temperature for 10 minutes, the so-called 'Botulinum cook' is required to kill the spores of *Cl. botulinum*.

The botulinum toxin itself is inactivated (denatured) rapidly at temperatures greater than 80 °C, however due to the severity of the risks involved heat-treatment of contaminated foods is not an acceptable food safety control.

As increasing numbers of carers follow recommendations to introduce nuts and seeds early into infants' diets, more babies may be exposed to foods that carry bacterial spores, potentially presenting an under recognised risk of botulism.

Although dried foods are usually considered microbiologically stable it is not true to say they are inherently safe microbiologically. Dried foods can still become contaminated, and some organisms can survive even harsh conditions. Their safety therefore needs to be managed as rigorously as that of any 'wet' food requiring full adherence to good manufacturing practice throughout production. It is essential to understand both the risks of microbial contamination and the controls to achieve safety.

Gluten from biodegradable tableware

A study has shown that gluten can transfer from tableware (Food Contact Materials (FCM)) made from wheat or other cereal derivatives into food, especially liquids, and can exceed safe levels for those with celiac disease for whom even tiny amounts of gluten can cause harm. This poses an invisible risk, particularly with FCM products that don't have mandatory allergen labelling.

The exact extent of the migration depended on a number of factors including: stability of the tableware during use, contact time, heat and the food it came into contact with.

Coeliac societies have advised that sufferers exercise caution when dining out or at events where the type of disposable tableware used is unclear. Some even recommend bringing their own reusable items in order to avoid this potential hazard.

UK import controls failing

Concerns about poor UK border controls following Brexit have been widely reported across multiple areas, and The Environment, Food and Rural Affairs Committee has described the commercial animal and plant import system as “inadequate” due to inconsistent inspections, flawed IT, and data gaps. Despite a 2025 meat import ban from Germany, prohibited goods entered for six days before digital updates were made. Responses improved in later incidents. The Border Target Operating Model oversees biosecurity on imports.

Concerns for illegal meat and dairy products include the risk of spreading serious animal diseases, including foot and mouth disease, African swine fever, and also potential food safety incidents caused by bacteria, viruses, and parasites.

Allergy concerns continue for Dubai style chocolate

Throughout the year concerns have been raised about some imported Dubai style chocolate. Dubai chocolate refers to a milk chocolate bar with a filling typically featuring a combination of shredded filo pastry (kataifi) & pistachio paste.

Local authorities have identified a number of products that pose a health risk to consumers with allergies. Issues have continued to be raised in the last month. Some of these products may also contain additives and colours which aren’t allowed on the UK market.

It is estimated that 3.5 - 4% of adults and 6 - 9% of children have a food intolerance or allergy of some form. These can range from mild symptoms such as rashes to anaphylactic shock, and death. Testing for the presence of certain food allergens helps to assure a manufacturer that an undeclared allergen has not found its way into a product. For this reason, testing can also protect a company's reputation, minimising the chance of costly product recalls and adverse publicity.

2025 NFCU actions

In 2025, the UK's National Food Crime Unit (NFCU) secured several significant convictions and saw its officers granted new investigative powers to tackle food fraud more effectively.

A major case concluded with five men and a business being convicted, and four of the men receiving custodial sentences for a conspiracy to divert meat not fit for human consumption (Category 3 animal by-products) into the human food supply chain.

A man pleaded guilty to handling stolen goods in a case linked to a wider fraud involving a substantial amount of poultry.

An abattoir was prosecuted for obstructing FSA officers from carrying out their regulatory duties, resulting in a significant fine.

Suspected food fraud, involving the creation of potentially fraudulent documents that enable movement of cattle, with likely adverse impacts on the food chain.

An ongoing investigation into the distribution and sale of basmati rice in counterfeit packaging has resulted in the arrest of four people.

UK experts warn of potential dangers in imported eggs

A survey of environmental health professionals in the United Kingdom has highlighted growing concerns over the use of imported eggs. The British Egg Industry Council (BEIC) has also urged food businesses to exercise caution when sourcing eggs from overseas. Serving unsafe eggs could lead to serious consequences, including fines, reputational harm, or even business closure.

These findings come amid reports of large volumes of eggs entering the UK market from countries such as the Netherlands, Poland, and Ukraine. The concerns are underscored by a series of recent salmonella outbreaks linked to eggs across several countries in Europe raising further questions about the safety of imported egg products.

Reintroduction of expired products

Operation OPSON, a Europol INTERPOL joint operation, revealed that the reintroduction of expired food products into the supply chain continues to be a major global issue, with crime groups infiltrating waste disposal companies with the intent to get access to expired food awaiting destruction.

Such waste diversion crimes pose serious risks to public health, consumer trust, and food safety, as expired or condemned goods may be re-entering the food chain.

The findings highlight the need for tighter supply chain controls, stronger enforcement, and improved traceability to prevent unsafe or fraudulent food from reaching consumers.

E. coli STEC in 2025

Shiga toxin-producing *Escherichia coli* (*E. coli* STEC), including the O157 serotype, poses a significant food safety risk, especially in vulnerable groups such as young children and the elderly.

E. coli is naturally found in the intestinal microbiota of humans and animals, but strains with the *stx* gene, which produces Shiga toxin, can cause serious illness. *E. coli* STEC strains capable of causing clinical disease are sometimes referred to as EHEC (Enterohemorrhagic *E. coli*).

These can damage the kidneys, colon, nervous system, and brain, making them a critical food safety concern across the UK and Europe.

Transmission and contamination routes

Sources of *E. coli* STEC Shiga toxin transmission include raw and undercooked food products, such as:

- Undercooked minced beef, e.g. burgers
- Raw milk and unpasteurised dairy products
- Raw vegetables and sprouted seeds
- Unpasteurised juices (e.g. apple juice)
- Contaminated water
- Non-heat-treated flour

Contamination often occurs during slaughter, milking, irrigation, effluent from ruminant farms, food handling or processing. Cattle and sheep are common carriers without showing symptoms. Drinking water can also be contaminated accidentally or due to a lack of adequate treatment.

In the UK, the detection of any STEC (Shiga-Toxin producing *E. coli*) in ready to eat (RTE) foods is considered a serious public health risk, which might necessitate action such as immediate product withdrawal or recall.

Recent data indicates a significant increase in Shiga toxin-producing *Escherichia coli* (STEC) infections in England. While the rising number may be partly attributed to enhanced detection methods, such as PCR testing, it also indicates a genuine rise in infections.

Notable STEC issues in 2025

- Recalls of salads, raw nuts, houmous, raw milk, nut butters, dietary supplements, raw pet foods.
- German authorities are still investigating a serious outbreak that has affected over 400 people, many of them children, including three deaths. The outbreak was first detected in August. Authorities suspect the outbreak is likely foodborne. Despite thorough efforts, the exact sources of infection remain unidentified, and investigations into the cause are still underway.
- An outbreak in Belgian nursing homes, with at least 70 cases and nine deaths, was linked to ground beef.
- Scientists investigating a 2024 UK STEC outbreak linked to pre-packed sandwiches revealed that contaminated lettuce was the most likely source of the infection. Possible routes include a failure in control measures protecting the crop from agricultural run-off, contamination of water or growing materials used in lettuce production, or contaminated seeds.

Listeria in 2025

Listeria is a genus of bacteria comprising 27 species, among which *Listeria monocytogenes* is pathogenic to humans, causing listeriosis. Infections lead to severe health issues, particularly in vulnerable populations such as the elderly, pregnant women, newborns, and immunocompromised individuals.

Common sources of Listeria in food

Listeria monocytogenes is widespread in the environment, found in soil, water, and animal reservoirs. It can contaminate various food products, notably:

- Smoked fish and meats (particularly beef and pork)
- Cheeses made from raw milk
- Raw and frozen vegetables

Cooking food at temperatures above 65°C can kill *Listeria monocytogenes*, and a 'pasteurisation cook' equivalent to at least 70°C core temperature for 2 minutes to achieve a 6-log reduction is an accepted control. However, contamination may occur following a 'kill step' during further processing, e.g. if food is handled or sliced after cooking but before packaging. Without proper hygiene controls recontamination presents a significant risk in ready-to-eat foods.

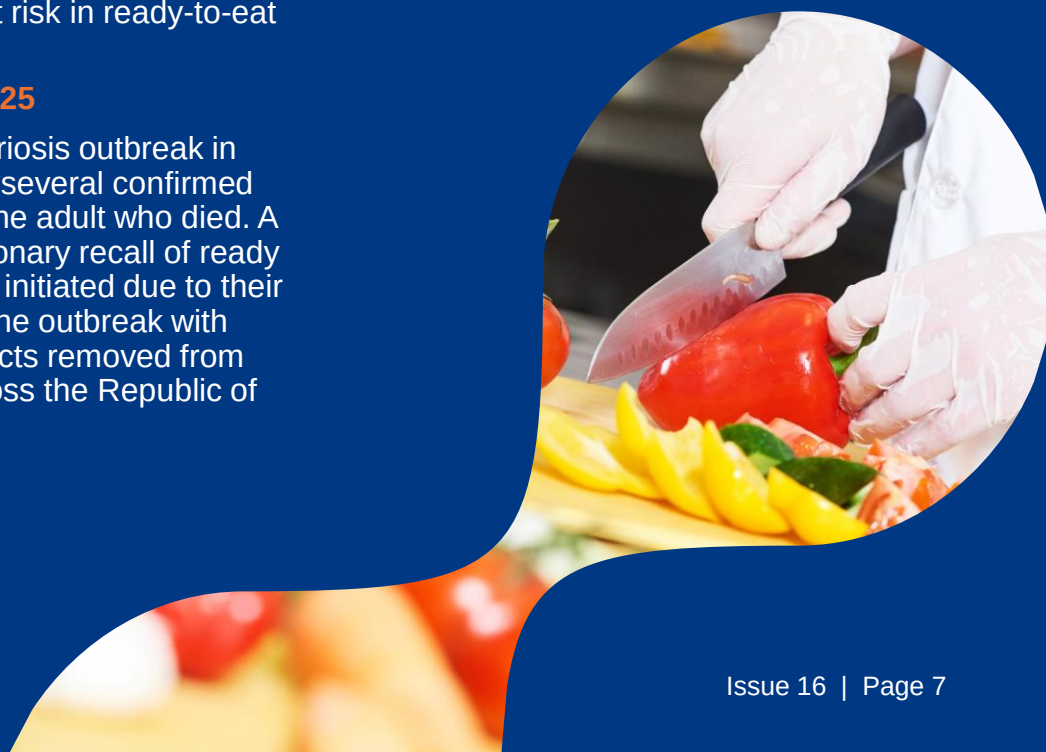
Notable cases in 2025

- A widespread listeriosis outbreak in Ireland resulted in several confirmed cases, including one adult who died. A voluntary precautionary recall of ready to heat meals was initiated due to their suspected link to the outbreak with hundreds of products removed from supermarkets across the Republic of Ireland.
- In the U.S. six people have died and dozens more have been hospitalised following a listeria outbreak linked to precooked pasta meals. The outbreak, which was first identified in June, prompted widespread recalls of the affected pasta products.

Both incidents underscore the persistent difficulty of depending on consumers to reheat meals correctly and raises important questions about whether stricter manufacturing practices or regulatory oversight are needed for foods that require reheating or re-cooking, particularly those with a cooked appearance.

Although *Listeria monocytogenes* is usually eliminated through proper cooking and does not produce heat resistant toxins, manufacturers need to consider the possibility that some consumers may not have followed heating instructions adequately or instructions are unclear, or in extreme cases ineffective.

The UK Health Security Agency (UKHSA), in collaboration with partner agencies investigated cases of listeria in NHS hospitals and other healthcare settings with the outbreak associated with dessert food served to patients.



Allergens in 2025

Food allergen management continued to be a problem in 2025. Labelling errors were the leading cause of food recalls in the UK; a 2025 report found that 35% of recalls were due to incorrect or missing allergen information. These mistakes include not listing allergens, using incorrect allergy warnings, or mispacking products in the wrong packaging. The issue highlights the critical importance of stringent allergen control measures throughout the food industry to protect consumers with allergies.

Contributory factors reported were: Packaging and printing error, supply chain failures, product formulation and ingredient change, cross-contact and process failure / manufacturing errors.

Causes of labelling errors

- Mistakes made when manually inputting information
- Inexperience or misunderstanding of labelling requirements
- Incorrectly translating labels for different markets
- A lack of clear communication in a supply chain or within a process
- Change of suppliers, or changes in ingredients from suppliers leading to undeclared allergens or other incorrect information on label
- Mistakes in the packaging process itself, such as putting the wrong product in the wrong packaging or poor control at change over.

2025 Market data

Pistachios

After concerns during the year around cost and availability of supply there are continued issues with pistachios nuts. As a *salmonella* outbreak in Canada related to pistachios grows, authorities have ordered importers and manufacturers to hold and test any pistachios imported before September 27th for *salmonella* before selling them in Canada. Imports from Iran have been banned since September 27th. The Food Standards Agency (FSA) have raised concerns around Dubai style chocolate products containing peanuts and other types of nuts not mentioned on the labelling (almond, cashew, walnut) in place of pistachios. Inferior quality, substituted or adulterated ingredients can cause allergic reactions, food poisoning, or long-term health issues.

Cocoa

The continuing rise of cocoa meant record high prices in 2025. Problems with cocoa supply are expected to continue. Issues include collapsing harvests due to climate change and disease, socio-economic problems like farmer poverty with farmers dropping out of the market and environmental issues such as deforestation and loss of biodiversity.

Coffee

Like cocoa, coffee has suffered from climate change, extreme weather events and socio-economic problems. Further exacerbated by Brazil, a major coffee producer, is facing serious logistical challenges that are disrupting its trade. Outdated port infrastructure, container shortages, and rising transport costs have caused major delays. Experts warn that Brazil's ports are operating beyond capacity. The issue of traffic imposed on Brazil have also played a part. Not only hurting exporters but also reducing income for coffee growers and threatening global supply reliability.

Orange Juice

Trade wars have also affected the cost and supplies of orange juice in 2025 with prices approaching record highs recently. Over reliance on supply from a few nations, 80–90% of global orange juice comes from Brazil & Florida, persistent citrus greening disease as well as climate issues have all contributed. Orange juice (not inherently a luxury item) is moving from a functional item to a luxury purchase for some households.

Climate change is already affecting the food system, with food production facing the greatest impacts both in the UK and globally. Extreme heat, flooding, drought and soil erosion are particular concerns. Supporting infrastructure for distribution, storage, processing and retail is also vulnerable to severe weather, likely driving price increases due to supply chain disruption. Although some uncertainties remain around how climate change may alter consumption patterns, all parts of the food system are exposed to short term shocks from climate related weather events.

2025 legislative update

New Maximum Limits for Nickel

In July 2025, maximum levels for nickel in various foodstuffs came into force for the first time in EU regulations. The Regulation (EU) 2024/1987 amends the European Contaminants Regulation (EU) 2023/915. Nickel (Ni) is a metal that is ubiquitous in the environment as a component of the Earth's crust. The presence of nickel in food is partly natural. Nickel in food and drinking water can also come from various industrial and technological applications.

EU Arsenic regulations Updated

From 8th October new maximum levels (MLs) for inorganic arsenic in fish, crustaceans, bivalve molluscs, and cephalopods came into force. These new rules, Commission Regulation (EU) 2025/1891, amending regulation (EU) 2023/915, range from 0.05 to 1.5 ppm (mg/kg) on a wet weight basis, and aim to protect consumer safety and reduce health concerns from inorganic arsenic exposure.

Nitrate/Nitrite

The EU has lowered the maximum permissible levels of nitrites (E 249–250) added during the manufacturing of meat products. The amendment to legislation came into force from October.

Commission Regulation (EU) 2023/2108 amends Regulation (EC) No 1333/2008 as regards food additives nitrites (E 249-250) and nitrates (E 251-252).

Lower limits for cheeses and fishery products are due to follow (2026/2027).

It remains unclear how Great Britain will continue to diverge from EU legislation in the post Brexit landscape.

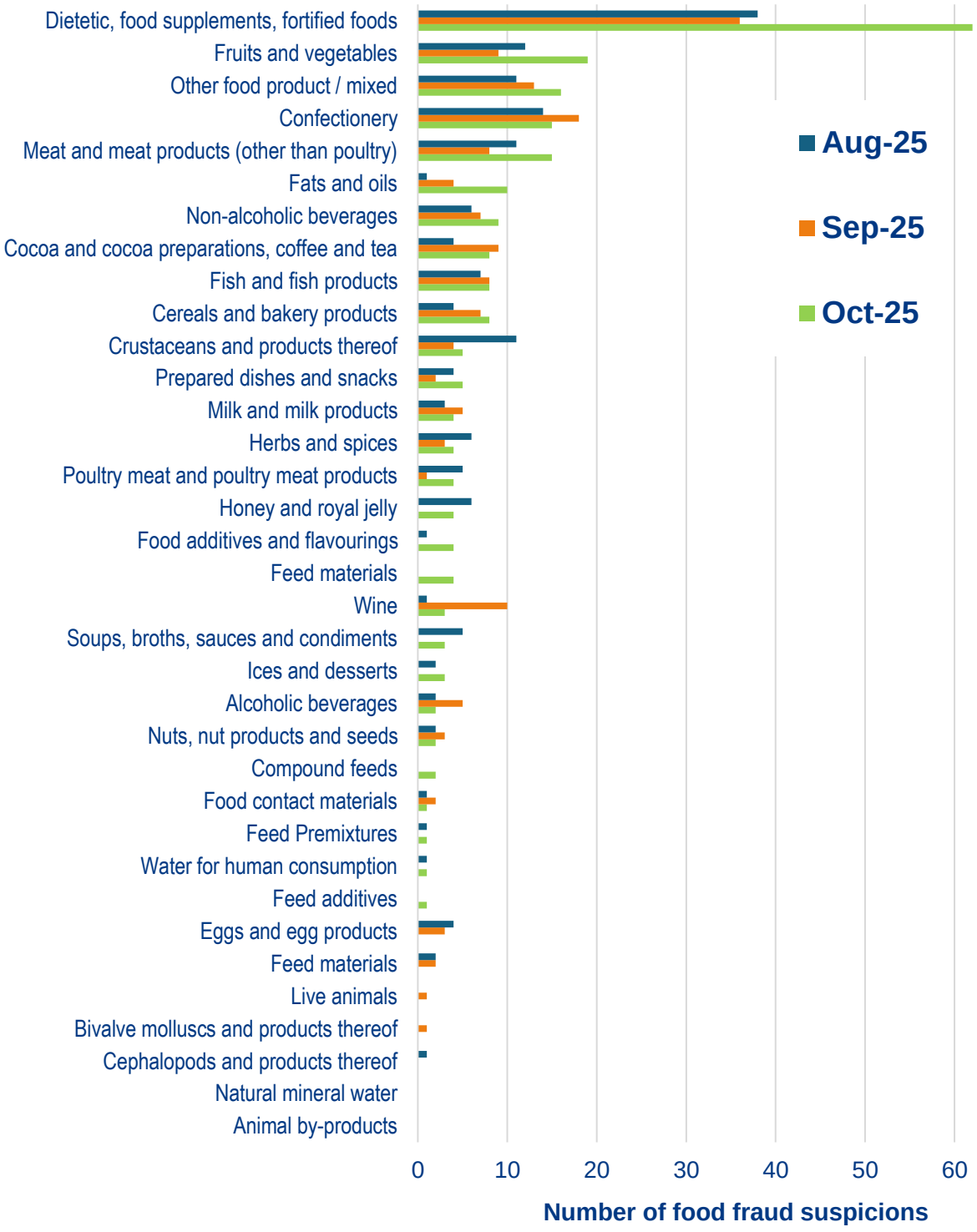
UK BPA consultation

The UK BPA consultation is a consultation by the Food Standards Agency (FSA) on a proposed ban of bisphenol A (BPA) and related chemicals in food contact materials. The consultation is not intended to revisit the scientific consensus on BPA's risks, but to gather any robust, peer reviewed evidence that may justify an alternative approach. The consultation is open to all interested parties until 24th December 2025.

FSA & FSS review of acrylamide data

In a consultation, now closed, the Food Standards Agency (FSA) working jointly with Food Standards Scotland (FSS) launched a call for data on acrylamide levels in food to better understand the risks posed by dietary exposure and to inform future policy. This consultation aimed to gather a broad and representative dataset, wanting to reflect the reality of acrylamide levels in order that any regulatory measures reflect the true situation on the ground and are proportional and achievable.

Summary of Food Fraud Suspicions



Source: https://food.ec.europa.eu/food-safety/acn/ffn-monthly_en

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Food Risk Insights

The Eurofins Compliance and Risk Management Team can work with you to identify and mitigate risks within your business, whether they be microbiological, contaminants, allergens, pesticides, authenticity (food fraud) or risks to your supply chain such as price changes or climate fluctuations.

We are here to work with you to protect your customers, brand and reputation.

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