

Efficacy of Withdrawals and Recalls: Executive Summary

3.1 Introduction

This system redesign aimed to increase consumer awareness of the recall process, outline clear roles and responsibilities during a recall event (for Food Business Operators, local authority enforcement officers and consumers) and increase legislative compliance among food business operators (FBOs). The system redesign resulted in the creation of a package of tools, including UK guidance on Traceability, Withdrawals and Recalls, best practice guidance on communicating food recalls to consumers, a template point of sale notice and a Root Cause Analysis (RCA) package.

RSM UK Consulting LLP (RSM) was commissioned jointly by FSA/FSS in 2021 to conduct a process evaluation to explore the following two objectives:

- **Objective 1:** The internal programme processes, which featured a partnership approach with stakeholders;
- **Objective 2:** The success (or otherwise) of achieving:
 - clear and distinct roles/ responsibilities in the new system;
 - consistent and accessible information provided to consumers, and cross- industry sharing of approaches and impact;
 - increased public awareness of food recalls and actions they need to take; and
 - commitment to continuous system improvement.

3.1.1 Our approach

This mixed-method evaluation approach included:

1. A desk review of existing programme documents and data (eg RCA Guidance and working groups Terms of Reference)

Aim: to understand the original evidence base and problem statement/rationale for change, as well as the processes used to redesign the system.

2. Interviews with External Stakeholder Reference Group (ESRG) members ([footnote 1](#)) (November-December 2021 and January-March 2022)

Aim: to explore ESRG members' perceptions of the effectiveness of processes used to develop the new system (Nov-Dec 2021) and to understand how well the current withdrawals and recalls system responds to new and emerging food trends (Jan-March 2022).

3. Anonymised real life recall case studies

Aim: to capture the experiences and views of FBOs and enforcement agencies involved in recent recalls. These case studies involved a review of FSA/FSS documentation, followed up by in-depth virtual interviews with affected FBOs and relevant enforcement authorities.

4. Exploration of hypothetical scenarios

Aim: to glean learning on the ability of the redesigned recalls system to address new and emerging trends in the food sector. This involved interviews with ESG members and enforcement officers.

5. Consumer focus groups

Aim: to explore consumer awareness of product recalls, five virtual focus groups were conducted with consumers. These groups comprised four-eight participants in each, sampled by geography, age, gender and any experience of recalls.

6. Secondary data analysis

Aim: to establish a baseline, a review was undertaken of FSA/FSS datasets prior to system redesign (March 2018 – March 2019) and to explore implementation, for the post system redesign (April 2021 – March 2022).

3.2 Evaluation key findings

Key findings to address the two evaluation objectives include:

3.2.1 Evaluation objective 1: To evaluate the internal system redesign process, which featured a partnership approach with stakeholders

Overall, ESG members regarded the internal system redesign process to have been effective, as it addressed the key outcomes and featured a strong co-design approach. The desk review highlighted key factors (such as having a dedicated project manager, clearly defined workstreams and a strong commitment to the system redesign) as being particularly successful.

The system redesign process involved the creation of four delivery workstreams:

- **Workstream 1** – Roles & responsibilities (designed to develop and implement comprehensive UK guidance that clarified the roles and responsibilities of the key players involved in food withdrawals and recalls)
- **Workstream 2** – Accessible & consistent consumer information (designed to deliver a body of work to ensure that information to consumers is consistent and accessible, based on proven best practice and underpinned by cross-industry sharing of approaches)
- **Workstream 3** – Improved trade-to-trade notifications (designed to improve the consistency of trade-to-trade information)
- **Workstream 4** – Feedback loops & incident prevention (designed to develop and implement systematic root cause analysis procedures to be used by industry in the event of food withdrawals and recalls).

Those involved in the internal system redesign process (including external stakeholders and FSA/FSS colleagues) were confident that these workstreams were developed following extensive research (both externally and internally commissioned by the FSA/FSS). This drew out best practice and provided a solid evidence base for the redesign. Having four workstreams also meant that delivery was divided into manageable sections, with clear objectives and remits.

ESG members also agreed that the system redesign sufficiently engaged with representatives from relevant stakeholder groups, including local authorities, consumer research groups, food manufacturer organisations and regulators. This allowed for the consideration of issues from various viewpoints – for example, industry representatives suggested that it would not be feasible for the system redesign to mandate where to place point of sale notices in stores, given the diversity of store sizes and layouts. As a result of this strong and early engagement with stakeholders, the system redesign had significant buy-in, and did not require a piloting phase.

Overall, ESRG members regarded the governance and management structures as robust and effective as:

- the system redesign was a corporate priority for FSA/FSS, so it was assigned significant resource and support
- oversight from the ESRG kept the system redesign on track and ensured that objectives were delivered
- decision making by the ESRG was quick but thorough.

3.2.2 Evaluation objective 2: To evaluate the success (or otherwise) of achieving the four planned outcomes

Overall, the system redesign was successful in delivering the planned outcomes, with some areas for further development. The table below outlines each of the four planned objectives, and the extent to which these were achieved.

Outcome 1: Clear and distinct roles/ responsibilities in the new system

- FBOs, ESRG members and enforcement officers noted that there was a clear understanding of the roles and responsibilities, but with some minor areas for development.
- Consumers who had experienced a recall suggested that they had a clear understanding of their role, while those who had no experience were less confident of consumer actions during a food recall.
- All the FBOs interviewed reported that roles and responsibilities during the recall process were clearly stated by both the local authority and the FSA/FSS.
- Contrary to many micro FBOs' expectations (ie businesses with one-nine employees), the process was less daunting than expected, due to the responsiveness of the regulators to FBO queries, in addition to support and guidance received from local authorities.
- Enforcement officers suggested that not all FBOs were aware of the guidance. Findings from the FBO Tracker Wave 3 endorse this, as only 37% of Small and Micro FBOs were aware of this guidance. ([footnote 2](#))
- ESRG members from industry expressed concerns that smaller FBOs may have fewer resources to implement the new processes and understand the legalities underpinning them, and that more tailored support may be required for this group.

Outcome 2: Consistent and accessible information provided to consumers, and cross-industry sharing of approaches and impact

- Consumers were less likely to regard the information provided to consumers as accessible than enforcement officers and ESRG members. Consumer focus groups indicated that awareness of the recall process can be dependent on chance (e.g. if a consumer happened to see a notice in store or read about a recall in a newspaper), indicating that information is not always consistently available. Consumers maintained that the onus was on retailers (as opposed to regulators) to inform consumers of a recall, using a range of communication methods.
- ESRG members suggested that having a standardised template for the point of sale notice was a positive step in ensuring consistency. Some FBOs had used this template during their recall experience, and appreciated that it had saved them time and effort during a stressful period.
- Enforcement officers considered the point of sale notice template to be clear, and containing all the relevant information for consumers. Consumers themselves would welcome the addition of a QR code, as well as guidance on what consumers should do in the event of the foodstuff being consumed. In addition, there may be merit in promoting the

use of supermarket loyalty schemes to contact consumers who have purchased affected items.

- Enforcement officers noted that there is currently no regulation covering where recall notices should be placed within a store, and use of the template is not mandatory. They also suggested that further thought should be given to how the system can adapt to changing consumer shopping habits (i.e. how best to display point of sale notices online).
- There is little current evidence of cross-industry sharing of approaches.

Outcome 3: Increased public awareness of food recalls and the actions they need to take

- Perceptions of consumer awareness differed between FBOs and ESRG members, and consumers themselves.
- Data suggests that consumer awareness has increased slightly between 2018 and 2021, but is still generally low: 23% of consumers in 2021 reported in the 2021 Food and You 2 survey that they were aware of alerts (a slight increase from 21% in the Public Attitudes Tracker 2018).
- FBOs highlighted that consumers often contacted them directly to ask about next steps during the recall, suggesting limited awareness of the required actions.
- Consumer focus groups suggested that those who had experienced a recall were aware of the process. However, the majority of participants had experienced a recent high-profile chocolate recall, during which steps were outlined in the media, which may have increased their knowledge.
- Those consumers who had not experienced a recall were less aware of the actions they should take, and many suggested they would be more likely to dispose of the product than return it to the store.
- However, data suggests that where consumers are aware of food recalls, they are increasingly returning food items. In 2021/22, 22% of consumers returned items to the store. Although a direct comparison cannot be made only 2% of those surveyed in 2018/19 returned an item (Public Attitudes Tracker & Food and You 2) ([footnote 3](#))
- Several ESRG members indicated that the system redesign had not necessarily raised consumer awareness. They indicated that delivering the consumer awareness campaign that was envisaged was a challenge due to the pressures of EU Exit and Covid-19.
- One ESRG member suggested that this was potentially an overambitious objective.

Outcome 4: Commitment to continuous system improvement

- There is limited evidence to suggest that there is an ongoing commitment to continuous system improvement, although there has been an increased focus on the completion of the RCA as a result of this system redesign.
- Prior to the system redesign, not all businesses clearly defined the 'root cause' of their incidents and the level of understanding across industry sectors was variable. Therefore the development of the Root Cause Analysis (RCA) guidance and the e-learning course were viewed positively by ESRG members.
- Enforcement officers suggested that RCAs are being routinely conducted by larger FBOs, but there was still some further work required to ensure that smaller FBOs also took part in this process. A focus on dissemination and awareness would increase use and impact amongst SMEs.
- FBOs considered the completion of RCAs as beneficial for individual businesses, as it helped to identify the root cause of the incident, and enabled them to put specific measures in place to avoid future recall incidents. However, the majority of FBOs did not share these findings wider within their industries.
- ESRG members and enforcement officers suggested that the system has been less effective in ensuring industry-wide learning, as there is currently no formal process in place to share the RCA learnings.

- Enforcement officers and FBOs suggested that greater clarity is required regarding who is responsible (FSA/FSS, local authorities or FBOs) for sharing RCA findings, and for confirming the types of forums these findings could be shared in.
- There appears to be a limited awareness of the e-learning course amongst FBOs.

3.3 Considerations for the future

Based on these evaluation findings, the evaluation suggests the following considerations for the future:

Table 2: Considerations for the future

Area	Consideration
Process	For any future FSA/FSS project requiring partnership working, consider adopting a similar approach to that used in the system redesign (eg clearly defined workstreams and regular engagement with all key stakeholders).
Guidance	<p>Continue to raise FBO awareness of the recalls guidance on the FSA/FSS websites, as FBOs and enforcement officers suggested that current awareness of its existence was limited. Once aware that the guidance was easily accessible, it was well regarded by FBOs. Raising awareness could be done via trade organisations, LinkedIn posts or during local authority inspections.</p> <p>Consider also designing separate guidance documents on new and emerging trends, to ensure that the guidance remains current and responsive to new challenges within the industry (eg in the event of an online recall).</p>
Point of sale notices	Consider making the point of sale notice template mandatory for FBOs to improve the consistency of information provided to consumers. As more consumers shop online, consider producing guidance on where these notices should be displayed online. The point of sales notice template could also include a QR code, as suggested by consumer focus groups.

Area	Consideration
<p>Consumer awareness</p>	<p>Continue to raise consumer awareness of the steps to take during a food recall (eg at FSA/FSS stands at food shows or advertisement campaigns), as data suggests that awareness is still lower than expected. Consumers also require greater education about why they should return a product during a food recall as opposed to disposing of it themselves. Consider further promoting the current FSA/FSS text alert service, as focus group participants were responsive to this idea (as long as the alerts received were tailored to their food consumption habits).</p>
<p>SME support</p>	<p>Consider providing more tailored support for smaller FBOs to raise awareness of their role within the withdrawals and recalls process. SMEs are less likely than larger FBOs to have internal processes or resources in place in the event of a recall.</p> <p>This could include a series of webinars, paid advertisements on social media platforms or additional posts designed for smaller FBOs on the FSA/FSS website. Further promotion of the Quick Reference Guide may also be beneficial.</p>
<p>Communicating with consumers</p>	<p>Going forward, ensure that a combination of communication channels is being used by FBOs to notify consumers of a recall, to reflect consumer preferences and shopping habits. As part of this, the FSA/FSS could create a communication best practice guide, outlining the various methods that could be used, and local authorities could encourage FBOs to use a combination in-store notices, online notices, supermarket loyalty scheme notifications and social media posts.</p>
<p>Greater sharing of root cause analysis findings</p>	<p>More clarity is required regarding who is responsible (FSA/FSS, local authorities or FBOs) for sharing RCA findings, and for confirming the types of forums that these findings could be shared. This would ensure continuous improvement within the system.</p> <p>Consider also developing a national database of RCAs, accessible by all local authorities.</p>
<p>Further promotion of the RCA e-learning course</p>	<p>To increase uptake of the RCA e-learning course, consider requesting local authorities share the RCA e-learning course with FBOs as part of the recalls process. Consider monitoring course completion rates, to explore if uptake increases post local authority promotion.</p>

Area	Consideration
Standardise data collection categories	Consider standardising the FSA and FSS data collection categories, so data can be directly compared to monitor recall trends in the future.

1. The ESRG was a multi-stakeholder group involved in designing and delivering the system redesign, and included representatives from industry, local authorities, regulators and consumer groups.
2. Food Standards Agency (2022) "Small and Micro Food Business Operator (FBO) Tracking Survey: Wave 3 2021 - Technical Report" FSA [Available at: <https://doi.org/10.46756/sci.fsa.sty242>]
3. Armstrong, B. et al (2022) "Food and You 2: Wave 3" FSA, [Available at: <https://doi.org/10.46756/sci.fsa.hrb725>]