

**FOOD STANDARDS**

**AGENCY**

**INCIDENT PREVENTION**

**STRATEGY TO 2010**

**October 2008**

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# 1. BACKGROUND AND INTRODUCTION

## Definitions: incidents and emerging risks

1.1. The Food Standards Agency plays a key role in the handling and management of food<sup>1</sup> incidents, along with the food industry, local authorities and enforcement agencies. We use the following definitions:

*Incident: 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' interest.*<sup>2</sup>

*Emerging risk: any risk resulting from exposure to a newly identified hazard, or a new or increased exposure and/or susceptibility to a known hazard.*<sup>3</sup>

1.2. Types of food incident can range from large-scale outbreaks of food poisoning to smaller incidents such as isolated cases of botulism in livestock. Within the Agency, we classify the incidents that are reported to us in terms of complexity and severity (low, medium and high)<sup>4</sup>. Currently, the main categories of incidents are:

- allergens,
- animal feed,
- biocides,
- counterfeit products,
- environmental contamination,
- food contact materials,
- illegal imports/exports,

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<sup>1</sup> Including animal feed. Throughout this document “food” is taken to refer to both human grade food and animal feed and refers to the whole food chain, from farm to fork.

<sup>2</sup> Taskforce on Incidents: Principles for preventing and responding to incidents:

<http://www.food.gov.uk/multimedia/pdfs/taskforcefactsheet23mar07.pdf>

<sup>3</sup> EFSA: “Definition and description of “emerging risks” within the EFSA’s mandate”. Available at: [http://www.efsa.europa.eu/EFSA/Scientific\\_Document/sc\\_definition\\_emerging%20risks\\_en.pdf](http://www.efsa.europa.eu/EFSA/Scientific_Document/sc_definition_emerging%20risks_en.pdf)

<sup>4</sup> Annual report of Incidents 2006, Appendix 2 “How do we classify an incident”. Available at: <http://www.food.gov.uk/multimedia/pdfs/incidentsar.pdf>

- irradiated ingredients,
- labelling/documentation,
- microbiological contamination,
- natural chemical contamination,
- on-farm incidents,
- pesticides,
- physical contamination,
- process contaminants,
- radiological,
- use of unauthorised ingredients,
- veterinary medicines, and
- water quality.

### **Why incident prevention is important**

1.3. In recent years the Agency has dealt with several large-scale incidents, each greatly impacting on the food community.<sup>5</sup> Although not all food incidents are injurious to health, nevertheless they undermine consumer confidence in food safety and are costly to individual companies and national economies. The 2005 Sudan I incident<sup>6</sup> is estimated to have cost the food industry £100 million. Incidents also contribute to an erosion of trust between consumers, regulators and the food industry. A recent incident led to a 25 % reduction in purchases of chocolate demonstrating how food incidents can destabilise the food market and diminish consumer confidence.

### **The Agency's strategic plan target**

1.4. Food safety remains one of the Agency's top priorities and we will continue to maintain high standards for protecting public health and consumers' other interests in relation to food.

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<sup>5</sup> The Food Standards Agency, the food industry, and local authorities and enforcement bodies.

<sup>6</sup> The Sudan I contamination incident resulted in the largest ever recall of food products in the UK. It related to the adulteration of chilli powder by this illegal dye.

- 1.5. In particular, we will develop effective interventions to reduce the number of incidents by tackling food safety problems at source by the end of December 2010.
- 1.6. Our strategic plan to 2010<sup>7</sup> also sets out our objective of building and maintaining the trust of stakeholders in our handling of food safety issues by working in partnership with the food industry, local authorities and other stakeholders to improve mechanisms for preventing incidents.

### **The impetus for an incident prevention strategy**

- 1.7. The Taskforce on Incidents<sup>8</sup>, established in June 2005, identified areas in which the Agency, food industry and enforcers could work together to reduce the number of food incidents and to respond better when they occurred. Suggested areas of work included improving our knowledge of the food chain and fostering more joined up working with our stakeholders. One of the key outputs was the production of the guidance document: "*Principles for preventing and responding to food incidents*".<sup>9</sup> This document, aimed at small businesses, identifies actions that can be taken to prevent incidents as well as describing what food business operators should do if an incident occurs.
- 1.8. In March 2007 the Agency, in cooperation with the European Food Safety Authority (EFSA), held an international workshop on food incident prevention and horizon scanning to identify emerging food safety risks.<sup>10</sup> This workshop was one of the first steps towards developing this strategy by building and maintaining the trust of the food industry, enforcers, consumer groups and international partners in our handling of food safety

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<sup>7</sup> The Agency's strategic plan can be found at:  
<http://www.food.gov.uk/multimedia/pdfs/strategicplan2010e.pdf>

<sup>8</sup> Further information on the Taskforce on Incidents can be found at:  
<http://www.food.gov.uk/foodindustry/industrycommittees/taskforcebranch/>

<sup>9</sup> The guidance document on the principles for preventing and responding to food incidents can be found at <http://www.food.gov.uk/foodindustry/guidancenotes/incidentguidance/principlesdoc>

<sup>10</sup> A full report of that workshop can be found at  
<http://www.food.gov.uk/multimedia/pdfs/horizonscan.pdf>.

issues. The recommendations from that workshop<sup>11</sup> underpin the development of this strategy.

- 1.9. Following the Sudan I contamination incident in 2005, the Agency appointed an independent review panel. The panel identified lessons learnt, actions which should be put into place, and the need to strengthen current procedures for handling incidents. A number of recommendations were made including better sharing of intelligence, partnership working and communication. We are committed to addressing the relevant recommendations of the review panel as part of this strategy<sup>12</sup>.

### **Our partners**

- 1.10. Building on the foundations of trust that have already been created the Agency will take forward the delivery of this strategy in partnership with a wide range of stakeholders, particularly the food industry, local authority representatives and consumer representatives.

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<sup>11</sup> Recommendations from the workshop can be found at:  
<http://www.food.gov.uk/news/newsarchive/2007/mar/emerging0307>.

<sup>12</sup> The Agency's response to the Sudan I review recommendations can be found at:  
<http://www.food.gov.uk/multimedia/pdfs/board/fsa070906.pdf>.

## **Scope of this strategy**

1.11. This strategy sets out the current programme of work planned by all relevant policy divisions across the Agency on incident prevention for the whole food chain, from farm to fork. The strategy will initially run until 2010, in parallel with the current strategic plan target of reducing incidents at source. Additional projects may be added in future as experience is gained delivering the strategy.

## **Agency governance of its incident prevention programme**

1.12. The strategy has been endorsed by the incident prevention programme board, which is made up of high-level representatives from policy divisions across the Agency with an interest in incidents. The board acts as the governing body for the incident prevention programme, facilitating a co-ordinated approach to preventing incidents. The board will agree the priority for activity and resources to deliver the strategy.

1.13. To help deliver this strategy we will establish an external stakeholder consultation group comprising representatives from the food industry and enforcement bodies with a wide range of expertise. The consultative group will support the programme board and help oversee delivery of the incident prevention programme.

## **Legislative requirements placed on businesses in respect of food.**

1.14. Regulation (EC) 178/2002 of the European Parliament and of the Council, which came into force on 21 February 2002, lays down the general principles and requirements of food law, procedures in matters of food safety and establishes EFSA.<sup>13</sup> The Regulation applies to all stages of food production, processing and distribution, with exemptions for private domestic use/consumption. The main requirements of this Regulation are:

- Businesses take responsibility for the safety of the food that they produce, import, pack, transport, store or sell;
- Businesses must not place on the market unsafe food;

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<sup>13</sup> Official Journal of the European Communities, L 31/3 (2002)

- Unsafe food must be withdrawn from sale or recalled from consumers if it has already been sold;
- Businesses must be able to rapidly identify any immediate supplier or customer, apart from the final consumer;
- Labelling, advertising and presentation of food must not mislead consumers;
- Businesses must report food incidents to the competent authorities.

### **Role of the Agency**

1.15 Ultimately, it is the food industry's responsibility under Regulation (EC) 178/2002 to make food safe, to comply with general food law and to notify competent authorities when unsafe food is withdrawn or recalled from sale. Responsibility for enforcement is through local government bodies, including district and county councils and unitary authorities. Enforcement officers must ensure that they apply food law in a fair and consistent way and use their professional judgement to decide what action to take during an incident based upon an assessment of the risks to public health. However, the Agency clearly has a large part to play in supporting food businesses and enforcement officials deal with incidents. The Agency also has a clear role in helping food business operators to reduce the number of incidents and where possible to prevent these incidents from occurring. Partnership working with the food industry and enforcers is needed to tackle incidents at source; we see our role as facilitating and coordinating work across all stakeholders as well as providing support and encouraging the sharing of best practice to prevent incidents. We need to change the way that we work with our stakeholders so that as a community we move towards sharing information with increased emphasis on the prevention of incidents.

## 2. WHERE CAN WE HAVE IMPACT?

- 2.1. In order to ensure the success of this strategy, we must focus our efforts at those points in the food supply chain where we can have most impact. The Taskforce on Incidents looked at the types of incidents that can occur at the various stages of the food supply chain.<sup>14</sup> We will build on this, by taking data from past incidents and establishing which points in the food supply chain are most at risk. We will also identify the categories of incidents where interventions will have the most impact.
- 2.2. The Agency is undertaking a Data Analysis Project to carry out a detailed examination of all the incidents reported since 2000. The project aims to investigate, as far as possible, how and why incidents occur as well as providing detailed statistical data on the numbers and types of incidents that have been reported to the Agency.
- 2.3. This project has enabled the Agency to identify trends and make observations. This work became possible with the development of the incidents database which records data as incidents are reported, to which we have now added all available retrospective data.
- 2.4. The first output from the Data Analysis Project was the first Annual Report of Incidents in 2006.<sup>15</sup> A further report containing 2007 and historical data was published in May 2008. By reviewing interim data for incidents that occurred in 2007, it is already possible to draw useful conclusions that have been used to shape this strategy.

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<sup>14</sup> Taskforce on Incidents: Food supply chain structure, can be found at <http://www.food.gov.uk/multimedia/pdfs/fitf0520.pdf>

<sup>15</sup> The Annual report of Incidents for 2006 and 2007 can be found at <http://www.food.gov.uk/multimedia/pdfs/incidentsar.pdf>  
<http://www.food.gov.uk/multimedia/pdfs/incidents07.pdf>

**Table 1. Categories of incidents most frequently reported to the Agency in 2007**

<b>Incident category</b>	<b>Number of incidents</b>
Environmental contamination	225
Natural chemical contamination	215
Microbiological contamination	163
On farm	159

- 2.5. During 2007, the Agency handled 1,310 incidents. Closer inspection of the 2007 data (see table 1) shows that we will not be able to reduce incidents in all frequently occurring categories. Environmental contamination of food represented the largest number of incidents reported to the Agency in 2007; however, 193 of these incidents occurred because of fires and chemical spills/leaks. Preventing such incidents is beyond the scope of this strategy.
- 2.6. Initial analysis of 2007 data shows that about a quarter of all incidents reported originate from outside the UK, with this proportion being considerably higher for some categories. For example, 202 out of 215 incidents in the natural contamination category and 24 out of 32 incidents in the “preventable” environmental contamination category, originated from outside the UK. Other categories showing large proportions from imports were “use of unauthorised ingredients” and “radiological and irradiated foods”.
- 2.7. This observation suggests that efforts to prevent certain types of incidents should be concentrated on border controls and using intelligence based targeted surveillance to address illegal activity, as well as promoting food safety in developing countries and raising awareness of existing EU food safety legislation. We recognise that we only have limited direct influence on food safety in third countries. Nevertheless, we will investigate the

opportunities for collaboration with other countries and international organisations.

- 2.8. There is much to be learnt by looking back at our past data on incidents. Now that the full data series of all incidents reported to the Agency from 2000 is available to analyse to a common standard, our first task under the Incident Prevention Strategy will be to interrogate fully these data in order to assess more specifically where this strategy can have most impact.
- 2.9. In the short term, we will focus our efforts on a range of incident types as well as seeking to get best value from existing Agency work that can be seen to have an incident prevention dimension. We will pilot a range of new initiatives with key UK industry, enforcement and consumer stakeholders to inform future work.
- 2.10. In the longer term, we will see what more can be done to target incidents occurring in food originating from outside the UK/EU, including exploring ways for working with other organisations such as the European Commission; the US Food and Drug Administration (FDA), which has recently published its “Food Protection Plan<sup>16</sup>”, and related action plan for imported food<sup>17</sup>. We will also seek to collaborate with international organisations such as the Food and Agriculture Organisation (FAO).

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<sup>16</sup> <http://www.fda.gov/oc/initiatives/advance/food/plan.pdf>

<sup>17</sup> <http://www.importsafety.gov/report/actionplan.pdf>

### **3. THE INCIDENT PREVENTION PROGRAMME**

- 3.1. Much of the Agency's work already contributes towards incident prevention although more can be done. The strategy focuses on new areas of work that will have a specific impact on incident prevention. Details of the work that has been taken forward to deliver this strategy are set out in table 2. The work plan for future years will be further developed as part of our business planning for the next two years. Quarterly updates on the work carried out under the Incident Prevention Programme will be published on the new incident prevention section of the Agency's website.
- 3.2. The Incident Prevention Programme will be delivered under three themes that also address the recommendations made by the Sudan I review panel to the Agency. The Sudan I review panel also made a number of recommendations for the food industry and local authority enforcement bodies to implement.<sup>18</sup>
- 3.3. By working with the food industry and enforcement agencies under the incident prevention themes we will develop and implement effective interventions together in order to reduce the numbers of food incidents, thus limiting the financial effects of incidents and improving the safety of food for consumers.
- 3.4. For the strategy to succeed there needs to be a high level of trust between all parties involved in its delivery. This will be addressed through a series of projects under the theme of building trust and partnerships.
- 3.5. The data analysis project provides the initial basis for deciding which categories of incidents to concentrate on. It will also enable us to identify

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<sup>18</sup> The report of the Sudan I review panel can be found at:  
<http://www.food.gov.uk/multimedia/pdfs/sudanreview.pdf>

Industry and enforcement's responses to Sudan I recommendation can be found at:  
<http://www.food.gov.uk/multimedia/pdfs/board/info071201.pdf>

where affected products originated from. As already indicated results so far suggest a need to address the safety of imported food. The Sudan I incident highlighted the importance of good intelligence to identify and respond to emerging risks promptly. We will address this through a project on horizon scanning. Linking the analysis of past incidents and horizon scanning will be a project mapping out key ingredients and vulnerabilities in the supply chain. The results from this project will be used to develop an intelligence led surveillance programme.

- 3.6. The intelligence gathering project will be reliant on information from food businesses and enforcement authorities. However, recognising concerns about what will be done with such information we will explore the use of third parties to collect and analyse such information.
- 3.7. Information from the intelligence gathering project will also enable us to ensure that regulatory limits are based on the most up to date scientific data. Finally there will be a need for underpinning research to support many of the projects. We will be looking to collaborate with a number other organisations in commissioning such research.

### **Incident Prevention Themes**

- **Intelligence gathering and horizon scanning**
  - Building a clear picture of when, why and how incidents occur to enable us to develop effective interventions to prevent future incidents;
  - Facilitating a coordinated approach to sharing information on the food supply chain, surveillance data and horizon scanning activities with all parties;
  - Understanding the weaknesses in the food supply chain and developing measures to strengthen these;
  - Monitoring for emerging risks and spotting incidents before they escalate.

- **Building trust and partnerships**
  - Building on the existing foundations of trust so that information is shared at an early stage in order to prevent the impact of incidents;
  - Exploring new ways of working with the food industry to raise standards through shared responsibility for education and understanding of the food chain;
  - Partnership working to deliver effective interventions that are useable and will deliver results;
  - Developing further our relationship so that we can work together with enforcement agencies to reduce incidents.
  
- **Better science, better regulation**
  - Targeting our research and surveys to deliver practical outcomes for incident prevention;
  - Developing partnerships with industry, European and international partners to share the responsibility of research that will strengthen our scientific knowledge base and underpin the delivery of this strategy;
  - Negotiating food contaminants legislation to ensure that regulatory limits are based on sound science in order to avoid incidents triggered by inappropriate limits.

Each project is described in detail in appendix 1. The work for year one of the strategy is shown in table 2. The work plan for future years will be developed as part of our business planning processes.

## 4. EVALUATING SUCCESS

- 4.1. As the Agency continues to raise awareness of the requirement for reporting incidents, it is highly likely that more incidents will be reported to us. Thus, monitoring the total number of incidents over the years to 2010 is unlikely to provide a meaningful measure of our success in preventing incidents.
- 4.2. A more relevant measure of success will be changes in the number of food product recalls. In addition having identified specific categories of incidents, such as natural toxicants, on farm incidents, and allergen mislabelling, we will measure changes in numbers of incidents within these categories to assess the impact of our interventions.
- 4.3. A key aim of the strategy is to build and maintain trust of stakeholders in our handling of food safety issues. We will measure our success here using a range of indicators:
- Number of companies contributing to the development of a coordinated approach to horizon scanning;
  - Increased sharing of information between the Agency, industry, enforcement agencies and consumers;
  - Increased trust between the Agency, industry, enforcement agencies and consumers on food safety;
  - Increased consumer confidence in food safety;
  - Development of effective partnerships that lead to increased knowledge of the food chain and food safety issues;
  - Established collaborations with industry and international partners, focussing on shared responsibility for research.

## **5. FURTHER INFORMATION**

- 5.1. We are currently developing an incident specific section on our website, which brings together the Agency's information on incident prevention and response. In this section, we will publish quarterly updates communicating progress on delivering this strategy.
  
- 5.2. For more information about this strategy and the work the Agency will take forward on incident prevention, please contact the Head of the Incidents Unit:

Paula Waldron  
paula.waldron@foodstandards.gsi.gov.uk  
020 7276 8537

Table 2

**Work plan for year one of the incident prevention strategy**

<b>PROJECT</b>	<b>DELIVERABLES</b>	<b>RATIONALE</b>	<b>SUCCESS MEASURES</b>	<b>DELIVERY DATE</b>	<b>LEAD</b>
<b><i>INTELLIGENCE GATHERING AND HORIZON SCANNING</i></b>					
<b>Data analysis project</b>	2000-7 incidents report	To use past data to identify areas where we can have more impact in preventing incidents	Development of effective partnerships that lead to increased knowledge of the food chain and food safety issues	<b>May 2008</b>	<b>FPD</b>
	Analysis of volumes and severity of incidents across all sources to identify where to focus more targeted action (e.g. allergen labelling and imported food) and to better understand root causes.			<b>May 2008</b>	<b>ARD</b>
<b>Incident reviews</b>	Develop process for external reviews, including potential for investigating root causes	To investigate root causes and learn lessons from past incidents	Increased trust between Agency and stakeholders	<b>May 2008</b>	<b>FPD</b>
<b>Key ingredients in food chain</b>	Set up scoping group	To enable targeted surveillance of vulnerable ingredients	Increased consumer confidence in food safety	<b>June 2008</b>	<b>FPD</b>
	Effects of contamination on food chain			<b>March 2009</b>	<b>FDF</b>
<b>Horizon scanning</b>	Identify mechanism for horizon scanning	To enable better identification of emerging risks by improved sharing of information mechanisms	Number of emerging risks identified	<b>March 2008</b>	<b>FPD</b>
	Develop web crawler for information on food safety			<b>December 2008</b>	

PROJECT	DELIVERABLES	RATIONALE	SUCCESS MEASURES	DELIVERY DATE	LEAD
<b><i>BUILDING TRUST AND PARTNERSHIPS</i></b>					
<b>Regional working</b>	Pilot stakeholder engagement work in East Midlands  Roll out to other regions	To explore new ways of working with industry at regional level to prevent incidents	Increased trust between Agency and stakeholders	<b>March 2008</b>  <b>March 2009</b>	<b>FPD</b>
<b>Working with SMEs</b>	Framework for ensuring best practice advice reaches SMEs	To increase incident prevention awareness of SME's	Reduction in number of product recalls	<b>December 2008</b>	<b>BRC/BHA</b>
<b>Earned recognition</b>	Developing a proposal for a scheme of earned recognition	To focus LA's resources on high risk areas	Increased trust between Agency and stakeholders	<b>March 2008</b>	<b>RIOD/FPD</b>
<b>Communication</b>	Develop an industry specific section on FSA's website  Set up a communications' working group  Develop an industry discussion forum  Develop a communication's strategy	To improve flow of information to Stakeholders  To improve flow of information to Stakeholders  To avoid repeating past mistakes  To publicise incident prevention activities	Increased sharing of information between Agency, and stakeholders  Increased sharing of information between Agency, and stakeholders  Reduction in number of product recalls  Increased trust between Agency and stakeholders	March 2008  June 2008  July 2008  September 2008	COMS/FPD  FDF/COMS/FPD  FDF  COMS
<b>Allergen labelling</b>	Develop a proposal to improve accuracy of food	To reduce the number of incidents caused by	Number of incorrect labelling of allergens	<b>March 2009</b>	<b>LSA</b>

<b>PROJECT</b>	<b>DELIVERABLES</b>	<b>RATIONALE</b>	<b>SUCCESS MEASURES</b>	<b>DELIVERY DATE</b>	<b>LEAD</b>
	allergen labelling controls by food businesses	incorrect labelling of allergens	incidents reduced		
<b>Enhanced food safety education</b>	Develop award scheme as part of food industry/FSA joint placements for students	To improve training of students	Reduction in product recalls	<b>March 2009</b>	<b>FDF/BHA</b>
<b>Imported food international strategy</b>	Develop proposal for action to be taken by LA enforcement officers at ports to target controls based on incident analysis	To reduce the number of incidents caused by imported food	Number of incidents caused by imported food reduced	<b>June 2008</b>	<b>IFD</b>
<b>Dissemination of Information</b>	Develop a mechanism to disseminated incident prevention messages to farmers	To ensure better communication and support for farmers specifically on lead poisoning and botulism	Number of on-farm incidents reduced	<b>August 2008</b>	<b>FPD</b>
<b>Working in partnership</b>	Develop a proposal for partnership working with industry and enforcement authorities on mycotoxins	To explore new ways of working with industry and enforcement authorities to prevent mycotoxins incidents	Number of mycotoxins incidents reduced	<b>August 2008</b>	<b>FPD</b>
<b><i>BETTER SCIENCE, BETTER REGULATION</i></b>					
<b>Chemical contaminants</b>	Ensuring contaminants' limits are risk based	To ensure contaminants' limits are risk based	Number of chemical contaminant incidents reduced	<b>On-going</b>	<b>FPD</b>
<b>Joint industry surveillance programme</b>	To develop a proposal for a joint risk based	To develop a joint risk based surveillance	Established collaborations with industry and	<b>March 2009</b>	<b>FPD</b>

<b>PROJECT</b>	<b>DELIVERABLES</b>	<b>RATIONALE</b>	<b>SUCCESS MEASURES</b>	<b>DELIVERY DATE</b>	<b>LEAD</b>
	surveillance programme	programme	international partners, focussing on shared responsibility for research		

<b>Food Standards Agency Divisions</b>	<b>External partners</b>
<b>ARD- Analysis and Research Division</b> <b>COMS- Communication Division</b> <b>FPD- Food Protection Division</b> <b>IFD- Imported Food Division</b> <b>LSA- Labelling, Standards and Allergy Division</b> <b>RIOD- Regulation, International and Openness Division</b>	<b>BHA- British Hospitality Association</b> <b>BRC- British Retail Consortium</b> <b>FDF- Food and Drink Forum</b>

## PLANNED INCIDENT PREVENTION PROJECTS

### INTELLIGENCE GATHERING AND HORIZON SCANNING

- 6.1 In order to work with the food community to reduce the numbers of food related incidents, the Agency needs to have a clear picture of when, where, how and why incidents occur.
- 6.2 Both the Taskforce on Incidents and the Sudan I review panel have recommended that the Agency plays a more central role in coordinating horizon scanning in a way that ensures intelligence is shared between all players. We need systematically to anticipate, identify and prepare for new emerging risks in order to stem these before they become full incidents. The Taskforce on Incidents highlighted the need for the Agency and its stakeholders to develop a deeper understanding of the food supply chain, especially the origin of key ingredients and how these become distributed throughout the food chain.
- 6.3 Better data sharing is needed between us and our stakeholders, as well as between stakeholders. By having a clearer picture of what is happening around us, we can target our efforts to reduce the numbers of incidents and to raise the standards of our food.
- 6.4 The Agency is putting a great deal of effort into improving existing information gathering mechanisms, reviewing past incidents to learn why they occur and improving the sharing of data between the food community. Key projects are:

#### **Data Analysis Project**

- 6.5 Existing incident data going back to 2000 is being analysed to investigate how and why incidents occur. The first output from this project was the

Agency's Annual Report on Incidents 2006<sup>19</sup>, which drew on those incidents that occurred in 2006. A further report containing 2007 and historical data was published in May 2008. The project has enabled us to look at who notifies the Agency of incidents and how many types of incident to which we respond. We now need to mine that dataset further and establish options for how we can focus our efforts to effect potential reductions in at least some incident categories. At first, we will analyse data on the volumes and severity of incidents across all sources of incidents, and carry-out more detailed analysis (e.g. imports by country of origin) of the high volume and higher severity incidents to better understand sources and root causes, and looking specifically at imported food (see para 1.23) and allergen labelling (see para 1.19). We will then carry out a review of data quality and future data requirements. We will use the output from this project to inform where we focus activity in this strategy

### **Identifying root causes of incidents**

6.6 The Agency is currently developing a strategy for reviewing incidents externally, i.e., with stakeholders. To date only a small number of external reviews have been undertaken and in the main have focused on incident handling and building trust with our stakeholders. Once our incident review strategy is in place and proven, we will expand our reviews to encompass investigations into the root causes and underlying reasons why particular incidents occur and how we might work together to reduce the likelihood of the same incidents reoccurring. In addition we will work with the food industry and enforcement authorities to encourage companies to critically review the root causes of incidents. We will also encourage companies to share generic lessons from such reviews to reduce the probability of similar incidents occurring elsewhere (see para 1.16)

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<sup>19</sup> The Annual report of Incidents for 2006 and 2007 can be found at <http://www.food.gov.uk/multimedia/pdfs/incidentsar.pdf>  
<http://www.food.gov.uk/multimedia/pdfs/incidents07.pdf>

## **Key ingredients in the food chain**

6.7 The Sudan I incident and recent incidents involving chemical contamination of guar gum have highlighted the importance of knowing what the key ingredients<sup>20</sup> of the various industry sectors are, how they might become contaminated or deemed unsafe, and understanding how they are distributed throughout the different food supply chains. The first phase of this project will be to set up an industry led scoping group including trade associations and the Agency in order to identify:

- geographical areas from where ingredients are sourced;
- key ingredients sourced from these areas;
- types of contamination these ingredients are susceptible to;
- and the subsequent effects of using contaminated ingredients in the food supply chains of the different industry sectors.

Having identified key ingredients, the next stage will be to focus effort on targeted surveillance (see para 1.32), thus preventing possible large-scale incidents. By improving our knowledge of the food supply chain, we will also be better placed to reduce the impact of future incidents that involve transmission of a key ingredient through the food chain.

## **Horizon scanning**

6.8 The Agency will take a leading role in coordinating, collating and disseminating information gathering effort across a wide range of stakeholders. We will explore ways of sharing information gained at the European and international level with our stakeholders and also link our work to the horizon scanning activities of the food industry and enforcement agencies. By identifying and preparing for emerging risks at an early stage we can work to prevent these from escalating into incidents. Horizon scanning will also provide us with information that will allow us to focus better our future incident prevention work.

6.9 As a first step we will Work in partnership with the Canadian Public Health Agency and EFSA, we plan to develop a global food safety alert system

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<sup>20</sup> Key ingredients are those that are commonly used in a variety of foods.

similar to the existing system used to identify emerging public health issues. This will include:

- developing a tool to search the internet for information on emerging food safety issues;
- devising a mechanism to share this information with stakeholders.

A second phase of this project will be to develop a framework for analysing and acting upon information from such a system. For example putting in place a targeted surveillance project for a particular ingredient (see also para 1.32). We will also continue to play an active role in the work of EFSA's Scientific Cooperation Group on Emerging Risks and the WHO INFOSAN network.

**Summary of delivery commitments for *intelligence gathering and horizon scanning*:**

- *We will analyse our incidents data from 2000 to present and use our findings to shape further our Incident Prevention Strategy by May 2008;*
- *We will continue to develop our strategy for external reviews of incidents in consultation with stakeholders by May 2008 and will expand the scope to include investigating the root causes why the incidents occurred and how similar incidents can be prevented;*
- *We will set up an industry led scoping group with stakeholders to investigate key ingredients by June 2008, and determine how contamination of these could affect the food supply chain by March 2009;*
- *We will develop a webcrawler to search the internet for information on food safety risks by December 2008.*
- *We will feed the suggestions for research on horizon scanning into the emerging issues project as part of EFSA's strategy on scientific cooperation; we will implement an Agency coordinated mechanism for food safety horizon scanning by December 2009.*

## **BUILDING TRUST AND PARTNERSHIPS**

6.10 Clearly, reducing the number of food incidents will greatly benefit consumers, but this is not a task we can accomplish alone. We are keen to continue to look at ways of improving our relationships with all of our stakeholders and recognise the need to work together to achieve our common goal of safer food for all. The work covered in this theme will focus on building trust and partnerships with the food industry, enforcement agencies and consumers. We have an important role to play in helping the food industry to continue to raise its standards. We also need to work more closely with enforcement agencies so that we develop clear, uncomplicated and effective procedures for handling incidents.

6.11 Some of the key projects we will take forward under this theme are:

### **Regional working**

6.12 Working through the Agency's Regional Presence Unit representative in the Government Office for the East Midlands, we have been piloting work on industry engagement with the East Midlands Food and Drink Forum and the Food Consortium in collaboration with the local enforcement agencies. The Agency aims to raise its profile and increase trust, and spread incident management and prevention messages. Workshops with industry in the East Midlands were held in February 2008. The next stage is to look at what other partners can be engaged. We are planning work through our North West Regional Presence Unit representative to achieve similar outcomes. The Agency will also explore working with a number of other regional stakeholders such as development agencies and local trade associations with the aims of providing training and facilitating events to promote food safety. We plan to roll out a programme of engagement in other English regions in future years.

### **Working with small and medium enterprises (SMEs)**

6.13 As identified by the Sudan I review there is a need for effective mechanisms to get information and advice out to SMEs. We will work with

local authorities, larger food companies, and trade associations to ensure best practice advice reaches SMEs. As a first step larger food companies will develop a mechanism to ensure that information such as guidance developed by the Agency is passed to all their suppliers.

### **Earned recognition**

6.14 We will work in partnership with enforcement agencies and industry stakeholders to develop a scheme of earned recognition for those businesses that have successfully demonstrated that they are able to achieve and maintain compliance. The scheme will seek to reduce where possible the frequency and nature of enforcement interactions where food businesses that are able to show compliance with the requirements of food and feed law through schemes. The scheme will allow local authorities to target resources at high-risk areas.

### **Communication**

6.15 We will develop an ***incident specific section of our website***, bringing together the Agency's information on incident prevention and incident response. This section will contain information on how to report incidents to the Agency and details on what actions should be taken when an incident occurs. We will also provide information about our incident prevention work as well as the many guidance notes that the Agency has prepared to help food business operators.

6.16 We will also develop an industry ***discussion forum*** on incident prevention that will allow food business operators to share information and best practice, and to discuss anonymously food safety issues and concerns. Our aim is to improve industry sharing of information about incidents so that lessons can be learnt and incidents avoided.

6.17 We will set up a ***communication working group*** with our stakeholders to explore and establish best ways to share information. As part of this work,

we will explore the possibility of developing a “safe space” to report near misses.

6.18 A **communication strategy** will be developed to promote and publicise the incident prevention programme. Progress will be reported on a quarterly basis.

### **Allergen labelling**

6.19 There has been a steady increase in the number of allergy incidents during 2007 and continuing into 2008. The majority of these incidents arise because product is put into the wrong packaging and therefore the ingredients’ and allergen labelling on the packaging does not relate to the product inside the packaging. However, some incidents relate to errors in the allergen labelling, either with the allergen not being clearly declared or with inconsistencies between the ingredients list and the allergy advice statements, or to significant instances of allergen cross contamination. Working with the food industry we will consider possible interventions to encourage food businesses to improve the accuracy of their allergen labelling by March 09.

### **Training**

6.20 An important mechanism for preventing incidents relates to ensuring that employees in the food industry are adequately trained. The Agency has recognised that a key way to deliver outcomes under its strategic theme of food safety is to influence the training provided to those working in the food chain. By helping to ensure that those working in the food chain have the necessary knowledge and skills in food safety, we are aiming to influence people’s working behaviour and thus reduce the potential for future food safety incidents. Since 2003, we have been working in close partnership with the relevant Sector Skills Councils (Improve, People 1<sup>st</sup>, Skillsmart retail, Lantra, Asset skills, and Skills for Logistics); our focus has been to ensure that the relevant national occupational standards for the food chain and the accredited qualifications that are based on these contain the

necessary knowledge and skills relevant to food safety. Our initial work has resulted in revised training courses now being available from colleges and other providers. Work is on-going in the areas of primary production, animal feed, cleaning and logistics and we are currently engaging with Improve to take forward their wish to input to the manufacturing sector “Industry Guides to Good Hygiene Practice” that are recognised by the Agency. In addition the Agency provides guidance through the Safer Food Better Business initiative. The Agency also supports the ‘Safe and Local Approval Scheme (SALSA<sup>21</sup>)’ scheme for small businesses. The Agency will explore with the food industry the possibility of providing joint placements on incident prevention for students. The creation of an award scheme to recognise the best student will also be considered.

### **Developing alternative enforcement activities**

6.21 By introducing the flexibility to choose from a range of interventions, we will help enforcement agencies to take an approach to enforcement targeted even more at the key risk areas for incidents. We aim to introduce this new policy, via a revised Code of Practice, from April 2008

6.22 Starting from April 2008, monitoring data will focus on an outcome measure of the proportion of food businesses which are considered to be “broadly compliant” with food law. The intention is that this approach will raise standards in food premises and lead to a reduction in incidents occurring in these areas of the food chain.

### **Imported food**

6.23 Analysis of data on previous incidents has shown that 25% of incidents in 2007 resulted from imported food. A priority will be to reduce the number of incidents caused by imported food. In doing so we will adopt a twin track approach. Our priority is to ensure that controls are in place to identify ‘high risk’ products likely to give rise to incidents, and action taken to prevent affected consignments from entering the UK. Analysis of data collected will

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<sup>21</sup> More information on SALSA can be found at: [www.salsafood.co.uk](http://www.salsafood.co.uk)

help to identify product groups, importers and countries of origin where Local Authority staff need to focus enforcement efforts. The Agency's international strategy 2007 – 2009 includes a key objective to plan for risk-based border controls of food imports.

6.24 A longer-term goal will be to reduce the quantity of non-conforming food being exported to the European Union by proactively engaging with certain third countries to drive up standards prior to export. The intention is to reduce the prevalence of incidents related to food originating in third countries as far as is possible. Although the scope for direct intervention will be limited we will also explore ways to work in collaboration with other organisations such as the European Commission and the Food and Agriculture Organisation. Another approach that we will explore is the potential to work with the US Food and Drug Administration (FDA) as they deliver their recently published “Food Protection Plan” and related “Action Plan for Imported Food”. In addition we will explore the practicality of the food industry working to improve the quality of food production techniques in some 3<sup>rd</sup> countries.

### **Dissemination of information**

6.25 On farm was the fourth largest category of incidents occurring in 2007. The Agency is working with the Veterinary Laboratories Agency (VLA) to develop a mechanism to disseminate information and key incident prevention messages directly to farmers. The work is focussing on the most common types of incidents in this category, lead poisoning and botulism, where simple messages can make an impact on the number of on-farm incidents and it is also considering how to use existing relevant associations and networks to ensure that the messages are incorporated where possible in other channels of communication. A report will be produced by Aug 2008 outlining the specific challenges and measures for reaching farmers directly and recommendations on how to take this forward in the future.

## **Working in partnership**

6.26 Partnerships can leverage the resources of industry to help achieve commonly agreed goals in a voluntary manner. However, success depends on a number of factors being present, such as commitment, shared goals and effective representation of industry. This project would explore and build on alternatives to enforcement as per the wider Hampton agenda, particularly by exploring the scope and potential for partnership working on this issue and helping to scope out (e.g. common action plans, common test procedures, leaflets for the public etc) and even initiate partnership working. The project objectives are to evaluate the potential for a mycotoxin partnership between industry and enforcing authorities and scope out the role, composition and aims of such a partnership. Specific mycotoxin issues will be identified and then used to produce a partnership plan. The earned recognition themes will also be investigated.

### **Summary of delivery commitments for building trust and partnerships:**

- *We will continue to explore new ways of engaging the food industry at the local level so that we build trust and develop effective partnerships that will allow us to work together to reduce incidents;*
- *We will devise a proposal for a scheme of earned recognition by March 2008 and look to implement the scheme by December 2009.*
- *We will establish an incident specific section on our website to bring together the Agency's information on incident prevention and response by March 2008;*
- *We will develop an industry discussion forum by July 2008;*
- *We will introduce the new policy of interventions for food law enforcement by local authorities from April 2008;*
- *We will introduce the new outcome measure for food law enforcement by local authorities in April 2008;*
- *We will promote our "Working together on imported food" leaflet and seek to increase the number of imported food samples analysed by enforcement agencies;*

- *We will develop a communications strategy to promote our success by September 2008;*
- *We will develop a proposal for disseminating incident prevention information to farmers by August 2008;*
- *We will develop a proposal for a mycotoxin partnership between industry and enforcing authorities and scope out the role, composition and aims of such a partnership by August 2008;*

## **BETTER SCIENCE, BETTER REGULATION**

- 6.27 In the context of incident prevention, better regulation is about getting the science right and assessing the risk from contamination of food, introducing risk based proportionate measures and reducing the administrative burdens placed on our stakeholders by the regulatory regime. Maximum levels for contaminants are adopted to protect consumers. Setting limits can be complex, involving estimation of the risk and finding the correct balance between protecting the consumer and being proportionate towards industry.
- 6.28 As a European Union Member State, our approach to regulation must also take into account our legal obligations under European law.
- 6.29 One of the Agency's core values is to be "science and evidence-based". In an age of diminishing resources the Agency needs to take a new approach to targeting research. We need to focus our efforts on those areas that have a clear potential for being high risk; we need to move our emphasis from pure collation of scientific evidence to promotion of the practical messages derived from it, which can make a difference to incident prevention.
- 6.30 In addition to traditional scientific research, we also need to consider social science research. We need to understand people's behaviour towards incidents and how behaviour can lead to incidents occurring.
- 6.31 There is also a clear need for more joined up research. The Agency needs to collaborate with European and international partners, as well as with the UK food industry who conduct extensive research on their products.
- 6.32 The Agency must work to ensure that our on-going research and survey programmes, and our negotiation work in Europe, is targeted and effective.

## **Chemical contaminants**

6.33 To ensure the outcome of European discussions on setting limits on certain chemical contaminants are both protective of UK consumers and achievable by industry, the Agency frequently commissions research to provide a scientific basis for our negotiating position. We are currently engaged in the European Union in discussions on setting limits for certain chemical contaminants and to drive these discussions we are funding a number of research projects. For example, work is being carried out to improve current methods of analysis and sampling (which are onerous for industry and enforcement officers). In the future we will focus on developing practical methodologies to reduce the occurrence of mycotoxins in food, alongside developing improvements in the prevention and control of mycotoxins.

## **Joint industry surveillance programme**

6.34 We will explore ways of running a joint surveillance programme on contaminants in foods with our stakeholders. We will make risk-based choices about which foods and contaminants are included in this programme, focusing on potential food safety threats as highlighted by the analysis of shared intelligence. Better targeted surveillance will contribute to tackling a higher number of food safety incidents at source before they escalate.

### **Delivery commitments:**

- *We will engage in a targeted, proportionate and effective way in Europe to negotiate limits on contaminants where the evidence demonstrates that changes are appropriate, so as to avoid incidents caused simply by failure to comply with inappropriate limits (on-going work);*
- *We will ensure our scientific research is targeted and look for ways to collaborate with our stakeholders and partners;*
- *We will develop a proposal for a joint industry risk-based surveillance programme by March 2009.*