



Food Standards Agency's international workshop on food incident prevention and horizon scanning to identify emerging food safety risks, organised in cooperation with European Food Safety Authority  
London 5-6 March 2007

## **Introduction**

An incident is defined as any event where, based on the information available, there are concerns about actual or suspected threats to the safety or quality of food that could require intervention to protect consumers' interests.

At both a national and international level, we are frequently faced with the need to manage food incidents varying in complexity from small localised events to those involving multiple product recalls. Even where food incidents are not injurious to health, they undermine consumer confidence in food safety, they are costly to national economies and contribute to an erosion of trust between consumers, regulators, and the food industry. Responding to these incidents can be very time consuming both for risk assessors and risk managers. It is clearly in everyone's interest to address the underlying causes of food incidents and find means of reducing them.

The ability to anticipate new threats to food safety is a key element in enhancing the way the food industry and official bodies are able to prevent incidents or react quickly to them if they do occur. Several high profile incidents, such as illegal veterinary medicine residues in shellfish and poultry; Sudan dyes in chilli powder; benzene in soft drinks and ITX migration from food cartons have illustrated the need to develop early warning mechanisms to alert food authorities and the food industry to potential problems.

Food safety experts from across Europe and the rest of the world were invited to London to participate in a two-day workshop to consider food incident prevention and horizon scanning to identify emerging food-safety risks.

## **Aims of the workshop**

The Food Standards Agency's (FSA) 2005-2010 science strategy requires us to bring our horizon scanning activities together into a coherent programme. A key objective of this horizon scanning is to reduce the risk to consumers from contaminated food. This covers contamination from all sources: chemical, microbiological, radiological and physical. Developing a strategy for preventing such incidents is very challenging, hence the workshop brought together a wide

range of stakeholders whose experience and expertise it was hoped would help shape a future strategy for incident prevention.

The workshop was a first step towards building and maintaining the trust of stakeholders in the FSA's handling of food safety issues, in particular the objective to work with the food industry, local authorities and other stakeholders to improve mechanisms for preventing and responding to incidents.

The European Food Safety Authority (EFSA) has recently adopted a strategy on scientific cooperation and the workshop was organised in cooperation with them. A strategy for networking and cooperation was agreed by EFSA's Advisory Forum in December 2006 and endorsed by their Management Board. Horizon scanning to identify and manage emerging risks was identified as one of the potential areas for cooperation. This workshop was part of the first project to be taken forward to deliver this strategy.

## **Workshop structure**

The workshop, running over one and a half days, comprised three sessions of presentations, each accompanied by a panel discussion, followed by syndicate work in breakout groups to consider matters raised in more detail. The proceedings were brought to a close with the syndicate feedback and a final plenary session.

### **Day 1**

Sessions on the first afternoon were chaired by Ian Reynolds, Deputy Chair of the Food Standards Agency, with opening remarks from Nick Tomlinson, Head of Chemical Safety Division, and Djien Liem, Head of the EFSA Scientific Committee and Advisory Forum Unit.

The introductions set the scene for the day of how we can prevent incidents and why horizon scanning is so important. Raising awareness of steps that companies should be following such as HACCP principles, the task force on food incidents that the FSA established in 2005 and codes of practice were discussed. The task force has developed a set of principles on incident prevention and response to aid food businesses and others to prevent or deal efficiently with food incidents if they occur. These guidelines were provided at the meeting and a link to these can be found at:

[www.food.gov.uk/foodindustry/guidancenotes/incidentguidance/principlesdoc](http://www.food.gov.uk/foodindustry/guidancenotes/incidentguidance/principlesdoc).

## **1. UNDERLYING CAUSES OF INCIDENTS**

### **a. Food Manufacturers' Perspective (Jim Moseley, Food and Drink Federation).**

Jim Moseley began his presentation with a short video clip which gave an example of how the media sensationalised an incident. A number of causes of incidents were identified such as: changes in raw materials (source, growing conditions etc.)

and raw material suppliers', changes to ingredients or product formulations and processing conditions; failures or defects in processing, packaging, storage and distribution; inadequate training; failure to be aware of or comply with legislative changes; fraudulent practices and malicious activities; new information becoming available on hazards associated with the product; and more sensitive test methods finding ever lower levels of contamination.

#### **b. Catering Perspective (John Dyson, British Hospitality Association)**

John Dyson emphasised the huge size and diversity of the catering industry, the lack of knowledge and the difficulties in training with a high staff turnover in small and businesses and sole traders being a particular challenge for the sector. Communication with the catering industry and Local Authority resources were also discussed.

The larger food service businesses have well developed supply chain control systems but globalisation still creates problems e.g. Sudan 1 contamination. (Sudan 1 is a dye that should not be added to food and is banned in the UK and across the EU because it can contribute to an increased risk of cancer. This dye was in a batch of chilli powder used to manufacture Worcester sauce, which was then used as an ingredient in a wide range of products).

#### **c. Retail Perspective (Kevin Swoffer, British Retail Consortium)**

Kevin Swoffer explained the role of retailers in relation to the high number of own label products within the UK market and how this trend is mirrored in Europe and other regions of the world. He also emphasised that retailers had to meet other consumer's expectations on matters such as GM, animal welfare and ethnic sourcing.

The demand for innovation and diversification has led to the globalisation of the food supply and the ability to maintain standards of control through the supply chain has potentially increased the number of incidents. This potential increase the number of incidents related to a number of factors such as low levels of technical expertise at the primary level of supply, poor understanding and control within a complex and multilayered supply chain and the ever increasing commercial demands within all sectors of the food industry.

#### **d. Impact on Brand Reputation (David Edwards, CMI plc)**

The relevance of corporate governance and business strategy to food safety and food security were discussed. David Edwards explained how a very significant part of the equity of many major food businesses is tied up in the brand itself. How a company responds during and after an incident can have a major impact on the reputation and therefore the value of a company. Consumer attitudes need to be factored into business thinking, bearing in mind that consumers may sometimes perceive risks differently to the way it is viewed by experts in food safety.

#### **e. Consumer Perspective (Sue Davies, Which?)**

Sue Davies identified a number of causes for incidents that had come to the attention of consumers. These included: deliberate fraud or illegal behaviour; inadequate control systems, lack of understanding of the control systems or the responsibilities within them; inadequate enforcement measures, resources or sanctions; inadequate or unclear legislation; insufficient sharing of information; failure to take a precautionary approach or to act sufficiently quickly to previously unknown hazards and new technologies.

## **2. INCIDENT PREVENTION IN EUROPE AND ABROAD**

### **a. UK Approach (John Clague, ASDA)**

ASDA, as a major UK retailer, focuses on due diligence and certification as keys to incident prevention. Continuous assessment and audit time lines must be adhered to and recorded so that any non compliance can be identified quickly and easily. The scope of the audit, always carried out by an independent third party, is critical and must cover all product types and include suppliers of materials.

### **b. European Approach ( Eric Poudalet, Directorate-General Health & Consumer Protection, European Commission)**

The European Commission runs a network of 40 Community Reference Laboratories, including animal health, biological risk and chemical contamination, which are responsible for the co-ordination of National Reference Laboratories in each Member State (running workshops and proficiency testing as well as providing reference methods).

The Commission provides a good information exchange across Europe through the Rapid Alert System for Food and Feed (RASFF network) through which Member States can quickly be made aware of food and feed products that fail to comply with legislation or represent a food safety hazard. The roles of the European Food Safety Authority and the European Centre for Disease Prevention and Control (ECDC) in providing scientific assessments was briefly mentioned

An international Internal Commission Crisis Coordination system (ARGUS) can be activated or used for major events such as earthquake, pandemic, terrorism etc. It is used as a means of communicating technical and political advice between the various Directorate Generals and Commissioners involved.

The Commission anticipates incidents through a number of sources: DG Research (networking, interactions, epidemiology); EFSA/ECDC (vigilance on emerging risks); RASFF/INFOSAN (information on individual problems with food produced in or imported in to the EU). It aims to react rapidly (through the emergency administrative procedure), proportionately and effectively.

### **c. Canadian Approach (Samuel Godefroy, Food Directorate, Health Canada)**

Samuel Godefroy showed the value of close links between health and food regulators. The Food Directorate in Health Canada has strong relationships

between public health and food/diet and within the food safety and quality mandate to maintain and improve health of Canadians through ensuring safety and nutritional quality of food to understand impact on chronic disease and impact on acute foodborne reactions. He reported the concern about allergenic effects and the possibility of saving life as he speculated shared published data suggesting that it was thought that were about 10-15 deaths each year from anaphylactic reactions are attributed to allergens in food. He shared data made available by the Canadian Food Inspection Agency, showing that food recalls for allergens in Canada constituted the highest proportion of food recalls with 199 in 2000/1, 259 in 2001/2 and 159 in 2002.

#### **d. South African Approach (Lucia Anelich, Consumer Goods Council of South Africa)**

Lucia Anelich reported that in the light of the significant health and social problems faced by South Africa, food safety has a lower priority; there is no national food safety policy. Out of a health budget of 50 billion Rand (about £4 bn) only 5 million Rand (£0.4m) has been allocated to food safety, leading to weak import controls and inadequate food regulation. However, food export is very important to South Africa and therefore the food industry itself has taken the lead. The goal of the Food Safety Initiative, run by the CGCSA and industry-funded, is to provide a proactive service to the broader food industry and all of its stakeholders to ensure the continuous production, sale and consumption of safe and nutritious foods.

One of the objectives of CGCSA is the creation of a web-based central knowledge database as a means of providing essential information regarding food safety issues to all stakeholders. There are two levels of access, free for consumers and by subscription for industry.

CGCSA are also exploring the process of improved self regulation by industry through food safety auditing in order to maintain a minimum food safety standard. Resources can be redirected towards ensuring the continuous quality of the food produced.

#### **e. United States approach (Nega Beru, U.S Food and Drug Administration)**

Nega Beru gave an overview of FDA's food incident prevention activities which include modernizing their current manufacturing practises, risk-based inspections both domestic and imports and produce safety and decision making using existing data bases. The main focus has been on modernising Current Good Manufacturing Practise (CGMP) which involves training for supervisors and workers in CGMPS and food safety principles, an allergen control plan, environmental *Listeria monocytogenes* control plans for firms that produce ready to eat foods that support growth and written sanitation procedures for food contact surfaces. A produce safety plan was developed in 2004; this provided commodity-specific guidance and a leafy greens safety initiative.

**f. Australian approach (Steve Crossley, Food Standards Australia, New Zealand)**

FSANZ have developed Food Safety Standards that apply mandatory hygiene requirements to the manufacturing, retail and the food services sectors of the food supply chain. These standards are now being extended to the primary production and processing sectors. Information networks, partnerships and collaboration with the food industry and education of consumers are other strategies used by FSANZ to reduce food incidents. The management of food incidents was also discussed using benzene in soft drinks as an example.

**DAY 2**

**3. DEVELOPMENT OF A EUROPEAN SYSTEM**

The morning session was chaired by Nick Tomlinson and included presentation on the first steps in developing a European system for the identification of potential emerging food risks and horizon scanning mechanisms.

**a. EFSA Scientific Committee (Djen Liem, EFSA)**

EFSA has an obligation under Art 34(1) of Regulation 178/2002 to establish monitoring procedures for systematically searching for, collecting, collating and analyzing information and data with a view to the identification of emerging food risks. EFSA is collecting data from a wide range of information sources and is evaluating the programs and tools that are currently available but this work is still at a fairly early stage.

Following EFSA's Scientific Committee Opinion on Emerging Risks (adopted 31 May 2006) an Emerging Risk Unit will be established. The Emerging Risk Unit will monitor all relevant information sources in order to predict emerging risks at an early stage so that they can be prevented or contained. The current priority for the creation of the Unit is to appoint staff with qualifications appropriate to the categories of risk under consideration.

**b. EFSA Working Group of the Scientific Committee on Early Identification of Emerging Risks (John Dan Collins, Chair of the Working Group)**

The work of the working group is at an early stage. Indicators, defined as parameters that can be measured or calculated qualitatively and/or quantitatively will be identify to monitor the emerging risks. EFSA will then develop an IT system for the detection and assessment of the likelihood of risks emerging in the food chain. It will be important to decide how information will be used and shared. Then the issue of prioritisation (i.e. which information and data are most important) and the identification of additional sources of expert advice will be also addressed. The new Unit and the working group will also provide scientific support to individual Member States in the identification of indicators of emerging risks.

**4. HORIZON SCANNING MECHANISMS USED ABROAD**

#### **a. INFOSAN (Jennifer Bishop, WHO)**

INFOSAN is a global network of national food safety authorities. Developed in 2004 in collaboration with Food and Agriculture Organisation (FAO) and managed by World Health Organisation (WHO), it covers 151 Member States. It is still going through a learning curve. Although more work is needed for INFOSAN to realize its full potential, its work is already proving to be particularly useful for developing countries.

It is anticipated that the INFOSAN network will improve and expand, leading to increased surveillance and information on the interface between INFOSAN and IHR.

#### **b. EMRISK (Hub Noteborn, Food & Product Safety Authority, Netherlands)**

This is an EFSA-run project to develop an emerging risk identification system (ERIS), which is intended to provide tools for the early detection of emerging risk. The project involves collaborators from a number of European countries including Netherlands, UK, Germany and Italy.

The approach taken by EMRISK is to widen the horizon to include information that may come from outside the food supply chain, such as environmental and climate, social, cultural, political, industrial etc. It also looks at incidents retrospectively to determine what indicators should or could have signalled a coming problem.

#### **c. FSA Horizon-Scanning Project (Alistair Boxall, Central Science Laboratory, York)**

This project involved a desk-based study to identify methods that could be used to investigate emerging contaminants that could be of concern to food safety. There are a number of challenges, including the size and diversity of the groups of chemicals of interest, the need for new analytical methods and different behaviours of new compounds compared with the 'traditional' contaminants.

The approaches discussed included monitoring of the literature, media and conference proceedings and more effective prioritisation and chemical fate studies.

### **5. SYNDICATE DISCUSSIONS**

For the remainder of the morning and the first part of the afternoon, delegates were divided into three syndicate groups: Manufacturing, Retailing and Catering, according to their preference and their relevant expertise. Each group was asked to address the following questions:

1. How can best use be made of all sources of data (audit and surveillance) to help identify emerging problems? What are the key constraints to sharing information? How can these be overcome?

2. What are the main research needs on horizon scanning to identify emerging food risks and ways of preventing food incidents?

3. What initiatives would have most impact in the Retail/Manufacturing/Catering sector in preventing food incidents?

Who should be involved in such initiatives?

All three groups enjoyed lively discussions. In trying to identify the greatest challenges, there were many common themes. Individual points made in each syndicate are listed in Annex 1.

### **Summary of Common Issues**

#### 1. Availability of information.

There is a need to foster and maintain trust between all stakeholders. The food industry is a highly competitive market. Food safety was industry's no 1 priority and therefore companies would want to undertake their own audits of the supply chain rather than being reliant on some sort of collective audit scheme. The lack of information sharing leads to much duplication of effort (e.g. audit of suppliers) and it was recognised that pooling of resource in certain areas, such as testing, might be of shared benefit. Also, there may be a tendency for companies to be more willing to share information when a problem has already arisen, due to commercial sensitivity.

#### 2. Communication of existing information.

A large amount of relevant information is shared between Member States within the EU, as well as more widely. However, the current systems give the impression of being complex or cumbersome and are not accessible to everyone. Food companies in particular need to be able to access relevant information more quickly and easily.

#### 3. National collaboration.

European and International collaboration are poor and often duplicate efforts. There is also extensive duplication of testing and surveillance across industry.

#### 4. Guidance

Guidance from enforcement bodies would be useful to suggest where the food industry should concentrate their efforts to have the greatest impact.

#### 5. Feedback mechanisms

There are currently inadequate feedback mechanisms in some food industries into capturing complaints or non-compliance in food manufacturing.

#### 6. Media engagement

Media sensationalization can constrain regulatory response, especially risk management action.

## Recommendations:

- Sharing of information anonymously. This could be done e.g via trade organisations and where no competitive advantage exists there will be more of an incentive to share.
- Publishing existing information and informing stakeholders of planned activity. There is a large amount of material on incidents but many of the delegates did not know that they exist eg INFOSAN. Possibly work with the media to increase profile eg the Danes include the media in research projects.
- Better 2 way communications of research findings to the food industry: provide research summaries so that it is more easily accessible.
- Greater collaboration at the national, European and international levels to avoid duplication of testing and auditing, to make best use of finite resources.
- Consider introduction of mandatory sampling at ports and importers to be entitled to rely on port testing and avoid the duplication of testing for their due diligence. This could pool limited resources of local authorities, port authorities and retailers.
- Better planning and co-ordination of Port Authority surveillance and testing, for example if it is known that the majority of imported US rice comes to Rotterdam is it necessary to test in other ports?
- More work needed to clarify what is meant by an *emerging risk* vs an *incident*. Different actions may follow from this. When does an emerging risk become an 'incident'. Sudan 1 was known about for a long time through 'isolated alerts' before it became a full-scale recall. Should we use the term 'emerging issue' rather than emerging risk.
- Explore the different approaches that could be used alternatively for food safety risks and those arising from identification of non-compliance eg. non-authorized ingredients.
- Explore the idea of a 'national gateway testing body' one central body to carry out all testing for industry and regulators.
- Current anomaly of testing results across Europe. This presents problems for retailers and manufactures who sell across EU where different labs use different methodologies leading to inconsistent results.
- Is there a way of harmonising risk management approaches across Member States?
- Best practice guidance for industry and codes of practice

- Learning the lessons from incidents – post incident review to include all stakeholders in open discussion.
- Local Authorities have resource constraints. Belgium has adopted an approach based on earned autonomy. This would mean that companies proving good performance including product safety, testing and good management, may incur fewer inspections allowing authorities to devote efforts on companies performing less well or that are less trusted.

### **Future research areas**

- Current issues that could re-emerge as risks / incidents.
- Forecasting consumer trends and technological developments eg nanotechnology.
- Risk communication – how to translate science into consumer understanding?
- Allergen sensitivity.
- Reducing food fraud
- More links between health information and food industry. Rate of return of research on safety.
- Examining the effectiveness of training in food handling and safety, and overcoming language and cultural barriers and the challenges posed by high staff turnover in some industries.
- Use business models to predict way the industry will evolve eg using PESTLE (political, economic, social, tech, legal, env) analysis.
- Use the Office of Science and Innovation (OSI) future forecasting service, including consumer trends and adoption of new technology and packaging ie more low temp cooking or revisiting past technologies such as sous-vide. Move towards reducing carbon footprints.

## **6. NEXT STEPS**

The Food Standards Agency will reflect on the recommendations made in the workshop and will develop a draft strategy for incident prevention by the summer. The suggestions for research on horizon scanning will be fed into the emerging issues project as part of EFSA's strategy on scientific co-operation.

A key output from the workshop was providing a framework for all parts of the food chain to work together to address issues of common interest. The aim now is to build still further on the foundations of mutual trust laid by the workshop. FSA is now embarking on proactive engagement with all types of stakeholders to plan a programme of practical work based on the feasible recommendations of the workshop. This work will be led by a new Head of Incident Prevention post in FSA, Valerie Curtis. The creation of this new post underlines FSA's commitment to working with industry, consumer groups,

enforcers and others to tackle incident prevention issues for our shared benefit.

You can contact Valerie Curtis on [valerie.curtis@foodstandards.gsi.gov.uk](mailto:valerie.curtis@foodstandards.gsi.gov.uk) if you wish to discuss any of these issues.

## Annex 1

### A. MANUFACTURING DISCUSSION GROUP

#### Best use of all sources of data?

- Two types of data – prevention / management of ‘current’ risks and avoidance of long-term risks.
- Differentiate between Issues, Hazards and Risks.
- How far down the supply chain can QA data be obtained?
- One up / one down HACCP, audit and traceability duplicates effort but only looks at the principal hazard.
- Manufacturers need guidance on where to invest effort to have the best impact.
- Suppliers often duplicate tests for different customers.
- Pooled industry sector data would be ideal, but how to achieve and to finance?
- Lessons learned could be better disseminated across industry.
- Europe-wide food consumption data for exposure assessment.
- Regulators need ‘unsanitised data’ to represent real-world situation – anonymous provision via trade associations?

#### Constraints? How to overcome?

- Finite resources
- Media sensationalism can constrain regulatory response, especially risk management actions – e.g. press attention to benzene.
- Pressure on regulators constrains industry to be defensive of data/information sharing.
- Trust and confidentiality are key aspects – ethics of risk communication not always shared by media.
- Not legally defensible to alert other manufacturers to ‘rogue’ suppliers.
- A ‘good track record’ can sometimes fail.

Mistakes can occur where humans are involved!

## 2. RETAILERS

### What are the challenges to the transfer of information to regulators?

#### What information channels exist?

- Informal channels (technical directors – call each other informally). Usually done on case-by-case basis (unlikely to proactively contact a competitor/regulator about a supplier) but once a problem has emerged retailers are more likely to share information
- Local contacts in third countries
- Surveillance done by all major retailers (and have own QA data for own label products)
- One representative of the group ( a food manufacturer) was happy to share information with regulatory authorities, as early as possible. It found that this served the company best in the long-term, and it had a good relationship with the FSA. Retailers within the group did not proactively share information with Authorities unless an issue had been identified and action was necessary.
- Cross–industry collaboration does take place if a common problem is identified and a consistent approach will be of benefit to the industry as a whole.

#### Constraints to information sharing:

- Competitive advantage e.g. recent example of retailers issuing public statements to say that they did not source Bernard Matthews turkeys.
- Lack of availability of information and the understanding of and the use of the precautionary principle by Authorities.
- One regulator representative wanted to know if retailers have enough information readily available about the products they sell. During some incidents, journalists can be quicker gathering product information and putting it in the public domain than retailers. Are retailers willing to put more information in the public domain?
- Challenge for retailers to get information from manufacturers/brand owners.
- Insufficient understanding of the complexity of the food chain/network
- Constraints on control in some circumstances as there are limitations on one-up one-down traceability systems.
- Retailers do use different approaches to sharing information depending on the circumstance. Where there are issues, some retailers often seek to minimise brand reputation by quoting the supplier of the product; this does differ significantly from retailer to retailer.
- Disincentive to share information if one company can use its QA alternative suppliers for instance to competitive advantage. Highly competitive retailers actually use their QA systems as an added selling point.
- 'Perception information' shared could spiral out of control
- Lack of certainty on how information, given in good faith, be used and communicated leading to possible lack of trust
- Press and /or regulators over-reaction leading to poor risk communication.

- Clear 'rules of engagement' would be required to ensure closer co-operation is achieved. These should be developed and agreed.
- There is poor harmonisation of risk assessment across Member States as EU Members do differ in approach and multinational retailers are bound by the most 'stringent' opinion of one Member State.
- Consideration should be given to a 'safe zone' of decision making for the industry, where an emerging issue has been identified and there is lack of knowledge or research allowing a reasoned course of action. This would have to be extremely carefully managed with a need for clear and unambiguous risk communication with active participation by all relevant stakeholders.

What are the **main research needs on horizon scanning** to identify emerging food safety risks and ways of preventing food incidents?

**Context:**

- Emerging risks and long-term research not a priority for retailers
- Retailers said research must provide 'value' and be relevant
- Possible microbiological safety risks from reformulation driven by the regulator eg. salt and sugar reductions
- Lack of proactive work on nanotechnology
- With the emergence of packaging that will deliberately interact with food greater regulation will be needed for testing/disclosure by the packaging industry. More research needed on food safety risks.
- Differentiation between known and unknown risks.
- Thought unknown risks are not the responsibility of the retailer to scope as there should be a total supply chain approach.
- Research not a priority for retailers & shareholders, if there is no practical application
- Are research needs – driven for food law or food safety?
- Retailers tend to rely on manufacturers for the safety of product ( with the exception of own label product where they have a direct influence and therefore responsibility for the safety of the product)
- Rely on government for pure research on longer-term issues
- Extensive duplication of testing and surveillance across industry– is there a way of pooling resource and sharing this? Is there also duplication between EMRISK and EFSA?
- Many recent incidents relate to 'fraud'; can scoping been done to improve intelligence specifically in relation to fraud? [Note the FSA's Food Fraud Task Force will report specifically on this issue].

### 3. Catering perspective

#### Data sources

- Primary and secondary.
- International networks and national distributions system such as the World organisation for animal health (OIE), Food Surveillance System (FSS) and INFOSAN.
- Consumer complaints collected by Trading Standards for consumer products but not for food safety.
- Catering sector has feedback mechanism for capturing complaint or non-compliance. This could only come from FSA/LACORS (Local Authorities Co-ordination of Regulatory Services) unless catering notified supplier who ought to report.
- Full reporting to FSA will allow common cause to be identified encourage whistle blowing.
- Food service suppliers will have some data.
- Industry share data on habitual complainers but this is limited by the data protection act.
- Labs and research have data but this is commercially protected. If this information was shared, companies would stop using those labs.
- Companies have to report non compliances or there is little additional useful info. Can company audit info be used? There is a feeling that FSA has more info that it could share earlier eg GM rice, RASFF.