

## FSA/FSS Efficacy of Recalls

### Final Report

6<sup>th</sup> September 2017



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# 1. Executive summary

The Food Standards Agency (FSA) and Food Standards Scotland (FSS) are non-ministerial government departments, in England, Wales and Northern Ireland and in Scotland respectively, set up to protect the public's health and consumer interests in relation to food. As part of this responsibility, the FSA and FSS help to ensure that food businesses meet their legal requirements around food withdrawals and recalls in situations where food fails to meet safety requirements or presents a risk to health.

In 2016, the FSA/FSS recognised that the UK system for food withdrawals and recalls had not been reviewed before, that little evidence was available on the efficacy of the current system and little was known about consumer awareness and behaviours in relation to food recalls. Against the backdrop of criticism of product recalls processes more widely<sup>1</sup>, there existed the potential to break new ground by adjusting consumer protection processes to make them truly responsive to public needs.

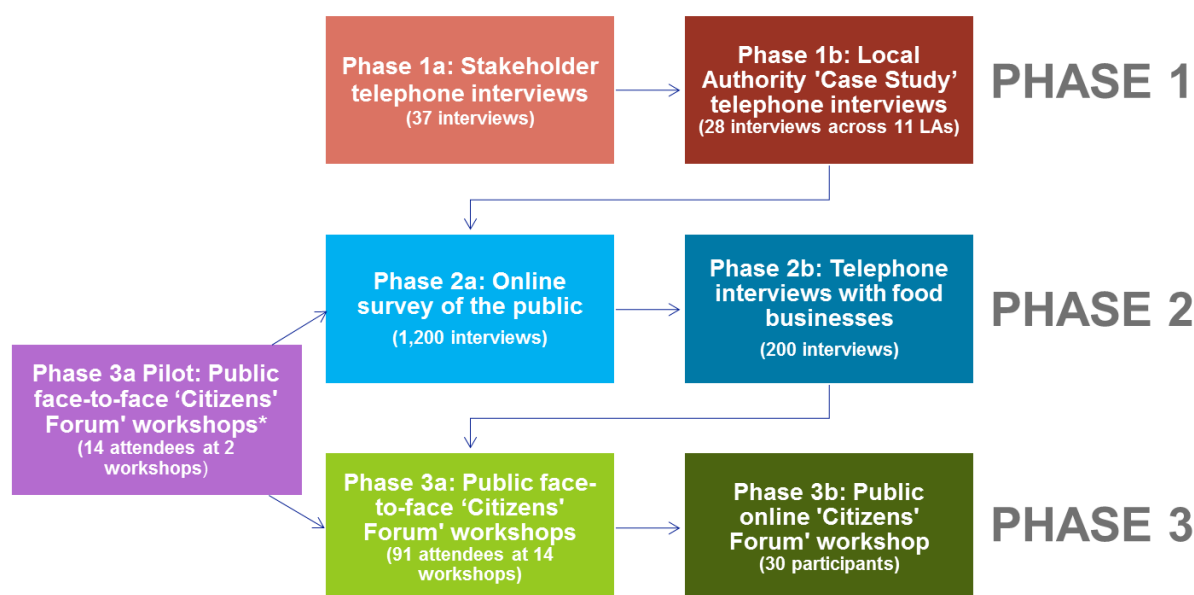
The FSA/FSS commissioned a programme of work to review and, if necessary, improve the efficacy of the food withdrawals and recalls process in the UK food retail sector. Part of this programme of work included commissioning Kantar Public, an independent social research agency, to conduct research with consumers and other stakeholders (including consumer interest groups, Local Authorities (LAs) and food business representatives). The research aims were to establish the key features and baseline consumers' and stakeholders' views of the current process, explore each step of the process in detail and where improvements might be made, and explore public awareness attitudes and behaviours and how these might differ among high risk groups.

## 1.1 Research design

To meet these aims, Kantar Public worked with FSA/FSS to design and apply a mixed method and iterative research approach, which consisted of three distinct phases incorporating both qualitative and quantitative research methods. Fieldwork took place between December 2016 and May 2017. The research design is summarised in Figure 1.

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<sup>1</sup> L.F. Wood (2016) UK consumer product recalls: an independent review. Summary research conducted on behalf of BIS: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/509125/ind-16-4-consumer-product-recall-review.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/509125/ind-16-4-consumer-product-recall-review.pdf)



\*The timing of the 3a pilot meant that findings were used to inform the development of both phases of consumer research

**Figure 1: The three phases of mixed methods research**

It should be noted that the sample for phase 2b was not designed to be representative of all UK food businesses. Therefore, the phase 2b findings in this report apply only to those food businesses interviewed and cannot be generalised to food businesses in the UK as a whole. Similarly, this study's findings are not representative of practices across the whole food retail sector but, rather, are built on the perceptions and experiences of the consumers, stakeholders, and food businesses that participated in the study. Further, the terminology reported reflects the word choices and levels of knowledge of participants and hence may not reflect language used in the legislative and regulatory environments.

## 1.2 The withdrawals and recalls process summarised

Figure 3 shows a simplified process map developed by Kantar Public and the FSA/FSS to illustrate the key related steps in the withdrawals and recalls process (though it is recognised that the process is not usually linear and that some of the steps can occur simultaneously or in a different order).

This simplified map has been used as a means by which to review, organise and present the emerging findings throughout the various phases of the research.

**Figure 3: The simplified withdrawals and recalls process map**

STEPS IN THE WITHDRAWAL / RECALL PROCESS				
STEP 1	STEP 2	STEP 3	STEP 4	STEP 5
ISSUE IDENTIFICATION / TRIGGERING	WITHDRAWAL / RECALL NOTIFICATION	PRODUCT REMOVAL AND DESTRUCTION	CONSUMER ACTION	FEEDBACK LOOP
Issue reporting	Notifying business to business / trade customers in the supply chain	Removing affected product from supply chain and consumers	Throw away, destroy, or eat anyway?	Determining cause of incidents
Issue identification and risk assessment	Notifying consumers	Reprocessing or destroying product		Preventing similar incidences occurring
Notifying authorities	Notifying consumer groups	Reconciling with LA(s)		
Triggering product withdrawals/recalls	Choosing the right method for notifications	Adhering to Competent Authority requirements to monitor and verify standards		

### **1.2.1 Step 1: Issue Identification and Triggering**

Overall there was confidence among food business representatives, LA representatives and consumer and industry group representatives in how step 1 is carried out. There were some concerns, expressed particularly by manufacturers and retailers, around the amount of support available for smaller food businesses in investigating an issue. There were also concerns around LAs having enough capacity to support businesses when needed.

Overall, food business representatives could speak in depth about this stage and, while issues with a product could be identified from many different sources (such as from suppliers, customer complaints, LAs and media contacts), most representatives were confident that once identified they could manage these issues up to the point of triggering a recall. After a recall was triggered, and communications extended to consumers, businesses' perceptions of their ability to manage this step lessened.

### **1.2.2 Step 2: Withdrawal and Recall Notification**

This step transitions from clear confidence in owning and implementing the withdrawals process to less confidence and, subsequently, less perceived success in the process once it went beyond other businesses in the supply chain and reached consumers as a food recall. Over time, it seems likely it will become easier for food businesses to trace product and notify consumers as online accounts and/or membership of loyalty schemes grow in prevalence. Businesses that currently hold digital purchase records reported them as helpful means by which to notify customers who had bought affected products.

While in step 1 and the beginning of step 2 food businesses and stakeholders were clear on whose responsibility a sub step was, clarity around ownership decreased when it came to informing consumers and ensuring they had received a recall notice. Additionally, they were unlikely to report collecting evidence to evaluate the effectiveness of this particular element, which further compounded the issue.

Consumers' level of engagement with recall notices was low. They had little awareness of the channels of communication and were generally not proactive in seeking out information. This was in part because they felt the system should protect them and that they didn't need to know, but also because recall notices were not always effectively designed and placed to reach them. The research findings indicate there is clear consumer appetite for standardised recall templates that stand out, deliver key information quickly and are disseminated via easily accessible channels. Knowledge of the FSA/FSS and their information channels was limited, but once informed, consumers reported they would be likely to use the recalls sections of the FSA or FSS websites in future. This suggests that visits to the websites (and uptake of the options for email and text alerts) would increase if consumer awareness rises.

### **1.2.3 Step 3: Product Removal and Destruction**

The withdrawals and recalls process was perceived as becoming less effective the further it moved along the supply chain from the trigger. There was concern that, at times, the message to withdraw or recall may not reach every smaller or independent retailer. There was no clear view on timings for products to be withdrawn or recalled: the current picture is that this varies considerably by business and type of withdrawal or recall.

Although food businesses felt well prepared at this step, there existed a gap between this perception and how many targets or guidelines they stated they were abiding by.

LAs were not routinely involved in this part of the process but instead became involved on a case-by-case basis, usually at the discretion of the food business.

### **1.2.4 Step 4: Consumer Action**

Consumer behaviour around recalls and recalled products is critical to running an effective recalls system as it underpins the purpose for its existence: to ensure the safety of consumers. It was clear from this research that the majority of consumers did not actively seek out information on food recalls. Recalls were considered the responsibility of food businesses together with the FSA/FSS. Consumers expected food businesses to inform them of recalls in an effective and transparent manner when they occurred.

Consumers appeared to trust the FSA/FSS more than they trust food businesses in putting their safety first. They had a low to medium awareness of the involvement of any other organisations in the withdrawals and recalls process. Participants were not always able to name the FSA/FSS as the government regulator, but understood there to be one and had trust in it.

One in twenty consumers were aware that they had bought a product that had been recalled in the previous 12 months. The most common reported responses to food recalls were to throw the product away or return it to the shop. These actions appeared to be influenced primarily by convenience and product price.

Overall, food recalls did not generally have an adverse impact on consumer opinion of the food business that issued the recall, with just over a quarter stating their opinion of the business was actually more favourable following the experience of a recall. This was also the case for consumers with food allergies or intolerances (with over one third agreeing) and was also seen in the phase 3 research with consumers, including those with food allergies or intolerances. When handled well, recalls were likely to have a positive impact on the issuers' image, as consumers considered them to be taking ownership. This could be an incentive for food businesses both to develop more impactful communications (discussed at step 2) and to wholly engage in the food recalls system.

#### **1.2.5 Step 5: Feedback Loop**

Determining a root cause can take a long time, particularly when the supply chain involves many sources. Currently, root cause analyses and lessons learned often appear to take place in isolation, with businesses undertaking evaluations within their own organisations but being unlikely to share the findings more widely. Food businesses again reported feeling confident at this step but noted that greater shared learnings among businesses, and LAs and the FSA/FSS (when appropriate), may reduce the number of future withdrawals and recalls.

### **1.3 Efficacy of the withdrawals and recalls process**

The main findings on the efficacy of the withdrawals and recalls process can be split into six broad themes. These themes reflect the views of consumers, food businesses, regulatory bodies, trade bodies and consumer groups from both the qualitative and quantitative parts of the research.

#### **1.3.1 Process variation**

It appears that the withdrawals and recalls process varies primarily along three intersecting dimensions: firstly, based on the size of the food business; secondly, the relationship of a food business with Competent Authorities; and thirdly, the individuality of the business itself.

Food business representatives reported that food businesses could identify affected products within between four hours and a day of an issue being discovered, but the time taken for a product to be withdrawn or recalled varied widely. The withdrawals process does not always work quickly enough to remove products from the market before consumers are affected.

Kantar Public recommends that the FSA/FSS further clarifies what is expected of food businesses in terms of involving the FSA/FSS in withdrawals and recalls, with guidance targeted at smaller and independent businesses in particular.



Also, further research is needed to explore the relationship between the FSA/FSS, food businesses and LAs as those relationships are central to successful withdrawal and recall processes. In addition, further research is needed to understand in more detail how the three dimensions of variability relate to the functioning of the withdrawals and recalls process, including with smaller food businesses, and to explore if and why smaller food businesses are less capable of conducting withdrawals and recalls successfully.

Kantar Public recommends not developing general KPIs on response times but suggests exploring variability in response time further to better understand its causes.

### **1.3.2 Process effectiveness**

Representatives of larger food business reported that their internal systems and traceability are robust. However, there was a feeling that the process became less effective the further from the trigger it progressed. Manufacturers expressed concern around the withdrawal or recall message reaching smaller or independent retailers. While manufacturers are only legally required to notify their direct customers, in phase 1a manufacturer representatives spoke in general terms about the challenge of sending a message down a complex supply chain.

Kantar Public suggests the FSA/FSS conducts a review of the points at which the FSA/FSS interacts with food businesses in relation to the withdrawals and recalls process.

### **1.3.3 Process measurement**

Food business representatives reported confidence in their withdrawals and recalls processes but had few metrics to measure success. They also reported that the current system was effective and fulfilled its job of protecting consumers. However, they did not report collecting any evidence to evaluate this. Similarly, few food business representatives reported being able to measure whether consumers were communicated with effectively or what proportion of items had been successfully retrieved or destroyed.

Kantar Public recommends further qualitative research to explore whether the high levels of confidence reported by food business representatives are well-placed. Kantar Public also recommends further research to assess how targets and/or measurements might facilitate best practice.

### **1.3.4 Process learnings**

Feedback and root cause analyses appeared to take place in isolation and are not coordinated across food businesses or authorities. The withdrawals/recalls process owner (typically the manufacturer) tended to undertake any root cause analysis after a withdrawal or recall. The process of determining a root cause can take a long time, particularly as potential causes in complex cases need to be considered in the broader context.

Food business representatives overwhelmingly reported feeling confident in undertaking an evaluation of a withdrawal and/or recall, but few businesses reported active evaluation. There appeared to be little consistency around sharing learnings from withdrawals and recalls across the food industry. Food business representatives only occasionally reported working with the FSA/FSS to improve the sharing and learning after withdrawal or recall events.

Kantar Public suggests that the FSA/FSS capitalises on the appetite for greater sharing and considers offering a forum for sharing best practice. Further research should explore the most effective routes for feedback and sharing among industry stakeholders. Kantar Public also suggests the FSA/FSS considers introducing guidance on 'wash-ups' to facilitate best practice for future withdrawals and recalls.

### **1.3.5 Brand image**

Food recalls could have a positive or negative impact on consumers' opinions of the food manufacturer and/or the retailer. Where consumers perceived the food recall to have been handled well, the impact on brand perceptions was positive, even if consumers are not clear on the distinct roles of retailers and manufacturers. Food businesses that were seen to be honest, to communicate well and to handle the

subsequent return professionally were viewed favourably, and many consumers reported that they would buy products from the relevant food business/es again.

Kantar Public recommends that the FSA/FSS considers working with stakeholders to develop and introduce best-practice consumer-facing recalls communication procedures, including a notification template, on the basis that high-quality recalls communications also offer brand benefits.

### **1.3.6 Consumer notification**

Consumers were generally unaware of how the food withdrawals and recalls process works. They considered recalls to be the responsibility of food businesses together with the FSA/FSS. Food business representatives believed their consumer communications were effective in terms of messaging and channels. However, they recognised, and consumers confirmed, that communications were not currently effective in reaching consumers, and little was known about whether consumers took action in response.

There is no existing industry standard or template across food businesses that describes what recall notifications should look like or what information they should include. Consumers saw a need for a more consistent and efficient communication approach to ensure maximum reach.

Kantar Public recommends that the FSA/FSS introduces a standard industry recall notification template based on the principles revealed by this research, as well as the best-practice guidance on consumer-facing communications processes mentioned in section 1.3.5 above. These should be based on the consumer feedback discussed in section 5 and, ideally, validated by further consumer research before being introduced. Kantar Public also recommends that the FSA and FSS make consumers more aware of their websites, particularly the food alerts pages.

## **1.4 Future outlook**

This research presents an opportunity to recognise and expand on elements of the withdrawals and recalls process that are currently working well. There are several opportunities to undertake further research into areas where more information is required, according to the baseline findings in this report. It is critical to build a deeper understanding of the process in order for the FSA/FSS to continue to protect consumers' health into the future.

## 2. Introduction to the research

### 2.1 Background and wider context to project

The Food Standards Agency (FSA) in England, Wales and Northern Ireland, and Food Standards Scotland (FSS) in Scotland, are non-ministerial government departments set up to protect the public's health and consumer interests in relation to food, including risks that can arise during food production, handling and supply.

As competent authorities for food safety in the UK, both the FSA and FSS have responsibilities to inform the public about risks to health from food and feed<sup>2</sup>. One of the mechanisms by which the FSA/FSS inform the public of risks to food is to publish food alerts. The procedures adopted by the FSA/FSS are well established and require others, such as Local Authorities (LAs) and food business operators (food businesses), to notify it when there is a food incident.

If a food business considers or has reason to believe that it has placed food on the market that is unsafe, it is legally obliged to immediately initiate procedures to withdraw the food in question and to notify the competent authorities, including relevant Local Authorities. Where such food is already on the market and has reached consumers, a food business must effectively and accurately inform consumers of the withdrawal and, if necessary, recall products already supplied to consumers<sup>3</sup>. Requirements for LAs to notify the FSA of food incidents are set down in The Food Law Code of Practice and associated Practice Guidance<sup>4</sup>. Similar requirements exist for LAs in Scotland.<sup>5</sup>

As part of its responsibilities, the FSA/FSS reminds food business operators of their legal responsibilities around food withdrawals and recalls in situations where food fails to meet safety requirements or presents a risk to health.

In particular, the FSA/FSS helps to protect consumers by monitoring and, where appropriate, enforcing food businesses' compliance with:

- = Having traceability, withdrawal and recall processes in place
- = Immediately taking steps to withdraw a product from the market or recall it from consumers if it is found not to comply with food safety requirements
- = Notifying local and central competent authorities in the case of food withdrawal and recall
- = Effectively and accurately informing consumers of recalls and the reasons for them

The FSA/FSS recognised that the UK system for food withdrawals and recalls had not been reviewed before. Little evidence was available on the efficacy of the current system and little was known about

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<sup>2</sup> This obligation stems from Section 7 of The Food Standards Act 1999 (for FSS Section 31 of the Food Scotland Act 2015 applies) and Article 10 of Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety. See also: <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02002R0178-20140630&qid=1498222369269&from=EN>

<sup>3</sup> Article 19 of Regulation (EC) No 178/2002.

<sup>4</sup> [https://www.food.gov.uk/sites/default/files/food\\_law\\_code\\_of\\_practice\\_2017.pdf](https://www.food.gov.uk/sites/default/files/food_law_code_of_practice_2017.pdf) and <https://www.food.gov.uk/sites/default/files/Food%20Law%20Practice%20Guidance%20October%202015%20-%20FINAL%20.pdf>

<sup>5</sup> <http://www.foodstandards.gov.scot/publications-and-research/food-law-code-of-practice-2015>

consumer awareness and behaviours in relation to food recalls. To address this, a programme of work was commissioned to review and, if necessary, improve the efficacy of food withdrawal and recall processes for food sold at retail, from both an industry and competent authority perspective, to ensure that effective consumer protection is being delivered.

Part of this programme of work included commissioning Kantar Public, an independent social research agency, to conduct mixed-method qualitative and quantitative research with consumers and other stakeholders to:

- = Explore their perspectives on how the current system works
- = Seek their views on challenges associated with the current system and suggestions around areas for improvement
- = Explore consumer awareness, knowledge and expectations around the recalls system, and their behaviours in relation to food recalls

In this context, 'stakeholders' refers to food businesses, their representative bodies, LAs and consumer representative bodies, e.g. allergy support organisations/charities (a full glossary of terms used in this report can be found on page 83). The food businesses involved in this research were drawn exclusively from (or were associated with) the food retail sector, and did not include those in the hospitality or food service sectors (such as restaurants, caterers, etc.). LAs were interviewed specifically about food businesses from the perspectives of different stakeholders.

As part of the programme, the FSA/FSS also set up an External Stakeholder Reference Group, comprising bodies representing industry, consumers and regulators to help interpret findings and inform any recommendations for potential improvements.

## **2.2 Research purpose and objectives**

The FSA/FSS is working to provide consumer protection by ensuring there is an effective and proportionate withdrawal and recall system throughout the food supply chain. In order to gain a baseline level of knowledge about the existing process in the UK retail sector, the scope of the research covered food manufacturers, retailers, distributors and wholesalers, consumers and other stakeholders – such as LAs and bodies representing industry and consumers. The research also aimed to produce new insight into the withdrawal and recall process from a variety of perspectives to guide future research phases.

The aims of the research conducted by Kantar Public were to:

- = Baseline the views of consumers and relevant stakeholder groups
- = Refine the existing withdrawals and recalls process map produced by the FSA/FSS, in order to gain a fuller understanding of the key steps
- = Explore each step of the process in detail, including investigating possible key performance indicators (KPIs) at each stage
- = Create a baseline of understanding of the current process by exploring how it works for all stakeholder groups involved, including:
  - = The challenges
  - = Key points in the process (e.g. where crucial decisions are made)
  - = Potential areas for improvement
  - = How consumers are informed and engaged
  - = Existing KPIs, potential for new KPIs and how to measure them

- = Explore public awareness of, experiences of and behaviours around the current process including:
  - = Their understanding of what events trigger a recall
  - = How consumers are notified (e.g. channels and timings)
  - = Actions they are meant to, or do, take
  - = Levels of interest in the process in terms of their own lives
  - = How effective they perceive the process to be
- = Identify high-risk groups (e.g. allergy sufferers) and how being at risk affects attitudes and behaviour

## 2.3 Sampling and method

In order to achieve the above aims (section 2.2 ), Kantar Public used a mixed method iterative approach, which consisted of three distinct phases incorporating both qualitative and quantitative research.

The first phase included qualitative in-depth telephone interviews with representatives from food businesses, LAs, industry representative bodies and consumer interest groups. The aims of this phase were to test the process map previously developed by the FSA/FSS (see section 3.1) and to explore in detail the key withdrawals and recalls steps from the perspectives of different stakeholders.

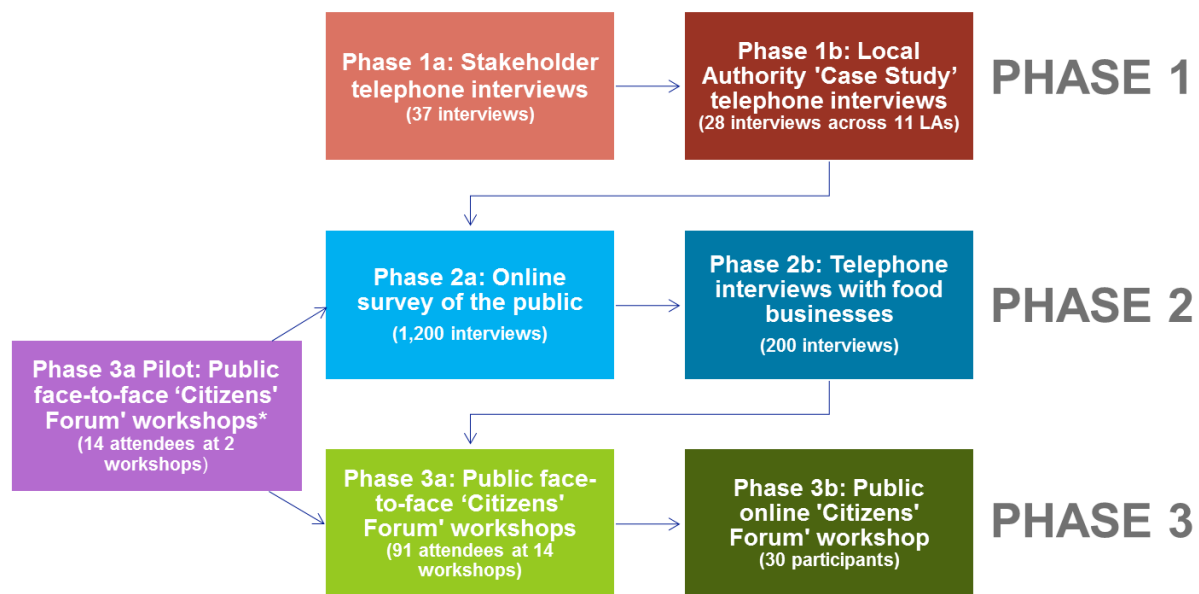
These stakeholder perspectives fed into the next phase of research that included two quantitative surveys; the first with consumers and the second with food business representatives. The questions in these surveys were informed by the insights of phase 1 and designed to gain an overview of the knowledge and implementation of the withdrawals and recalls process among these stakeholders. In particular, phase 2a was conducted with consumers and so addressed the recalls process alone, while phase 2b was conducted with food business representatives and addressed the withdrawals and recalls processes together.

Phase 3 of research focused solely on consumers. The 'Citizen's Forum' model was used with focus groups across the UK used to gain insight into levels of awareness and the effectiveness of the recalls process. An additional online 'Citizen Forum' discussion group was conducted with consumers who had experienced a food recall.

Analysis was conducted throughout each phase of research, with new data continually being compared with existing understanding from previous phases. Furthermore, Kantar Public worked closely with the Project's internal working group to ground emerging insights in FSA/FSS knowledge of the food withdrawals and recalls process. This study's findings are not representative of the practices and processes adopted by all food businesses in the retail sector but, rather, are built on the perceptions and experiences of the consumers, stakeholders, and food businesses that participated in the study.

The phases of research are summarised in Figure 1 and explained more fully below.

**Figure 1: The three phases of mixed methods research**



\*The timing of the 3a pilot meant that findings were used to inform the development of both phases of consumer research

### 2.3.1 Phase 1

Phase 1 included qualitative stakeholder interviews with food business representatives and representatives from industry bodies and consumer interest groups at 1a, and with LA representatives at 1b. These interviews helped to establish baseline knowledge and understanding of the current withdrawals and recalls process and to achieve greater insight into issues affecting its efficiency. During the interviews, researchers probed participants on their role in and their baseline knowledge of this overall process<sup>6</sup>, and reviewed the process map (see interview guides and stimulus at Appendix A). Participants spent the majority of their interview reviewing, annotating and highlighting on the map areas that they thought worked well and areas that they felt needed improvement.

An interim analysis brainstorm during phase 1 fieldwork was also undertaken to help inform the design of the quantitative phase 2 survey with food business representatives. This included identifying key steps in the existing process as well as perceptions and understanding of it.

In phase 1a representatives from a range of food businesses were interviewed, including manufacturers, wholesalers, distributors, and retailers, as well as interest groups working on behalf of consumers and of industry. A 45-minute in-depth telephone interview was deemed the appropriate way to reach this group, to make allowances for the busy diaries of stakeholders who would likely participate in the research during their working day rather than in their own time. This method was less burdensome for participants, and allowed for flexibility to rearrange appointments at short notice without incurring the expense and inconvenience of researchers needing to adjust travel arrangements.

Stakeholders in this phase were recruited by one of two methods. To begin with, the FSA/FSS was able to provide a list of select food business representatives covering the majority of the stakeholders of interest (e.g. wholesalers, retailers, manufacturers, interest groups, food discounters, specialist retailers).

<sup>6</sup> As seen in the appendix, the guides refer to the recalls process. Some participants distinguished throughout interviews and spoke explicitly about the withdrawals and recalls process separately. The evidence generated from phase 1 showed that precision in definition was important in revealing any nuance between recalls and withdrawals processes. Hence, subsequent phases separated the concepts of 'withdrawals' and 'recalls' in discussion

While the FSA/FSS provided this sample, the participants' identities were not disclosed to it and the interviews were anonymised throughout. The recruitment from this sample list was then subsequently supplemented by specialist free-find recruiters, targeting the more niche stakeholder groups of interest, as well as ensuring sufficient representation of stakeholder groups that came from the FSA/FSS provided sample (e.g. independent/convenience stores, food discounters, interest groups).

#### Phase 1a Methodology

- = 45-minute telephone interviews with food business representatives and consumer and industry interest groups (see Appendix Aa)
- = Fieldwork took place from 12<sup>th</sup> December 2016 to 24<sup>th</sup> February 2017
- = Recruited from a mix of FSA/FSS supplied sample and free-find specialist recruiters once the supplied sample was exhausted

#### Phase 1a Interview sample breakdown

Industry	Interviews
<b>Interest Group</b>	
Consumer Groups	5
Industry representative groups	5
<b>Retailer</b>	
Major retailer	7
Specialist food and drink retailer	2
Food and drink discounter	2
Convenience store/independent	6
<b>Manufacturer</b>	
Manufacturers – both branded and retailer own brand (including under license)	2
Manufacturers – branded	5
<b>Wholesaler/distributor</b>	
Wholesaler/distributor	3
<b>TOTAL</b>	<b>37</b>

Phase 1b involved interviews with two or three members of staff within individual LAs across the UK. Kantar Public spoke to a range of authorities including those acting as Primary Authorities (PAs)<sup>7</sup> for food safety, and covered authorities in England (both district and county), Wales, Scotland and Northern Ireland. As with phase 1a, the need to allow for additional flexibility for the LA representatives to participate, meant that in-depth telephone interviews (rather than in person interviews) were the best approach to reach this group.

The option of conducting in-depth group telephone interviews with the 1 to 3 representatives was discounted to ensure the perception and understanding of each participant was captured. This avoided junior colleagues deferring to more senior and/or knowledgeable colleagues.

As in phase 1a, the FSA/FSS was able to provide a comprehensive list of contacts, this time from LAs, from across the UK. A specialist telephone-recruiter worked from this list to secure a lead contact from each participating LA. One or two further 'snowballed' contacts were then secured who could discuss the withdrawals and recalls process in their area, to ensure a range of views were captured within each LA.

<sup>7</sup> Some Local Authorities (LAs) may still have Home Authority or Lead Authority partnerships with businesses that haven't entered into Primary Authority (PA) agreements. In this research, no reference was made to these types of partnerships by Local Authorities.

The FSA/FSS was not involved in the selection of LAs and the list of participating LAs has not been provided to the FSA/FSS, meaning participation was anonymous.

#### Phase 1b Methodology

- = 45-minute telephone interviews with LA officials (see Appendix Ab)
- = Fieldwork took place from 12<sup>th</sup> December 2016 to 17<sup>th</sup> January 2017
- = Recruited from a comprehensive FSA/FSS list of LA contacts across the UK
- = Also recruited from a 'snowballed lead' from an LA contact, to include other colleagues who would have involvement in and/or an awareness of the withdrawals and recalls process

#### Phase 1b Interview breakdown

Local Authority	Local Authorities spoken to	Total individual interviews
<b>England</b>		
District Local Authority	2	6
Borough Local Authority	2	5
Primary Local Authority	1	3
<b>Wales</b>		
County Local Authority	1	2
Primary Local Authority	1	3
<b>Scotland</b>		
Scottish Local Authority	2	5
<b>Northern Ireland</b>		
Northern Irish Local Authority	2	4
<b>TOTAL</b>	<b>11</b>	<b>28</b>

### 2.3.2 Phase 2

The general public, i.e. consumers (phase 2a), and food business representatives (phase 2b), were interviewed using a quantitative survey approach to help build a more representative picture of the awareness and understanding of the existing withdrawals and recalls process. Food business representatives were interviewed about both the withdrawals and recalls process, while consumers were asked only about food recalls. As well as understanding overall views on the process, these surveys aimed to explore perspectives on the effectiveness of the process (consumers – see Appendix Ba) and how 'best practice' could be built upon (food business representatives – see Appendix Bb). Phase 2a helped identify key themes that could be explored and expanded upon in the public workshops taking place in phase 3, while phase 2b interviews produced quantifiable measures to complement some of the findings that came from phase 1a.

For the consumer research in phase 2a, consumers were sampled from Kantar Public's Lightspeed<sup>8</sup> panel. Basic quotas were set on broad age bands, gender and region. Fieldwork took place between 22nd February and 8th March 2017. The agreed sample of 1,200 interviews was achieved. Participants were weighted by age, gender, region and social grade to be representative of the UK population aged 18 and over.

<sup>8</sup> Lightspeed is a leading provider of online access panels for market and social research



### Phase 2a Methodology

- = Web survey of the general public in the UK (see Appendix Ba)
- = Fieldwork took place from 22<sup>nd</sup> February to 8<sup>th</sup> March 2017
- = Participants aged 18 and over

### Phase 2a Interview breakdown

Demographic	Percentage
<b>Gender</b>	
Male	49%
Female	51%
<b>Age</b>	
18–34	31%
35–54	33%
55 and over	36%
<b>Social Grade</b>	
ABC1	54%
C2DE	46%
<b>Working Status</b>	
Working	56%
Not working/retired	40%
In education	4%
<b>Region</b>	
England	84%
Scotland	8%
Wales	5%
Northern Ireland	3%
<b>Living Situation</b>	
Living alone	30%
Not living alone	69%
<b>Pregnant</b>	
Pregnant	1%
Not pregnant	99%
<b>TOTAL INTERVIEWS COMPLETED</b>	<b>1200</b>

For phase 2b, the food business sample was provided by Dun & Bradstreet<sup>9</sup>. Sample was randomly selected using UK region, industry (manufacturer, wholesaler, distributor and retailer) and US Standard Industrial Classification (SIC) codes. All available food businesses in the sample frame were included to ensure the sample would be as representative as possible. The only exclusions applied were for pet food businesses, which were removed prior to sampling. For a full list of SIC codes and descriptions included in the sample frame, please see Appendix C. The sample was selected on the basis that a sufficient number of interviews were required by industry type, which produced a skew away from retailers and towards manufacturers and wholesalers/distributors. As such, the research did not attempt to replicate the food business profile of the UK, and instead looked at the three key industry types (manufacturer, wholesaler/distributor, and retailer) as discrete industries during interviewing. The quantitative data from food businesses (both when combined and when discussed by each industry type – retailers, manufactures, and wholesalers/distributors) are therefore applicable only to those interviewed and cannot be generalised to the UK as a whole. Based on Kantar Public's previous experience of response rates when interviewing business sample, and the fieldwork period available, the amount of sample selected was based on the assumption that 15 business contacts would be required in order to achieve one complete interview. As there are fewer large businesses in the UK compared to small and medium-sized food businesses, the majority of the interviews in this phase took place with small and medium-sized businesses.

After sampling, telephone interviews were conducted with those food business representatives who were most able to speak about withdrawals or recalls for their company, to ensure answers would be as informed and accurate as possible. In this report, 'food businesses' refers to manufacturers, wholesalers, distributors and retailers (of all sizes). In some instances, the food business representative could also be the food business operator (FBO) but is referred to as a representative in this report. Fieldwork took place between 6<sup>th</sup> March and 3<sup>rd</sup> April 2017 and achieved the agreed sample of 200 interviews. Because of this sample size, base sizes by industry are relatively small so the quantitative food business results must be interpreted with caution. As stated above, they only apply to those interviewed in this research and cannot be generalised to food businesses in the UK as a whole.

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<sup>9</sup> Dun & Bradstreet is an independent commercial data supplier

### Phase 2b Methodology

- = Telephone interviews with food business representatives (see Appendix Bb)
- = Fieldwork took place from 6<sup>th</sup> March to 3<sup>rd</sup> April 2017
- = Conducted via computer-assisted telephone interviewing (CATI)

### Phase 2b Interview breakdown

Industry	Interviews
<b>Retailer</b>	<b>63</b>
Major supermarket	3
Convenience store (non-franchise)	8
Convenience store (franchise)	4
Discounter	4
Specialist	10
Independent	34
<b>Manufacturer</b>	<b>65</b>
Under licence	18
Branded product	47
<b>Wholesaler/distributor</b>	<b>72</b>
Wholesaler	36
Distributor	36
<b>TOTAL</b>	<b>200</b>

- = Data have not been weighted, as the sample was not designed to be representative of the food business profile in the UK. This was due to a need to obtain sufficient interviews to allow for analysis, which resulted in relative oversampling of certain groups within sector, business size and UK region.
  - = **As a result, all phase 2b data discussed in this report are applicable only to the food businesses interviewed and cannot be generalised to the UK as a whole**
- = Subgroups (i.e. types of retailer – from major supermarket to convenience store) were targeted during interviewing, where it was possible to identify these from the sample information, but for the most part these proportions fell out naturally
- = A simplified version of the process map (as found in Appendix Bc) was shown to respondents via a short web link if they were able to access it during the interview, otherwise the interviewer described each step of the map to respondents verbally

Some questions were only put to those food business representatives who claimed to have experienced a food withdrawal/recall in the previous year. The numbers of food business representatives answering these questions were too small to analyse in depth: top-level numbers are provided in this report but the findings cannot be generalised to food businesses in the UK as a whole.

### 2.3.3 Phase 3

Phase 3 involved direct research with members of the public. There were two parts to phase 3: phase 3a, which was face-to-face workshops across the UK, and phase 3b, an online forum with consumers who had experienced a recall. Phase 3a allowed greater and deeper exploration of some of the broader themes that transpired from the work in phase 2a. It also included a pilot stage. Phase 3b gave an

understanding of actual behaviours rather than perceived or expected responses to a recall alert, by speaking to consumers who had directly ‘experienced’ a recall.

Due to the nature of qualitative research, phase 3 findings cannot be considered nationally representative. However, they were designed to understand the experiences of these niche segments of society that would not necessarily be heard in a quantitative survey.

### ***Phase 3a recruitment***

Participants were identified and secured through Kantar Public’s in-house recruitment team, using their specialist free-find recruiters who employ their networks and snowballing techniques. A recruitment screening document was produced, with FSA/FSS’s input, to ensure the requisite profile traits for each group were achieved. As well as gender, Kantar Public screened for the chief income earner’s occupation to establish socio-economic grouping for the ‘General Public’ sessions. Existing research shows that, in general, attitudes and behaviours in relation to food and food safety vary by this measure. Participants in the ‘Have Allergies’ group, were screened based on the severity and likelihood of reactions if exposed to allergens. Additional questions were used for the recruitment of the pregnant women groups, student groups, elderly (65+) groups, and the groups with men living alone. This ensured both a wide range of views and an over representation of groups recognised by the FSA/FSS as being at risk or known to have a higher likelihood of risky food behaviours.

### ***Phase 3a pilot***

In London, during January, pilot face-to-face workshops were undertaken with the general public group and an allergies group, prior to the main stage of fieldwork. This was to test the proposed discussion structure and to ensure the language and stimulus used as part of the discussions was understandable and worked as intended. The discussion guide and some of the stimulus was subsequently amended to reflect the pace of group discussion and to focus on the key objectives of phase 3a of the research, particularly to allow more time for the co-creation session. As will be reflected in this report, the findings from the pilot were in line with findings from the main phase. The pilot was also used to inform the approach taken in the quantitative phase 2a, such as confirming the explanations and language used in the questionnaire with consumers, which was in development at the time.

### ***Phase 3a main***

Face-to-face consumer workshops took place across the UK and included mixed general public groups as well as vulnerable groups for profile-specific sessions (to allow discussion among individuals who may have similar concerns when it comes to considering food risk). Face-to-face workshops work well to encourage discussion and identify common themes or concerns and the reasons for these. They also allow for creative ideas to be explored through specifically designed co-creation tasks. The workshops were broken into five sections which explored consumers’ awareness and actual experience of recalls, their response to a simplified map of the recalls process and to some specific recalls, and a co-creation session where groups were asked to design an ‘ideal’ food recall communication for consumers. See Appendix D for the discussion guide and stimulus used during these workshops and Appendix E for examples of the co-creation exercise.

### ***Phase 3b***

To ensure the consumer experience was captured in the research process, participants at phase 3b were screened and recruited on the basis that they had seen a food recall alert for a product that they had purchased sometime in the previous 12 months. As the expectation (from responses to previous phases) was that such consumers would be relatively small in number, it was deemed inappropriate to try and conduct this phase face to face – gathering such individuals in a central location would be problematic.

Again, a group discussion (rather than one-to-one) was considered most appropriate and allowed for more collaborative and engaging conversation, especially as the participants could log in and complete the activities at their convenience and at any point during the five-day fieldwork window.

Initially, it was planned that participants would be recruited for this phase, from Phase 2a. This was dependent upon the incidence of respondents who reported that they had seen a food recall alert for a product they themselves had purchased. During Phase 2a, it was found that an insufficient number of respondents fitted this criterion to recruit enough participants for Phase 3a, so Kantar Public also used their in-house recruitment team to free-find participants for the online forum.

#### Phase 3a Pilot Methodology

- = 90-minute face-to-face workshops
- = Fieldwork took place on January 31<sup>st</sup> 2017
- = 2 workshops in London

#### Phase 3a Pilot Interview breakdown

Profile	Number of workshops	Total participants
General public	1	8
Have allergies	1	6
<b>TOTAL</b>	<b>2</b>	<b>14</b>

#### Phase 3a Main Methodology

- = 90-minute face-to-face workshops (see Appendix Da)
- = Fieldwork took place from 18<sup>th</sup> April to 2<sup>nd</sup> May 2017
- = 14 workshops spread across the UK
  - = 7x England (5x London and 2x Manchester)
  - = 3x Scotland (Edinburgh)
  - = 2x Wales (Bridgend)
  - = 2x Northern Ireland (Belfast)

#### Phase 3a Main Interview breakdown

Profile	Number of workshops	Total participants
General public	4	32
Men living alone	2	12
Students	2	12
Pregnant women	2	11
Have allergies	2	12
65+ – 'Elderly'	2	12
<b>TOTAL</b>	<b>14</b>	<b>91</b>

### Phase 3b Methodology

- = Online discussion forum with the general public (Appendix Db)
- = 90 minutes of activities to be completed over the course of five days
- = Fieldwork took place from 8<sup>th</sup> May to 12<sup>th</sup> May 2017

### Phase 3b Interview breakdown

Demographic	Percentage
<b>Seen a recall for purchased product</b>	30
<b>Gender</b>	
Male	15
Female	15
<b>Age</b>	
18–24	1
25–34	7
35–44	8
45–54	6
55–64	4
65+	4
<b>Social Grade</b>	
ABC1	21
C2DE	9
<b>Working Status</b>	
Working	25
Not working/retired	5
In education	0
<b>TOTAL</b>	<b>30</b>

## 2.4 Analysis

As discussed in section 2.3 , analysis was conducted in an iterative manner, whereby the data were reviewed between phases in order to inform the upcoming phases. The analysis drew on multiple data sources including:

- = Understanding based on previous FSA/FSS discussions with stakeholders regarding the process map (see section 3.1 below)
- = Audio recordings from workshops and interviews
- = Analysis sessions after each phase
- = Materials completed by participants

Matrix mapping, whereby structured charts are used to map data against the research objectives and emergent key themes, was used to ensure that data analysis was robust and thorough. The data were systemically analysed to look for themes and explore variation among high-risk groups including those with allergies and pregnant women. An analysis session followed each phase of research, where findings were explored against each of the key themes in detail, as well as against the overarching objectives.

Note that for the quantitative food businesses results at phase 2b, the results only apply to these businesses specifically and cannot be generalised to food businesses in the UK as a whole. Anonymous, verbatim quotes are used throughout this report to illuminate findings and are attributed as follows:

*“Quote.”* (Source).

#### **2.4.1 Terminology**

The research materials in phase 1 used the phrase ‘recalls process’ to encompass the combination of actions that might be taken for a recall or for a withdrawal. The evidence generated from phase 1 suggested that adding further granularity in definition in subsequent research phases would be important in revealing any potential nuances between recall and withdrawal processes. Therefore, subsequent phases separated the concepts of ‘withdrawal’ and ‘recall’ in questioning and discussion.

In any phase, where participants communicated specifically about ‘recall’ or ‘withdrawal’, this report communicates the distinction. However, as this report is rooted in primary research, it reflects the language and terminology used by participants in the undirected conversations conducted in phases 1 and 2b. Consequently, the terminology reported here reflects participants’ word choices and levels of knowledge which may not reflect legal definitions in all cases.

Similarly, in phases 2a, 3a and 3b the research captured consumers’ knowledge, expectations and attitudes on the roles of food businesses and the state in relation to the food recalls system. This report reflects consumers’ word choices and levels of knowledge rather than the realities of the legislative and regulatory environments.

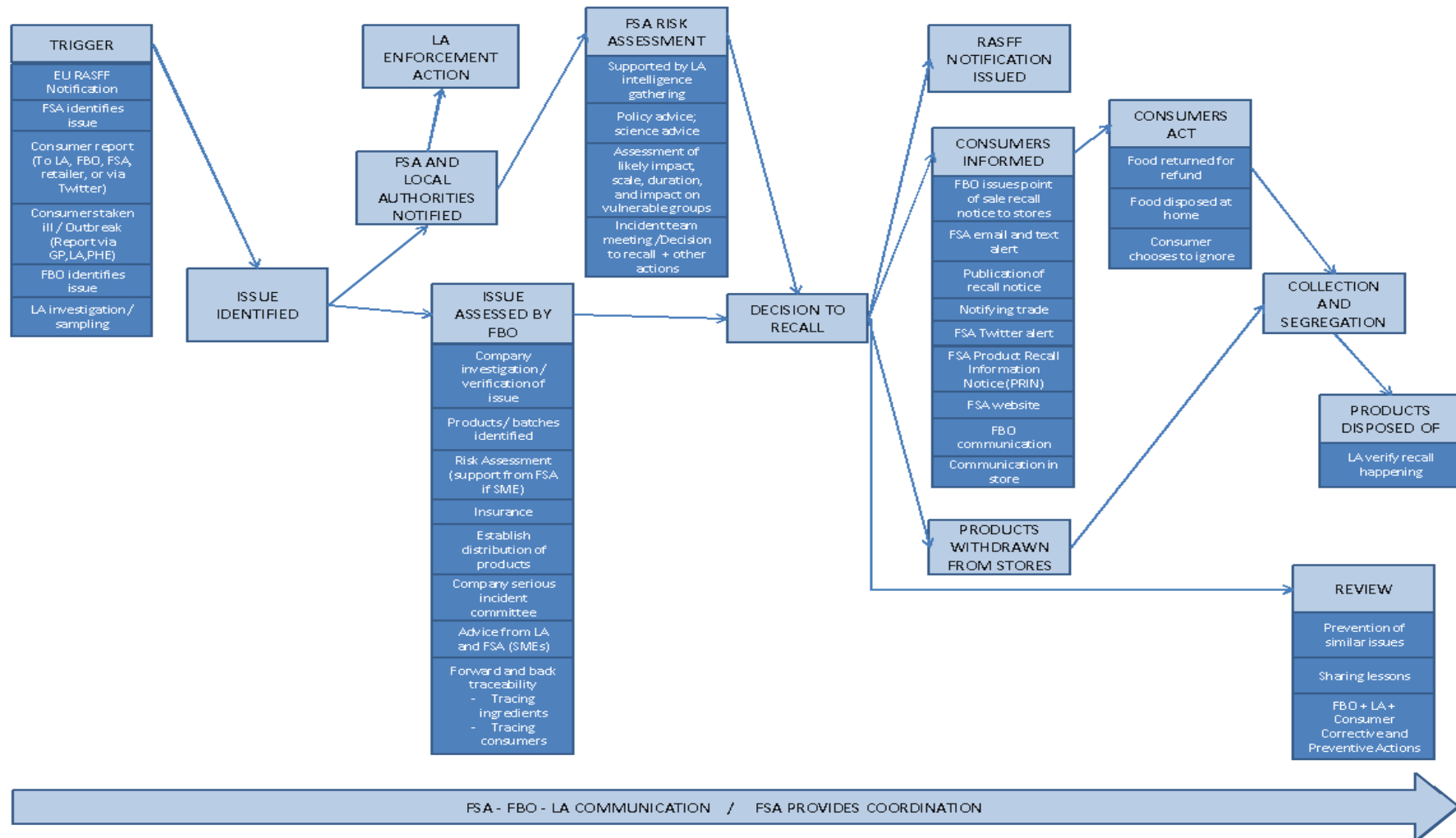
# 3. The withdrawal and recall process map

## 3.1 FSA/FSS Process Map

Prior to this research (in summer 2016) the FSA/FSS developed a process map to reflect the key steps in the withdrawals and recalls process. The map, shown on the next page, outlines the key actions that may be taken by different players in the process, including food businesses, relevant authorities and consumers. Not all steps necessarily take place for every withdrawal or recall and some are dependent on the type and severity of the issue. Part of the scope of the current research was to explore the relevant steps and develop a refined process map based on the findings (see Figure 22 in Conclusions and recommendations, section 6).



**Figure 2: The original withdrawals and recalls process map used by the FSA/FSS**



<sup>10</sup> This original map was produced in summer 2016.

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<sup>10</sup> This original map was produced in summer 2016.

The above process map was shown to food business representatives in the phase 1 qualitative research (see Appendix A Stimulus B). It was also shared with the project's External Stakeholder Reference Group in order to start discussions with that group on possible areas for improvement in the process. Kantar Public then worked with the FSA/FSS to produce some simpler versions for use in the subsequent phases of the research, as explained below (section 3.2).

### 3.2 The simplified withdrawals and recalls process map

Kantar Public worked with the FSA/FSS to develop various simplified process maps for use during fieldwork, as the map the FSA/FSS had already developed was extensive and would be unnecessarily time-consuming in an interview setting. The simplified maps were based on the key steps in the full original map (see section 3.1) and it was intended that each step be discrete and easily summarised to facilitate discussions with stakeholders during relevant phases of the research. One map was used during the quantitative research at phase 2b to allow the key steps to be easily assimilated by food business representatives (onscreen or verbally) during a telephone interview (see Appendix Bc). A further simplified version was used as a stimulus for discussion during the public workshops in phase 3a (see Appendix Da).

During the research, and on the basis of feedback, analysis and review, the version of the simplified map shown at Figure 3<sup>11</sup> was developed to illustrate key, related steps in the process. It is recognised, however, that the process is not usually linear as this map may suggest, and that some of the steps can occur simultaneously or in a different order.

**Figure 3: The simplified withdrawals and recalls process map**

STEPS IN THE WITHDRAWAL / RECALL PROCESS				
STEP 1	STEP 2	STEP 3	STEP 4	STEP 5
ISSUE IDENTIFICATION / TRIGGERING	WITHDRAWAL / RECALL NOTIFICATION	PRODUCT REMOVAL AND DESTRUCTION	CONSUMER ACTION	FEEDBACK LOOP
Issue reporting	Notifying business to business / trade customers in the supply chain	Removing affected product from supply chain and consumers	Throw away, destroy, or eat anyway?	Determining cause of incidents
Issue identification and risk assessment	Notifying consumers	Reprocessing or destroying product		Preventing similar incidences occurring
Notifying authorities	Notifying consumer groups	Reconciling with LA(s)		
Triggering product withdrawals/recalls	Choosing the right method for notifications	Adhering to Competent Authority requirements to monitor and verify standards		

This simplified map has been used to present a dense amount of information regarding the withdrawals and recalls process and as a means by which to review, organise and present findings throughout the various phases of the research. It also acts as a structure for the bulk of this report. Some steps within the process are very detailed while others are less comprehensive. This broadly reflects the research findings: as the process moves further away from the identification and triggering step, the understanding of the process reduces and measurements to reflect on the success of the steps are less accurate. This is discussed in more detail in the next section.

<sup>11</sup> Note that the simplified map that was shown to food business representatives at phase 2b only had four steps (it did not have the consumer action step). This was added later in order to provide a logical outline for this report. Step 5 in the above map was labelled as Step 4 in the version that food business representatives saw (see Appendix Bc. for the version used during phase 2b).

### **3.3 Perceived accuracy of the simplified process map among food businesses**

Food business representatives were shown the simplified process map (see Appendix Bc. – Simplified process map shown to food business representatives at phase 2b) during the quantitative telephone interviews at phase 2b. They viewed it via a short web link if they had computer access while taking part in the survey. 82 food business representatives (out of the 200 interviewed) were able to view the map.

Most representatives who viewed the map felt it was an accurate reflection of the various key steps in the process. However, it must be noted that fewer than a quarter of businesses (22%) interviewed in phase 2b had experienced a withdrawal or recall in the previous 12 months, so many had not had recent direct experience of the process to inform their response (see Table 3 in section 4.4 ).

- = Ninety-one percent of the 82 food business representatives able to view the map (75 representatives) felt that it accurately reflected their business' process/es. Fifty-one percent said it reflected their processes very accurately and 45% said fairly accurately
- = Smaller businesses saw it as somewhat less accurate (90% of those with fewer than ten employees), as did those with no guidelines in place for withdrawing and/or recalling products (86%). Crucially, none of the food business representatives interviewed said the map was inaccurate – the food business representatives who did not say it was accurate said they did not know, and these were businesses who had not experienced a withdrawal or recall in the previous year.

## 4. The withdrawals and recalls process: overall issues and processes

### 4.1 Food businesses and the withdrawals/recalls process

This section provides an overview of the withdrawals and recalls process from the perspective of food business representatives. As explained in sampling and method (section 2.3 ), the sample of food businesses engaged in phase 2b of the research was not intended to be representative of food businesses in the UK, and hence the quantitative results only apply to those interviewed and not to food businesses in the UK as a whole (similarly, this study's findings are not representative of practices across the whole food retail sector but, rather are built on the perceptions and experiences of the consumers, stakeholders, and food businesses that participated in the study). The findings can, however, provide a useful indication of the issues faced by a range of food businesses. In phase 1, food businesses were predominately recruited through the sample provided by the FSA/FSS, which led to large food businesses being overly represented during this phase. In phase 2, small to medium-sized food businesses were overly represented. This report will show that this relative over-representation of food businesses in the qualitative and quantitative research allows for some cross analysis between perspectives on a food business' own practices and other business' practices. Overall, there is a large variation in knowledge (or understanding) of the withdrawals and recalls process among food businesses.

The findings in this section mainly come from phase 2b (quantitative telephone interviews with food businesses), although some qualitative results from phase 1a (qualitative in-depth telephone interviews with food businesses) are also included. This section summarises findings that carry relevance across all five steps of the withdrawals and recalls process (as outlined in Figure). It looks at food business involvement at different steps of the process, before discussing food businesses' guidelines and processes regarding food withdrawals and recalls. It then assesses food businesses' actual experiences of different types of withdrawal and recall in the previous 12 months, and establishes overall process variation.

Throughout the research, in interviews with food business representatives, and in this report, withdrawals and recalls have been defined in the following way:

- = **withdrawal** is the process by which a product is removed from the supply chain, with the exception of a product that is in the possession of consumers
- = **recall** is 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

In the quantitative survey (phase 2b), food business representatives were asked, in the first instance, to describe the withdrawals/recalls process they would follow in their business. The answers gave an initial feel for how varied business preparation, knowledge and involvement is, with some food businesses responding vaguely and others providing detailed descriptions of their processes. A selection is listed below:

*"Put a sign up in the shop and ask if they [the customer] have bought that product."* (Retailer, Independent).

*"Nothing in writing. It's not something we would anticipate."* (Retailer, Food and Drink Specialist).

*"To begin [with] we inform the customers; we then internally have a review of actions to take, all stock is placed on hold, followed by an internal test held on site. Based on this we look towards a recall or withdrawal, whichever is needed."* (Retailer, Major supermarket).

*"We get notification that a product has been taken off the shelf and that is what we do. We stop selling it, we wait for it to be credited."* (Wholesaler/distributor).

*"We would go to the BRC [British Retail Consortium] and ask what the guidelines are and follow those."* (Wholesaler/distributor).

*"We would check batches, codes, use-by dates, how much was produced, where it has gone; phone the relevant people to recall and bring it back to the site, and if need be we would then destroy it."* (Manufacturer).

*"1. Brief the team of any notice to recall. 2. Team would decide whether we proceed with the director's permission. 3. Undertake full traceability of the product. 4. Quarantine any stock left in-house. 5. Arrange collection of sold goods. 6. Marketing team may issue press releases. 7. Notify FSS/FSA and certification bodies. 8. Stocktake of all raw materials."* (Manufacturer).

#### **4.2 Involvement at each step of the withdrawal and recall process**

At the beginning of the interviews for phase 2b, food business representatives were shown a simplified version of the FSA/FSS process map (see section 3.1) and were asked in which steps of the process they would be involved. The involvement of food businesses in the various steps of the process was found to vary a lot, by business size, industry and experience level. However, this finding should be interpreted with caution; most food business representatives answering were doing so hypothetically, as only a minority reported experiencing a food withdrawal or recall situation in the previous 12 months.

Table 1 below shows that the majority of food business representatives reported they would be involved at each step of the withdrawals and recalls process. As described in the sampling section (section 2.3), base sizes by industry are relatively small so the quantitative results must be interpreted with caution.

**Table 1: The steps in the withdrawals and recalls process food business representatives claimed they would be involved in**

Steps involved in	All food businesses interviewed	Retailers	Manufacturers	Wholesalers/distributors
	<b>200</b>	63	65	72
<b>ALL INVOLVED IN STEP 1 –</b> Issue identification/trigger	<b>92%</b>	84%	97%	93%
<b>ALL INVOLVED IN STEP 2 –</b> Withdrawal/recall notification	<b>74%</b>	67%	78%	76%
<b>ALL INVOLVED IN STEP 3 –</b> Product removal/destruction	<b>86%</b>	92%	78%	86%
<b>ALL INVOLVED IN STEP 4 –</b> Feedback/review and learn	<b>80%</b>	57%	97%	83%
Not involved at all	<b>3%</b>	3%	2%	3%

*Food businesses phase 2b: Q020. Based on the withdrawal or recall process we have just shown or explained to you, which of the following steps of the withdrawal or recall process would your organisation usually be likely to deal with? Base: All participants (200); for other base sizes see table*

### 4.3 Guidelines and processes for withdrawals and recalls

Most food business representatives (86%) reported that their business had developed its own guidelines and had processes in place for food withdrawals and recalls (see Table 2). A further 7% said they did not have any of their own guidelines, but that they adhered to another form of guidance given by connected associations.

**Table 2: The proportion of food businesses that have some guidelines in place for withdrawals and recalls**

	All food businesses interviewed	Retailers	Manufacturers	Wholesalers/distributors
	<b>200</b>	63	65	72
Yes, my organisation has clear guidelines/processes	<b>72%</b>	48%	86%	79%
Yes, my organisation has some guidelines/processes	<b>14%</b>	16%	11%	14%
No, my organisation does not have any guidelines/processes	<b>8%</b>	19%	2%	4%
No, my organisation follows the guidance given by the association to which the business belongs	<b>7%</b>	16%	2%	3%

*Food businesses phase 2b: Q010. Does your organisation have its own established guidelines for food withdrawals or recalls? By guidelines, we mean established plans and processes for employees to follow in case of food withdrawals or recalls. Base: All participants (200), for other base sizes see table*



#### 4.4 Experience with withdrawals and recalls in the previous year

Fewer than a quarter of food businesses (22%) represented at Phase 2b had experienced any food withdrawal or recall in the previous 12 months. As part of the question, two types of withdrawal or recall were defined. These are outlined below:

- = **Food-safety:** Any food/drink product withdrawal/recall that is related to potential harm to consumers (e.g. food contaminated with bacteria)
- = **Non-food-safety:** Any food/drink product withdrawal/recall that is NOT related to potential harm to consumers (e.g. inorganic food mislabelled as organic)

Retailers were relatively more likely than manufacturers and wholesalers/distributors to report involvement in both food-safety and non-food-safety types of withdrawal/recall over the previous 12 months (see Table 3).

**Table 3: The proportion of withdrawal/recall occurrences in the previous 12 months by withdrawal/recall type and food business type**

	All food businesses interviewed	Retailers	Manufacturers	Wholesalers/distributors
Base	200	63	65	72
Food-safety withdrawals/recalls	13%	21%	6%	11%
Non-food-safety withdrawals/recalls	10%	13%	8%	10%

*Food businesses phase 2b: Q007. How many **food-safety** related product withdrawals or recalls has your organisation been involved in or dealt with directly in the past 12 months? Q008. How many **non-food-safety** related product withdrawals or recalls has your organisation been involved in or dealt with directly, in the past 12 months?*

*Base: All participants (200); for other base sizes see table*

#### 4.5 Overall process variation

Throughout this report substantial variation can be seen across the industry in the withdrawals and recalls process. Overall, it appears the process varies primarily along three intersecting dimensions: firstly, based on the size of the food business; secondly, the relationship of a food business with competent authorities; and, thirdly, the individuality of the business itself.

As discussed in depth in subsequent sections, the research revealed differences between larger and smaller food businesses across each of the different steps related to their size and scale of operation. The size of the food business was defined by the number of employees: smaller businesses are defined as having ten or fewer, medium-sized businesses as having 11-49, and large businesses as having 50 or more employees. Findings from phases 1 and 2 both indicate that larger manufacturers and retailers generally lead the withdrawals and recalls process, while smaller food businesses sometimes require more support. Larger businesses generally reported that they are better equipped as they tend to have automated processes, more robust systems for tracing and more labour to carry out investigations. For them, the withdrawals and recalls process is simply part of doing business.

Equally, food businesses' relationships with their LAs or PAs<sup>12</sup> and with the FSA/FSS appear to be key factors in how the process works. There are large differences in how food businesses involve the various authorities, at which step, and for what purpose.

Finally, the process is affected by the degree of individuality in how businesses operate as well as in their contexts of operation. This relates back to food business size, business type and existence of guidelines, as outlined in Tables 1, 2 and 3 above. It is further reflected in the diversity of the quoted experiences provided in section 4.1. Generally, the process becomes less effective the 'further away' it gets down the supply chain and manufacturers expressed concern around the withdrawal or recall message reaching smaller or independent retailers. While manufacturers are only legally required to notify their direct customers, in phase 1a manufacturer representatives spoke in general terms about the challenge of sending a message down a complex supply chain.

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<sup>12</sup> Food businesses may choose to enter the Primary Authority (PA) Programme. It was set up by Central Government to give every business access to reliable, tailored regulatory advice with the aim of supporting businesses to get things right first time, protecting consumers and allowing enforcing authorities to target their resources. See <https://www.gov.uk/government/news/primary-authority-consultation-to-help-all-uk-businesses-grow>

## 5. The steps

This section reports findings for the five different steps outlined in the simplified withdrawals and recalls process (introduced in section 3.2). These five steps are:

1. Step 1: Issue identification and triggering of withdrawals and recalls
2. Step 2: Withdrawals and recalls notification
3. Step 3: Product removal and destruction
4. Step 4: Consumer action
5. Step 5: Feedback and root cause analysis

For each step findings from the three phases of research are analysed, and reveal what is considered to be working well currently and what is not working so well. The report also explores how different stakeholders see their own roles and how they see other stakeholders' roles. It then assesses how this compares with the FSA/FSS process map. Lastly, it makes suggestions about where further research is needed. As stated in the previous section, food businesses' knowledge was more in-depth at some steps than others. The sections discussing some earlier steps are, therefore, longer than later sections because participants had more to say about earlier and less about later steps.

As outlined in section 4, and seen throughout the report, three main themes emerged in the analysis of the research as having an impact on the withdrawals and recalls process. These are:

- = the size of the food business
- = the relationships between the various stakeholders
- = food businesses' unique business structures

Alongside the evidence from food businesses, reference is made to the opinions and knowledge of consumers throughout the steps. Note, where consumers are discussed, it is only in reference to recalls, since by definition, withdrawals do not reach the consumer. One of the key findings is that food businesses tend to be unsure as to whether food recalls reach consumers, what consumers' views and behaviours are in response to recalls, and how these could be measured or improved. The report introduces these important consumer perspectives at the relevant steps, and focuses wholly on consumer actions and perceptions at step 4.

### 5.1 Step 1: Issue identification and triggering of withdrawals and recalls

This chapter describes the first step in the withdrawals and recalls process. It discusses the stakeholders involved and the differences between larger and smaller food businesses, before going into detail about each part of the process at step 1. This follows the sub steps outlined (in red) in the diagram below (see Figure 4).

While the findings in this step derive from all phases of the research, they are drawn primarily from phases 1 and 2. Findings with regards to food businesses are reported from the qualitative interviews conducted (phase 1a) and the quantitative survey (phase 2b). Findings from LAs are reported from the

qualitative phase 1b. Relevant findings from consumers in phase 3 are also included. However, the consumer voice is limited as consumers have little involvement at this step.

### 5.1.1 Summary

Overall there was confidence among food business representatives, LA representatives and consumer or trade group representatives in how step 1 is carried out. There were some concerns around support for smaller food businesses (in particular manufacturers and retailers) in investigating an issue. These concerns were due to the financial risks involved in triggering a withdrawal or recall and the lack of systems in place for smaller food businesses to identify an issue, investigate it and trace the problem quickly. There were also concerns around LAs having enough capacity to support food businesses when needed.

Overall, food business representatives could speak in depth about this stage and felt that while issues could be identified from several sources, they were confident they could manage them to the point of triggering a recall. As will be seen in the next step, it is after a recall is triggered that communications begin to involve the public more and the perceived success of the abilities of food businesses to manage these communications effectively lessens.

#### Working well

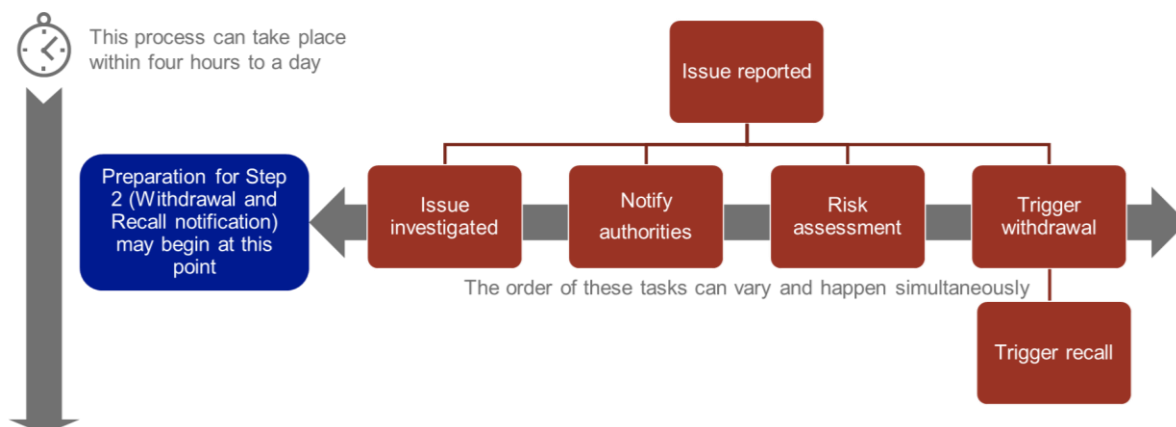
- = Larger food businesses believe internal systems are robust, as is traceability, because it is easy to trace stock due to their digital record keeping and they can identify affected products within between four hours and a day of a potential issue being identified
- = Fifty-eight percent of food business are satisfied with their established procedures and 44% say their traceability records are easily available (this was higher among larger businesses at 52%)
- = There is a feeling that larger businesses are better equipped as they have automated processes, more robust systems for tracing product and more labour to carry out investigations
- = Consumers generally have the perception the food safety regulation system is working even if they are unsure how

#### Not working well

- = There is a perceived variation in the application of guidance and decision-making relating to the assessment of risks and the potential need to trigger a recall from the FSA/FSS at this stage
- = There is a lack of clarity around when to involve the FSA/FSS, LA or PA
- = There are a range of potentially conflicting influences on when to involve the FSA/FSS or PA
- = There is a strong feeling among larger food businesses and LAs that smaller manufacturers and retailers are less able and possibly less willing to engage with this process
- = Consumers appear to have little trust in food businesses and have a low understanding of food businesses' responsibilities at this point in the process, as well as overall

**Figure 4: Typical processes at step 1**

As



illustrated in Figure 4, there are six sub steps within step 1. The process begins when an issue is reported. Food businesses either discover an issue or are informed of a potential food risk issue from a variety of sources. The following tasks are undertaken in various orders. In some cases, these are undertaken simultaneously:

- = Food businesses investigate the issue. As part of investigating the issue many food businesses will carry out a risk assessment
- = Food businesses may notify authorities. This could be the LA, their Primary Authority or the FSA/FSS
- = If food businesses believe the issue has a chance of resulting in a recall, they will begin preparing for step 2 by developing consumer communications

If the issue is a health risk but has not reached consumers, a withdrawal is triggered. If the product has reached consumers and is, therefore, beyond the control of food businesses, then a recall is triggered by the food business or, if necessary, by the FSA/FSS.<sup>13</sup> A food business may trigger a withdrawal or recall 'voluntarily'<sup>14</sup> then inform the FSA/FSS, or they can inform the FSA/FSS of a problem and then the FSA/FSS is involved in the decision of whether to trigger a withdrawal or recall. Relationships between the FSA/FSS and food businesses are discussed further in section 5.1.7 .

### 5.1.2 Organisations involved at step 1 of the withdrawals and recalls process

Manufacturers, retailers, wholesalers and distributors and LAs are involved in identifying and triggering withdrawals or recalls. Ninety-two percent of food business representatives interviewed in phase 2 of the research reported involvement in the issue identification and triggering of withdrawals and recalls step. Almost all manufacturers (97%) reported involvement at this stage followed by wholesalers and distributors (93%). Just over four in five (84%) of retailers reported involvement at step 1. The early involvement of manufacturers in the withdrawals and recalls process suggests they take the lead among food businesses at this step. Findings in phases 1 and 2 support the idea that consumers do not have extensive involvement at this step. This contradicts consumers' perspectives of their own role as reported in phase 3. Consumers identified themselves as an important source of potential issues which could lead to a food business triggering a recall. However, in phase 2, food business representatives reported issues being identified by a variety of sources, as discussed further in section 5.1.4 .

<sup>13</sup> The FSA/FSS may trigger a recall in certain cases, for example if a food business is unable or unwilling to provide sufficient information to satisfy that a recall is not necessary or if a food business is not willing to initiate a recall when a risk assessment indicates one is necessary.

<sup>14</sup> Food business representatives interviewed used the term 'voluntarily' to describe this process in phase 1 of the research.

### 5.1.3 Identifying the issue and triggering a withdrawal or recall

#### ***Larger food businesses' performance***

Larger manufacturers and retailers expressed confidence in this step. Food business representatives recognised mistakes can occur in the production and distribution of food products and felt they had systems in place to mitigate errors and the need for triggering a food withdrawal or recall. For example, some larger retailers and manufacturers have employees with a remit to maintain food product standards across their business. Many reported having risk assessment processes to investigate issues and that they may set up internal committees to manage potential withdrawals or recalls and make decisions on whether to trigger a withdrawal or recall.

Some of the infrastructure that often comes with running a larger business, such as digitisation or automation, supports an effective withdrawals and recalls process. LAs and representatives of larger food businesses believed smaller food businesses were less likely to have this kind of infrastructure in place and were therefore less well equipped to identify and investigate issues that may require a withdrawal or recall. One specialist food and drink retailer interviewed in phase 1a had recently introduced an electronic stock management system after growing from a medium-sized to a large business. This retailer believed this would improve the business because it would make stock easier to trace. Previously their stock records had been kept by hand but, given their growth, these methods were now less suitable and left more room for human error. Adapting processes to enable better traceability of products while businesses grow could help to ensure safety and support the withdrawals and recalls process.

#### ***Perceptions of how smaller food businesses perform***

The link between scale of operation and size of a food business is supported by the quantitative findings in phase 2b. Representatives from smaller food businesses were less likely to report having set plans and infrastructure in place to deal with withdrawals and recalls, particularly in the retail industry. Sixty-two percent of food businesses with fewer than ten employees reported an individual being solely responsible for making a withdrawal or recall decision compared with only 5% in food businesses with 50 employees or more. Only 70% of retailers had agreed roles and responsibilities in advance of a withdrawal or recall, which is significantly lower than manufacturers where 94% had set roles and responsibilities. As explained in 2.3, the sample in phase 2b was skewed towards smaller businesses. Therefore, these findings highlight their relative lack of infrastructure. Overall the quantitative findings suggest smaller food businesses make decisions on a case-by-case basis and are less likely to follow formalised internal guidelines.

### 5.1.4 Issue reported

Food business representatives stated in phase 1a that potential issues which could lead to a food withdrawal or recall could be reported from a range of sources. For example, one participant described potential issues as coming from *"any event, everywhere"* (Manufacturer). They identify issues from their suppliers, customer complaints, LAs and media contacts. Manufacturers identify issues through self-testing. Some retailers audit their manufacturing suppliers which may identify any potential issues. In phase 1b LAs reported they conduct tracing audits of manufacturers as part of their regular inspections.

*"Our routine inspections look at products and premises and we may identify and prevent a problem." (LA, England)*

LAs also receive further information about recalls through the FSA/FSS alerts system. Trade bodies reported in phase 1a that they may become involved in identifying an issue, particularly if the issue is hard to trace or linked to an outbreak of illness across the UK or internationally. In these instances, the FSA/FSS would lead and coordinate the food chain investigation process, working with trade bodies and international governments to try to identify the source. Issue identification is considered a core

responsibility by representatives of larger food businesses and, from their perspective, it is central to their operation of a food business.

Phase 2 quantitative findings support this. Of the 45 businesses that had experienced a recall in the previous 12 months, the sources for identifying the issue were evenly distributed. Food business representatives reported identifying issues from consumer feedback, information from other food businesses, information from the FSA/FSS, internal investigations and their LA.

While in phase 1 consumers were identified as a potential source for identifying an issue, it appears from the findings that consumers play a limited role in reporting issues that lead to a recall. However, this is not conclusive as it may be due to the difference between the informer to a food business and the actual primary source. For example, consumer groups reported that consumers may notify them or LAs if they identify a potential issue, which would then be flagged with the relevant food businesses. In this instance, a food business might consider the consumer group or the LA as the source.

From the research conducted with consumers in phases 2a and 3a, it appears they do not have clarity over their roles. Consumers in phase 3 imagined they were the predominant source of issue identification. This may be due to their underestimation or lack of awareness of the number of food recalls that take place in the UK, or a lack of knowledge around other potential sources. Consumers were surprised at the number of recalls presented in phase 3a groups as they imagined them to be a rare occurrence.

*"So, these are up in shops? I'm ignorant enough that I've probably eaten 15 batteries because I never notice anything like this in a supermarket or shop" (Man living alone, Belfast)*

Some consumers in phase 3 recognised that food businesses have processes in place to assess quality and to mitigate potential recalls. Furthermore, phase 2 found 43% of consumers believed there was a system by which they could report such incidents to retailers.

Although consumers believed they were the primary identifiers of potential issues, they appeared to have limited faith in the process of notifying food businesses about potential issues. While consumers believed they had a big role, only 40% believed they would be listened to. This contradiction reflects consumers' low awareness of and engagement with the recalls process. Despite consumers' beliefs, food businesses were confident that they had systems in place to handle a recall and felt prepared for issues to come from a wide variety of sources.

### **5.1.5 Issue investigation**

The overall findings from phases 1 and 2 suggest larger manufacturers and retailers take the lead on investigating issues internally. Food business representatives reported high levels of confidence in investigating and tracing potential issues. In phase 2, 100% of manufacturers and retailers (and 98% of wholesalers/distributors) felt prepared to make an internal assessment to decide about product withdrawal or recall. One hundred percent of manufacturers felt able to trace products that needed to be withdrawn/recalled (99% for wholesalers/distributors and 91% for retailers). Similarly, larger food businesses in phase 1 were confident of their ability to carry out an investigation. In phase 1b LAs echoed this confidence.

*"Businesses on [a large] scale are very cooperative and have good systems in place." (LA, Scotland).*

Although there were high levels of reported confidence across food business representatives, the causes of this confidence vary. As discussed above (see *'Perceptions of how smaller food businesses perform'* in section 5.1.3 ) smaller food businesses are likely to have a single person responsible for this step. Some of the food business representatives in phase 2b reported being the sole person responsible, which may contribute to the high levels of reported confidence, as it is their role. In phase 1a, larger manufacturers

and retailers may have reported being confident due to their size and their having in-house teams or procedures dedicated to this part of the process.

There are four apparent causes of confidence among food businesses: Firstly, in phase 1, food business representatives who had PAs reported having a good working relationship.

*"We find them very supportive, very helpful, we value their advice and we seek [our PA's] advice and, as a consequence, they see us as a reputable organisation...and as an organisation that has a lot of technical and scientific backup and that we're trying to assess things in a sensible and scientific manner."* (Manufacturer).

Having an independent body from which food businesses can draw support when investigating issues may build their confidence. This relates back to the importance of relationships between the FSA/FSS and food businesses and their individual employees, as discussed in section 4.5 .

Secondly, in phase 2, 76% of manufacturers reported having targets in place in this step of the process, compared to wholesalers/distributors (56%) and retailers (42%). When in place, targets were most commonly around the time taken to trace a product or initiate a recall (37% manufacturers, 27% wholesalers/distributors and 11% retailers interviewed).

Thirdly, in phase 1, food business representatives reported having good systems in place to manage the process. They described being able to place products on 'hold' while they investigated and sampled batches. If a food businesses' experience suggested a recall was likely they might then begin to develop public recall notice communications. These would then be used at step 2 when they notified consumers, or if a recall did not go ahead they would be discarded.

Fourthly, in phase 1, food business representatives reported that they rehearsed or conducted withdrawal and recall scenarios at various times. They assessed traceability of product ingredients across their supply chain. Similarly, LAs reported conducting tracing exercises as part of their regular food business inspections. For example, one LA in Wales interviewed in phase 1b explained that as part of a visit they would bring a product produced by a manufacturer, such as a pie, and ask them to trace the ingredients throughout the day.

Findings from LAs in phase 1b also reflect on the confidence of food businesses. LAs carry out regular inspections of food businesses ensuring they have procedures in place, and reported supporting smaller food businesses where needed. They take into account their knowledge of food businesses, considering past compliance, whether a business is high or low risk, knowledge from previous inspections and their prior relationship.

Interviewees perceived that larger food businesses were inspected more regularly as they pose more risk in terms of the number of food products manufactured, but some LA representatives suggested smaller food businesses present a higher risk as they do not have the same structures and processes in place as larger food businesses. LAs saw their role as supporting smaller businesses in preventing recalls.

*"The main problem is with small businesses who lack knowledge of their legal duties and the technical ability to have good procedures in place, but they usually just operate locally so it's more containable."* (LA, Primary).

This study was not designed to offer definitive evidence on what causes confidence among food businesses in their approaches to withdrawals or recalls. Regardless, it does reveal suggestions, as discussed above, of from where such confidence emerges. Food business representatives at larger manufacturers and LAs in phase 1 perceived smaller businesses as less capable, and phase 2 infrastructure findings discussed above (see *'The perception of how smaller businesses perform'* in section 5.1.3 ) seem to corroborate this. Further research is suggested to qualitatively unpack the high levels of confidence reported by food business representatives at phase 2 and to ascertain whether the



confidence is well placed or whether improvements can be made to the withdrawals and recalls process to justify their confidence.

### 5.1.6 Risk assessment

Some investigations into a possible withdrawal or recall triggered a risk assessment by food businesses. From phase 1, it appears risk assessments are carried out by larger manufacturers and retailers and the perception is that the FSA/FSS or PAs may be more likely to assist smaller or medium-sized food businesses in this area<sup>15</sup>.

Larger manufactures and/or retailers may have internal classification systems for assessing the potential risk of issues which are developed and used internally. These risk assessments appear to be carried out by quality assurance or standards teams. In some cases, these may involve 'crisis management' committees or a food business's company board if the food business employee managing the assessment believes the risk of a recall appears to be 'highly likely' or 'imminent'.

### 5.1.7 Notify authorities

In phase 1 there was variation in the ways in which food business representatives reported involving the FSA/FSS in this step of the process. This appears to be based on factors unrelated to the potential recall in question. Instead, existing working relationships with individuals and past experiences with the FSA/FSS seem to be the most relevant factors.

#### **Notifying the FSA/FSS**

Food business representatives in phase 1a had two different approaches to involving the FSA/FSS at this stage: The first approach taken by food businesses was to involve the FSA/FSS early in the process. By involving the FSA/FSS they believed it would lead to a better outcome for the food business. They felt that if the FSA/FSS incident report form was the first time the FSA/FSS heard of an issue then they would recall based on that information whereas if they informed the FSA/FSS earlier in their own internal process they would achieve a more favourable outcome for the food business.

*"I'd expect FSA to be closely involved [in the risk assessment process] if they made the decision to recall and not the food business". (Manufacturer).*

The second approach by food businesses was the opposite of this. They were hesitant to notify the FSA/FSS. They believed that it was unnecessary to involve the FSA/FSS if an incident had not reached, or would not reach, the point of being recalled.

*"If that's us identifying an issue we would not be informing the FSA at that point, we'd only do it when a decision to recall had been made because otherwise they'd be informed about things they didn't need to know about." (Retailer, Convenience stores).*

Both these views involved the FSA/FSS at different points to lead to what they saw as a preferable outcome for their food business. Some food business representatives were unsure what was expected of them and did not know whether the FSA/FSS preferred them to gather information first or involve them as soon as they suspected there was an issue. The reasons why food businesses act differently do not appear to be based on structural differences such as type (e.g. manufacturer versus retailer) or size (larger versus smaller).

*"It's about when do the FSA want us to contact them because, obviously, you don't want to contact the FSA because obviously something's gone wrong but do you contact them as soon as*

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<sup>15</sup> The FSA/FSS conducts a risk assessment based on the information provided, regardless of the size of the business. Irrespective of whether a large food business has conducted a risk assessment to inform its decision on whether to initiate a recall, the FSA/FSS will come to its own decision. In such instances, FSA/FSS would liaise with the food business in the same way as they would with a smaller food business. The likely main difference might be that a smaller business might not have conducted an internal risk assessment at all, or to the same degree as a larger food business.

*you know there's an issue and work with them all the way up, that's where I'm a little bit confused. At the moment we're waiting until...we've got all the information which may take a day, a day and a half..." (Retailer, Specialist food and drink).*

Overall, food business representatives in phase 1 reported a perception of variability across service or quality in reporting incidents to the FSA/FSS. This was both in terms of the ease of use of the reporting tools and in terms of the engagement and outcomes of liaison with the FSA/FSS. It appears past experiences can influence businesses' perceptions of the FSA/FSS. For example, one food business representative explained how they felt the FSA had examined to a *"molecular"* level and made a *"disproportionate"* decision to widely recall a product; a decision with which the representative disagreed. This framed their perception of the working relationship with the FSA.

When notifying the FSA/FSS, some food business representatives found the Incident Report Form difficult to use, while others appeared more familiar with the process and did not find it difficult. Some of the food business representatives interviewed thought that having a better working relationship with specific individuals at the FSA or FSS produced a better recall process and outcome. Food business representatives want a trusting relationship with individuals at the FSA or FSS that they consider competent and able to understand the issue being investigated.

*"We have in the past established good relationships with very competent FSA senior management. We would value their opinion on the issue concerned, they would add considerable weight to how we manage an issue. If we don't know who we're speaking to, and in some cases it's questionable if they fully understand the issue concerned, then that would cast some doubt, is this going to add a great deal to our view of the process." (Major retailer).*

It appears there may be regional differences in relationships between LAs and the FSA in Northern Ireland and Wales and FSS in Scotland due to the different regulatory contexts in each devolved nation. In Wales, one LA representative who had previously worked in an English LA found the working relationship much more effective because the FSA Wales has fewer LAs to deal with. However, others felt there was a tense relationship between LAs and the FSA Wales. These participants felt that LAs take on all the risk of food safety and are not rewarded when things go well. They felt that LAs in Wales are under resourced and have a high degree of responsibility.

*"With a small and poorly resourced team like ours I think their expectations are too high and they need to be more realistic about what we're able to achieve and by when because it's not as fast as they want it." (LA, Wales)*

In Northern Ireland, LA representatives commented on the good working relationship with the FSA. There were strong personal relationships between the FSA in NI and LAs as staff move between the two. Similarly, this was commented on in relation to Scottish LAs and the FSS. Having fewer LAs and more personal connections appears to facilitate good working relationships.

*"...because [FSS] have the overall coordinating role, they would assist us with contact with other Local Authorities, but you know Scotland is a very small place in connection with [Environmental Health] and we all know each other anyway...I could tell you who I could speak to in each Local Authority of Scotland." (LA, Scotland)*

It seems clear that the relationships between food businesses and local and central authorities matter at this point more than the size of a food business. Further research could be undertaken to explore the effect of business culture or individuality on relationships with central authorities to better facilitate working relationships to ensure best outcomes from the withdrawal and recall process.

### **Notifying Local Authorities (LAs)**

In phase 1b, LAs reported being notified about recalls in three ways:

1. Through the digital FSA food alerts system in Wales<sup>16</sup>. LA officers check these daily for any relevant information. Some officers commented on how having a centralised system is preferable to when they used to receive emails. The new system means all officers have access as opposed to emails being sent to particular people and which can get lost or create duplication of work. Some officers felt that decisions by the FSA/FSS were made last minute and it was suggested that sharing information earlier would better support LAs in their roles

*"It's well recognised that incidents occur on a Friday afternoon – clearly they don't all come to light on a Friday afternoon, but obviously someone, somewhere is dragging their heels until they realise they are going to have to do something about it."* (LA, Scotland).

2. LAs may come across a recall through their own inspections. These are carried out in food businesses in their local area as described above (see section 5.1.5 )
3. Food businesses may notify the LA about a food recall in their area. They will then report this also via the FSA/FSS incident report form

### **Notifying Primary Authorities (PAs)**

Food business representatives described having a positive working relationship with PAs in phase 1a. Those that had a PA said they were a positive source of information, advice and support. The food business representative will notify the PA of a recall, as described above, but may also involve the PA earlier to discuss the issue.

*"We find [our PA] very supportive, very helpful, we value their advice and we seek their advice and as a consequence they see us as a reputable organisation...and as an organisation that has a lot of technical and scientific back up and that we're trying to assess things in a sensible and scientific manner."* (Manufacturer)

While PAs seem to have a good relationship with food businesses there was some concern expressed by one consumer group that the supportive role PAs have may conflict with their role as LAs responsible for enforcing food legislation.

*"PA's advisory role is possibly conflicting with LA's enforcement role, so it's hard for them to be totally independent."* (Consumer group).

Overall, there appears to be variability in the involvement of authorities at this point in the process. These differences seem to be related to food business representatives' perceptions of authorities and past experiences, rather than case-by-case with each incident. There was a feeling that a lack of labour resource in both the FSA/FSS and LAs added extra pressure to investigating and assessing potential incidents. The advisory role of PAs appears to be a positive one which could be considered a solution to this. However, there was some concern among some other stakeholders that the role may conflict, which could affect how food businesses relate to their PA. There are opportunities for further research into relationships between food businesses and PAs based on these preliminary findings to better understand the impact of the PA scheme on food withdrawal and recall compliance<sup>17</sup>.

### **5.1.8 Triggering a withdrawal or recall**

The data across phases 1 and 2 indicate that the decision to trigger a withdrawal or recall varies based on the size of the manufacturer and their relationship with their LA or PA and the FSA/FSS.

<sup>16</sup> The digital food alerts system is in place in Northern Ireland and Wales. In England FSA notifies LAs via email.

<sup>17</sup> For further research on the relationship between businesses and the PA programme see: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/591042/pa-consultation-implementing-the-enterprise-act-2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591042/pa-consultation-implementing-the-enterprise-act-2016.pdf)

Large manufacturers reported in phase 1a that they would withdraw products that posed a risk and would trigger a recall if the issue was beyond their control (i.e. has been bought by consumers and is no longer traceable). They would then confirm this decision with the FSA/FSS. Importantly, large manufacturers reported that they made the decision to withdraw or recall independently of the FSA/FSS as they saw themselves as “*responsible businesses*”. LAs shared this confidence in larger food businesses’ abilities to know when to trigger a withdrawal or recall. They were more concerned by the perceived attitudes and behaviours of some smaller food businesses.

*“The smaller ones...probably not willing. They probably wouldn't want to tell us in case we stop them trading.” (LA, District).*

Both LAs and larger manufacturers assumed smaller manufacturers would be more hesitant to withdraw or recall because of possible negative influences on finances and reputation. While larger businesses have the established reputations and resources to handle a withdrawal or recall, a smaller manufacturer may fear they could risk losing their business if they incurred substantial costs.

In addition to the size of the manufacturer and the relationship they may have with LAs and the FSA/FSS, there was a sense that timings matter when it came to informing the FSA/FSS about a potential recall. There was a perception among some food business representatives, that decisions made by the FSA/FSS on the basis of its risk assessment to trigger a recall, are of a lower quality over the weekend due to different teams operating. They believed the FSA/FSS would be overly cautious and trigger a recall if the information was received at the end of the working week. They felt the FSA/FSS would potentially spend more time investigating if it was given the same information earlier in the week, and so avoid a potentially unnecessary recall.

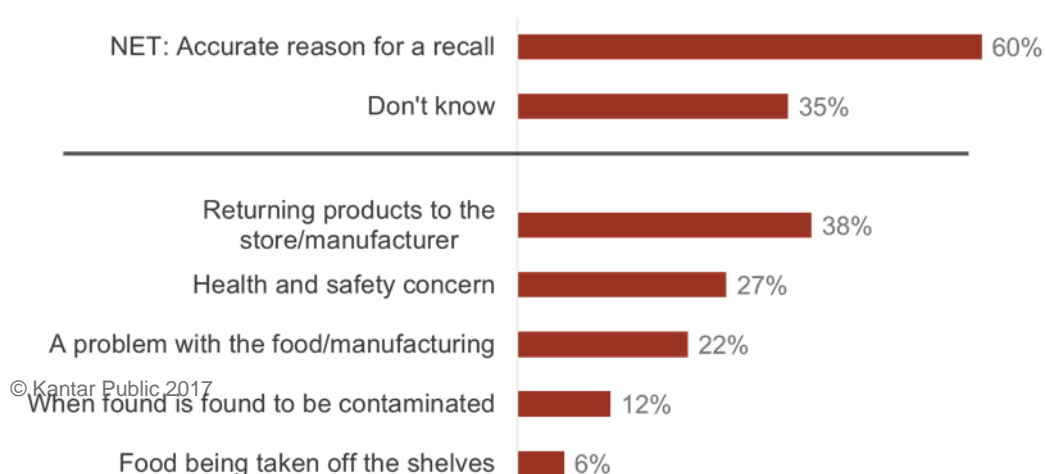
The issues surrounding communication and decision-making processes in this critical step are grounded in trust and relationships between food business representatives and the FSA/FSS. Further research is recommended into these relationships to better understand effective working.

#### 5.1.9 Consumer understanding of why recalls are triggered

In phase 3, consumers had a general perception that the food safety regulation system is working, which seemed to be largely based on a view that there are not many food recalls. However, they were unsure how the system worked and of specifics such as why a recall would be triggered. In phase 2 consumers were asked to describe their understanding of food recalls. Thirty-five percent of consumers were not sure why a recall would be triggered (see Figure 5). Six in ten (60%) gave an accurate reason for a recall. Twenty-seven percent recognised they could be related to a health and safety concern and one in five (22%) thought they could relate to problems with manufacturing. In phase 3, participants in the Citizens’ Forums showed similar uncertainty; consumers could give accurate descriptions but few were completely certain in their understanding of why a recall would be triggered.

*“When there's something that isn't fit for consumption by the public, it has maybe been tampered with.” (Male, Men living alone).*

**Figure 5: Reasons for food product recalls given spontaneously by consumers**



*Consumers phase 2a: Q006. We would like to understand what you know about 'food recalls'. Can you please tell us what the term 'Food recalls' means to you? Base: All consumers (1200)*

## **5.2 Step 2: Withdrawals and recalls notification**

This chapter describes the second step in the withdrawals and recalls process: the notification stage. It discusses business-to-business notifications of customers in the supply chain, as well as communication between businesses, LAs, the FSA/FSS and, in the case of recalls, consumers and consumer groups. This follows the sub steps outlined in the diagram below (see Figure 6).

While the findings in this step derive from all phases of the research, the first part of this chapter primarily focuses on phases 1a, 1b, 2a and 2b. Findings relating to food businesses are drawn from the qualitative interviews (phase 1a) and the quantitative survey with food business representatives (phase 2b). In the latter part of this chapter, which discusses consumer views, the quantitative consumer figures from phase 2a are augmented with relevant findings from the qualitative research from phases 3a and 3b.

## 5.2.1 Summary

### Key points

This step transitions from a confidence in owning and implementing the withdrawals and recalls process to less confidence and, subsequently, less perceived success in the process. While in step 1 and the beginning of step 2 food businesses and stakeholders were clear on whose responsibility a sub step was, their sense of ownership decreased when it came to effectively informing consumers and ensuring they had received a recall notice. In other words, food businesses reported feeling confident at this step, but reported losing confidence once it came to notifying consumers, and recognised that this was a flaw in the process. Additionally, they were unlikely to report collecting evidence to evaluate the effectiveness of this particular element.

On the other side of the process, consumer's level of engagement with recall notices was low. They had low awareness of the channels of communication and were generally not proactive in seeking out recalls. This was in part because they felt 'protected' and didn't feel they needed to know, but also in part because recall notices were not effectively placed and designed for reaching them. The research shows there is clear consumer appetite for standardised recall templates that stand out and deliver key information quickly and for dissemination via easily accessible channels. Knowledge of the FSA/FSS information channels was limited but, once informed, consumers reported they would be likely to use the recalls sections of the FSA or FSS websites in future. This suggests that visits to these websites (and the uptake of options for email and text alerts) would improve if consumer awareness increases.

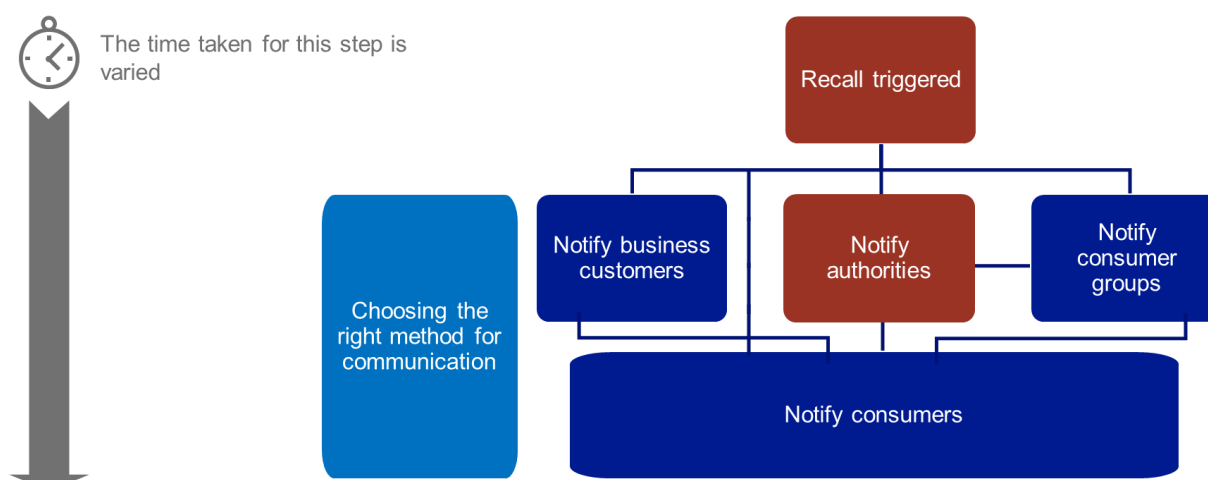
### Working well

- = Over time, it seems likely it will become easier for food businesses to trace where a product has gone and notify consumers accordingly due to the increase in online accounts and/or membership of loyalty schemes which digitally hold purchase records. Businesses that currently hold digital purchase records reported them as a helpful means by which to notify consumers who had bought affected products
- = For food businesses that have established procedures to inform other businesses, LAs and consumers reported feeling these procedures work well

### Not working well

- = Some food business representatives reported concern about identifying and contacting trade customers and consumers to recall affected products
- = Consumer groups feel they are not informed early enough to be of greatest assistance in notifying consumers
- = Consumers do not have knowledge of or feel engaged in this process. They generally feel they are kept safe but also feel food businesses are not putting sufficient effort into communicating with them
- = Lack of consumer awareness is an issue for food businesses and consumer groups in communicating food recalls effectively
- = Where recall notices are clear and contain key information, they are positively received by consumers. However, currently the information they contain is not always seen as sufficient, clear or memorable. There is an appetite for standardisation across notifications in terms of their appearance and the information provided.
- = Consumers are largely unaware of the FSA and FSS websites as sources of recall information (yet, when shown a webpage, they found it helpful and user-friendly)

**Figure 6: Typical processes at step 2**



*Manufacturers, retailers, wholesalers, distributors and LAs are involved at this step.*

There are six sub steps within step 2 as illustrated in Figure 6. This step begins when a food business triggers a withdrawal or recall. Food businesses inform other businesses in the supply chain, relevant authorities, and in the case of a recall, extend the notifications to consumers and consumer groups. Choosing the right method for communicating the withdrawal or recall is a key consideration for all businesses, authorities and consumer groups in this step.

The following tasks can happen in various orders, or concurrently, and not every task will necessarily take place, depending on the type of withdrawal or recall:

- = The food business that triggered the notification will inform the businesses they have supplied with the particular food or drink product and, in turn, each business will notify the relevant businesses they have supplied. How far the notification cascade extends depends on the length of the supply chain and the progress of the product through it
- = Businesses reported that they may decide to notify authorities depending on the severity or scope of the withdrawal or recall, but this does not happen in all cases, for example in less serious incidents. This can include LAs, PAs and/or the FSA/FSS
- = Consumer groups may also be notified of a recall, especially in cases involving potentially vulnerable consumers, such as those with a food allergy or intolerance. Notifications may come from businesses in the supply chain or from the LA, or the FSA/FSS.
- = All three of the above stakeholders can notify consumers of a recall, and often consumers are notified through multiple means (in-store; via the websites of the food business, LA and the FSA/FSS; through consumer group alerts, etc.)

## **5.2.2 Organisations involved at step 2**

Just under three-quarters (74%) of all food businesses interviewed at phase 2 reported involvement in the notification step. As with step 1, manufacturer involvement remained high at 78%, followed by wholesalers/distributors (76%) (see Table 4). The involvement of retailers remained somewhat lower at this early stage in this step, at 67% (although this is not a statistically significant difference). The lesser involvement of retailers here reflects that they are usually the last link in the supply chain. How far the product has travelled through the supply chain by the time a withdrawal or recall is initiated determines whether they would become involved at this step.

**Table 4: Food businesses' involvement in step 2 by industry type**

Step	Description	All food businesses	Retailers	Manufacturers	Wholesalers distributors
		<b>200</b>	63	65	72
<b>2</b>	Issuing withdrawal or recall notifications (either to customers in the supply chain, to end consumers, consumer groups or to the LA)	<b>74%</b>	67%	78%	76%

*Food businesses phase 2b: Q020. Based on the withdrawal or recall process we have just shown or explained to you, which of the following steps of the withdrawal or recall process would your organisation usually be likely to deal with? Base: All participants (200); for other base sizes see table*

Almost all of manufacturers (94%) said they felt well prepared to inform their business customers about a product withdrawal or recall; similarly, 93% of wholesalers/distributors said they felt well prepared, compared to 83% of retailers.

Despite such high levels of confidence, just under half (47%) of food business representatives reported having targets (either business-specific or industry guidelines) to adhere to at step 2: retailers were the least likely to have any targets (33%), compared to wholesalers/distributors (49%) and manufacturers (57%). For those that did have targets, the most commonly mentioned were time frames for meeting certain deadlines (27%) (these were mostly internally set and businesses quoted anything from four hours to a day), or standards set by the British Retail Consortium<sup>18</sup> (7%).

In summary, although food business representatives claimed high levels of confidence in undertaking the notification step, they were unlikely to collect evidence to evaluate the effectiveness of what they do.

### **5.2.3 Notifying business-to-business customers**

At this step, manufacturers reported usually taking the lead in notifying trade customers of a withdrawal or recall. The exception to this was when the recalled product was a retail own brand produced under licence by a manufacturer for a retailer<sup>19</sup>. In this situation, the retailer is likely to take the lead on recalling the product.

The qualitative research with stakeholders (phase 1a) shows that the notification route of a withdrawal or recall tends to follow the product supply chain (see Figure 7).

<sup>18</sup> These are produced by BRC Global Standards, a separate company from the BRC trade association.

<sup>19</sup> 'Manufacturer - producing retail own brands' and 'Manufacturer - producing own brand' is how the manufacturer types were referenced in the questionnaire in phase 2b. However, as the language around industry stakeholders developed, manufacturer types were rephrased as 'Branded' and 'Under licence' respectively



**Figure 7: The route of a typical withdrawal or recall notification**



Although the notification step tends to follow the supply chain in a linear fashion, it is also dependent on interpersonal and working relationships between businesses. Food business reported that the notification chain can break down when businesses cannot get in touch with each other, for example, when wholesalers cannot reach trade customers, individual contacts who are on holiday or those who are not registered with the wholesalers' website. The notification chain can also be affected by the number of stakeholders involved in individual cases, which varies widely. The more businesses are involved, the longer it may take to inform them all. Time taken may also be influenced by challenges in reaching some food business, in particular, smaller independent food businesses.

Moreover, some wholesalers reported that while they try to work closely with their customers, there can be questions of openness around the risk to consumers in notifications.

*"When you're dealing with other people in other companies you can't necessarily judge them by yourself, how open and honest are they being? ...It's just the clarity of the problem...the supplier clarifying the true scale of the problem."* (Wholesaler)

As such, the time frames for issuing withdrawal and recall notifications can vary widely among food businesses due to the range in the number of stakeholders involved in individual cases, how easy or difficult it is to reach them and how effectively the businesses communicate. In the qualitative research with industry stakeholders (phase 1a), one wholesaler described aiming for a two-hour response to a notice and for all products to be withdrawn within 24 hours.

The methods used to notify other food businesses vary and findings from the quantitative research indicate they depend on the issuer, the type of customer and the scope of the withdrawal or recall. Most food businesses notify their business customers directly, but some involve other parties to help them do this (see Table 5).

**Table 5: Methods used by food businesses to notify customers in the supply chain**

Method of contact	Base: 35
Directly contacted business customers e.g. via phone/email (individual alert)	26
Group recall notifications via email (generic alert to all involved)	17
Notified LA who informed businesses involved on food business's behalf	12
Written recall notification letters	11
Notified trade associations who informed businesses involved on Food business's behalf	10

*Food businesses phase 2b: Q032. Thinking about the food withdrawals or recalls you have recently dealt with, which of the following methods have you used to notify other businesses involved in the supply chain about a product withdrawal or recall, if applicable? Base: All food businesses involved at step 2 who had experienced a withdrawal/recall in the last 12 months (35). Results are given as numbers rather than percentages due to low base.*

Most food business representatives who had experienced a withdrawal or recall in the previous year reported that they contacted their supply chain customers directly to inform them of the withdrawal or recall, or sent a group notification to all their customers together. Others reported notifying the LA or relevant trade associations and allowing them to inform other food businesses on their behalves. Stakeholders believed this approach of disseminating information through multiple channels was more likely to be taken in cases where the food product is harder to trace, such as internationally sold food.

*"My issue is you're informing whoever's affected so it's not just consumers, you're also informing customers and also the wider thing, my learning over the years is, because we're a global business you always have to think where could this have gone, therefore it could be other authorities in terms of Ireland, elsewhere in Europe, RASSF<sup>20</sup> [Rapid Alert System for Food and Feed] or other markets, countries." (Manufacturer).*

The research indicates that this step works well because there is a clear understanding of responsibility of the manufacturer and overall strong communication between businesses and other stakeholders. This step risks breaking down when relationships are weak or there is an interruption or delay in the line of communication. The notification process can be slow because it tends to work linearly.

In the qualitative research (phase 1a), consumer groups expressed a desire to be more engaged at the recall notification stage in order to be aware and able to streamline communications with consumers. While the FSA/FSS advises manufacturers to notify consumer groups, in practice this does not always happen. Some consumer groups reported receiving recall notifications primarily via the FSA/FSS alerts system and not the manufacturer issuing the recall.

*"[The] FSA does tell food businesses that they must notify consumer groups – that doesn't happen." (Consumer group).*

Furthermore, these notifications are not always timely. If the consumer group receives an alert in the evening, it is often not shared until the next day. This could put consumers at risk. It appears that communication (both from businesses to consumer groups and from consumer groups to consumers themselves) could be better managed, for example with both groups being able to respond out-of-hours in the case of urgent recalls. Some consumer group participants felt that delays affected their ability to produce quality communications in a timely manner to their membership base.

<sup>20</sup> [https://ec.europa.eu/food/safety/rasff\\_en](https://ec.europa.eu/food/safety/rasff_en)

*"Ideally we'd almost like to be communicated to, before the FSA put their consumer information out...At the moment we don't necessarily know there's an issue and an investigation could have been going on for two days on a product that's [allergen] free. [Knowing in advance would mean] we can line up our communications, not that we'd put it out before the FSA, just having that heads up would be really useful."* (Consumer group).

They reported needing to be better informed at this stage, so they could take on a greater role in notifying consumers. For example, some consumer groups reported having experienced delays in receiving the full details of the recall from the manufacturer, which made risk assessment difficult.

To mitigate these problems, some consumer groups reported contacting a manufacturer to develop consumer-facing communications in collaboration with them as a way of achieving better communications in a time-pressured situation.

#### **5.2.4 Notifying consumers**

Food business representatives reported that confidence begins to diminish at the stage of notifying consumers. While they reported confidence in their withdrawals and recalls systems, including generating and displaying their public recall notices, they were generally unsure whether the message reached consumers and was effective.

The qualitative research with stakeholders (phase 1a) supports this. Food business representatives reported not having accurate measures of whether consumers see the recall notifications they release, although many noted that a smaller number of consumers returned the products affected by a recall than those who had bought the product. In some cases, food business representatives considered that their responsibilities were fulfilled once the notices were released, regardless of whether they were seen by consumers.

*"How many consumers actually get the message that a product is affected is probably a very moot point."* (Manufacturer).

There is no industry standard across food businesses as to what notifications look like or what information they include. Food businesses may use automated templates or develop consumer communications ad hoc for each recall. Food businesses without a standard or automated template expressed uncertainty about what to include, for example, what is too much information, and what could be alarming for consumers. Other stakeholders such as consumer groups may also be involved in communicating to consumers.

*"Based on past food scares, how much to tell consumers is a concern as there's a risk of telling them too much and scaring them or not enough and putting them at risk, so you need to get the right balance."* (Consumer group).

Additionally, as phase 2b revealed, there was considerable variety in the channels used by food businesses to communicate with their consumers. These varied depending on the type of business, the nature of the recall and the type of consumer. See Table 6 for the methods used by the food businesses interviewed during phase 2b. In-store notices were most common, followed by written communication, including both those aimed directly at consumers (e.g. letter or email) and those aimed at the public more generally (e.g. press). Relatively fewer food business representatives reported using consumer groups to assist them in getting the message out to consumers. The FSA and FSS publish recall notifications and alerts on their websites as standard, as well as email and text alerts, when they are informed but it is not a service to 'assist' businesses.

**Table 6: Methods of contact used by food businesses to get in touch with consumers about a product recall**

Method of contact	Base: 35
In-store (e.g. point of sale notices or shelf barkers) (NET)	17
Any written communication (e.g. press/letter/email/texts) (NET)	13
Written recall notification letters	7
Written recall notification emails	7
Any websites/social media (NET)	7
Notification through social media	6
FSA/FSS website/social media	4
Notifications to consumer groups	4

*Food businesses phase 2b: Q033. And which of the following methods have you used to notify end consumers about a product recall, if applicable? Base: All Food businesses involved in step 2 who had experienced a withdrawal/recall in the last 12 months (35) Results are given as numbers rather than percentages due to low base.*

Written communication can include email and text alerts and this is possible when consumer details are available to the recall issuer due to online shopping or another online facility. Having these records may provide an advantage from the point of view of a business: in the qualitative research (phase 1a) one manufacturer, who is now an online supplier, believed the next recall would be easier as they had consumer details to contact them directly.

*"I expect recalls will be easier online as you know all your customers. With retail, you know your customers so you can be effective with the trade, but you can't reach consumers direct."*  
(Manufacturer).

Media was another channel to communicate to consumers that stakeholders mentioned in phase 1a. However, as they highlighted, a problem with relying on media to communicate recalls is that they do not always report recall details accurately, or at all. Some food businesses reported that newspaper advertisements are used on occasion but these can make it challenging to target the correct consumers.

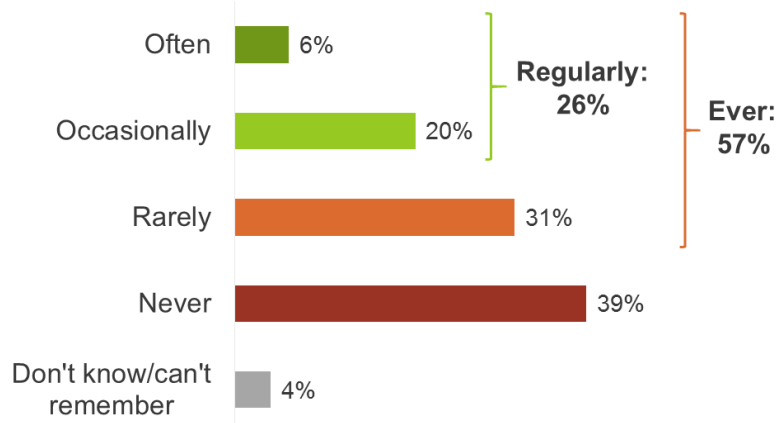
Regardless of the channels used, food businesses lost confidence in the recall process once it reached the stage of notifying consumers. However, the responsibility for a potential breakdown at this stage does not necessarily lie entirely with the food business issuing the recall, as consumers also have a responsibility to look after their own safety, even if this is not widely understood by them at present.

One key challenge for food businesses is that very few consumers reported regularly checking or looking out for food recall notices. Only a quarter of customers proactively looked out for food recall notices and almost two in five (39%) never did (see Figure 8). The situation is a paradox: consumers think recalls are rare and so do not look out for them and, as a result, may miss existing notifications. Furthermore, a mismatch between business practices and consumer expectations about where notifications should be placed might add to this problem: while businesses often placed notifications in less visible places, such as customer service desks, consumers generally expected in-store notifications to be highly visible and *'in*

*your face*'. Some consumers in the qualitative research expressed surprise that they had not been aware of recent recalls when they were told about them during the interviews.

*"What I'm shocked about is I'm quite an avid reader of news and listen to radio as well – I never heard about any of these, they could be trying more."* (Male, Men living alone).

**Figure 8: The claimed frequency with which customers look out for food recall notices**



Consumers phase 2a. Q019. In general, how often do you check or look out for food recall notices? Base: All consumers (1200)

Key groups of consumers who claimed that they never check for recall notices included those:

- = From higher social grades (42% ABC1 compared to 35% C2DE)
- = Without allergies or intolerances (41% compared to 29% of those with allergies or intolerances, or who prepare food for or eat with people who do)

As discussed previously, another method of notifying consumers is via consumer groups. Once consumer groups have received alerts from food businesses, the FSA/FSS or LAs, they decide which to share with their members based on relevance and risk. However, as explained, consumer group representatives in the qualitative research (phase 1a) felt they were not used adequately and expressed a desire to be more engaged and involved in notifying consumers, so that they could assist in streamlining communications.

Twitter, mobile alerts, Facebook and websites are used as key channels of notification by consumer groups. There was a concern among consumer groups that emails may be ignored due to the large number of emails people receive and the fact that they might end up in junk mail.

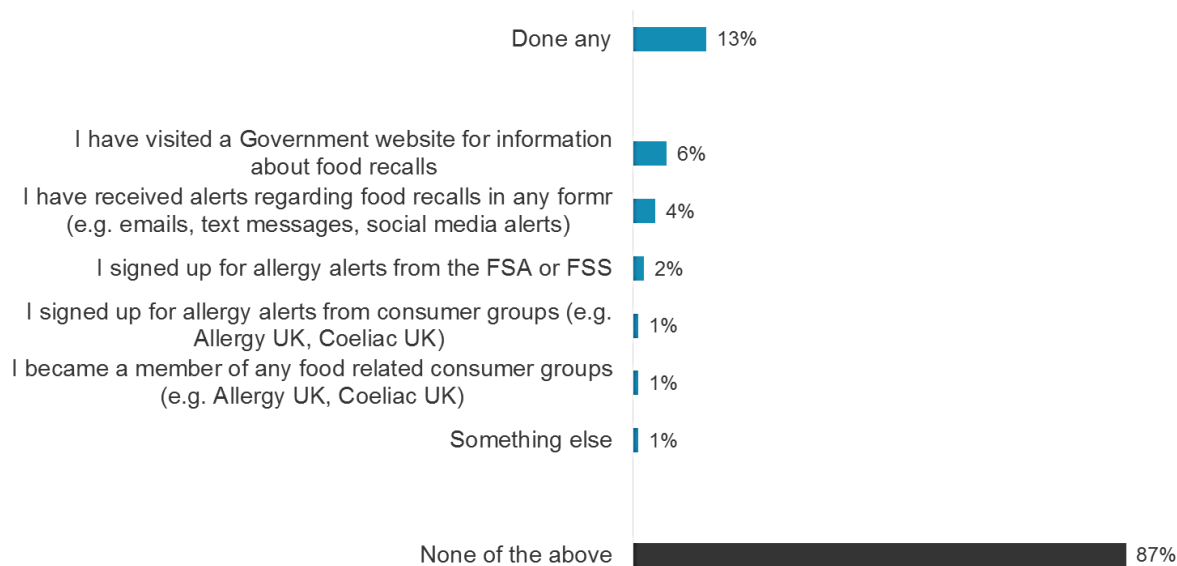
Just like food businesses, consumer groups had limited ways of measuring the effectiveness of their notifications. They therefore reported similar concerns to food businesses: will too much information scare consumers and will limited information not adequately convey the risk? Additionally, like food businesses, consumer groups felt that when they did send out notifications they had done their jobs and were limited in what else they could do.

*"I think what is done is quite comprehensive and I honestly don't know what more could be done to reach people who have maybe bought these products."* (Consumer group).

As discussed earlier, the quantitative research with consumers (phase 2a) revealed that only just over half of consumers (57%) reported ever looking out for food recall notices. Similarly, only 13% of consumers reported signing up for consumer group allergy or recall alerts, or using the FSA or FSS websites directly (see Figure 9). This means the reach of consumer groups' communications are not as wide as they could be and suggests that a key issue for both food businesses and consumer groups is

that consumers are not knowledgeable or proactive around seeking out recall information. Without engaging consumers in the process, even the 'ideal' notification channel, layout and content is unlikely to capture attention.

**Figure 9: The proportion of consumers who report taking any actions around looking for or signing up for food recall alerts**



Consumers phase 2a. Q020. Which of the following apply to you, either in the past or currently? Base: All participants (1200)

The following groups of consumers were more likely to have taken direct action to receive recall alerts:

- = Younger consumers (21% of 18–34-year olds vs. 9% of those aged over 35). This difference is likely to be due to the methods of notification available – younger members of the public are generally more engaged with technology so, therefore, are more likely to sign up for email and text alerts
- = Those who report being conscious of food safety (17% vs. 4% of those who report not being so)

Consumers with any allergies or intolerances (or who prepare food for people with an allergy or intolerance) were significantly more likely to have done any of the actions listed in Figure 9 compared to the average (30% vs. 13% of all consumers). However, it is apparent that even among allergy sufferers only a minority take pre-emptive action:

- = Thirteen percent had visited a government website (vs. 6% average)
- = Eight percent had signed up for text alerts in any form (vs. 4% average)
- = Eight percent had signed up for allergy alerts from the FSA/FSS (vs. 2% average)
- = Three percent became a member of any food related consumer groups (vs. 1% average)

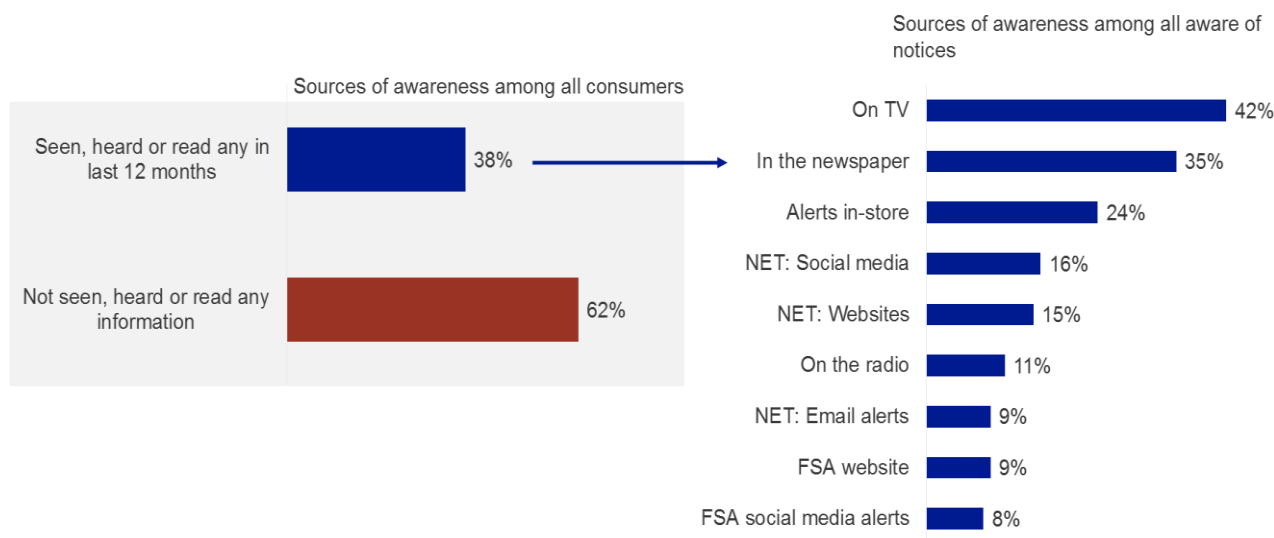
LAs had limited involvement in notifying consumers. While they believed that consumers needed to be more aware of food recalls (as the current belief among consumers is, wrongly, that all food sold is safe to eat), they held food businesses responsible for notifying consumers, highlighting that it is their legal requirement to keep customers safe.

*"Ultimately it's the food business as they produce the food and are responsible for ensuring it's off the market and consumers are aware."* (LA).

### 5.2.5 Consumer views on recall communication

As discussed above, consumer awareness of food recall notices was low. Consumer experiences and views of food recall communication were explored in the phase 2a consumer survey and in the qualitative work in phases 3a and 3b. Among those consumers in phase 2a who reported seeing a food recall in the previous 12 months, a range of sources were stated as the notification channel (see Figure 10).

**Figure 10: The proportion of consumers who had seen a food recall notice in the previous 12 months, and the source of awareness**

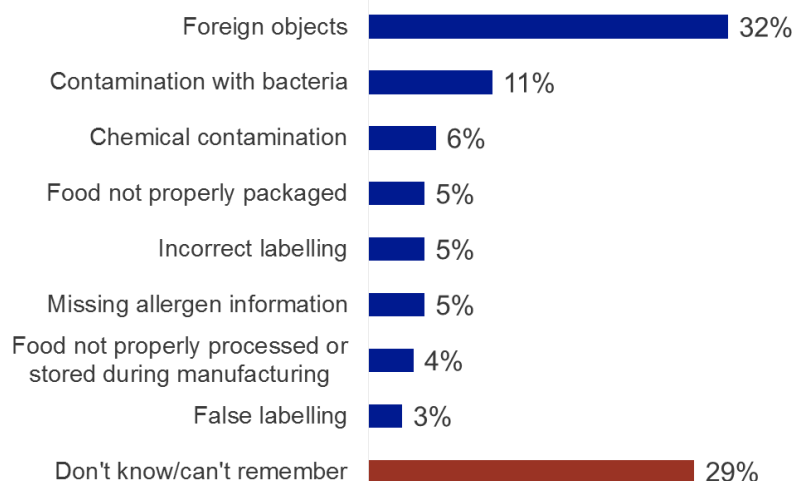


*Consumers phase 2a. Q011. Have you seen, heard or read any food recall notices in the past 12 months in any of the following places? Base: All participants (1200), all aware of food recall notice(s) in last 12 months (450)*

The three key sources of consumer awareness were the news (TV and newspapers), in-store and via social media. Only one in ten (9%) consumers mentioned the FSA or FSS websites, confirming findings from the qualitative research (phases 3a and 3b) that consumer knowledge of these resources is low.

Therefore, a key problem with the recalls process is that recall communications are not currently effective in reaching consumers. A further issue is that recall notifications do not always contain the recall reason or the content of communication is not consistently clear and consequently is not always effective in alerting consumers. A large minority of those who did see notices did not know or were unable to remember the recall reason (29%), indicating that, in some cases, this is not always clear (or it is not always included in the notice itself); see Figure 11.

**Figure 11: The reason for the most recent food recall seen by consumers**

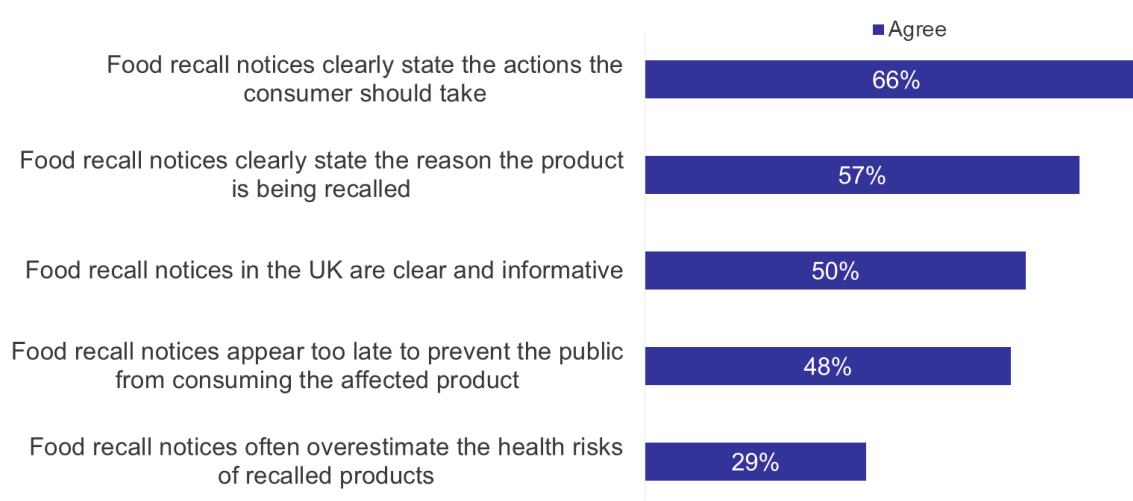


Consumers phase 2a. Q012. Thinking about the most recent food recall you have seen or heard of, what was the main reason for that recall? Base: All aware of food recall notice(s) in last 12 months (450). NOTE: this was asked of all consumers who had seen a recall notice, regardless of whether they had bought the product

Seven in ten respondents (71%) could remember the reason for which the recall notice(s) they had seen in the previous 12 months was issued, while three in ten (29%) reported that they did not know or could not remember the reason. While recollection is generally high, a third being unable to state the reason suggests that there is some scope for food businesses to improve their consumer notices to ensure that they quickly and effectively convey all the necessary information.

Consumer opinions on food recall notices were mixed, with around six in ten agreeing that they clearly stated the action required (66%) and the recall reason (57%), but fewer agreeing that they were clear and informative overall (see Figure 12).

**Figure 12: The proportion of consumers agreeing with statements about food recall notices**



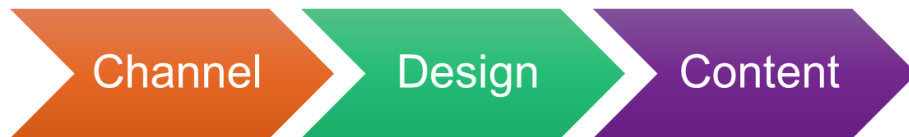
Consumers phase 2a. Q008. Here are a few statements about food recalls in the UK. How strongly do you agree or disagree with each of them? Base: All consumers interviewed (1200)

Given the finding that current recall communications do not consistently reach consumers effectively and efficiently, consumers were asked for their opinion on ideal recall communications as part of both the qualitative and quantitative consumer research strands. The outcome was clear: consumers saw a need for a more consistent and efficient communication approach. Crucially, consumers tended to feel that ineffective communication reflected a lack of effort on the part of food businesses, rather than a lack of means to produce better notices.

From qualitative research (phases 3a and 3b), consumers' ideas on improving communications suggested a 'sequence of communication needs', which would enable consumers to make quick and informed decisions. The key steps in this sequence are illustrated in Figure 13.

**Figure 13: The sequence of communication needs for consumer recall notices**





These three steps show that consumers want to:

1. Be made aware of food recalls via appropriate, easily accessible and highly visible channels without having to search for them
2. Instantly recognise a food recall and decide whether it affects them
3. Receive clear, helpful and consistent instructions on how to act in response to the recall

#### **5.2.6 Channels of communication**

In the phase 2a survey, consumer suggestions on preferred channels of communication largely mirrored the ways they currently tend to find out about recalls (see Table 7). These are consistently channels that do not rely on consumers themselves taking a proactive approach: seeing it on the news, in-store or having alerts sent to them directly.

**Table 7: The top five ways (combined) that consumers chose that they would like to be notified**

Method	% Choosing
On TV	58%
Alerts/notifications in-store	48%
Email alerts from retailers	41%
In the newspaper	36%
On the radio	34%
Text alerts from the FSA/FSS	30%
Email alerts from the FSA/FSS	29%
Text alerts from retailers	29%
From family or friends	27%
Email alerts from consumer groups	23%

*Consumers phase 2a. Q021. Here are a number of ways you could be notified of food product recalls. Please choose your top five options and rank them from 1 to 5 where 1 would be the most ideal way for you to be notified. NOTE: not all participants selected five options. Base: All consumers (1200)*

Consumers in both phases 3a and 3b were largely unaware of the FSA or FSS websites as sources of recall information. However, when consumers were shown images of the FSA website in phase 3a, they reported that it looked helpful and user-friendly. Some indicated they would use it more now that they were aware the resource existed, for instance signing up for the email alerts or researching recalls they had seen elsewhere. Yet, consumers also noted that realistically, given time constraints and other priorities, they were unlikely to visit the website regularly to check for recalls.

The qualitative research (phases 3a and 3b) revealed that younger people especially view social media as an effective way recalls could and should be communicated to them. In fact, several consumers in phase 3b had found out about a recall that had affected them via social media.

*"It was on social media where I first heard about the recall" (Phase 3b: experienced a recall).*

*"As a user of social media several times a day I would definitely be highly likely to notice and read posts/tweets." (Phase 3b: experienced a recall).*

Yet, within social media there were some sources that were trusted more than others. Trusted sources included reputable news sources and a food businesses' own online presence.

*"I saw the news as it was one of those 'trending' links on the side, I clicked on it and then checked it out with other sources to make sure it was true." (Phase 3b: experienced a recall).*

Furthermore, as one consumer pointed out, with many social media platforms like Twitter and Facebook, one has to know about them and sign up to receive alerts in the first place. Other respondents expressed reservations about signing up to online alerts, given the volume of information they might receive as a result.

*"Issue with Twitter is, you'd have to know FSA has a Twitter account before you even follow them." (General public, London).*

*"I think subscribing to a recall system is overkill unless I can clearly filter the type of alerts I would receive."* (Phase 3b, experienced a recall).

The qualitative research suggested that online communication does not reach elderly people effectively. Some elderly research participants expressed concern that everything was going online.

*"I would never see anything like that online because I just wouldn't look for it."* (Elderly, Manchester).

Of the channels that food businesses would be able to use, in-store notifications came out as the most preferred option in the quantitative research, followed by email or text alerts (from retailers or the FSA/FSS). The qualitative research (both phases 3a and 3b) showed that consumers expected and wanted point of sale notifications to be placed in a visible, accessible and consistent manner. Speaking from their own experiences of having been affected by food recalls, consumers in phase 3b found current practice, such as placing recall notices by the customer service desk or on busy notice boards, as being far from satisfactory.

*"The only reason I was aware of the recall notice is because I visited the customer service desk to collect a parcel. If I hadn't visited customer service I would never have been aware of this recall. I feel the awareness of recalls need to be improved with more notices visible in stores for example store entrances."* (Phase 3b: experienced a recall).

Yet, they also noted positive examples.

*"Recall [was] prominently placed in shop window."* (Phase 3b: experienced a recall).

*"The notice [was] in store near the entrance and exits plus I think I saw it near the till, caught my attention so this was done well. Also saw it on social media and the packet image also caught my eye as an item I had purchased."* (Phase 3b: experienced a recall).

Overall, phases 3a and 3b showed that consumers favour a number of locations for in-store placement of point of sale notifications:

- = By the entrance and exit
- = In the relevant product aisle
- = By the check-out

### 5.2.7 Design of point of sale notifications

Throughout the qualitative research (phases 3a and 3b), consumers expressed a desire for consistency and standardisation of recall notice communications, especially of in-store notices. They felt that this would enable them to recognise recall notifications more quickly and improve the quality of communication. Moreover, consumers noted that a standard recall template would enable those that had difficulties reading English or were illiterate to recognise a potential recall and seek further information.

*"There should be some sort of standard protocol to follow. Not one shop do it one way and another shop do it a different way."* (General public, Bridgend).

*"The standard alert signs are helpful for someone who doesn't have good English – they are the most important thing..."* (General public, Belfast).

*"This one here has a stamp that says 'product recall' and then immediately underneath it says what it is and then you can stop reading [if not relevant to you]."* (Men living alone, Belfast).

When discussing the design of point of sale notifications, consumers expressed a strong preference for a recognisable template, such as the Australian press advert example (see Appendix Da). Consumers

agreed, in line with the Australian example, that food recall notifications would benefit from including the signalling colour red and an image of the product that was being recalled. As outlined above, they felt that this should be contained within a standard template used across all stores.

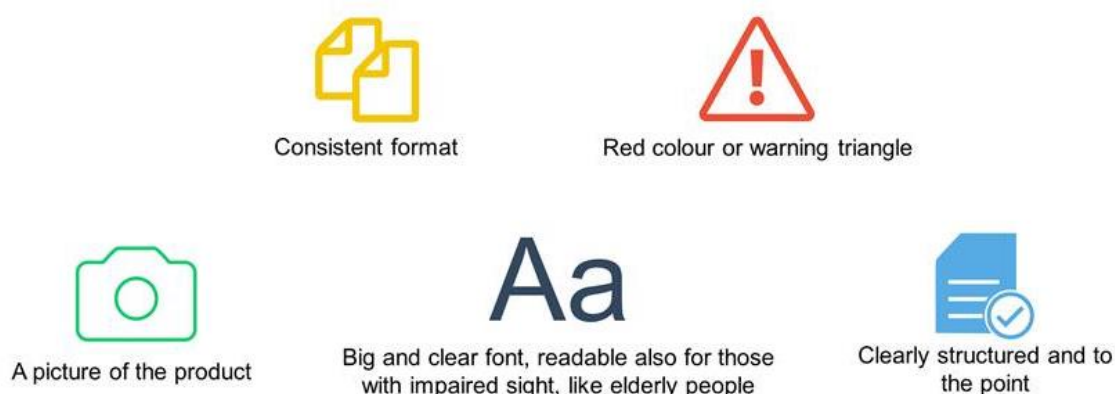
*"Everyone knows colour red means danger...you see red and you go like uh-oh."* (Pregnant women, London)

*"You're going to look at the picture and think 'oh, I remember buying that'."* (Allergies, Edinburgh).

*"I think that [the Australian example] is excellent, because it walks a person through the process...and every step is made very relevant and is easy to read."* (Elderly, London).

Besides expressing a preference for the Australian press advert template approach, consumers in phases 3a and 3b consistently mentioned a number of 'design principles' that they would like to see incorporated in a point of sale notification template, as outlined in Figure 14 below.

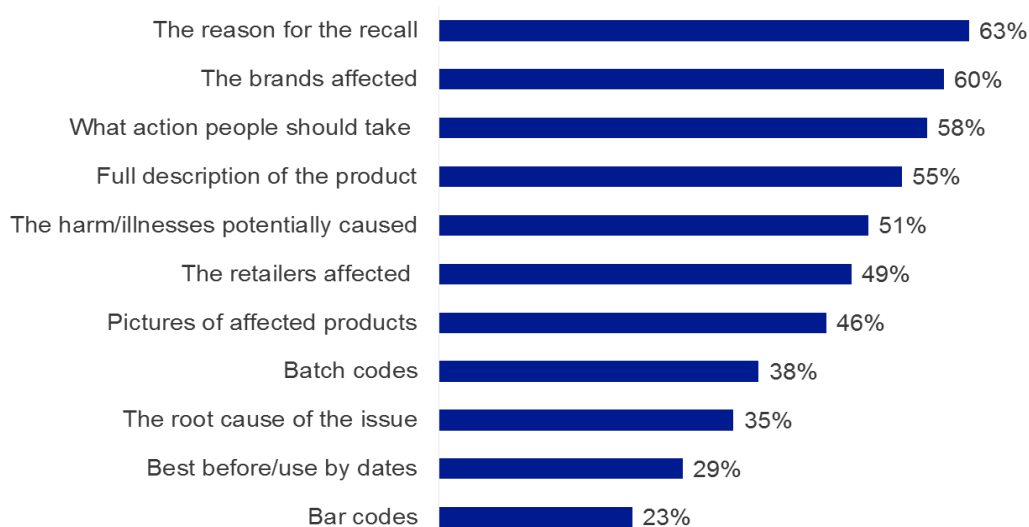
**Figure 14: Key design principles suggested by consumers in phases 3a and 3b**



### 5.2.8 Content of recall communication

In the phase 2a survey, consumers were asked what they would consider to be the essential information that should be included in recall notices. The three most common pieces of information consumers wished to receive were the reason for recall, the brands affected and what action they should take (i.e. whether they could/should return it); see Figure 15 below.

**Figure 15: Proportion of consumers who consider the information essential for inclusion on food recall**



*Consumers phase 2a. Q022. What types of information would you consider it essential to know in order to take action when it comes to food product recall notices? Base: All participants (1200)*

Consumers who classed themselves as more conscious of food safety were likely to want to know more secondary information as well:

- = Forty-one percent considered batch codes essential (vs. 29% of those who were less conscious of food safety)
- = Thirty-eight percent felt the root cause for the recall essential (vs. 27% of those who were less conscious of food safety)

A range of communication principles that confirm and complement the quantitative data emerged from the qualitative research (phases 3a and 3b). In general, consumers stated they wanted to receive information that helped them decide whether and how to act. This, most of all, included the reason for the recall and instructions on return and refund. In fact, those consumers in phase 3b that had experienced a food recall incident in which they were not told the reason noted this as particularly negative, as they felt it was important information that should be included (particularly in the event of deciding whether a product was too dangerous to eat or whether the recall was for a less serious reason). Another reason that food recall notices were viewed negatively in phase 3b was because they contained too much or unclear information.

*“There was one that had a big long sentence and I got bored half way through.”* (Allergies, Edinburgh).

Positive examples from phase 3 included those recall notices that were eye-catching, clear and succinct and ensured consumers that they could receive a refund without a receipt.









*“The recall notice did explain clearly that the item could be returned at the store without a receipt for a refund.”* (Phase 3b: experienced a recall).

In summary, communication principles regarding the preferred format and content of food recall communications are outlined in Figure 16 below.

### 5.2.9 The classification system

In phases 3a and 3b, consumers were asked about their views on the concept of a classification system (see Figure 16) which is not used in the UK, but is used in some other countries. To get views on both versions, a traffic light colour-coded classification system was presented in the pilot and main phase 3a workshops and a black-and-white version was introduced in phase 3b. Consumers in both phases (3a and 3b) expressed mixed and somewhat contradictory views about the classification approach. These ranged from a positive assessment that the classification system helped to simplify the urgency of the recall, to the opposite negative judgment that the classification was unnecessarily confusing.

**Figure 16: Communication principles suggested by consumers in phases 3a and 3b**

-  The reason for the food recall
-  A clearly structured text, in line with a standard format
-  Clear instructions, including where to return the food
-  Reassurance of a refund without receipt
-  A to-the-point notice (i.e. as little text as possible, without compromising content)
-  A relevant title to the recall notice (i.e. a title that clearly states that this is a food recall and not just a generic 'customer notice')
-  An apology
-  Food business contact details for further information and/or FSA/FSS website details (one suggestion was to always include a reference to the FSA/FSS website on recall notices. This, it was suggested, would not only increase public knowledge of the FSA/FSS website, but also enhance credibility of recall notices)

Positive comments included that classification is structured and simplified the process and so enabled quicker decision making and better assessment of the severity of the risk.

*“This is a very good idea, it would be helpful at a glance to see the implications to eating or using the product after recall. As it is now you have to often read through a lot of information to determine the risks. This information can also often be confusing. It would definitely be helpful to differentiate levels of risk...”* (Phase 3b: experienced a recall).

Negative assessments, on the other hand, included that the classification was confusing, simplistic, and/or problematic. For example, some cases are difficult to classify (such as nuts not being declared, which can be severe for those with allergies, but harmless for most). Another problem noted was that people may ignore Class III notifications (see Figure 17 below).

*“I think it may over-complicate things for the average consumer. A product either needs to be returned or it does not – the likelihood of the incident is not a factor in this.”* (Phase 3b: experienced a recall).

While responses to both versions of the classification system were mixed, some respondents shown the black-and-white version also spontaneously suggested a traffic light, colour-coded approach.

*“I think this is great, maybe a more traffic light or low, med and high would be more relevant? I think it's great to see a classification.”* (Phase 3b: experienced a recall).

Another consumer suggestion was that the borders of the Australian press advert template (Appendix Da) could be colour-coded according to the classification system, resulting in a standard template that also conveys the severity of the recall risk.

**Figure 17: The classification system stimulus used in phase 3b**

<b>Class I incident</b> - <u>reasonable probability</u> that product use will cause <u>serious adverse</u> health consequences → e.g presence of E.coli in product
<b>Class II incident</b> - <u>remote probability</u> that product use will cause <u>adverse</u> health consequences → e.g. chemical taint not likely to be harmful but could cause minor, short-lived adverse effects
<b>Class III incident</b> –product use will <u>not cause adverse</u> health consequences → e.g quality related issues or mislabelled product

### 5.3 Step 3: Product removal and destruction

This chapter describes the third step in the withdrawals and recalls process. It discusses the organisations involved before exploring in detail each part of the process at step 3, following the steps outlined (in yellow) in the diagram below (See Figure 18). Conclusions are then drawn, including suggested recommendations and potential areas for further research.

Findings in this step are drawn from qualitative interviews with food business representatives in phase 1a, LAs in phase 1b and the quantitative survey with food business representatives in phase 2b.

### 5.3.1 Summary

#### Key points

The withdrawals and recalls process was perceived as becoming less effective the further it moved along the supply chain from the trigger. Some manufacturers expressed concern around the withdrawal or recall message reaching smaller or independent retailers. While manufacturers are only legally required to notify their direct customers, in phase 1a manufacturer representatives spoke in general terms about the challenge of sending a message down a complex supply chain.

There was no clear view on timings for products to be withdrawn or recalled: the current picture is that this varies considerably by business and type of withdrawal or recall. Although food businesses continued to feel well prepared, again there existed a gap between this and how many targets or guidelines they observed.

LAs were not routinely involved in this step of the withdrawals and recalls process. They may become involved on a case-by-case basis, usually at the discretion of the food business involved.

#### Working well

- = Food businesses are confident they can manage this step in their food business
- = Where processes are in place, food businesses feel they work well
- = Some good cooperation between food businesses in removing affected products from consumers

#### Not working well

- = The recalls process does not always work quickly enough to recall products before consumers are affected

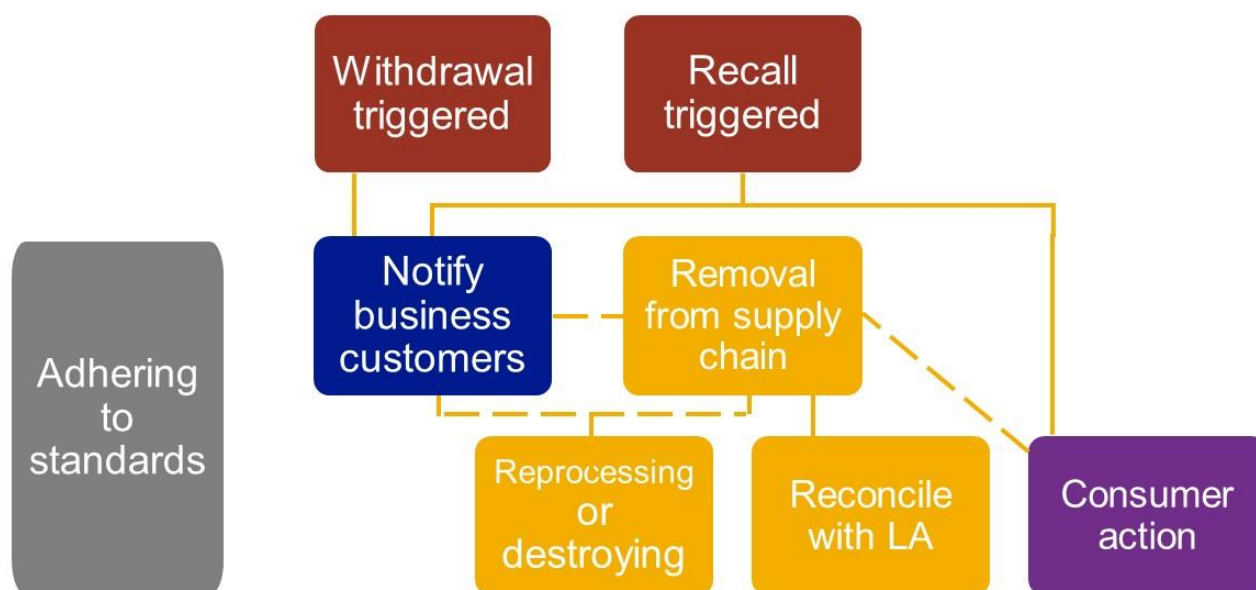
There are four sub steps within step 3 but it is not clear from this research how long this process could take. It is described as illustrated in Figure 18:

- = Once a withdrawal or recall has been triggered any business-to-business customers are notified and products will be removed from the supply chain
- = Products that are traceable will be destroyed or if possible reprocessed
- = In some instances, the results will then be reconciled with the LA
- = Some food business representatives reported adhering to standards throughout this step, but this is not widespread and the standards themselves were not specified



### 5.3.2 Organisations involved at step 3

Figure 18: Typical processes at step 3



*Manufacturers, retailers, wholesalers, distributors, LAs and consumers are involved at this step.*

Eighty-six percent of food businesses were involved at this step as reported in phase 2b. Retailers displayed more involvement at this step than in previous steps. Food businesses were more likely to be involved in removing rather than destroying products, as retailers were more likely to remove products and send them back to the manufacturer or supplier for destruction, rather than destroying them themselves. These findings are echoed in the qualitative findings at phase 1. In particular, food business representatives who worked in store (rather than head office) explained how this was the point in the step at which they had greatest involvement.

### 5.3.3 Adhering to standards

Food businesses were confident in this step but they did not collect evidence to evaluate their effectiveness. In phase 2, 94% of food business representatives felt confident their business could adhere to competent authority requirements and standards in removing affected products from consumers. Similarly, 92% of food business representatives were confident their businesses could dispose of affected and returned products. However, just under half (47%) of food business representatives reported having any targets relating to step 3. Those who did mention targets most commonly mentioned adhering to internal procedures (12%) or targets to do with time frames, industry standards, and procedures relating specifically to product destruction and disposal (5%). In phase 1, some food business representatives who worked in supermarkets or stores (as opposed to head office) reported adhering to standards relating to the speed at which they responded to recall notifications and removed affected products. Some retailers had technology to assess the speed and accuracy of product removal. Some manufacturers mentioned also having targets relating to product removal, for example having 100% of affected products returned (typically in withdrawal cases before the product has reached the consumer). Some food business representatives in phase 1 felt that targets could help communicate the seriousness of a food withdrawal or recall, while others felt that these should not be led by time targets.

*"I think putting time frames on things is important to communicate the urgency of the issue."*  
(Retailer, Specialist food and drink).

### 5.3.4 Removal from the supply chain, reprocessing and destroying

In phase 1, food business representatives reported it becoming harder to remove products from the supply chain the further the products had travelled down it. Manufacturers expressed concern around the withdrawal or recall message reaching smaller or independent retailers. While manufacturers are only legally required to notify their direct customers, in phase 1a manufacturer representatives spoke in general terms about the challenge of sending a message down a complex supply chain.

Manufacturers reported that trade customers generally returned products back to them. If possible, products were reprocessed by the manufacturer (for example fixing a label, heat treatment or using the food for another purpose or in another product), otherwise they were destroyed. Alternatively, customers confirmed to manufacturers they had destroyed products. Some manufacturers worried in particular that withdrawal and/or recall messages did not reach smaller retailers.

*"I hope this hasn't come over wrongly, it's not pointing at the smaller set ups, it's more difficult and I think, we have examples where, something was still on sale two weeks later and it was a little corner shop we happened to go into. How do we get the message to them?" (Manufacturer).*

Manufacturers also reported that in-store managers at retailers will remove products from shelves and return to, as they described it, their 'head office'. Smaller chain retailers explained they would inform their head office when a product had been destroyed. In-store food business representatives explained how this step is their primary involvement in the recall process. In some cases, they did not understand why a product had been recalled and only did as they were instructed. One explained how they had a specially marked area in the stock room for recalled products as previously a junior staff member had restocked the shelves with a product which had earlier been removed.

### 5.3.5 Reconciling with LAs

In phase 1, food business representatives reported not seeing extensive LA involvement at this step. Manufacturers explained they were left to manage the recalls process without LA verification, although they may involve them after an incident has taken place. One manufacturer felt that the 'hands-off' approach shown by LAs reflected the trust the LA had in their food business. Other food business representatives saw no involvement at all and wondered if their role was carried out within other organisations, for example the manufacturer.

*"I've no visibility of that [LA involvement] and I've certainly never been contacted by any Local Authority or Primary Authority to say we've recalled but it's still on sale. Maybe that's a silent thing from the FSA." (Retailer).*

LAs reported in phase 1b a more nuanced view on their involvement in this step as a whole. They became involved based on their trust in a food business and the risk of harm to consumers. They trusted larger retailers and manufacturers, where they had agreed and robust procedures, to handle recalls effectively and did not always see the need to get involved. LAs were more likely to become involved to support smaller food businesses who may need more guidance than the larger food businesses. Some LAs reported evaluating the risk of each incident and becoming involved if there were pathogens and a significant risk to public health. Others became involved based on the advice given by the FSA/FSS. If a recall was high risk LAs would visit or would send out letters to retailers notifying them of recalls.

LAs saw their biggest value as knowing their local context. They used their expertise to evaluate the risk of each recall within different food businesses.

*"I think local knowledge is really important in these kinds of things. There's some businesses where you've got more trust with than others." (LA, District).*

## 5.4 Step 4: Consumer action

This step discusses consumers' behaviours, attitudes and recommendations in relation to the food recalls process. Findings are drawn from the quantitative survey with consumers at phase 2a and the qualitative phases 3a and 3b – findings from both the pilot and main stages of phase 3a are combined in the analysis. The step first discusses consumer concern about risks associated with food and general attitudes to food recalls. It then explores consumer awareness of the food recalls process, who consumers trust and who they regard as responsible for food recalls. Next it outlines consumer behaviours in response to food recalls and explores the impact of recalls on consumers' image(s) of retailers and manufacturers. Lastly, it summarises the main learnings on what makes for a positive food recall experience.

### 5.4.1 Summary

Consumer behaviour is critical to running an effective recalls system as it underpins the purpose for its existence: to ensure the safety of consumers. It is clear from these findings that most people do not actively seek out information on food recalls. They do expect food businesses to communicate food recalls when they arise, in an effective and transparent manner. Recalls were considered the responsibility of food businesses together with the FSA/FSS. However, consumers trusted the FSA/FSS more than food businesses to put their safety first.

Consumers had a low to medium awareness of the process, especially when it came to the involvement of organisations other than food businesses and the FSA/FSS. The most common responses to food recalls were to throw the product away or return it to the shop. These actions were influenced primarily by product price and convenience.

Overall, food recalls did not generally have an adverse impact on consumers' opinions of the food business (either the issuer or the business whose branding was on the recalled product), with just over a quarter of consumers in phase 2a stating their opinion of the business that issued the recall was actually more favourable following a recall. This was also the case for consumers with food allergies or intolerances (with over one third agreeing that their opinion of the issuer was now more favourable). Similar views were expressed by consumers in all phase 3 research (3a pilot, 3a main and 3b), including those with food allergies or intolerances. Consumers reported that, when handled well, recalls could have a positive impact on their perceptions of the food businesses involved, even where they did not necessarily understand the differing roles of different food businesses. This could be seen as an incentive for food businesses to develop more effective communications (discussed at step 2).

#### Working well

- = Consumers have an overall trust in the food safety regulation system
- = Where food recalls are communicated well, consumers generally feel able to make informed decisions
- = Consumers trust the FSA/FSS to have their interests at heart and found the homepages useful when presented with screenshots<sup>21</sup>

#### Not working well

- = Knowledge of the food recalls process is generally low among consumers
- = Consumers do not feel that food recalls are currently communicated consistently and effectively
- = Consumers do not always trust food businesses to put their safety first and effectively manage the food recall process

<sup>21</sup> In the phase 3a public workshops, consumers in England, Wales and Northern Ireland were shown screenshots of the FSA homepage, while those in Scotland were shown a screenshot of the FSS homepage

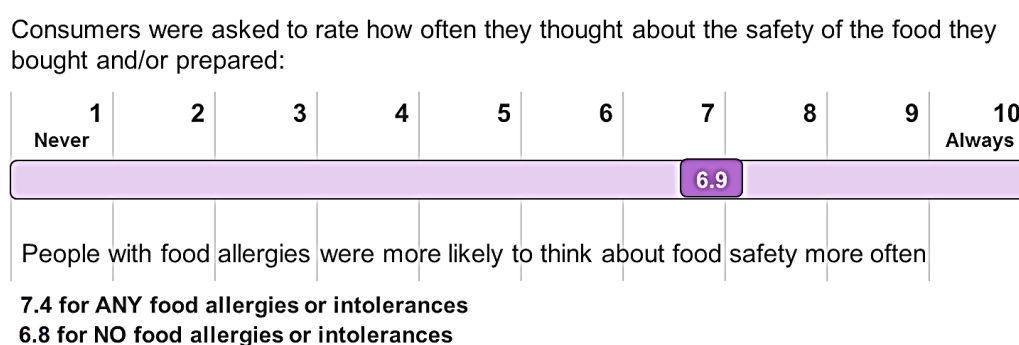
## 5.4.2 Communication style

The data revealed throughout that all consumers, whether pregnant women, students, the elderly or those with allergies, expected to be communicated with effectively, responsibly and transparently. Consumers felt that currently this is not the case. While they had an overarching trust in the system of safety regulation and controls, they believed food businesses could do better in communicating food recalls. Ideally consumers would like communications to be consistent and standardised. In general, food recalls did not negatively influence consumer views on the retailer or manufacturer in question. On the contrary, if consumers felt respected and well informed to make decisions in response to recalls, their views of food businesses remained largely unchanged or even improved. Consumers who had experience a recall in the last 12 months did not tend to distinguish between the food item brand and the retailer selling it and in general had a low awareness of food recalls.

## 5.4.3 Concern about food safety and food recalls

The online consumer survey in phase 2a shows that consumers considered food safety on a fairly regular basis. As shown in Figure 19, when asked to rate how often they thought about the safety of the food they bought and/or prepared, on a scale from 1 (never) to 10 (always), the average was 6.9. People with food allergies, including those who cooked for or ate with someone affected by food allergies, were more likely to think about food safety (7.4) as compared to those without allergies (6.8).

**Figure 19: Consumers' perception of how often they think about the safety of the food they buy or prepare**



*Note: food allergies/intolerances include those who cook for or eat with another adult or child who is affected*

*Consumers phase 2a. Q005. On a scale of 0-10, where 1 is never and 10 is always, how often do you think about the safety of the food you purchase or prepare? Base: All respondents (1200), any food allergies/intolerances (249), no food allergies/intolerances (951)*

Most consumers in the phase 2a survey agreed that food recalls were serious and should always be heeded. Yet, as the survey and the qualitative research (phases 3a and 3b) show, consumers' concern about food safety did not translate into actively looking out for food recall notices.

The phase 2a survey also indicates that most consumers did not regularly check for food recall notices or alerts. Only 6% reported often checking or looking out for food recall notices and/or alerts, with a further 20% doing so occasionally. Thirty-one percent of consumers reported doing so rarely and 39% never checked for food recalls. The qualitative research (phases 3a and 3b) supports this finding. While some respondents recounted looking out for point of sale notifications in shops or signing up to relevant email alerts, the general approach to food recalls seemed to be passive.

*"I wouldn't go out my way for recent recalls in [the supermarket] before I do my shop."* (Students, Bridgend).

Consumers' passive approach to food recalls seemed to go hand in hand with a general trust in existing food safety regulations and controls<sup>22</sup>.

*"I would have thought that there would be legislation with good policies in place that if something goes wrong, like it would with anything, that there would be some way of letting the public know to take it back, so I suppose I have a lot of faith in that."* (General public, Edinburgh).

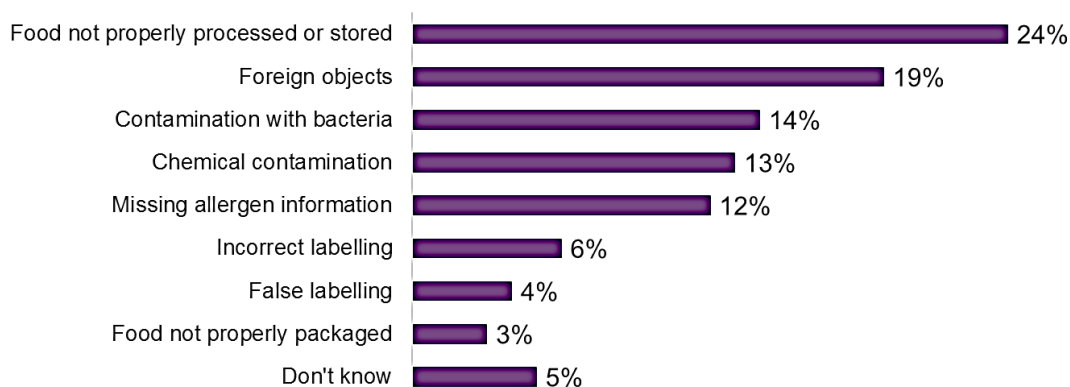
Most consumers did not actively seek out information on food recalls and trusted in the system as they assumed it to exist. However, they did expect food businesses to communicate food recalls in an effective and transparent manner as instances occurred.

In line with the finding that most consumers did not actively look out for food recalls, the proportion of consumers aware that they had bought a recalled product was very low. Asked to think about all food recall notices they had seen or heard of in the previous 12 months, 4% (52 people) of respondents had bought a product that they knew had subsequently been recalled.

**Figure 20: Reason for recalls given by consumers who had bought a recalled product**

Consumers phase 2a. Q015. Thinking about the food recall notices you have seen/heard of in the last 12 months,

% of those who had bought a product that was recalled



where any of these recalls relevant to a product you had bought at the time when the notice was issued? Q016. What was the main reason for this food recall Base: All who had bought a recalled product (52) NOTE SMALL BASE

As Figure 20 shows, among the 52 consumers who had bought a recalled product, awareness of the reason for the food recall was high (95%). This suggests that when personally affected, consumers will pay more attention to the reasons why a product is being recalled (95% vs. 71% of all consumers who had seen a recall but had not necessarily bought a product). Similarly, in the qualitative research with consumers, participants explained that they wanted to be informed about the reasons which lead to a recall being triggered. For consumers, providing a rationale about why a product has been recalled informs their decision-making process on how to act based on the notice, as discussed further in section 5.4.7 on consumer behaviours in response to food recalls.

*"If you buy something and it's wrong, they've got [a] responsibility to let you know why it's wrong."* (General public, Bridgend).

<sup>22</sup> This finding is in line with previous research Kantar Public has conducted on behalf of FSA including Regulating Our Food Future and Transparency.

#### 5.4.4 Consumer awareness of the food recalls process

The phase 2a survey asked consumers to self-assess how much they thought they knew about who is responsible for, and who oversees, food recalls in the UK. Only 6% indicated they knew a lot, with a further 21% suggesting they knew a little. In contrast, 37% indicated they did not know very much and 27% said they knew nothing at all. The qualitative research (phase 3a) supports the finding that, while there were differing levels of knowledge about the process, consumers generally had a low to medium awareness. This includes their knowledge of which organisations might be involved in coordinating and communicating food recalls.

When consumers mapped the food recalls process in phase 3a, they consistently (and correctly) thought that retailers and manufacturers were involved and were generally aware that 'the government' had a role. Awareness of the FSA/FSS as the specific regulatory body was more mixed and, where existent, might have to some extent been prompted by the fact that the research was being conducted on behalf of the FSA/FSS. Accordingly, despite knowing who was involved, consumers were often unsure what the exact roles and responsibilities of these stakeholders would be. They were especially unsure about the FSA/FSS's involvement. Some thought the FSA/FSS to have a background role as the main regulatory body while others suggested the FSA/FSS was involved in managing, organising or even initiating food recalls. On learning about the FSA/FSS's remit, consumers generally thought there would be merit in the FSA/FSS publicising its role and the services it offers to consumers more widely<sup>23</sup>.

Consumers were not generally aware of other stakeholders, besides food businesses and the FSA/FSS, that would be involved in food recalls. In phase 3a, unless prompted, consumers did not seem to think of an LA as an organisation involved. Upon being prompted, they imagined that LAs were involved at the point of quality control: the point in the system of food safety that is meant to prevent withdrawals and recalls from occurring. Similarly, consumer groups were only considered upon prompting. This included the three phase 3a focus groups with people that have allergies<sup>24</sup>, who did not think of consumer groups as stakeholders involved in the process. Furthermore, in the qualitative research, no participants with allergies reported having signed up to any food recall alerts. In the quantitative research, 8% of respondents with allergies or intolerances had signed up for any allergy alerts (please see step 2 for further detail).

GPs were generally not mentioned unprompted in phase 3a groups but, once prompted, consumers did see them as potentially involved with reporting issues. Some consumers in phase 3a expected GPs to take a role in notifying stores and manufacturers after having treated ill people. In particular, the pregnant women involved in phase 3a felt that GPs should also be involved in communicating recalls. For instance, they suggested that recall notices could be placed in GPs' surgeries, although the viability and effectiveness of this approach was not explored.

#### 5.4.5 Responsibility and trust

Qualitative research from phases 3a and 3b confirms that consumers generally saw the responsibility of food recalls lying with food businesses, together with the FSA/FSS. Consumers overall agreed that supermarkets and other retailers in particular carried the main responsibility for organising food recalls and communicating them transparently, effectively and efficiently.

While consumers held food businesses responsible for communicating food recalls, they did not necessarily trust them to do so well. In the phase 2a survey consumers were asked how strongly they agree or disagree with the statement that *'food businesses such as manufacturers and retailers always ensure their customers are fully aware of food recalls'*. Fifteen percent of consumers disagreed, 31% neither agreed nor disagreed and 32% said they tended to agree, while 13% strongly agreed.

<sup>23</sup> One potentially useful and cost-effective consumer suggestion in this regard was to consistently include reference to the FSA/FSS homepage and/or recall alerts page on recall notifications as a source of further information.

<sup>24</sup> This includes the pilot group with allergies.

The qualitative research supports the variation of trust levels. The impacts of this are discussed further in Section 5.4.6 below.

*"I'm quite critical of these companies covering it up because at the end of the day it's going to damage their business by putting it out there so I don't trust them to give you the full story and put it fully out in everybody's face."* (Students, Manchester).

Given the mixed levels of trust towards food businesses, consumers saw a crucial role for the FSA/FSS as a regulatory body. This was the case especially given that individual consumers did not feel they ultimately had much power to defend their interests and rights against food businesses that were perceived to be mainly interested in making profits. In contrast, consumers thought that the FSA/FSS had the public's interest and safety at heart. Through regulating businesses and watching over the withdrawals and recalls system, the FSA/FSS was seen to represent consumers' interests and ensure the public's health and safety.

*"It's kind of like the police of the supermarkets, right? That's how I see it."* (Allergies, London).

*"They are ultimately responsible for everybody's health and well-being and they should be seen as controlling situations that could endanger the public, public health. Ultimately the buck lands with them, no matter if it's come through the manufacturer."* (Students, Manchester).

Consumers saw the role of the FSA/FSS as making sure the occurrence of food recall incidents are minimised through a working system of food industry regulations and ensuring food recalls are handled responsibly if they do occur.

#### **5.4.6 Impact of food recalls on consumers' views of food business**

Evidence from the quantitative survey (phase 2a) suggests that recalls largely had no impact on the brand image of the food business issuing the recall (usually a retailer), and if handled well were more likely to have a positive rather than a negative impact. The survey asked consumers to think about how the most recent food recall they had seen or heard of had affected their opinion about the food business who issued the recall: 43% said their opinion had not changed as a result of this food recall notice, 27% viewed the issuer a little or a lot more favourably, while 18% viewed them a little or a lot less favourably. Moreover, 78% of those who could remember the food business who issued the notice said they would buy a product from them in the future, with the remainder unsure (5%) or stating they would definitely or probably not buy a product from them again (18%).

The qualitative data from both phases 3a and 3b confirm this finding and suggests that consumer attitudes depended a lot on whether consumers perceived the food recall to be handled well. Furthermore, there were no perceived differences in the findings between high risk groups (pregnant women and allergies) and the general population. Consumers also felt more positive about businesses that were upfront about their product recalls.

*"I think food recalls are a good idea, as it [is] putting the safety of consumers first, and it is better to be safe than sorry, it also gives the company who does it a sense of integrity and they are putting people's safety first."* (Phase 3b: experienced a recall).

While some people did mention that a food recall would generally reduce their trust in the brand, the more common opinion was that a poorly communicated recall (which they felt they only saw or heard about by chance) would do the most damage to the brand's image.

*"I no longer trust this brand of [product]. I would like more information about how they have changed their manufacturing process so this cannot happen again."* (Phase 3b: experienced a recall).

Food businesses that were seen to be honest, communicated a recall well and handled the subsequent return well (see section 1.3.5), were viewed favourably and generally trusted.

*“My only negative would be against a retailer/supplier that would try and cover up a mistake/fault in an item. I would personally never buy that brand or use that retailer again as my trust would have been destroyed.”* (Phase 3b: experienced a recall).

The findings that recalls are more likely to impact positively rather than negatively on consumer views of brands (both the manufacturing brand and the issuer) could be an incentive for food businesses to improve recall notices where needed. In any case, improved communication will certainly generate more engagement from consumers in the recalls process.

#### **5.4.7 Consumer behaviours in response to food recalls**

The qualitative research with consumers who had experienced a food recall (phase 3b) shows that consumers engaged in a number of behaviours in response to learning of the recall. The behaviours were driven by several considerations which are discussed below. The key behaviours were:

- = Returning the item
- = Throwing away the item
- = Eating the item anyway
- = Nothing, having already eaten the item

This is supported by the findings at phase 2. The most common actions were to throw the product away, which 44%<sup>25</sup> of consumers had done, followed by returning the product to the shop (25%). Only one person ate the item after hearing it was recalled. However, 13% had already eaten the product prior to hearing about the recall. This could be an indication of possible delays in communicating recalls, an impression that some consumers further talked about in phase 3, but could also be explained by other factors, such as when and by whom the issue was originally identified.

The qualitative research with consumers who had experienced a recall in the past (phase 3b) explored what they had done in response to the recall and what they expected to do in response to potential future recalls. The data suggest that there were several factors that intersected in influencing consumers' decision making. These included:

- = Price
- = Convenience and time
- = Principle
- = Severity of risk
- = Sense of responsibility
- = Type of store

The research suggests that price and convenience were the two major factors influencing whether consumers returned items or not. Across the board, consumers were more likely to return expensive

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<sup>25</sup> Please note that the base for this question was 52 consumers. This is a low base, so these figures must be interpreted with caution.



items. However, the threshold of what constituted 'expensive' varied. For example, some people stated they would return anything over £5 while for others £10 was the threshold.

*"If the item was fairly costly, e.g. over £10, then yes I think I would make more of an effort to find the time to return it."* (Phase 3b: experienced a recall).

This should not imply that people would never return cheaper items. However, in the case of a cheaper item being recalled, other considerations, especially convenience, became more important.

*"I took the [product] back to [the store]. I did consider just throwing it away as it was not expensive, but I was going there for a weekly shop anyway so thought I'd get my money back."* (Phase 3b: experienced a recall).

Considerations of convenience included whether the store was close by, whether it was on their way home and whether they would go back anyway. The time taken to return a product was also a consideration. People who worked late or long hours felt they did not have the time to return an item even if they would have liked to do so.

*"I put it in the compost bin (minus the packaging). I had no time to return to the store – it was decided by work commitments – the process should be improved in that a recall – people should get the option for this to be collected or an incentive to return and not just get a refund – I work long hours."* (Phase 3b: experienced a recall).

Consumers who had experienced a recall also mentioned returning items 'out of principle', even if they had been inexpensive, because they had paid for it and wanted their money back or because they felt that the food business had not done its job of keeping them safe.

*"I just think that 1. the supermarket should have the product back for tracking purposes or any other things they may need to do to ensure [the] issue is sorted in the future and 2. that the supermarket should refund my money. It may be a small amount but it's about the principle."* (Phase 3b: experienced a recall).

This response also highlights a sense of responsibility felt by some consumers, which either translated into returning or not returning the item. Of the participants who had experienced a recall, some explicitly stated they returned an item to allow the shop to track returns of items and to make sure the product got destroyed. However, one person mentioned they had not returned a recalled item as they did not trust the shop to destroy it. Instead they disposed of it themselves at home. See section 5.4.5 for further discussion on consumers' trust of food businesses and the issue of responsibility in relation to food recalls.

Other considerations that played into whether consumers returned recalled items were the nature of the recall and especially the level of risk. Some consumers suggested that higher risk recalls or those seemingly due to ineffective controls upset them more, leading to a return 'out of principle'. If the food was recalled for a minor issue, consumers were more likely to eat it anyway. Other consumers returned an item because they expected an apology, or they did not return it because of the type of store (e.g. they bought it from their local corner shop and did not expect the shop would take back the item).

#### **5.4.8 Learning from consumer food recall experiences**

When reviewing consumers' accounts of their actual food recall experiences (phase 3b) alongside other consumer data (from phase 3a), the following four themes consistently emerge in relation to what consumers generally considered to be a positive recall experience.

The first is the channels of communication and the impression that the store or manufacturer has made an effort to communicate the recall. For example, if the recall notice is prominently placed in the store, the recall is communicated via major news outlets, or consumers are contacted by email or letter.

*"I came across this specific one via a media outlet (almost certain it was BBC News page) but I am also aware of the food.gov.uk and the foodsafety.gov web pages. It is quite simple if you know where to look, but I do think that making it known both in shop and in the wider media can be most beneficial."* (Phase 3b: experienced a recall).

The second is the design of the point of sale recall notice. Consumers reported that it should be eye-catching and signal effectively that it concerns a food recall. Consumers expressed a preference for a standard template and approach to be used across the industry.

*"I think as long as the notices are clear, well positioned and simple pictures and language is used especially as we are living in a multi-cultural society and English is a second language for a lot of people and also everyone's level of understanding is different."* (Phase 3b: experienced a recall).

The third is the content of notices. Consumers generally expressed preference for a notice that is clearly structured, formulated, and to the point, as well as containing an apology and clear instructions on what to do, including information on a refund without a receipt. A preferred notice would also state the reason for recall, and contact information or avenues for further information and, chiefly, a reference to the FSA or FSS website.

*"The recall notice clearly stated to bring in the item and you could get a full refund and it also stated a contact number if you needed advice."* (Phase 3b: experienced a recall).

The fourth is the experience of returning an item. Customers expressed preference for the food business staff to be informed, polite and helpful, and for the consumer to receive a full refund without requiring a receipt with, ideally, further compensation.

*"The staff in [the food business] were brilliant. They reassured me it was only items that had certain batch numbers and I got a refund and they said they had to waste the item."* (Phase 3b: experienced a recall).

## **5.5 Step 5: Feedback and root cause analysis**

This chapter describes the fifth step in the withdrawals and recalls process map. It discusses the organisations involved before exploring in detail each part of the process at step 5. This follows the sub steps outlined in the below diagram (see Figure 21). Conclusions are drawn, including suggested improvements and potential areas for further research. One thing to note about this step is that it is not always the last point in the process: it can start or happen earlier on during a withdrawal or recall.

Findings in this step are drawn from qualitative interviews with food business representatives in phase 1a and the quantitative survey with food business representatives in phase 2b.

### 5.5.1 Summary

#### Key points

Determining a root cause can take a long time, particularly when the supply chain involves many sources. Food business representatives noted that greater shared learnings may reduce the number of future recalls (phase 1) and reported feeling confident at this step (phase 2). Yet, root cause analyses and lessons learned appeared to take place in isolation. Food businesses may undertake evaluations of the withdrawals and recalls process in their own organisations but were less likely to share this more widely.

#### Working well

- = Food businesses with established procedures (phase 2b) felt these procedures work well. In particular, they mentioned evaluating withdrawal and recall success and investigating the cause of an issue
- = Some food businesses in phase 2 felt their organisation has good internal traceability systems which help identify root causes
- = There was some mention of good communication among staff in food businesses (phase 2) which can lead to effective identification of the cause of an issue

#### Not working well

- = Root cause analyses appear to take place within the food business in isolation, and lessons learned are not shared more widely among businesses or with authorities

Figure 21: Typical/proposed processes at step 5



There are four sub steps within step 5. They do not follow a particular order and are not always undertaken for every recall. The sub steps are as illustrated in Figure 21:

- = The root cause of an issue will be investigated to discover the underlying problem
- = Food businesses will then take steps to prevent similar incidents from occurring
- = Food businesses will often undertake what they refer to as an 'internal post mortem' (or post incident review) on how they performed during the recall and identify any steps they could take to learn for future withdrawals and recalls
- = Food businesses and other stakeholders felt that sharing learnings with one another would help prevent issues from occurring in the future and encourage best practice behaviours

### **5.5.2 Organisations involved at this step**

Food business representatives in phase 1a reported that step 5 was undertaken by the recall process owner. In phase 2, 80% of food business representatives interviewed reported being involved at this step. Manufacturers were most likely to be involved followed by wholesalers/distributors. This supports the qualitative findings as manufacturers tended to own the recall process, except in cases where retailers were leading an investigation into an own brand product manufactured under license<sup>26</sup>.

### **5.5.3 Determining root cause of incidents**

The process of determining a root cause could take a long time (though this was largely undefined) and potential issues needed to be considered in broader context for complex cases. This was particularly the case when the supply chain involved many sources. One food business representative gave an example of an incident where they did not immediately identify the source of a veterinary residue because a supplier had changed an ingredient source without notifying them. Food business representatives described how they might involve trade bodies if an issue was at industry level. They may also choose to involve their PA if they have one.

### **5.5.4 Post incident review**

In phase 1, food business representatives described the undertaking of a 'post mortem' within their businesses. This dissected the process for future learnings. It was also used to identify any corrective actions within food businesses to prevent mistakes being repeated. In the phase 2 survey, food business representatives reported feeling confident in this process; 94% of food business representatives felt confident conducting a post-withdrawal review to assess the success of a withdrawal. Similarly, 82% of food business representatives felt confident using the post-recall review to assess the effectiveness of communication to the public, and 94% of food business representatives felt confident conducting a root cause analysis to identify a cause and ensure it was not repeated. However, only half (51%) of food business representatives had any measures to evaluate effectiveness and success. The most commonly mentioned method was keeping written reports or recording withdrawal or recall statistics, which one in five (20%) food business representatives did. Only 6% of food business representatives mentioned they held meetings to review procedures and only 4% mentioned holding mock recalls to test the effectiveness of their processes. These low numbers may reflect the skew towards smaller food businesses in the quantitative survey at phase 2b. The sample for phase 1 was made up predominantly of larger food businesses which were more likely to have formal procedures, including reviews, in place.

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<sup>26</sup> 'Manufacturer - producing retail own brands' and 'Manufacturer - producing own brand' is how the manufacturer types were referenced in the questionnaire in phase 2b. However, as the language around industry stakeholders developed, manufacturer types were rephrased as 'Branded' and 'Under licence' respectively

#### **5.5.5 Preventing similar incidences occurring/improved feedback after a recall may reduce the number of future recalls**

Food business representatives interviewed in phase 1 felt that greater shared learnings between stakeholders may reduce the number of future recalls. While internal evaluations may be taken, findings were less likely to be shared more widely within the industry. This is supported in phase 2, where just over half of food business representatives (56%) reported sharing learnings or case studies with other food businesses. Across the qualitative interviews (in phase 1) there was a feeling among some stakeholders that sharing should be more frequent while recognising the commercial constraints.

*“There’s not enough sharing of lessons – no mechanisms exist. [A consumer group] could disseminate such information, but [it] may be too commercially sensitive.” (Manufacturer).*

Some concerns were raised, specifically around sharing information and with regards to withdrawals. For example, a contamination in a product could be contained with a withdrawal of one manufacturer’s product, but if the issue was with a base ingredient it could also affect products made by another manufacturer. This second manufacturer would not automatically know about the issue if the first manufacturer, or the supplier of the base ingredient, did not share the information.

## 6. Conclusions and recommendations

This chapter brings together the main findings on the efficacy of the withdrawals and recalls process, organised into six key themes. These themes reflect the views expressed by consumers, food businesses, regulatory bodies, trade bodies and consumer groups from all phases of the research. Each theme identifies recommendations for further research, as well as actions for consideration that have the potential to improve the effectiveness of the current withdrawal and recall process.

### 6.1.1 Process variation

There is substantial variation in the withdrawals and recalls process across the industry and it appears that the withdrawals and recalls process varies primarily along three intersecting dimensions: firstly, based on the size of the food business; secondly, the relationship of a food business with competent authorities; and thirdly, the individuality of the business itself.

Findings from phases 1 and 2 suggest that larger manufacturers and retailers feel they lead the withdrawals and recalls process and perceive smaller food businesses as requiring more support. Food businesses' relationships with their LA, PA and the FSA/FSS appear to be key factors in how the process works. There is substantial variation in how food businesses involve these stakeholders, at which step, and for what purpose. Importantly, there is a perceived variation in guidance and decision making from the FSA/FSS at step 1 and a lack of clarity around when to involve the FSA/FSS, LA or PA.

The findings indicate that individuality in how businesses operate as well as the context in which they do so influences how they approach the process. This individuality includes business size, business type and existence of guidelines, among other factors.

Food business representatives report that affected products can be identified within between four hours and a day of an issue being discovered, but the time taken for a product to be withdrawn or recalled varies widely. The withdrawal process does not always work quickly enough to withdraw products before consumers are affected. This is the case for various reasons and can be related to the nature, complexity and severity of the recall, including when and by whom the issue was originally detected, or the individuality and culture of the food businesses involved. Further, response time might be streamlined better if relationships between the stakeholders are clearer.

### **Recommendations**

Kantar Public suggests that the FSA/FSS further clarifies what it expects of food businesses in terms of involving the FSA/FSS in withdrawals and recalls and provides clear guidance on when to involve it in the process. Increased assistance and guidance, in conjunction with LAs, should be targeted at smaller and independent businesses in particular.

Also, further research is needed to explore the relationship between the FSA/FSS, food businesses and LAs. There appears to be a variation in ways of relating and perceived variation in the quality of service, both of which should be examined further. In addition, further research is needed to understand in more detail how the three dimensions of variability relate to the functioning of the withdrawals and recalls process. Specifically, this should include research with smaller food businesses to understand the process and its challenges from their points of view.

Particularly, it would be useful to explore the causes of the potential gap between the confidence in the

process that representatives of small food businesses describe and the views of larger food businesses and LAs, which suggest smaller businesses may be less able to undertake withdrawals and recalls.

Kantar Public does not recommend general KPIs around response time but suggests exploring the variability in response time further to better understand its causes.

### **6.1.2 Process effectiveness**

Larger food business representatives believe internal systems and traceability are robust because it is easy to trace stock. The withdrawals and recalls process appears to become less effective the further it moves down the supply chain, particularly when it reaches consumers in the case of recalls. However, manufacturers expressed concern around the withdrawal or recall message reaching smaller or independent retailers. While manufacturers are only legally required to notify their direct customers, in phase 1a manufacturer representatives spoke in general terms about the challenge of sending a message down a complex supply chain.

Consumers report a variety of behaviours in response to food recalls. The most common actions are to throw the product away, followed by returning the product to the shop. Seven reported eating the product before hearing about the recall. This could be an indication of lack of effective communication or possible delays in communicating recalls. Price and convenience appear to be the two major factors influencing whether consumers return items.

#### ***Recommendations***

Kantar Public suggests a review of the points at which the FSA/FSS interacts with food businesses in relation to the withdrawals and recalls process.

### **6.1.3 Process measurement**

Food business representatives report confidence in their recall processes, but have few metrics to measure their success. There is therefore a gap between what representatives feel prepared to do and what measures they have in place.

Food businesses feel very confident in the withdrawals and recalls process. They believe it is an effective system and fulfils its job of protecting consumers. However, food businesses do not always have effective measures of success in place to support their confidence and do not collect evidence to evaluate their effectiveness. Just under half of food business representatives report their food businesses have any targets relating to the step of product removal and destruction.

The process does not always work quickly enough to withdraw products before consumers are affected. In the case of recalls, few businesses report being able to measure whether consumers are communicated with effectively and whether items have been retrieved or destroyed.

Food businesses believe the complexity of the process and the uniqueness of each issue makes it a challenge to measure success and therefore do not set targets at each step.

#### ***Recommendations***

Kantar Public recommends further research to qualitatively unpack the high levels of confidence reported by food business representatives at phase 2 and to ascertain whether the confidence is well-placed or whether improvements can be made to the withdrawals and recalls process.

There is an open question about whether measurement would complicate the process given the diversity of withdrawals and recalls and that the definitive measure of success is the number of deaths or injuries prevented. Kantar Public suggests further research to assess the feasibility of targets or measurements to facilitate best practice.

#### **6.1.4 Process learnings**

Feedback and root cause analysis appears to take place in isolation and is not shared across food businesses or authorities. The withdrawal or recall process owner (typically the manufacturer) tends to undertake any root cause analysis after a withdrawal or recall. Determining a root cause can take a long time and potential issues need to be considered in the broader context for complex cases.

Food business representatives overwhelmingly report feeling confident in this process. Yet, only half of the surveyed food businesses report any measures to evaluate effectiveness and success. Larger food businesses are more likely to report formal procedures, including reviews.

There appears to be no consistency around sharing learnings from withdrawals and recalls across the food industry. Food businesses only occasionally work with the FSA/FSS to improve the sharing and learning after recall events. There is a demand for greater sharing between businesses although there are some minor concerns around commercial sensitivity.

#### ***Recommendations***

Kantar Public suggests that the FSA/FSS capitalises on the appetite for sharing, develops processes and potentially provides a forum for routinely sharing best practice while being sensitive to potential commercial implications. Further research could explore the most effective routes for feedback and sharing among industry stakeholders.

Kantar Public also suggests consistency on 'wash-ups' after a withdrawal or recall to reflect on all stakeholders in the process and their decision-making, and to facilitate best practice for future recalls.

#### **6.1.5 Brand image**

Food recalls can have positive or negative impact on the brand image of the product manufacturer, but there is generally no adverse impact on consumers' opinion of the issuer, for example, when a retailer displays a recall notice for a particular manufacturer's product. Further, the evidence suggests consumers don't clearly distinguish between issuer and retailer, even where they are different food businesses. This is an incentive for food businesses to develop effective communications.

#### ***Recommendation***

As mentioned above, Kantar Public suggests that the FSA/FSS introduces a standard industry recall notification template accompanied by best-practice procedures for food businesses to follow in their communications with consumers. These should be based on the consumer feedback discussed in section 5 and, ideally, validated by further consumer research before being introduced. Further message testing research with consumers could be usefully undertaken to ensure the communications are effective.

#### **6.1.6 Consumer notification**

Food business representatives recognise, and consumers confirm, that consumers are unaware of the recalls process and communications are often not effective in reaching them. Consumers are generally unaware of how the process works, assume recalls are a rare occurrence, and are surprised when presented with their frequency. Awareness of recalls was found to be low in both consumer phases of research (phase 2a and phase 3). Consumers consider recalls to be the responsibility of food businesses together with the FSA/FSS. However, consumers trust the FSA/FSS more than food businesses in putting their safety first.

Food business representatives believe their consumer communications are effective in terms of messaging and channels, however, they are unaware whether they reach consumers or whether consumers take action. This poses challenges for effective communication with consumers particularly as only just over half of consumers report ever looking out for food recall notices and only a minority of consumers sign up for relevant alerts or use the FSA or FSS websites to search for recall notices.



Consumer suggestions on preferred channels of communication largely mirror the ways they currently find out about recalls: the news, in store and social media, or having alerts sent to them directly. In store, consumers favour point of sale notifications being in three places: by the entrance and exit, in the relevant product aisle and by the check-out.

There is no industry standard across food businesses as to what notifications look like or what information they include and consumers see a need for a more consistent and efficient communication approach. Their views support the need for a standardised approach across food businesses with clear and concise messaging, containing an image of the affected products and designed in an eye-catching manner.

Consumers' ideas on improving communications suggest a three-staged sequence of communication needs. Firstly, the location of the notice, to ensure the consumer has a chance to see it. Secondly, the design, to ensure it catches consumers' attention sufficiently. Thirdly, with the content, to ensure that once consumers are aware of the notice's existence they know what action to take. Following this sequence would enable consumers to make quick and informed decisions, be made aware of food recalls via appropriate and highly visible channels, be able to instantly recognise a food recall and decide whether it affects them, and receive clear and consistent instructions on how to act in response to the recall.

### ***Recommendations***

As mentioned above, Kantar Public suggests that the FSA/FSS introduces a standard industry recall notification template accompanied by best-practice procedures for food businesses to follow in their communications with consumers. These should be based on the consumer feedback discussed in section 5 and, ideally, validated by further consumer research before being introduced. Further message testing research with consumers could be usefully undertaken to ensure the communications are effective.

Kantar Public also recommends that the FSA and FSS make consumers more aware of their websites, particularly the food alerts pages.

As part of the scope of the project, Kantar Public also refined the map of the withdrawals and recalls process based on the findings of the research. It aims to provide greater clarity on when and how various steps may occur and intends to show an improved process when compare to the 2016 process map (see Figure 22). For example, it adds steps on identifying root cause and sharing learnings with all stakeholders. Similarly, it highlights that LAs are not always involved at step 3.

**Figure 22: The refined withdrawal and recall process map based on findings from this research**



### **6.3 Future outlook**

Given the FSA/FSS's priorities around future strategies for food regulation within the shifting governing context that comes with the United Kingdom's exit from the European Union, this research presents an opportunity to protect and expand on elements of the withdrawals and recalls process that are working well. Similarly, as outlined in the findings above, there are several opportunities to undertake further research into areas where more understanding is required. It is critical to build a deeper understanding of the process in order to continue to protect consumers' health into the future.

## 7. Glossary

<b>ABC1/C2DE (Socio economic grading)</b>	<p>A 'social grade' is applied to each participating respondent based on the occupation of their household's Chief Income Earner (the individual with the largest income, whether from employment, pensions, state benefits, investments or any other source). Social grade grouping is implemented to ensure a mix of socio and economic backgrounds.</p> <p>A, B and C1 grades generally represents households with CIE's of a senior 'professional' status, senior/middle/junior management and/or roles that have at least some educational requirements</p> <p>C2, D and E grades generally represent households with CIE's who fall into more (skilled/semi-skilled) manual work sectors or long-term benefit recipients/unemployment</p>
<b>Allergy sufferer</b>	For Phase 3a recruitment, this was self-defined by participant as having an allergy/intolerance to one or more of the following food or food ingredients: peanuts, other nuts/tree nuts (namely almonds, hazelnuts, walnuts, pecan nuts, brazil nuts, pistachio, cashew, macadamia or Queensland nut), milk, eggs, cereals containing gluten such as wheat (spelt, khorasan wheat) barley, oats and rye, soya, crustaceans, molluscs, fish, mustard, sesame seeds, celery, lupin, sulphites (sulphur dioxide)
<b>Branded food products</b>	Food items produced, packaged and marketed under the brand name of the manufacturer (as opposed to <i>Retail own brand food products</i> )
<b>Competent authorities</b>	Those authorities with direct or delegated responsibilities to monitor, verify and ensure that the relevant requirements of food law are fulfilled by food business operators at all stages of production, processing and distribution. This includes the relevant central government authorities (FSA and FSS) as well as Local Authorities, to whom certain enforcement roles are delegated
<b>Consumer</b>	Member of the public who purchases food products for personal consumption
<b>Consumer interest group</b>	An organisation that works to protect the rights and interests of consumers and plays a part in making sure that businesses act fairly, that products are safe, and that advertising is honest
<b>Convenience store</b>	As used during the Phase 1a recruitment, a business with extended opening hours, stocking a limited range of household goods and groceries. They usually have smaller premises, and are predominantly used by consumers for top-up shopping
<b>Food and drink discounters</b>	A business selling food at less than the normal retail price and stocking fewer items and less branded products than other retailers
<b>Food business</b>	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 (as defined within legislation)
<b>Food business operator (FBO)</b>	The natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control (as defined in legislation)
<b>Food Business Representative (FBR)</b>	This is the interviewee spoken to through the course of the research. They are representatives from food businesses who are competently able to discuss their business's withdrawal and recall process and the action to take in the event of an incident (note, not necessarily the FBO for that organisation)

<b>Food Standards Agency (FSA)</b>	The central government authority responsible for protecting public health in relation to food in England, Wales and Northern Ireland. As well as broader responsibilities, they help ensure that food businesses meet their legal requirements around food withdrawals and recalls in situations where food fails to meet safety requirements or presents a risk to health
<b>Food Standards Scotland (FSS)</b>	The central government authority responsible for food safety, food standards, nutrition, food labelling and meat inspection in Scotland. As well as broader responsibilities, they help ensure that food businesses meet their legal requirements around food withdrawals and recalls in situations where food fails to meet safety requirements or presents a risk to health
<b>Free-find sampling</b>	Specialist recruiters using their established networks and <i>Snowball sampling</i> techniques to recruit interviewees not provided in a (client) sample list
<b>Independent retailer</b>	A business that is completely responsible for its own business, sourcing products primarily from wholesalers or cash and carry outlets and selling food for consumption off-premises
<b>Industry interest group</b>	Interest group representing needs of particular industry/food businesses, that seek to influence public policy, communicate with consumers and the government and/or represent the food industry to the government
<b>Interest group</b>	A group representing the needs of a particular group (in this report, either <i>Consumers</i> or <i>Food businesses</i> ) that seek to influence public policy and communicate with government
<b>Key Performance Indicator (KPI)</b>	A quantifiable measure used to evaluate the success of an organisation in meeting objectives for performance
<b>Large business</b>	In phase 2, these are defined as food businesses with 50 or more employees
<b>Medium-sized business</b>	In phase 2, these are defined as food businesses with between 10 and 49 employees
<b>Small business</b>	In phase 2, these are defined as food businesses with less than 10 employees
<b>Local Authority (LA)</b>	Administrative body in local government that is officially responsible for all the public services and facilities in a particular area
<b>Manufacturer</b>	A business making food products for sale to distributors/retailers/consumers
<b>Primary Authority (PA)</b>	Food businesses can form a statutory partnership with a Local Authority (usually the Local Authority of a major manufacturing/retailing site for the food business), which then provides robust and reliable advice for other local regulators to follow when carrying out inspections or addressing non-compliance
<b>Recall</b>	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
<b>Retail own brand food products</b>	Food items produced, packaged and marketed under the brand name of a particular retailer, usually a large supermarket chain, rather than that of the manufacturer (as opposed to <i>Branded food products</i> )
<b>Retailer</b>	A business selling goods directly to the public (or <i>Consumer</i> ) in relatively small quantities for use or consumption rather than for resale; generally used by consumers for their main weekly shop and some top-up shopping
<b>Small business</b>	In phase 2, these are defined as food businesses with fewer than 10 employees
<b>Snowball sampling</b>	Interviewees being asked to provide additional contacts within their network/organisation who would also be able to provide insight into the withdrawal/recall process within that network/organisation (as used in Phase 1b)
<b>Socio economic grading (ABC1/C2DE)</b>	See <i>ABC1/C2DE (Socio economic grading)</i>

<b><i>Stakeholders</i></b>	Food businesses, their representative bodies, Local Authorities (LAs) and consumer representative bodies, e.g. allergy support organisations/charities
<b><i>'Under license'</i></b>	In relation to manufacturers, a business arrangement whereby one company (i.e. the brand owner) gives official permission for another company to manufacture one or more of their products
<b><i>Withdrawal</i></b>	The process by which a product is removed from the supply chain, with the exception of products that are in the possession of consumers
<b><i>Withdrawal/recall process map</i></b>	Process map produced by FSA/FSS prior to the research showing the current understanding of the withdrawal and recall process. Different versions of the map (main and simplified) were used as stimuli in different phases. The appendices specify which map was used for which phase (as shown in the relevant discussion guides and questionnaire).
<b><i>Wholesaler/distributor</i></b>	A business selling goods in large quantities at low prices, typically to retailers/distributors/trade (but sometimes also direct to consumers)

## 8. Appendix

The appendices to this document are accessible through the following link:

[www.food.gov.uk/sites/default/files/recalls-efficacy-appendix.pdf](http://www.food.gov.uk/sites/default/files/recalls-efficacy-appendix.pdf)