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**An International Comparison of Guidance on Food
Recall Systems**



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This report undertakes a qualitative benchmarking exercise of the following countries' food recall systems on the basis of information that is publically available in the respective countries: UK, Ireland, Australia, New Zealand, US, Canada. The work was, in the main, carried out in the autumn of 2016.

The specific elements of food recall systems that are examined are: food recall procedures, traceability procedures and available guidance.

A number of publically available guidance documents published by the competent food authorities are assessed and multi-criteria analysis is used to score the six countries' food recall systems. This helps to identify areas of the UK's system that could be explored further for potential improvement.

The areas identified for further consideration or as having potential for improvement are to consider:

1. The creation of a new guidance document for FBOs to help ensure that they are aware of and fulfil their responsibilities.
2. Requiring food business operators (FBOs) to follow Food Standards Agency (FSA) provided templates for given types of communication in the recall process.
3. Requiring FBOs to have food recall plans prepared and available to the Competent Authorities upon request.
4. The effectiveness of implementing an 'urgency classification system' (based on the US and Canada's systems).
5. The effectiveness of developing a new central recalls database that is accessible to both FBOs and the FSA.

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3. Introduction

This research focuses on information that is accessible in the public domain, in particular, from guidance documents rather than an assessment of the existence, operation and effectiveness of the systems in place in the different countries. As such, the analysis will not reflect the actual systems in existence or their effectiveness. Nevertheless, the approach seeks to allow a level playing field by restricting the analysis to publically accessible information.

Six countries are included in the analysis: the UK, Ireland, Australia, New Zealand, US and Canada. These countries are chosen because they are English-speaking, making it less difficult to find and interpret relevant documentation.

This report uses qualitative analysis (multi criteria analysis) only¹.

It should be noted that the scores contain a level of arbitrariness and subjectivity and are not to be considered as absolute measures i.e. for comparison. Rather, the scores are used to highlight areas of the UK system that could potentially be improved. Also, it may be that the composite scores produced are biased towards services that are publicly advertised, due to the nature of the research approach.

The scope of this report is to compare different countries' food recall systems as documented in guidance published by the competent food authorities in the various countries, so that potential areas for improvement of the UK's system can be identified.

The scope of this report does not include recommending whether the identified areas for improvement should be actioned upon, as no cost benefit analysis or other such methods have been conducted. In particular, it should be noted that acting upon some of the areas for improvement may create burdens for FBOs; but this is not examined in the report.

¹ A quantitative analysis is not conducted, as the available data are inconsistent when compared internationally. Whilst other papers (see Section 4.4) have attempted to use international recall data in quantitative analysis, it is not clear that the data they use is consistent.

4. Literature Review

4.1 Guidance Documents

The guidance documents analysed are directed at Food Business Operators (FBOs). They give both a description of the country's food recall system and advice on how best to comply.

Table 4.1: List of Guidance Documents

Country	Agency	Year	Document
UK	FSA	2007	Guidance Notes for Food Business Operators on Food Safety, Traceability, Product Withdrawal and Recall ²
Ireland	FSAI	2013	Guidance Note No. 10 Product Recall and Traceability ³
Australia	FSANZ	2014	"Food Industry Recall Protocol" ⁴
New Zealand	MPI	2015	"Recall Guidance Material" ⁵
US	FDA	2003	"Guidance for Industry: Product Recalls, Including Removals and Corrections" ⁶
		2013	Chapter 7 Recall Procedures ⁷
Canada	CFIA	2014	Recall Plans - Distributors' Guide ⁸
		2014	Recall Plans - Importers' Guide ⁹
		2014	Recall Plans - Manufacturers' Guide ¹⁰
		2014	Recall Plans - Retailers' Guide ¹¹

² <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/fsa1782002guidance.pdf>

³ https://www.fsai.ie/food_businesses/starting_business/useful_publications.html

⁴ <http://www.foodstandards.gov.au/industry/foodrecalls/firp/pages/default.aspx>

⁵ <http://www.foodsafety.govt.nz/elibrary/industry/recall-guidance-material-template/recallguidancematerialfinal.pdf>

⁶ <http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129259.htm>

⁷ <http://www.fda.gov/downloads/ICECI/ComplianceManuals/RegulatoryProceduresManual/UCM074312.pdf>

⁸ <http://www.inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/distributors-guide/eng/1376400892829/1376401519986>

⁹ <http://www.inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/importers-guide/eng/1376337628284/1376337687139>

¹⁰ <http://www.inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/manufacturers-guide/eng/1376326890597/1376327095576>

¹¹ <http://www.inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/retailers-guide/eng/1376318261025/1376318389425>

4.2 Comparison of Global Food Traceability Regulations and Requirements

Charlebois et al. (2014) wrote a paper called “Comparison of Global Food Traceability Regulations and Requirements”¹². This report uses a similar multi-criteria methodology.

This report, however, has a broader scope: examining the entirety of the food recall process including available guidance, rather than just the traceability procedure¹³.

To avoid duplication, the results of the Charlebois et al.’s (2014) multi criteria analysis have been incorporated in this review in the assessment of traceability (see Chapter 5).

4.3 FAO/WHO Guide for Developing and Improving National Food Recall Systems

The World Health Organisation (WHO) (2012) produced a document entitled “FAO/WHO guide for developing and improving national food recall systems”¹⁴. This provides useful insights on how to assess food recall systems.

The paper gives seven areas that an effective national food recall system should focus on:

1. The legal framework
2. The powers of the competent authority
3. Clearly defined roles and responsibilities
4. Effective communication and notification
5. Accurate record-keeping
6. Guidance materials and training
7. Review of the national food recall system.

¹² <http://onlinelibrary.wiley.com/doi/10.1111/1541-4337.12101/pdf>

¹³ Another difference is that Charlebois et al. score their indicators as “Progressive”, “Moderate” or “Regressive”, whilst this report assigns numerical values to the indicators, so that a total composite score can be created.

¹⁴ <http://www.fao.org/docrep/017/i3006e/i3006e.pdf>

These areas are taken into account when selecting the appropriate indicators for the multi criteria analysis in Chapter 5.

4.4 2014 World Ranking: Food Safety Performance

Charlebois & Le Vale (2014) produced a report entitled “2014 World Ranking: Food Safety Performance”¹⁵. The report conducted a benchmarking evaluation of different countries. Food safety performances were compared using numerous criteria, including consistency scores for food recalls per 1,000,000 inhabitants. The report argues that it is better for a country to have a stable number of recalls (normalised by population).

The output of their analysis is Table 4.2:

**Table 4.2: Food Recalls per 1,000,000 Inhabitants and Consistency Scores
(Charlebois & Le Vale, 2014)**

Country	2009	2010	2011	2012	Range	Median	2013	Variation from median (%)	Score
Australia	2.5	2.4	3	2.6	2.4-3.0	2.6	1.8	-30.8	Regressive
Austria	13.1	10.5	7.7	5.8	5.8-13.1	9.1	5.4	-40.6	Regressive
Belgium	10.8	8.6	11.6	12.9	8.6-12.9	11.2	14.6	30.3	Regressive
Canada	7	6.2	7.7	8.7	6.2-8.7	7.4	7.6	2.7	Progressive
Denmark	22.1	23.6	27.1	23.2	22.1-27.1	23.4	20	-14.5	Moderate
Finland	26.4	24.2	20.6	19.4	19.4-26.4	22.4	16.3	-27.2	Regressive
France	2.4	2.6	3	4.2	2.4-4.2	2.8	3.9	39.2	Regressive
Germany	5	4.8	5.1	4.5	4.5-5.1	4.9	4.1	-16.3	Moderate
Ireland	6.6	7.2	10.7	11.6	6.6-11.6	9	8.7	-3.3	Progressive
Italy	7.7	8.9	9	8.7	7.7-9	8.8	8.9	1.1	Progressive
Netherlands	12.8	12.9	12.1	10.3	10.3-12.9	12.5	15.7	25.6	Regressive
Norway	6.2	4.7	10.3	12.2	4.7-12.2	8.3	8.8	6	Moderate
Sweden	6.5	7.8	7.6	10	6.5-10	7.7	9.5	23.3	Regressive
Switzerland	0.5	0.9	0.8	2.5	0.5-2.5	0.8	4.9	512.5	Regressive

¹⁵ <http://www.exchangemagazine.com/morningpost/2014/week46/Friday/FoodSaftey-2014.pdf>

Country	2009	2010	2011	2012	Range	Median	2013	Variation from median (%)	Score
United Kingdom	5.4	5.1	8	8.1	5.1-8.1	6.7	5.1	-23.8	Regressive
United States	1.7	2.4	1.6	2.2	1.6-2.4	2	1.9	-5	Moderate

Their analysis highlights that using just the relative rate of recalls is not a clear indicator. This is because having a high relative amount of recalls is not necessarily good or bad; it could be due to a poor level of food safety, or conversely it could be due to a high level of monitoring.

However, even using the consistency of relative rates of recalls as an indicator still suffers similar problems. If a country has a changing relative rate of recalls, this could be due to inconsistency and inadequacy of the competent authority, or conversely it could be due to an improved monitoring technology or other underlying factors. Further, it is unclear whether the data used for each country in this report are consistent¹⁶. Therefore Charlebois & Le Vale's (2014) analysis is not directly used in this report.

¹⁶ The data for the European countries is taken from the European Commission Rapid Alert System for Food and Feed notifications (RASFF) database by using "notifications" as a proxy for product recalls. However "notifications" in the RASFF are defined as "alerts, border rejections, information or news", meaning that not all notifications on the database are recalls. Furthermore, a country would not upload all of its food recalls onto the database, only the ones that have international elements, meaning that not all recalls are notifications. Therefore notifications in the RASFF database are an insufficient proxy for recalls, and so doubts must be considered when data on RASFF notifications are compared with data on recalls for other countries.

5. Comparison using Multi Criteria Analysis

5.1 The Indicators

The countries are given a composite score out of 100 for their food recall systems based on a multi criteria analysis, of which 40% of the score is weighted to the recall procedures; 20% to the traceability procedures; and 40% to the guidance that is readily available. Therefore, of the total score, 60% is weighted to procedures and 40% to guidance. It should be noted that these weightings are essentially arbitrarily determined.

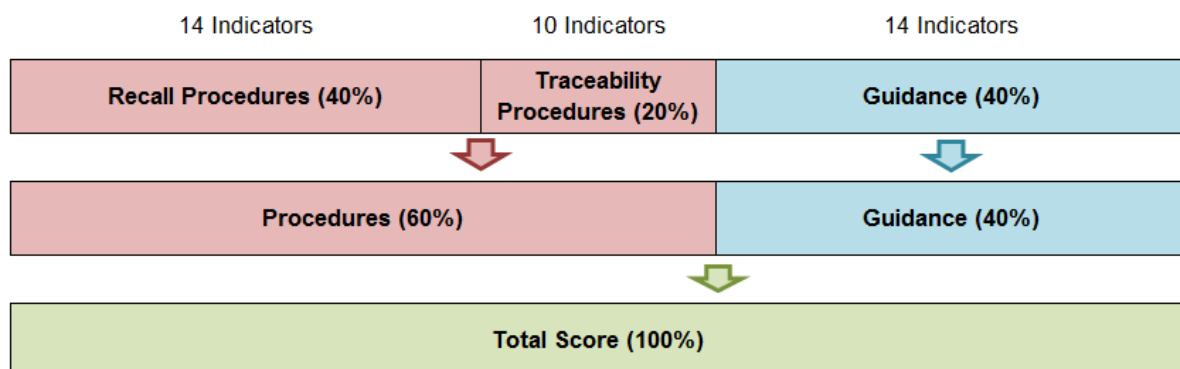
Both the recall procedures and guidance are appraised using 14 indicators each; being scored by studying each country's guidance material(s), rather than an assessment of the operation of the respective systems themselves.

To assess traceability procedures, the 10 indicators and associated scores from the Charlebois et al. (2014) paper are used.

Most indicators are scored out of 2, with the exception of the indicators considered most important by the **author**, which are given a double weighting and scored out of 4.

Figure 5.1 shows a diagrammatic display of the composition of the total score.

Figure 5.1: Total Score Composition



5.1.1 Recall Procedures Indicators

The 14 indicators used to assess the recall procedures of each country are as follows ¹⁷:

Table 5.1: Recall Procedures Indicators

#	Indicator	Max Score
1	Power of the competent authority to force a recall if required	4
2	Clearly defined roles and responsibilities for both food business operators (FBOs) and Competent Authorities	4
3	Clear contact points with the Competent Authority	4
4	Existing arrangements for international communication	4
5	Requirement for FBOs to have recall plans in place	4
6	Requirement for FBOs to submit post-recall reports	4
7	Urgency classification system	2
8	Central recalls database that is accessible to both FBOs and the FSA	2
9	Requirement for FBOs to submit formal health hazard evaluations	2
10	Post-recall audit conducted by Competent Authority	2
11	Recall adverts checked by Competent Authority before release	2
12	Archives available	2
13	Statistics available	2
14	Distribution of recall information on social media by Competent Authority	2

¹⁷ Rationale for the recall procedures indicators can be found in Annex 3

5.1.2 Guidance Indicators

The 14 indicators used to assess the guidance provided by each country are as follows¹⁸:

Table 5.2: Guidance Indicators

#	Indicator	Max Score
1	Single easily accessible guidance document	4
2	Quality of guidance on creating the recall plan	4
3	Quality of guidance on managing a recall	4
4	Quality of guidance on traceability	4
5	Quality of guidance given on risk assessment	4
6	Quality of Press Advert Template	4
7	Quality of Press Release Template	2
8	Quality of Trade Notification Template	2
9	Recommendation to place instore notifications in prominent areas e.g. not customer services	2
10	Recommendation for FBOs to use internet as a way of communicating with consumers	2
11	Recommendation for FBOs to use social media as a way of communicating with consumers	2
12	Emphasis on the importance of record keeping with a food incident log	2
13	Emphasis on the importance of regular evaluation of the recall plan	2

¹⁸ Rationale for the guidance indicators can be found in Annex 3

14	Recommendation to conduct regular mock trials	2
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5.1.3 Traceability Procedure Indicators (Charlebois, 2014)

The 10 indicators that are used in Charlebois (2014) to assess traceability requirements and regulations are ¹⁹:

Table 5.3: Traceability Procedures Indicators

#	Indicator	Max Score
1	Are there specific regulations/ policies on national level for domestic products? When did these policies come into effect?	2
2	Are there specific regulations/ policies for imported products? What documents are required for import products to address traceability?	2
3	What is the clarity of the system of authority responsible for traceability regulation?	2
4	If there are no specific governmental regulations, are there voluntary industry practices?	2
5	What products or commodities are being regulated for traceability?	2
6	What kinds of identifiers are being used for tracking/ registering of imports (such as ear tags, barcodes, radio-frequency identification)?	2
7	Are Global Food Safety Initiative (GFSI) benchmark standards recognised?	2
8	Are GS1 (international standards organisation) services (such as traceability tools and coding standards) available?	2
9	Is there an electronic database system used for monitoring import/exports and their traceability? Are these systems accessible by importing countries?	2
10	What information on packaging labels is available for the consumer to understand traceability?	2

¹⁹ Rationale for each of the indicators can be found in Charlebois et al. (2014).

The scores for the indicators for **recall procedures** and **guidance** are produced by studying the available guidance documents. In particular, the scores for the recall procedures are based on an assessment of the procedures as they have been described and set down in guidance. They are not an assessment of the actual recall procedures that may be in place in the countries (for example a country may have recall procedures in place, but they have not been detailed within the guidance), and they are not an assessment of the effectiveness of the recall procedures as implemented by the countries. In all cases the author's judgement is an important element in the determination of scores.

The scores for **traceability procedures** are taken from Charlebois et al.'s (2014) paper.

The scores of each country on all of the indicators are added up to create a composite score out of 100 for the country's overall food recall system.

5.2.1 Scores for Recall Procedures

1. Power of the competent authority to force a recall if required (/4)

All countries' Competent Authorities have the power to enforce a recall as a last resort, and so receive a score of **4**. UK and Ireland are given the power under Article 54 of Regulation (EC) No. 882/2004.

2. Clearly defined roles and responsibilities for both food business operators (FBOs) and Competent Authorities (/4)

The **UK's** guidance document provides minimal clarity on different FBO's roles and the FSA's role, and so receives a score of **0**. **Ireland, Australia** and **New Zealand's** guidance documents all describe in detail the role and responsibilities of all parties, and so receive a score of **4**. The FDA's manual on food recall describes in detail their own responsibilities, but is not as clear on FBO's responsibilities. On the other hand, Canada has different guides available for different types of FBO, such as manufacturer, distributor and retailer, which helps clearly identify their roles, however does not provide the

CFIA's responsibilities in as much detail. Therefore the **US** and **Canada** both receive a score of **2**.

3. Clear contact points with the Competent Authority (/4)

The FSA provides a single contact for notification of a recall, being a fax number for the incidents branch with a corresponding 'Food Incidents Report Form'²⁰. The FSAI provides an online food incident form where recalls can be reported, and New Zealand has a single number to ring for reporting recalls. Having a single go-to contact scores the **UK, Ireland and New Zealand 4** points. **Australia, US and Canada** provide detailed lists of contacts, but have different contacts for different regions, which loses some of the convenience. Therefore these three countries score **2** points.

4. Existing arrangements for international communication (/4)

All countries are part of the International Network of Food Safety Authorities (INFOSAN), and so gain **at least 2** points. The **UK and Ireland** are also both part of the Rapid Alert System for Food and Feed (RASFF), and so gain **4** points.

5. Requirement for FBOs to have recall plans in place (/4)

The FSA's and FDA's guidance documents contain no mention of recall plans, and so the **UK and US** both receive **0** points. In the FSANZ guidance document, it specifies that Australian FBOs must have recall plans that are accessible to the Competent Authorities upon request, and so **Australia** scores **4** points. **Ireland and New Zealand** suggest that FBOs should have recall plans in place in order to fulfil their obligations, but do not directly say that they are legally required, and so receive **2** points. **Canada** gives guidance on how to make recall plans, but at no point says that FBOs should have them in place as best practice, and so scores **1** point.

²⁰ In practice, notification is now done by phone or email/ report form to the relevant country's incident mailbox.

6. Requirement for FBOs to submit post-recall reports (/4)

The FSA's guidance document makes no mention of post-recall reporting in anyway, and so the **UK** receives **0** points. The FSANZ specifies that Australian FBOs must submit an Interim and Final Report, whilst the FDA requires status reports from American FBOs on a monthly basis, and so **Australia** and the **US** score **4** points. The FSAI and MPI's guidance document says that post-recall reports should be done, but do not make them legally required, and so **Ireland** and **New Zealand** both score **2** points. The CFIA specifies that FBOs must verify the effectiveness of recalls before the CFIA themselves checks on them, and so **Canada** also scores **2** points.

7. Urgency classification system (/2)

The **US** and **Canada** both have classification systems that rank recalls at three different levels of urgency, and so both countries score **2** points. None of the **other countries** have urgency classification systems, and so receive **0** points.

8. Central recalls database that is accessible to both FBOs and the FSA (/2)

The **UK** and **Ireland** have no central recall database available to FBOs, and so both receive **0** points. The **US** has its own purpose built Recall Enterprise System (RES), for which it scores **2** points. **Australia**, **New Zealand** and **Canada** have all subscribed to their own GS1 database, also scoring themselves **2** points.

9. Requirement for FBOs to submit formal health hazard evaluations (/2)

Both **New Zealand's** and the **US's** guidance documents specify the requirement of submission of formal health hazard evaluations, scoring themselves **2** points, whilst no other country does, meaning all the **other countries** score **0** points.

10. Post-recall audit conducted by Competent Authority (/2)

Both the FDA and the MPI conduct post-recall audits, and so the **US** and **New Zealand** both score **2** points. The CFIA checks FBO's recall effectiveness verifications, but does not complete thorough audits, and so **Canada** scores 1 point. The **other countries**, whose guidance documents make no mention of post-recall audits, score **0** points.

11. Recall adverts checked by Competent Authority before release (/2)

The FSANZ, MPI and CFIA all require that draft notices of recall and/or recall advertisements are sent to them for approval before publishing. Therefore, **Australia, New Zealand, and Canada** all score **2** points. The guidance documents advertise no such service in the **UK, Ireland or US**, and so these countries get **0** points.

12. Archives containing food recall data available (/2)

All countries provide archives on food recalls that are readily accessible to the public, and so they all score **2** points.

13. Statistics on food recall data available (/2)

Australia, US, Canada and the UK issue statistics on food recalls, and so they score **2** points, whilst the **other countries** score **0** points.

14. Distribution of recall information on social media by Competent Authority (/2)

All countries have a Twitter account where they announce food recalls, and so **all countries** score **2** points. The US actually goes one step further; the FDA has a Twitter account that is devoted to announcing food recalls.

5.2.2 Scores for Guidance

1. Single easily accessible guidance document (/4)

The **UK** does have a single guidance document (including some additional information on pages on its website), however it is incomplete, and so the UK scores **2** points. **Ireland**, **Australia** and **New Zealand** all have easy to find, single guidance documents that cover all areas, and so all score **4** points. **Canada** has a few detailed guidance documents directed at different parties, but as there is not a single go-to document, they score **2** points. The **US** has no clear or exhaustive single guidance document and so scores **0** points.

2. Quality of guidance on creating the recall plan (/4)

Neither the **UK** nor the **US** makes any specific reference to creating recall plans in their guidance document, and so both score **0** points. **Ireland** and **New Zealand** provide strong guidance on creating a recall plan, both including an example of a roles and responsibility diagram, and so they both score **4** points. **Australia** and **Canada** both also provide good advice on creating a recall plan with a devoted section on it, and so score **3** points.

3. Quality of guidance on managing a recall (/4)

Australia provides clear guidance on managing a recall, by including a clear flowchart of procedures, and scores **4** points. **Ireland**, **New Zealand** and **Canada** also provide good guidance on managing on a recall, and so score **3** points. The **US** provides minimal guidance, and scores **1** point, whilst the **UK** provides minimal guidance on managing a recall in its guidance document, and so scores **0** points.

4. Quality of guidance on traceability (/4)

Ireland provides good guidance on traceability, including a devoted and thorough section that details the best way for FBOs to fulfil their traceability responsibilities, and so score **4** points. **Australia** and **Canada** also provide good guidance scoring themselves **3** points, whilst the **UK** and **New Zealand** also provide some guidance, scoring themselves **2** points. The **US** guidance makes no reference to traceability, and so gets **0** points.

5. Quality of guidance given on risk assessment (/4)

Ireland, New Zealand and the **US** all provide clear and comprehensive advice on risk assessment, by including detailed recall decision trees and/or health hazard evaluation worksheets, and so all score **4** points. **Australia** and **Canada** provide minimal advice on risk assessment and so score **1** point, whilst the **UK** does not provide any in their guidance document, and so scores **0** points.

6. Quality of Press Advert Template (/4)

Neither the **UK, US** nor **Canada** provide a standardised recall advertisement template, and so all score **0** points. **Australia** provides a downloadable press advertisement template that is very eye-catching and instantly recognisable, and so scores **4** points. **New Zealand** and **Ireland** both provide example press advertisements, however they are only examples and not downloadable templates, and so both countries score **2** points.

7. Quality of Press Release Template (/2)

The **UK's** guidance makes no mention of press releases, and so scores **0** points. **Ireland, Australia, New Zealand** and the **US** all provide good press release templates and so score **2** points; the US even provides different sample press releases by type of recall. **Canada** provides a template although it is considered to not be as strong as the other countries and so scores **1** point.

8. Quality of Trade Notification Template (/2)

All countries except the UK provide a good template or sample trade notification in their guidance documents, and so score **2** points, whilst the **UK** scores **0** points.

9. Recommendation to place instore notifications in prominent areas e.g. not customer services (/2)

Ireland and **Australia** both specify in their guidance documents that in-store notifications should be placed in prominent places such as the main entrance or check out areas, and that placing it only in customer services is insufficient. Therefore both countries score **2** points. **New Zealand** only recommends putting the notice where the good was displayed, but makes no emphasis on making an effort to ensure customers see it, and so scores **0** points. The **UK**, **US** and **Canada** make no mention of in-store notifications in their guidance documents, and so also score **0** points.

10. Recommendation to use internet as a way of communicating with consumers (/2)

Ireland and **Australia's** guidance documents mention how FBOs can post recall information on their websites, which is essential if the product has been sold online. Both score **2** points. The **other countries** make no mention of the internet in their guidance documents, and score **0** points.

11. Recommendation to use social media as a way of communicating with consumers (/2)

Australia is the only country whose guidance document references social media as a method of communication that FBOs can use, by stating that FBOs can contact the public through Facebook, Twitter and blogs etc., securing themselves **2** points. The **other countries** get **0** points.

12. Emphasis on the importance of record keeping with a food incident log (/2)

The **UK** and **US** make no mention of record keeping in their guidance documents and so score **0** points. **Ireland, Australia, New Zealand** and **Canada** all stress the need to keep records, and so score **2** points; Ireland, Australia and Canada all focus on the need to keep an up to date food incident log during the recall, while Australia provided a recall distribution register template.

13. Emphasis on the importance of regular evaluation of the recall plan (/2)

All countries except the UK state that that recall plans should be evaluated on a regular basis in their guidance documents, and so score **2** points; Australia suggest it should be done at least annually, New Zealand biannually, and the US monthly. The **UK** scores **0** points.

14. Recommendation to conduct regular mock trials (/2)

The **UK** and **US** make no mention of mock trials in their guidance document, and so score **0** points. **Ireland, Australia, New Zealand** and **Canada** all suggest that FBOs should regularly conduct mock trials in order to test their recall plans, and so score **2** points.

5.2.3 Scores for Traceability Procedure

In Charlebois et al.'s paper (2014), instead of having numerical scores, the indicators were judged using the ratings "Progressive", "Moderate" and "Regressive"²¹. For the purpose of this paper, those ratings are transformed to the numerical values 2, 1 and 0, respectively.

²¹ Explanation of each rating given can be found in Charlebois et al. (2014).

5.2 Research Analysis: Findings and Results

Table 5.4: Food Recall System Scores

Indicators		Max Score	UK	Ireland	Australia	New Zealand	US	Canada
Recall Procedures	1	4	4	4	4	4	4	4
	2	4	0	4	4	4	2	2
	3	4	3	4	2	4	2	2
	4	4	4	4	2	2	2	2
	5	4	0	2	4	2	0	1
	6	4	0	2	4	2	4	2
	7	2	0	0	0	0	2	2
	8	2	0	0	2	2	2	2
	9	2	0	0	0	2	2	0
	10	2	0	0	0	2	2	1
	11	2	0	0	2	2	0	2
	12	2	2	2	2	2	2	2
	13	2	2	0	2	0	2	2
	14	2	2	2	2	2	2	2
Total		40	18	24	30	30	28	26
Traceability Procedures	1	2	2	2	1	1	1	1
	2	2	2	2	1	1	1	1
	3	2	2	2	2	2	1	1
	4	2	2	2	2	2	2	2
	5	2	2	2	1	1	0	1
	6	2	2	2	2	2	1	2
	7	2	2	2	2	2	2	2
	8	2	2	2	2	2	2	2
	9	2	2	2	2	2	0	0
	10	2	2	2	2	2	2	2
Total		20	20	20	17	17	12	14
Guidance	1	4	2	4	4	4	0	2
	2	4	0	4	3	4	0	3
	3	4	0	3	4	3	1	3
	4	4	2	4	3	2	0	3
	5	4	0	4	1	4	4	2
	6	4	0	2	4	2	0	0
	7	2	0	2	2	2	2	1
	8	2	0	2	2	2	2	2
	9	2	0	2	2	0	0	0
	10	2	0	2	2	0	0	0
	11	2	0	0	2	0	0	0
	12	2	0	2	2	2	0	2
	13	2	0	2	2	2	2	2
	14	2	0	2	2	2	0	2
Total		40	4	35	35	29	11	21
Total		100	42	79	82	76	51	61

5.3 Discussion

Whilst the UK scored joint highest in traceability procedures, it scored the lowest for recall procedures (as detailed within guidance) and significantly the lowest for guidance.

Australia and New Zealand had the joint best recall procedures (as detailed in guidance), whilst Australia and Ireland provide the joint best guidance documentation.

Chapter 6 considers the areas where, based on the relative scoring received, the UK's system could be assessed for potential improvement.

6. Areas for Improvement in the UK's Food Recall System

6.1 Where the UK system exceeds

In Charlebois et al.'s (2014) paper on traceability procedures, all EU countries received full marks due to the mandatory regulation of EU Legislation 178/2002, which is described as being superior to that of other countries where legislation is confined to specific products and commodities.

Another benefit that the UK gains from being part of Europe is access to the Rapid Alert System for Food and Feed (RASFF), which improves all European countries' ability to coordinate international recalls.

Moreover, the FSA has a single easily accessible guidance document that industry can use. However the document itself is not as complete as other countries' guidance.

Nevertheless it is good that the FSA has a single point of contact (being the Incidents branch) for food business operators (FBOs) to alert them of a recall.

6.2 Where the UK system has gaps

The majority of the UK's low scores result from having insufficient publicly available guidance. Guidance is an important part of the process as it ensures that all parties know their (and other's) responsibilities and the appropriate way to fulfil them. This is something the UK does not make clear in its own guidance.

Further, the FSA does not provide any communication templates (e.g. for press advertisements, trade notifications etc.); all other countries studied do.

One of the consequences of not having templates available to FBOs is that UK recall consumer notifications do not meet the standards of comparative countries.

For example, Australia, New Zealand and Ireland all provide point of sale notification templates that ensure the notification is eye-catching, contains a picture of the recalled food product and has a clear message. These countries emphasise that the

notification should not include unnecessary information about the company or try to create a marketing opportunity.

Ireland and Australia emphasise that the wording used must not downplay the seriousness of the incident, and between them give 3 examples of phrases that must **not** be used:

1. "Product is not up to our usual quality standards"
2. "Product is being recalled as a precaution"
3. "Voluntary recall"

In particular, Australia's template stands out as being eye-catching and instantly recognisable (see Figure 6.1).

In contrast, many of the notifications issued by UK FBOs do not include a picture and are in black text. Figure 6.2 provides an example of one of these.

Moreover, some of the UK notifications issued by FBOs perhaps put too much emphasis on brand protection and not enough on conveying the urgency of the message. This may downplay the importance and would not comply with the rules of other countries' food recall systems.

For example, Figure 6.3 shows an existing UK point of sale notification that includes variations of all three of the above given phrases that are banned by Ireland and Australia²².

²² "Product is not up to our usual quality standards", "Product is being recalled as a precaution", "Voluntary recall"

Figure 6.1: Australia's Press Advertisement Template

FOOD RECALL

Product name
 (insert affected sizes, Use by or Best Before dates)
 (insert product picture)

The recalled product(s) has/have been available for sale in
 (insert types of retail outlets).

Problem: The recall is due to (insert the problem, e.g. *Listeria monocytogenes* contamination, the presence of metal fragments, the presence of an undeclared allergen - peanuts).

Food Safety Hazard: (If the reason is Listeria the following must be included "Listeria monocytogenes may cause illness in pregnant women and their unborn babies, the elderly and people with low immune systems")

(If reason is another microbial contamination the following must be included "Food products contaminated with (pathogen) may cause illness if consumed.")

(If the problem is a packaging fault, the presence of foreign matter or chemical contamination the following must be included "Food products containing (matter/chemical) may cause illness/injury if consumed.")

(If the problem is undeclared allergen: the following must be included "Any consumers who have a (insert undeclared allergen) allergy or intolerance may have a reaction if the product is consumed").

What to do: (If reason is any type of microbial contamination the following must be included "Any consumers concerned about their health should seek medical advice").

(If the problem is a packaging fault or the presence of foreign matter the following must be included "Consumers should not eat this product")

(If the problem is undeclared allergen: the following must be included "Consumers who have a (insert undeclared allergen) allergy or intolerance should not consume this product")

Customers should return the product(s) to the place of purchase for a full cash refund (if applicable). We apologise for any inconvenience (optional).

Contact details: For further information contact (insert company contact details, including telephone number and web address if available).

See www.foodstandards.gov.au/recalls for Australian food recall information

Figure 6.2: 1st Example of an Existing UK Point of Sale Notification

PRODUCT RECALL

[redacted] Organic Sesame Seeds

The following batches of [redacted] Organic Sesame Seeds are being recalled due to the possibility that they may contain traces of salmonella.

Code	Size	Batch	BBD
NU208	25kg	LT0005816/52	30/11/16
NU213	6x125g	CP292	09/09/16
NU356	6x250g	CP297	16/09/16
		CP297	28/10/16
		CP301	25/11/16
NU080	2.5kg	WH911	16/09/16
NU210	1kg	WH915	21/10/16
		WH918	11/11/16

As a precautionary measure we ask that you return any of the above products if they have the same corresponding batch and best before date. No other batches are affected.

All items will be refunded.

Apologies for any inconvenience caused by this issue.

[redacted] Quality Control

Figure 6.3: 2nd Example of an Existing UK Point of Sale Notification

IMPORTANT SAFETY NOTICE!

[redacted] internal quality assurance checks have shown that a LIMITED NUMBER of [redacted] 500ml products may contain small pieces of metal.

The company has identified a specific production period during which [redacted] 500ml may have been affected and, as safety remains a top priority, [redacted] voluntarily recalling our batch codes of [redacted] 500ml L62110L011 / L62111L011 / L62112L011 / L62113L011 from sale.

As a precaution, everyone with a 500ml tub of Ben & Jerry's Cookie Dough in their freezers at home should CHECK THE BATCH NUMBER on the bottom of their tub to make sure it's not affected and, if it matches the batch numbers listed above, they SHOULD NOT EAT the product and, instead, we ask them to discard the product in the usual household bin.

Ice cream consumers who believe they might have an affected tub of [redacted] 500ml should call the folks at our Customer Care line on: **0800 146252 (UK&NI) or 1800 946272 (Ireland)** to find out how to receive a voucher for a replacement tub. Please have the details written at the bottom of your tub ready.

TURN YOUR [redacted] TUB UPSIDE DOWN - HERE'S WHERE YOU'LL FIND THE BATCH CODE ON YOUR 500ML:

IMPORTANT NOTE: The four batch codes listed (L62110L011 / L62111L011 / L62112L011 / L62113L011) are only for [redacted] 500ml available in the UK & Ireland. [redacted] products outside of the four batch codes listed are not affected. [redacted] takes great pride in the quality of its ice cream and the operation of their creation station. Operating to the highest standards of quality assurance, everyone at [redacted] is very sorry that a limited number of [redacted] 500ml ice cream failed to meet expectations on this occasion.

The FSA does not advertise as many services available to help FBOs through a recall as other countries' agencies do, such as:

- conducting post-recall audits
- checking recall advertisements before they are published (in order to ensure that the FBO is conveying the recall message as effectively as possible, and not trying to use it as a brand advertising opportunity)

Further, the FSA specifies fewer standard requirements from FBOs (in the guidance document) than some other countries do, such as:

- having recall plans in place and available to the Competent Authorities upon request
- formatting point of sale notifications, press advertisements, press releases and trade notifications as per set templates
- submitting formal health hazard evaluations upon making the recall decision
- submitting post-recall reports to the Competent Authorities, to assist with decisions to close the recall and future evaluation

Although the FSA publishes all food alerts on its website, it provides no central recalls database that is accessible to FBOs, unlike the US that has its own Recall Enterprise System (RES), and Australia, New Zealand and Canada who subscribe to GS1 recall databases.

Furthermore, the UK has no public urgency classification system or any real system of letting consumers instantly know the importance of a recall, unlike the US and Canada. However, this research is not making an assessment on the effectiveness of such a system.

7. Conclusion

To conclude, the results of this paper identify areas to consider further where there could be room for improvement to the UK's food recall system.

The areas identified for further consideration or as having potential for improvement are to consider:

1. The creation of a new guidance document for FBOs to help ensure that they are aware of and fulfil their responsibilities.
2. Requiring food business operators (FBOs) to follow Food Standards Agency (FSA) provided templates for given types of communication in the recall process.
3. Requiring FBOs to have food recall plans prepared and available to the Competent Authorities upon request.
4. The effectiveness of implementing an 'urgency classification system' (based on the US and Canada's systems).
5. The effectiveness of developing a new central recalls database that is accessible to both FBOs and the FSA.

8. Evaluation

8.1 Evaluation

The initial aim of this report was to be able to conduct both a qualitative and quantitative analysis of many countries, including several from the EU.

However the scope of the report had to be limited in the following ways:

1. Only qualitative was undertaken, due to a lack of sufficient data.
2. Only English speaking countries were studied, thereby excluding nearly all EU countries.
3. Scores cannot be treated in an absolute sense and weightings are, to an extent, arbitrary.

It may also be that the composite scores produced are biased towards services that are publicly advertised, due to the nature of the research approach.

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Annex 2: Definitions and Abbreviations

Abbreviations

The Competent Authorities in charge of recalls for each country:

UK: FSA: Food Standards Agency

Ireland: FSAI: Food Safety Authority of Ireland

Australia: FSANZ: Food Standards Australia New Zealand

New Zealand: MPI: Ministry for Primary Industries

US: FDA: Food and Drug Administration

Canada: CFIA: Canadian Food Inspection Agency

FBO: Food Business Operator

RASFF: Rapid Alert System for Food and Feed

INFOSAN: International Network of Food Safety Authorities

WHO: World Health Organisation

FAO: Food and Agriculture Organisation of the United Nations

Definitions

Withdrawal: The process by which a product is removed from the supply chain, with the exception of product that is in the possession of consumers.

Recall: The process by which a product is removed from the supply chain and where consumers are advised to take appropriate action, for example to return or destroy food.

Traceability: The ability to trace and follow a food, feed, producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution.

Food (or Foodstuff): Any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans. 'Food' includes drink, chewing gum and any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment. It includes water after the point of compliance as defined in Article 6 of Directive 98/83/EC and without prejudice to the requirements of Directives 80/778/EEC and 98/83/EC. 'Food' shall not include:

- a) Feed
- b) Live animals unless they are prepared for placing on the market for human consumption
- c) Plants prior to harvesting
- d) Medicinal products within the meaning of Council Directives 65/65/EEC and 92/73/EEC
- e) Cosmetics within the meaning of Council Directive 89/622/EEC
- f) Narcotic or psychotropic substances within the meaning of the United Nations Single Convention on Narcotic Drugs, 1961, and the United Nations Convention on Psychotropic Substances 1971
- g) Residues and contaminants

Food Law: The laws, regulations and administrative provisions governing food in general, and food safety in particular, whether at Community or national level. It covers any stage of production, processing and distribution of food, and also of feed produced for, or fed to, food producing animals.

Food Business: Any undertaking, whether for profit or not and whether public or private, carrying out any of the activities related to any stage of production, processing and distribution of food.

Food Business Operator: The natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control.

Retail: The handling and/or processing of food and its storage at the point of sale or delivery to the final consumer, and includes distribution terminals, catering operations, factory canteens, institutional catering, restaurants and other similar food service operations, shops, supermarket distribution centres and wholesale outlets.

Placing on the Market: Holding of food or feed for the purpose of sale, including offering for sale or any other form of transfer whether free of charge or not, and the sale, distribution, and other forms of transfer themselves.

Risk: A function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard.

Risk Analysis: A process consisting of three interconnected components: risk assessment, risk management and risk communication.

Risk Assessment: A scientifically based process consisting of four steps: hazard identification, hazard characterisation, exposure assessment and risk characterisation.

Risk Management: The process, distinct from risk assessment, of weighing policy alternatives in consultation with interested parties, considering risk assessment and other legitimate factors, and, if need be, selecting appropriate prevention and control options.

Risk Communication: The interactive exchange of information and opinions throughout the risk analysis process as regards hazards and risks, risk related factors and risk perceptions, among risk assessors, risk managers, consumers, feed and food businesses, the academic community and other interest parties, including the explanation of risk assessment findings and the basis of risk management decisions.

Hazard: A biological, chemical or physical agent in, or condition of, food or feed with the potential to cause an adverse health effect.

Home Authority: the local authority where the relevant decision making bases of a food business is located. For a business with multiple branches etc., the home authority will general be the local authority where the head office is located.

Annex 3: Rationale for Multi Criteria Analysis Indicators

Recall Procedure Indicators

1. Power of the competent authority to force a recall if required (/4)

The WHO (2012) guide highlights the importance of the competent authority being empowered to compel a food business operator to undertake a recall and to conduct any inspection or verification as necessary. This power being specified acts as a credible threat to food business operators, in order to encourage them to undertake food recalls of their own accord so that the food recall system can run smoothly.

2. Clearly defined roles and responsibilities for both food business operators (FBOs) and Competent Authorities (/4)

Another one of the WHO's (2012) key principles that enables the food recall system to run smoothly. If roles and responsibilities are not defined, then gaps in the system can form and important tasks can be left undone.

3. Clear contact points with the Competent Authority (/4)

A key part of the WHO (2012) principle on effective communication and notification. The WHO (2012) paper proposes that a single designated point of contact is ideal, in order for the provision of consistent information and for coordinating the activities of all parties during a recall.

4. Existing arrangements for international communication (/4)

Many food recalls may be international and so effective worldwide communication is important. The International Food Safety Authorities Network (INFOSAN) is a global network managed by FAO/WHO that is used

to share information rapidly with competent authorities. Further, the European countries employ the RASFF as a system to communicate international food recalls within Europe.

5. Requirement for FBOs to have recall plans in place (/4)

Food business operators having recall plans in place may create benefits, making recall procedures potentially run smoothly. The FSAI (2013) describe the advantages as facilitation of management review, crisis support and training of new employees. Requiring all food business operators to have food recall plans in place should mean that more actually have them.

6. Requirement for FBOs to submit post-recall reports (/4)

FBOs providing post-recall reports to the Competent Authority helps in both the decision to close the recall, and in improving the FBO's recall plan and future recall efforts through evaluation and review, which is another of the WHO's (2012) key principles.

7. Urgency classification system (/2)

Having an urgency classification system enables consumers to judge the importance of their potential actions, and helps ensure that the most urgent cases are not ignored. There are potential pros and cons however with such an approach and an assessment is not being made in relation to the effectiveness of this system over another.

8. Central recalls database that is accessible to both FBOs and the FSA (/2)

Having a central recall database (that is accessible to both FBOs and the FSA) helps in record keeping, and can be useful both when coordinating a recall and when conducting evaluation of recalls afterwards.

9. Requirement for FBOs to submit formal health hazard evaluations (/2)

Competent Authorities can request formal health hazard evaluations, to ensure that FBOs are acting in the best interest of the public.

10. Post-recall audit conducted by Competent Authority (/2)

Conducting a post-recall audit is a service that the Competent Authority can provide to help ensure that FBOs follow the legislation whilst undertaking the recall, and to help evaluate the recall afterwards. It can also be useful to ensure that corrective actions have been put in place to prevent a similar issue occurring in the future.

11. Recall adverts checked by Competent Authority before release (/2)

Another service that some Competent Authorities provide is the checking of advertisements before they are released to ensure they contain the best language to communicate the urgent recall message.

12. Archives containing food recall data available (/2)

Having a live archive of food recalls available to the public helps with record keeping and ensuring transparency. Further, it helps FBOs or other companies to conduct their own evaluation of the recall system, which could be used to identify improvements.

13. Statistics on food recall data available (/2)

Further to archives, Competent Authorities can have food recall statistics readily available in order to further aid transparency and analysis.

14. Distribution of recall information on social media by Competent Authority (/2)

As the media continually evolves, so to do the appropriate ways of contacting consumers. Following the growth of social media, it is important to consider it as a vessel to communicate recalls to consumers. As using social media is cheap (free), all Competent Authorities could use it to communicate to consumers.

Guidance Indicators

1. Single easily accessible guidance document (/4)

Having a single complete guidance document would help to ensure that FBOs see all guidance that is intended for them. Having guidance spread over many documents/ webpages makes it more likely that some will be missed or misunderstood.

2. Quality of guidance on creating the recall plan (/4)

As discussed before, FBO's having a recall plan in place is important, and so too is the quality of the plans they have in place.

3. Quality of guidance on managing a recall (/4)

Having guidance that can act as a manual for FBOs would help to ensure that they do not miss out any of their responsibilities and that they conduct them as effectively and timely as possible.

4. Quality of guidance on traceability (/4)

Traceability is a central part of the recall system, and it is important that all parties understand their traceability responsibilities. Charlebois et al.'s (2014) indicators for quality of countries' traceability procedures do not cover guidance available to FBOs on traceability.

5. Quality of guidance given on risk assessment (/4)

Guidance on risk assessment could encourage FBOs to make the right decision on whether to issue a recall or not, in turn ensuring that public health is protected.

6. Quality of Press Advert Template (/4)

Press advertisements are perhaps more likely to be effective if they are standardised. A good quality press advert template would help to ensure that the advert is eye-catching and instantly recognisable.

7. Quality of Press Release Template (/2)

Having a press release template could also help to ensure that press releases are more likely to be actioned upon by the media.

8. Quality of Trade Notification Template (/2)

Again, having a standardised trade notification template could help to ensure that an FBO receiving the notification recognises the urgency involved and does not ignore it.

9. Recommendation to place instore notifications in prominent areas e.g. not customer services (/2)

Some shops may wish to put in-store notifications only in customer service areas, which may result in very few consumers seeing them. A good guidance document should stress the importance of ensuring that the consumer sees the notification, by placing it in prominent areas such as the entrance, the aisle where the food is located, and checkout areas.

10. Recommendation to use internet as a way of communicating with consumers (/2)

As more food is being sold online, businesses can be faced different challenges, as well as opportunities, when dealing with a recall. A guidance document could usefully incorporate the need to alert customers through the FBO's website, if applicable, and to consider the implication of goods sold online.

11. Recommendation to use social media as a way of communicating with consumers (/2)

As mentioned before, social media is increasingly becoming a more appropriate method of communication to consumers (or at least certain demographics within the population), and so a good guidance document should highlight its potential use.

12. Emphasis on the importance of record keeping with a food incident log (/2)

Record keeping is one of the WHO's (2012) key principles, and must be undertaken not just by the Competent Authority but also by the relevant FBOs. A good guidance document should stress the importance of record keeping, perhaps specifically with a food incident log.

13. Emphasis on the importance of regular evaluation of the recall plan (/2)

Review and evaluations is another of the WHO's (2012) key principles, and it is important that FBO's review their recall plans on a regular basis so that they do not become outdated.

14. Recommendation to conduct regular mock trials (/2)

Mock trials are the best way to review and test an FBO's recall plan, and so should at least be recommended by the guidance document.

Annex 4: Other Countries' Guidance Documents

The specific areas in which the UK's guidance document has room for improvements when compared to other countries are:

- Clearly defining the specific roles and responsibilities of all parties involved, including different types of FBOs e.g. manufacturers, distributors and retailers.
- Explaining how to:
 - Create a recall plan
 - Effectively manage a recall
 - Effectively risk assess
- Provision of templates, such as:
 - press advertisement
 - press release
 - trade notification.
- Emphasising the importance of:
 - accurate record keeping.
 - regular evaluation and testing of the recall plan, such as by conducting mock trials.
 - ensuring the recall message reaches the consumer e.g. by placing in-store notifications in prominent places, contacting them via websites, email or social media.

Ireland, Australia and New Zealand all provide comprehensive guidance documents that can be used as examples for creating an effective guidance document:

1. The Irish Guidance: "Guidance Note No. 10 Product Recall and Traceability"²³
2. The Australian Guidance: "Food Industry Recall Protocol"²⁴
3. The New Zealand Guidance: "Recall Guidance Material"²⁵

²³ https://www.fsai.ie/food_businesses/starting_business/useful_publications.html

²⁴ <http://www.foodstandards.gov.au/industry/foodrecalls/firp/pages/default.aspx>

²⁵ <http://www.foodsafety.govt.nz/elibrary/industry/recall-guidance-material-template/recallguidancematerialfinal.pdf>

These guidance documents contain a lot of specific detail to best help FBOs through their responsibilities, but also include diagrams or flowcharts that sum up the process effectively, so that FBOs can find the information quickly if required. Following this approach gives the guidance document the ability to be detailed whilst still being easy to read.

Generally, a comprehensive guidance document could focus on four key areas:

1. Traceability
2. Role and responsibilities
3. Creating a food recall plan
4. Managing a food recall

Traceability

The Irish guidance document provides the good advice on food traceability, with its own devoted section.

Roles and Responsibilities

The Australian guidance document provides an example of clearly defined and detailed roles and responsibilities for different types of businesses and competent authorities. The Irish guidance document's roles and responsibilities chapter contains references to specific European Commission Regulations.

Creating a Food Recall Plan

The Irish guidance document provides the clear advice on creating a food recall plan and could provide a useful basis from which to develop guidance, with elements being drawn from other guidance documents, such as the information required when contacting the competent authorities, which is well documented in Australia's guidance.

Managing a Food Recall

Both the Irish and Australian guidance documents provide clear advice on managing a recall.

Annex 5: Other Countries' Templates

The key templates that countries provide in order to make communication between parties more effective during a recall are:

1. Press Advertisement/ Point of Sale Notification
2. Press Release
3. Trade Notification

The most important template is arguably the press advertisement/ point of sale notification as it is intended to reach as many people as possible. Further, consumers would be seeing it in situations when they do not expect to, and so the notification must be eye-catching.

Press Advertisement/ Point of Sale Notification Templates

Australia, New Zealand and Ireland all provide press advertisement templates and corresponding specifications that must be followed. All three countries ensure that the notification is eye-catching and contains a picture of the recalled food product.

They also ensure that the message of the notification is effective. New Zealand requires that consumer notifications are “clear, simple and unambiguous”, and that they must not include unnecessary information about the company or try to create a marketing opportunity. Ireland and Australia emphasise that the wording used must not downplay the seriousness of the incident, and between them give 3 examples of phrases that must **not** be used:

1. “Product is not up to our usual quality standards”
2. “Product is being recalled as a precaution”
3. “Voluntary recall”

Of all three countries' templates, Australia's is both eye-catching and instantly recognisable. Further, Australia provides a downloadable version of the template (see Figure A5.1).

Figure A5.1: Australia's Press Advertisement Template



FOOD RECALL

Product name

(insert affected sizes, Use by or Best Before dates)

(insert product picture)

The recalled product(s) **has/have** been available for sale in
(insert types of retail outlets).

Problem: The recall is due to **(insert the problem, e.g. *Listeria monocytogenes* contamination, the presence of metal fragments, the presence of an undeclared allergen - peanuts).**

Food Safety Hazard: **(if the reason is Listeria the following must be included "Listeria monocytogenes may cause illness in pregnant women and their unborn babies, the elderly and people with low immune systems"**

(if reason is another microbial contamination the following must be included "Food products contaminated with (pathogen) may cause illness if consumed.)

(if the problem is a packaging fault, the presence of foreign matter or chemical contamination the following must be included "Food products containing (matter/chemical) may cause illness/injury if consumed.)

(if the problem is undeclared allergen: the following must be included "Any consumers who have a (insert undeclared allergen) allergy or intolerance may have a reaction if the product is consumed").

What to do: **(if reason is any type of microbial contamination the following must be included "Any consumers concerned about their health should seek medical advice").**

(if the problem is a packaging fault or the presence of foreign matter the following must be included "Consumers should not eat this product")

(if the problem is undeclared allergen: the following must be included

Consumers who have a (insert undeclared allergen) allergy or intolerance should not consume this product")

Customers should return the product(s) to the place of purchase for a full cash refund **(if applicable).** We apologise for any inconvenience **(optional).**

Contact details: For further information contact **(insert company contact details, including telephone number and web address if available).**

See www.foodstandards.gov.au/recalls for
Australian food recall information

Press Release Template

Ireland, New Zealand, the US and Canada all provide example press releases. Ireland's press release example succeeds in being the most eye-catching and instantly recognisable, whilst Australia's provides the most advisory detail.

Figure A5.2: Ireland's Press Release Example

PRESS RELEASE - FOR IMMEDIATE RELEASE



04 June 2007
Food Recall

Ham-It-Up Cooked Ham Produced by B Ltd, Co. Dublin

B Ltd is recalling all cooked ham products under the brand name Ham-It-Up. This product has been implicated in a number of cases of Salmonellosis in the South West region of the country. Although testing of the ham has yet to identify Salmonella, B Ltd is taking this public health measure in conjunction with the Food Safety Authority of Ireland (FSAI). The FSAI has also advised anybody showing symptoms such as fever, diarrhoea and/or vomiting to seek medical advice.

All Ham-It-Up brand ham is affected irrespective of its 'use-by' date. Consumers should not consume the product. Consumers are also advised to dispose of the product, however, the label should be sent to the following address for a full refund along with the name and address of the consumer.

B Ltd.
Unit B, Street C
Co. Dublin

Mr Meat, CEO of B Ltd said "We apologise to our customers for any inconvenience this recall has caused. However, I stress that this is a public health measure and that no Salmonella has yet been found in the implicated food". Dr. Safe, FSAI said "B Ltd has cooperated fully with the FSAI investigation and have acted responsibly to protect public health. Anybody who has consumed this product and is showing symptoms such as fever, diarrhoea and/or vomiting should seek medical advice"

Consumers should contact the following number for further information:
01 -112211223

Figure A5.3: Australia's Press Release Template

[Insert Company logo/name]

[Insert date]

[Insert heading]

The heading should be no more than one line and should capture as much information as possible, but the word recalls/recalled should be used.

Example: [Company name] recalls [product name] due to presence of *Listeria* OR [Product name] recalled due to presence of *Listeria*

Body of media release

The body of the media release should include a short introduction of no more than a couple of lines and should include the main facts.

The media release should be no more than a page but needs to answer the questions:

- *who is taking action [Company];*
- *what action is being taken (Recalling a product - include all product details, including product name, varieties (flavours etc), package size/weight and date marking/batch codes, as relevant);*
- *where (from what stores in which states/territories);*
- *how (through a recall process); and*
- *WBBB (now).*

You can quote a spokesperson or the relevant company representative.

It should also include:

- *advice to consumers on what you want them to do (e.g. do not consume the product and return to the place of purchase for a full refund)*
- *an advisory to seek medical assistance for consumers concerned about their health, if the food being recalled has been associated with illness*
- *where customers can obtain more information such as a customer enquiry phone number and/or company website and links to more information, if necessary, such as the recall notice on the FSANZ website.*

You may also wish to include an apology and advice on when the product will be available again.

Example:

[Company name] today recalled all [include all products affected and details] from [name of retailer/s] stores across Australia due to the presence of *Listeria monocytogenes*.

[Company name] Director John Smith said the company had detected *Listeria monocytogenes*, on the products during testing at the company's facilities in Melbourne.

The affected product has use by/best before dates of: [date marking or other identifying features].

"As soon as we detected an issue we made contact with authorities in the [name relevant jurisdiction] to conduct a recall and have notified all relevant retailers," Mr Smith said.

"Any consumers who have the affected product should return it to the place of purchase for a full refund. If consumers have any questions they can contact the company by calling/emailing [number or alternative contact e.g. email]."

Listeria can be dangerous, particularly for pregnant women, the elderly or small children. More information on *Listeria* can be found on the Food Standards Australia New Zealand website at <http://www.foodstandards.gov.au/consumersafety/listeria/Pages/factsheet/listeriaandfoodjuly25590.aspx>.

Mr Smith said anyone concerned about their health should seek medical advice.

Contact

[Insert contact name and number]

Trade Notification Template

Ireland, Australia, New Zealand, the US and Canada all provide trade notification templates. Further, Australia's features a downloadable version.

Australia's trade notification template provides a robust structure and is very clear in what must be edited by the recalling firm. Ireland's example includes "URGENT" in bold red text at the top, which is a useful inclusion to make the letter stand out and to convey its importance.

Figure A5.4: Australia's Trade Notification Template

Distributor's name
Distributor's address

FOOD RECALL

Customers are advised that [name of the sponsor] is conducting a food recall due to [the reason for the recall].

The food involved is [name of the food product, package size, date marking, batch code and all other information that will identify the food].

We are recalling all supplies of the food with the above identification.

[For consumer level recalls, insert the following sentence]

Consumers have been advised of the recall and asked to return the purchased food. They will receive a refund of the purchase price.

If you have distributed any of the recalled stock to other distributors or retailers please immediately inform those distributors or retailers of the recall.

If you have re-packaged or re-processed the recalled food under another brand name, you, or the business you supply the re-packaged or re-processed food, may need to conduct a separate trade or consumer food recall. If this is the case, please immediately contact FSANZ on 02 6271 2610 and your state or territory health department.

Please hold the recalled food in an isolated and secure area pending further advice.

We apologise for the inconvenience.

[The name of the sponsor, address and contact numbers]

[Date]

Figure A5.5: Ireland's Trade Notification Example

URGENT

Food Recall (or withdrawal)

Company Name _____

Food Name _____

Food Details _____

Batch Identification _____

'use-by' or
'best-before' date _____

Reasons for the Recall

Action Required

Contact Details _____

Alternative
Contact Details _____