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Food
Risk Insights

Eurofins Food Testing Ireland Ltd

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In Focus

Emerging issues, trends and legislative changes

- Supermarkets fined
- Bisphenol A (BPA) consultation
- New Guidance's and Codes of Practice
- Virus preparedness
- Biofilms in manufacturing
- Acrylamide concerns
- Algal blooms
- Reintroduction of expired products

Welcome to the November 2025 food risk insights from Eurofins Food Testing UK Ltd.'s Compliance and Risk Management Team which includes insights ranging from UK retail prosecutions, to new contaminant controls and biosecurity warnings.

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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Supermarkets fined for placing unsafe food on sale

A UK supermarket chain operating in Wales was fined £36,000 after local authority officers discovered serious breaches of food allergen labelling regulations during a routine inspection. Environmental Health Officers found that three in store bakery products were incorrectly labelled, failing to declare allergens as required by law. Despite previous warnings issued to both the store and its Head Office, the company did not address the non-compliance. Given the serious risks posed by inaccurate allergen information, the Council took formal enforcement action. Regulations require that all packaged foods list allergens clearly highlighted in the ingredients to protect consumers.

Another major supermarket chain was fined £130,000 following a successful prosecution by a local authority in England for selling unsafe food. Environmental Health inspections found dozens of food items on sale past their use-by dates, including chilled meats, desserts, and fish products, one of which was 18 days out of date. Despite previous warnings to improve date-checking procedures, the business continued to breach food safety rules.

In a separate case, a large national retailer was fined £7.56 million for selling out-of-date food.

Selling mislabelled and out of date food can lead to serious legal, health, and reputational problems. Risking fines, legal action, and loss of business. To prevent issues, businesses should use proper stock rotation, train staff to understand date labels, and manage expiring items responsibly through discounts, donations or proper disposal.

UK BPA consultation

The UK Food Standards Agency (FSA) has opened a consultation on a proposed ban of bisphenol A (BPA) and related chemicals in food contact materials (FCM). 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:

- Policy Option 1; allow the continued use of BPA and its analogues in FCMs, maintaining the status quo.
- Policy Option 2; prohibit the use of BPA in FCMs but allow the continued use of structurally similar analogues, such as Bisphenol S (BPS) and Bisphenol F (BPF).
- Policy Option 3; prohibit BPA and structurally similar analogues in food contact materials.

Once the consultation closes, the FSA will review all responses and provide final recommendations to ministers, who will decide on the future regulatory status of BPA and related chemicals. The consultation is open to all interested parties until 24 December 2025.

Bisphenols are a group of chemical substances related in their structure to diphenylmethane (CAS 101-81-5) with two phenyl carbon rings; hence "bis (two) - phenol." The bisphenols include chemicals referred to as BPA, BPS and BPF, which are bisphenol reacted with different chemicals to change the overall structure and the resulting chemical's useful properties

FAO highlights food safety foresight approach

The Food and Agriculture Organization of the United Nations (FAO) has emphasised the combined importance of digital tools and human expertise in identifying and managing emerging food safety issues. In its report from the Food Safety Foresight Program, the FAO promotes a proactive, long term “foresight” approach using tools like artificial intelligence (AI) to support data analysis and prediction, while stressing that human oversight is essential for defining objectives, interpreting results, and ensuring quality control.

The approach relies on expert intelligence gathering, strong communication, and institutional support. However, challenges remain around data protection, bias, ethics, transparency, and maintaining confidence in AI generated insights.

New Food and Feed Law Codes of Practice published by FSA

These Codes of Practice give instructions that local authorities must consider when enforcing food and animal feed law. They have also issued Practice Guidance that is non-statutory as a complement to the statutory Code of Practice. These provide general advice on approach to enforcement of the law:

https://www.food.gov.uk/about-us/food-and-feed-codes-of-practice

Manure tank *salmonella* link

Researchers have linked a mismanaged manure storage tank in a buffalo farming area of Salerno, Italy, to a major 2024 European outbreak of *Salmonella* Umbilo.

The outbreak, which caused over 200 infections and one death across six countries, was traced to contaminated rocket salad and organic baby spinach from the region. Investigations revealed that within a one kilometre radius of the contaminated greenhouses, several buffalo farms housed calves showing digestive illness. Faecal samples from these animals tested positive for *Salmonella* Umbilo genetically identical to the outbreak strain, along with other serotypes.

The findings, published in the International Journal of Environmental Research and Public Health, highlight how poor manure management in the area likely contributed to the cross contamination of produce and subsequent multinational public health crisis.

Inspections in the affected area uncovered an unauthorised and poorly managed manure storage tank, likely linked to a nearby livestock farm. The tank, of unknown ownership, posed a serious risk of overflow into nearby irrigation canals, especially during rainfall, allowing animal waste to contaminate drainage systems and spread microbial pathogens to surrounding farmland.

Researchers noted that delayed sampling from the tank may have led to negative microbiological test results despite its likely role in environmental contamination.

FSAI publishes Guidance Note on Food Safety Culture

The Food Safety Authority of Ireland (FSAI) has published a new Guidance Note on Food Safety Culture to help food businesses meet their legal obligations to establish and maintain a strong culture of food safety.

This resource supports businesses in embedding food safety into their daily operations and provides inspectors with a framework for assessing it during inspections. Food safety culture reflects how everyone in an organisation from management to front line staff thinks about and acts on food safety, demonstrating a shared commitment to producing safe food.

The Guidance Note includes practical tools such as self-assessment checklists and questionnaires to help businesses evaluate their culture and prepare for inspections. A positive food safety culture is crucial in helping to maintain high standards of hygiene and compliance, protecting consumers from foodborne illness, improving communication and transparency among staff safeguarding your business.

Under an amendment to EU Regulation 852/2004, all food businesses with the exception of primary producers are now required to establish, maintain, and provide evidence of an appropriate food safety culture, taking in account the size and nature of the food business.

https://www.fsai.ie/publications/guidance-note-44-food-safety-culture

UK Virus preparedness

A report by the Public Accounts Committee (PAC) warns that the UK's ability to respond to major animal disease outbreaks such as bird flu is severely stretched, with over a quarter of local public services lacking confidence in their outbreak readiness.

While the Department for Environment, Food & Rural Affairs (Defra) and the Animal & Plant Health Agency (APHA) have worked hard to manage ongoing outbreaks of bird flu and bluetongue, resources have been diverted from future preparedness, further hindered by the loss of EU disease intelligence post Brexit.

The APHA faces a 15% vet vacancy rate, driven by mental health pressures, poor pay, and long hours, prompting calls for a veterinary workforce strategy.

The National Biosecurity Centre at Weybridge, vital for managing disease threats, is in poor condition and won't be fully redeveloped for a decade, leading the PAC to urge a 10-year redevelopment plan.

The report also highlights weak border controls against illegal meat imports, insufficient vaccine supply planning, and uncertainty over future bovine TB management following the scaling back of the badger cull.

Turkish hazelnut crop losses

Turkey, the world's leading producer of hazelnuts, is experiencing severe crop losses this season due to a combination of cold snaps and heavy rainfall that damaged orchards in key growing regions.

Experts predict total yields could fall by about 40%, potentially increasing global hazelnut prices by up to 30%.

Biofilms in food manufacturing

A study examining biofilms in water hoses from a meat processing environment revealed biofilms in 14 out of 15 hoses.

Sequencing results revealed high abundances of *Mycobacterium* and *Trichoderma*, along with low levels of bacterial genera associated with meat spoilage, including *Pseudomonas*, unclassified Microbacteriaceae, and *Stenotrophomonas*. Opportunistic pathogens such as *Legionella* and *Trichoderma* were also occasionally detected.

These microbial communities form on the inner surfaces of hoses, even those connected to drinking water supplies, and can harbour a diverse range of bacteria. Differences in the bacterial community composition were observed between hoses from various sampling points.

The findings suggest that biofilms in water hoses can serve as reservoirs for microbial contamination, highlighting the need for these areas to be regarded as potential sources of contamination in any HACCP assessment.

Biofilms are communities of microorganisms, such as bacteria, that attach to a surface and are encased in a protective, slimy layer of extracellular polymeric substances (EPS), making the microorganisms more resistant to antimicrobials. The mixed population of microbes within the biofilm, with differences in metabolic activity and growth rates, also make it a more adaptive population, creating subpopulations of "persister" cells that are more tolerant to treatment. These communities are found on many surfaces, from natural ones like rocks and teeth (dental plaque) to man-made ones like pipes, and hoses, especially in wet environments.

Acrylamide survey raises concerns

A new EU-wide test by the consumer organisations BEUC (Bureau Européen des Unions de Consommateurs, "European Bureau of Consumers' Unions") has revealed that many common foods, especially biscuits, wafers, and crisps, contain concerning levels of the chemical contaminant acrylamide, prompting calls for stronger regulation.

The findings showed that about one third of regular biscuits and wafers exceeded current EU benchmarks, with nearly two thirds failing to meet the stricter limits for baby biscuits raising particular concern for young children.

The BEUC is urging the European Commission to lower existing benchmark levels and make them legally binding for food producers, arguing that voluntary measures are insufficient. The group also highlighted that vegetable crisps, often seen as healthier options, contained nearly double the acrylamide levels of potato crisps and called for the establishment of benchmarks for these products.

BEUC emphasised that only mandatory limits will ensure manufacturers consistently reduce acrylamide in foods and better protect consumers, particularly children.

The UK Food Standards Agency (FSA) working jointly with Food Standards Scotland (FSS) have already issued a call for data on acrylamide levels in food with a deadline for submissions of data of 30 November 2025.

While the EU is actively reviewing and considering stricter regulations for acrylamide limits in various foods, with discussions ongoing at the technical level.

Algal blooms

Harmful algal blooms (HABs) are natural events that can damage aquatic ecosystems and aquaculture, with some species producing toxins that cause serious human illnesses through contaminated seafood, particularly bivalve molluscs.

To address this, the Joint Expert Meeting on Marine Biotoxins and HAB Monitoring developed new guidance on monitoring algal toxins in bivalves, filling a gap left by earlier Food and Agriculture Organization (FAO) and World Health Organization sanitation guidelines that focused only on microbiological hazards.

The guidance aims to strengthen monitoring, sampling, analysis, and management of marine toxins to ensure food safety, support sustainable aquaculture, and enhance global food security.

Based on existing programs, Codex standards, and national legislation, it provides a roadmap for authorities to establish or improve monitoring systems. This includes preharvest and postharvest testing and microalgae surveillance, to better manage risks to human health and meet market requirements.

The report identifies several key gaps in understanding and managing algal toxins and related food safety risks:

- Current toxicity equivalency factors (TEFs) rely on animal data that may not reflect human responses.
- Data on cyanotoxin contamination in bivalves are limited.
- The accumulation of shellfish toxins in non-bivalve species such as fish and crustaceans is poorly understood.
- Unregulated toxins, including tetrodotoxins, have been detected globally in molluscs, posing potential health risks that call for urgent evaluation and regulation.
- Long term human exposure data for many marine toxins remain incomplete, necessitating further toxicological research.
- Lastly, there is a lack of validated, rapid testing methods for detecting toxins in seafood, underscoring the need for more reliable commercial assays supported by robust scientific validation.

Indonesia radiation

As of October 31, the U.S. Food and Drug Administration (FDA) required import certifications for all shrimp and spices from certain parts of Indonesia following the detection of the radioactive isotope Cesium-137 (Cs-137) in shipments.

The contamination was found in containers holding over 58 million pounds of shrimp, prompting seven FDA issued recalls, as well as in a sample of cloves, which was subsequently denied entry to the U.S.

Indonesian authorities have traced the contamination to an industrial accident beyond the control of the import companies involved and have sealed off the Cikande industrial zone, to clean up 10 Cs-137 sources. Nine individuals in Indonesia have reportedly received treatment for radiation exposure following this incident.

Reintroduction of expired products

Operation Opson XIV 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.

This operation found that some businesses are illegally diverting expired or unsafe products back into circulation instead of disposing of them properly. Such waste diversion crimes pose serious risks to public health, consumer trust, and food safety, as expired goods may be relabelled or repackaged to appear legitimate.

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

Examples of waste diversion include:

- Selling expired or recalled food that was meant to be destroyed or processed as waste.
- Diverting food waste from animal feed or disposal facilities back into the retail supply chain.
- Relabelling or repackaging spoiled or rejected food to make it appear fresh or safe.
- Tampering with food disposal records to hide the fact that unsafe products were illegally resold.
- Using condemned meat or ingredients in food production despite safety bans.

As previously reported, earlier this year four men were given custodial sentences for diverting meat not fit for human consumption back into the human food chain following an investigation by Food Standard Agency's National Food Crime Unit.

Operation OPSON is a Europol INTERPOL joint operation targeting fake and substandard food and beverages.

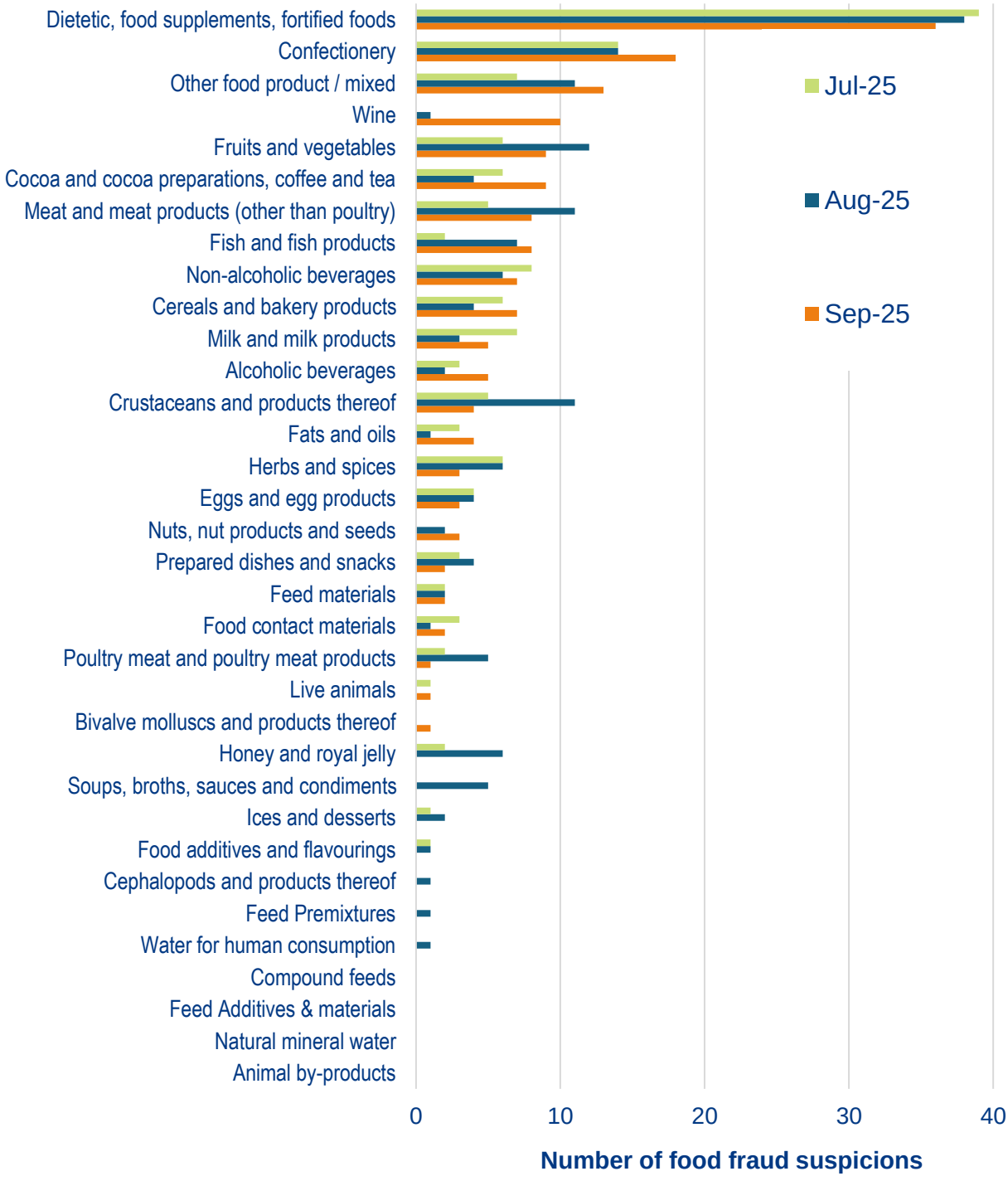
November in brief | Food safety risks and regulatory shifts

From UK retail prosecutions, to new contaminant controls and biosecurity warnings, this month's insights highlight key food safety challenges.

Enforcement actions for allergen and date-labelling breaches, EU calls for stricter acrylamide limits, and the UK's proposed BPA ban signal tighter regulatory focus. Globally, *Salmonella* outbreaks, waste diversion crimes, and biofilm findings stress the importance of strong hygiene and traceability systems.

At **Eurofins Food Testing UK Ltd.**, we help businesses manage and mitigate these evolving risks through accredited testing, expert consultancy, and food safety culture support.

Summary of Food Fraud Suspicions



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

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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