

**Note of the External Stakeholder Reference Group Meeting held at Aviation House London on 31 July 2017**

**Present**

Simon Dawson – Food Standards Agency FSA (Chair)

Richard Hoskin – Food Standards Agency

Kathryn Baker – Food Standards Agency

David Lowe – Food Standards Agency

Tracy Bishop (Food Standards Agency)

Andrew Collinson – Wycombe District Council

Holly Shaw – Allergy UK

Sian Thomas (Fresh Produce Consortium)

Sue Powell – Oxfordshire County Council

Kerina Cheesman – Food and Drink Federation

Karen O'Connor – Cambridge City Council

Martin Forsyth – British Frozen Food Federation

Moira Austin – Anaphylaxis Campaign

Sarah Collard – Coeliac UK

Kaarin Goodburn – Chilled Food Association

Ron McNaughton

Elizabeth Andoh-Kesson – British Retail Consortium

**Apologies**

Sue Davies – Which?

Diana Axby – Provision Trade Federation

Simon Wright – Gluten Free Industry Association

James Bielby (Federation of Wholesale Distributors)

Julie Byers – Association of Convenience Stores

Andy Morrison – Scottish Food

Enforcement Liaison Committee

Tony Lewis – Chartered Institute of Environmental Health

Corrine Lowe (Chartered Trading Standards Institute)

## **Agenda Item 1 - Introduction and Apologies**

- 1.1 The Chair welcomed the group and asked individual members to introduce themselves.

## **Agenda Item 2 – Minutes and actions points from the previous meeting**

- 2.1 **David Lowe** covered the action points from the previous minutes:
  - 3.4 The Chair asked for the wording in the Tracking Live Case Studies report to be nuanced to reflect that the loyalty card scheme was indeed a sophisticated system. The report has been amended to reflect this.
  - 3.4 Kaarin Goodburn suggested that the Tracking Live Case Studies report should refer to consumers rather than customers. The report has been amended to reflect this.

## **Agenda Item 3 – Draft recommendations and proposed work streams to improve the food withdrawal and recall system.**

- 3.1 Kathryn Baker provided a power point presentation of the improvement themes emerging from the research. The presentation also included the project team's draft recommendations for improving the withdrawal and recall system which would implement the findings from the research.
- 3.2 The presentation summarised the research that had been undertaken to date including the external research through Kantar Public and internal research undertaken by the FSA's Science, Evidence and Research, Division, these being the International comparisons, the analysis of recalls data and the in-depth case reviews.
- 3.3 The presentation then highlighted that the areas for improving the withdrawal and recall system could be summarised under 4 themes, these being;
  - Clarity of Roles and Responsibilities;
  - Accessible and Consistent Information;
  - Increased Consumer Awareness; and
  - Systematic Root Cause Analysis and Feedback Loops to aid Prevention
- 3.4 Kathryn then focused on each theme and introduced the project teams draft recommendations to improve the food withdrawal and recall system in these areas. Kathryn explained the evidence behind each recommendation (9 in total) and for reference they appear in Annex 1, attached to this minute.

#### **Agenda Item 4 – Workshop 1- Do the draft recommendations effectively address research findings.**

- 4.1 The meeting was then organised into 3 x mixed groups of industry, consumer organisations and regulators and each group was tasked to consider the following in relation to the draft recommendations:
- **Do the draft recommendations cover research findings?**
  - **Is there anything missing from the recommendations?**
- 4.2 In summary, the groups were largely supportive of the draft recommendations, in that they covered the research findings and key areas for improvement, and the workshop provided a forum in which members suggested minor amendments and improvements to the wording of the recommendations.
- 4.3 Many of the points that were raised related more to the detail behind the individual recommendations and the relevant work to be taken forward than to the wording of the recommendations themselves. However, one suggestion was to separate recommendation 3 into two parts, to deal separately with the notifications to consumers and the business to business notifications, which would not necessarily have the same format or contain the same information as one another.

#### **Agenda Item 5 – Workshop 2 - Work stream development.**

- 5.1 The final workshop of the meeting focused on the proposed development of work streams to deliver the draft recommendations and the ESG were invited to consider the following:
- **Do the work streams feel right – are there additional work streams we should include?**
  - **Who should lead the work streams?**
  - **Who else should support / be involved in the work streams?**
  - **Are there any other resources required to deliver the work streams?**
- 5.2 The proposed work streams to deliver the 9 recommendations were summarized in a sheet provided to ESG and for reference the sheet is available in Annex 2 to this minute.

5.3 In summary, ESRG felt that the work streams looked right, although there were individual group suggestions as to adding clarity to the scope / timeframe for work streams and how work stream could be improved. The table below provides a summary of responses.

<b>Work stream</b>	<b>Table 1 FSA lead Kathryn Baker</b>	<b>Table 2 FSA Lead David Lowe</b>	<b>Table 3 FSA Lead Tracy Bishop</b>
<p><b>Being clear on roles and responsibilities</b></p> <p><b>Work stream 1</b></p>	<p>Agreed with the need for this workstream.</p> <p>FSA/FSS to lead with strong collaboration from other stakeholders, so the group make up of any working group should mirror ESRG.</p> <p>The work should be developed with different business sectors and business size in mind.</p> <p>It was agreed that this work should be a priority in terms of a date for the UK leaving the UK.</p>	<p>Agreed with the development of this work stream.</p> <p>FSA to take the lead supported by industry.</p> <p>Must consult with groups representing consumers.</p> <p>Must link with other FSA programmes such as Regulating our Future.</p> <p>Representatives of small businesses should be specifically involved in the development of guidance.</p> <p>Guidance could describe what happens now and then updates prioritised.</p> <p>There should be a continuous improvement approach embedded within the process, so the guidance is constantly updated.</p> <p>Guidance should not impose any further responsibilities other than those required by regulation.</p> <p>Guidance should be as brief as possible with embedded links to other sources of information.</p> <p>Guidance should be applicable to both large and small businesses.</p>	<p>Agreed with the need for this work stream</p> <p>FSA/FSS to lead with elements supported by industry</p> <p>More information should be given on the respective timescales of the different elements in scope and consideration given to framing these differently to reflect the different timescales (including reference to links with RoF)</p> <p>Need and ensure that the terminology is clear and matches the intended scope of the work streams and corresponding recommendations</p> <p>Implementation of the guidance will require training for all involved (LA, FSA/FSS and industry)</p> <p>Should not assume that there is only one way to demonstrate/provide assurance – different elements of the guidance or presence of an effective system will be demonstrated differently; industry can help provide some evidence/assurance</p>
<p><b>Accessible and consistent information to businesses</b></p> <p><b>Work stream 2</b></p>	<p>Agreed with the development of this work stream.</p> <p>It was agreed that industry should take the lead on this workstream.</p>	<p>Agreed with the development of this work stream.</p> <p>Industry to lead, with significant input from the FSA.</p>	<p>Agreed with the development of this work stream</p> <p>Industry lead, with input from the FSA</p> <p>Noted the need to better understand how it works</p>

	<p>Membership should include sectors from the beginning of the supply chain through to retail.</p> <p>Other stakeholders should be involved including the FSA/FSS, so that all the workstreams are cohesive.</p> <p>Members of the group felt that this workstream was as much about traceability as developing a system or a set of templates.</p> <p>The group felt this work could be delivered in time for UK EU exit.</p>	<p>Suggestion that work streams 2 and 3 could merge due to significant overlap in activities.</p>	<p>now for different industry types/sizes etc and what needs to change – including possible role for Trade associations here</p> <p>Having suggested that recommendation 3 should be split into 2 parts, agreed that separate work streams were appropriate but noted the need for them to be closely aligned to ensure read across</p>
<p><b>Accessible and consistent information to consumers</b></p> <p><b>Work stream 3</b></p>	<p>Agreed with the development of this group.</p> <p>Agreed that this group should be led by FSA/FSS with significant input from consumer representative groups, with support from industry.</p>	<p>Agreed with the development of this work stream.</p> <p>Industry to lead with significant input from FSA in the development of guidance.</p> <p>Suggestion that as there was significant overlap with work stream 2, consideration should be given to merging these work streams.</p>	<p>Agreed with the development of this work stream</p> <p>Some industry lead with input from the FSA/FSS and some FSA/FSS lead with industry input</p> <p>Noted the need to better understand how it works now for different industry types/sizes etc and what needs to change – including possible role for Trade associations here</p> <p>Having suggested that recommendation 3 should be split into 2 parts, agreed that separate work streams were appropriate but noted the need for them to be closely aligned to ensure read across</p>
<p><b>Raising consumer awareness</b></p> <p><b>Work stream 4</b></p>	<p>Agreed with the development of this work stream.</p> <p>Agreed that FSA/FSS to lead with input from stakeholders.</p>	<p>Agreed with the development of this work stream.</p> <p>FSA to lead, but industry to be involved as well.</p>	<p>Agreed with the need for this work stream</p> <p>FSA/FSS to lead with elements supported /replicated by industry</p>
<p><b>Establishing systematic root cause analysis and feedback loops to aid incident prevention</b></p> <p><b>Work stream 5</b></p>	<p>Agreed with the development of this work stream.</p> <p>Work to be led by FSA/FSS but with significant input from industry and LAs.</p>	<p>Agreed with the development of this work stream.</p> <p>Industry to take the lead with FSA and LA input.</p> <p>Should be strong emphasis on prevention, with FSA and LA involved in trend analysis</p>	<p>Agreed with the development of this work stream</p> <p>Some industry lead with input from the FSA/FSS and some FSA/FSS lead with industry input</p> <p>Improved information flow arising from other</p>

		<p>Links to work stream 1, analysis may lead to improvements in future iterations of the guidance.</p> <p>Links with other programmes in the FSA identified / Regulating our Future.</p>	work streams should help inform and develop this
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## Agenda Item 6 – Any Other Business

6.1 No other items of business were raised

## Agenda item 7 – Date and Time of the next Meeting

7.1 Simon Dawson assured the group that the outputs from the workshops would be taken into consideration when developing the final recommendations for improving the withdrawal and recall system as well as work stream development.

7.2 Simon stressed that the recommendations reviewed today were draft recommendations.

7.3 Simon outlined the next steps for the project:

- The project team would review the recommendation in line with comments received at this meeting and recommendations to improve the withdrawal and recall system would be presented to the FSA's Executive Management Team on the 15<sup>th</sup> August, seeking their approval for the development of work streams to implement improvements.
- A report will be presented to the FSA Board's Business Committee on the 20<sup>th</sup> September on research findings, outcomes and actions to improve the system. In addition the project team will attend a meeting with the FSS Board on the same day to brief them on research findings.
- External and internal research would be publically available from the 7<sup>th</sup> September 2017

7.4 Simon Dawson thanked all those present for their contributions to the workshop sessions and advised the next meeting would probably take place in October, following the FSA Board meeting.

7.5 Date and time of next meeting to be confirmed.

## **Annex 1: Draft recommendations for the improvement of the withdrawal and recall system**

### ***Being clear on roles and responsibilities:***

**Recommendation 1:** It is recommended that the FSA/FSS work with industry and local authorities to develop a comprehensive UK guidance document that takes account of the principles detailed in The World Health Organisation (WHO) (2012) document “FAO/WHO guide for developing and improving national food recall systems”. Once the guidance has been published a further phase of work would be necessary to see it becoming embedded with industry and competent authorities.

**Recommendation 2:** The FSA has set out proposals for change to the way we deliver regulatory controls in food, through a new target operating model (this work is led within the ‘Regulating our Future’ programme). Within the new target model, the FSA will set standards so that food businesses of all types can understand what is required of them and in turn, the FSA can seek assurance through evidence that businesses are doing the right thing. It is recommended that within the ‘Regulating our Future’ programme of work, when standards are set, they take account of regulatory requirements placed on food businesses to withdraw and recall unsafe food that has been placed on the market and that business have effective systems in place to make that happen. It is also recommended that when seeking assurance from businesses regarding how they meet their food safety responsibilities, assurance is sought in these regards.

### ***Accessible and consistent information:***

**Recommendation 3:** It is recommended that FSA/FSS work with industry and others to agree a standardised/consistent template for industry notifications to consumers, taking into account the key design principles from the consumer insights and to agree a more consistent approach for trade to trade notifications. It is suggested that it would be necessary for any templates to be tested with consumers and industry and ultimately embedded within the guidance.

**Recommendation 4:** It is recommended that FSA/FSS work with industry and others to develop guidance detailing best practice on where notifications should be displayed (both in store and digitally) and on active consumer communications, taking account of new technologies/potential solutions. This would need to be explored further with industry to better understand barriers to any approaches.

Use of best practice guidance and templates to aid consistent application would be voluntary. It is recommended that FSA/FSS work with industry and others to explore ways to encourage application of the guidance and templates. This could include, for example, the use of a charter that businesses sign up to, making a commitment to follow good practice.

**Recommendation 5:** It is further recommended that FSA/FSS review their food alerts templates to ensure they also align with the key principles from the consumer insight. It is suggested that it would be necessary for any proposed changes to FSA/FSS food alert templates to be tested with consumers.

**Recommendation 6:** It is recommended that further work is explored with industry to identify possible solutions to ensure that withdrawal and recall notifications are shared effectively within the food industry. Solutions exist in other countries, for example, the 'Rapid Recall Express' service provided by GS1 – a US not for profit organisation. Possible solutions and options for use in the UK should be explored further. It is also recommended that consideration be given, within the 'Regulating our Future' programme to exploring if the digital solution (being developed within the enhanced registration workstream) could or should be used as a mechanism for targeting critical withdrawal/recall notifications to food businesses.

## ***Raising consumer awareness:***

**Recommendation 7:** The FSA or FSS has never actively run any targeted consumer messaging to raise awareness of the food recall system, the reasons why food might be recalled or the actions required from consumers. It is recommended that the project team engage with FSA/FSS communications teams to support the development of regular awareness raising messages around the UK's food recall system; explaining why recalls would be issued, where consumers can get necessary information along with actions expected from them.

## ***Establishing systemic root cause analysis and feedback loops to aid incident prevention:***

**Recommendation 8:** Currently there is no mechanism for information on root cause analysis of incidents, or effectiveness of withdrawals/recalls to be fed back to the CCA after an incident. This prevents the CCA having oversight of trends/issues impacting on the food industry and oversight to verify unsafe food has been removed from the market. It is recommended that there is a feedback process whereby information on the root cause of an incident (that results in food being withdrawn or recalled for food safety reasons) and potentially information on recall effectiveness is fed back to the CCA. It is recommended that such a mechanism is built into the new



target operating model being developed within the 'Regulating our Future' programme of work. Within the new model it will be necessary to intervene when things are not right. It is suggested that after an incident has occurred resulting in a withdrawal or recall of food for food safety reasons, a post incident intervention would take place by the competent authority (LA or FSA). This would involve an audit to determine the root cause of the incident and potentially effectiveness of recall and would be reported back to the CCA. For those businesses that can provide evidence/assurance that they are meeting standards and doing the right thing, they would submit a post recall report to the competent authority and CCA. Information would need to be reported in a consistent manner. The information would be used to establish trends over time that would provide part of the evidence base to inform further incident prevention work and could be shared with the food industry in an anonymised way. It would also feed into the Agency's Surveillance Strategy.

**Recommendation 9:** It is recommended that the incidents and resilience teams within FSA and FSS work with stakeholders to establish a programme of work to better understand what causes incidents and to share good practice. This would include analysis of data received following an incident as described above to provide trends and to highlight where prevention work should be prioritised.



## Annex 2: Draft proposals for work stream development

Work stream	Scope
<p><b>Work stream 1: Being clear on roles and responsibilities</b></p> <p>Recommendation 1 Recommendation 2</p>	<p>Produce UK competent authority guidance.</p> <p>Consider how food businesses can demonstrate how guidance has been implemented through assurance systems.</p>
<p><b>Work stream 2: Accessible and consistent information to businesses</b></p> <p>Recommendation 3 Recommendation 6</p>	<p>Industry to explore options for enhancing trade to trade notifications</p> <p>FSA to explore potential for notifications to be issued to trade through the digital solution for enhanced registration</p>
<p><b>Work stream 3: Accessible and consistent information to consumers</b></p> <p>Recommendation 3 Recommendation 4 Recommendation 5</p>	<p>Consumer behaviour insight to inform development of effective industry consumer notifications/food alerts</p> <p>Development of industry standardised notification template</p> <p>Review FSA/FSS consumer food alerts</p> <p>Guidance to business on best practice methods for proactively communicating recall notifications to consumers</p>
<p><b>Work stream 4: Raising Consumer Awareness</b></p> <p>Recommendation 7</p>	<p>On-going and regular consumer messaging to raise awareness of the recall system (explaining why recalls would be issued, where consumers can get necessary information along with actions expected from them)</p>
<p><b>Work stream 5; Establishing systemic root cause analysis and feedback loops to aid incident prevention</b></p> <p>Recommendation 8 Recommendation 9</p>	<p>To inform the incident prevention programme establish review/feedback loop to bring root cause analysis information into the CCA. Build feedback loops into the Target Operating Model of the Regulating our Future Programme</p> <p>Disseminate anonymised trend information</p> <p>Working with industry to establish an incident prevention programme</p>

