

Efficacy of Withdrawals and Recalls: How effective was the delivery of the redesign process? (Objective 1)

7.1 What insights were gleaned from the delivery progress of the internal programme process and partnership approach?

7.1.1 Insights from interviews with ESRG members

The evidence collected in the research phase of the system redesign was used to create the four key workstreams for delivery. ESRG members described how terms of reference were developed for each of these to outline key activities and guide delivery. A multidisciplinary team was set up to plan and deliver the objectives for the four workstreams, with a project lead for each. ESRG members were very positive about this process and were confident in the objectives, due to extensive consultation with industry and consumers. They also highlighted the benefits of having four workstreams, which meant that delivery was divided into manageable sections and aligned with clear and distinct objectives.

ESRG members outlined some aspects of delivery that worked well and worked less well, as outlined in detail below.

Delivery of programme processes - worked well and worked less well

Worked well

- The oversight of the system redesign and structure of delivery in four workstreams with different focuses
Engagement with stakeholders involved in the system redesign was extensive and through

Worked less well

- There were some delays in delivery of the workstream led by industry, and this was considered by some to be less efficiently managed
Engagement with smaller FBOs and trade associations was limited
It was sometimes difficult for industry to engage due to competing priorities, particularly when there was an expectation for in-person engagement prior to the pandemic

It is worth noting that ESRG members from the regulators were more likely to be positive about the level of engagement and representativeness of the stakeholders included. ESRG members from industry and those involved in enforcement of policy were more likely to suggest improvements that could have been made in this process.

Suggested improvements in delivery included:

- more time to produce the guidance and templates, as these were delivered within tight timeframes
- more guidance offered to the industry-led workstream around requirements
- a policy enforcement stakeholder suggested that more regular updates would have been useful, as it often felt as though several activities had progressed before an update was provided
- as smaller FBOs can find implementing recalls processes more difficult than larger ones due to resourcing, there could have been additional support for these stakeholders or further engagement.

When asked specifically about the partnership approach taken for the system redesign, ESRG members were very positive, as it allowed for the consideration of issues from various viewpoints. Trust between internal and external stakeholders was highlighted as a key aspect of this, with the encouragement of open and honest discussions at ESRG meetings. ESRG members suggested that the immediate feedback from external stakeholders was extremely valuable and resulted in stronger outputs from the system redesign, and allowed for more pragmatic considerations when developing the guidance.

7.2 Have objectives and planned outcomes been met in the design of the new system and the ‘package’ for FBOs/LAs?

7.2.1 Outputs

7.2.1.1 Output 1

A withdrawal and recall system founded on a clear and distinct set of roles and responsibilities agreed and commonly understood by all participants

Outputs delivered to achieve Outcome 1:

- • The guidance on Traceability, Withdrawals and Recalls within the UK food industry

Evidence from the desk review

In March 2019, the FSA and FSS published the Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry ([footnote 1](#)). It replaced the FSA Guidance Notes for Food Business Operators on Food Safety, Traceability, Product Withdrawal and Recall produced in 2007. The purpose of this guidance was to assist FBOs to comply with food law and to provide guidance on roles, responsibilities, and actions to take during food safety withdrawals and recalls in England, Northern Ireland, Scotland and Wales.

The Guidance has a separate chapter identifying roles and responsibilities of those involved in a withdrawal/recall, including FBOs, enforcement authorities and consumer organisations. It sets out specific actions and indicates whether these need to be followed in a case of recall or a withdrawal or both for a specific stakeholder group. The target audience of this guidance is FBOs and enforcement authorities.

Table 9: Example of actions to be taken in a withdrawal or recall scenario

Actions	Withdrawal	Recall
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Remove all unsafe food from sale or supply chain and ensure it is stored separately from other non-affected food	Yes	Yes
Issue POS recall notification to stores (Where applicable) and inform consumers of a recall (where appropriate using material provided by FBO initiating the recall) and facilitate the retrieval of the unsafe food	No applicable	Yes
If appropriate, accept returns of the affected food from consumers, clearly identify and store such food separately from non-affected food.	No applicable	Yes
Return the affected food to the FBO or dispose of it, if requested and in accordance with corresponding waste requirements (taking direction from the FBO who has initiated the withdrawal or recall)	Yes	Yes

The below is an example from the guidance that outlines key actions to be taken by retail FBOs receiving a withdrawal or recall notification.

Source: Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry, p.22

Insights from interviews with ESG members

ESRG members outlined that the guidance is clear and explains the roles and responsibilities of participants, and is an improvement on the previous guidance. The package was therefore said to have addressed this gap in knowledge and has made the process much easier for FBOs.

However, ESG members did raise some areas for consideration in terms of maximising the impact of this objective. One area of concern was the smaller businesses that have fewer resources to implement the new processes and understand the legalities underpinning them. Moreover, these organisations have been less involved in the delivery of the system redesign and would likely have less regular need to use and remain aware of recall processes. As such, they are less engaged in the updates to the process. Lack of resources was also discussed as a barrier in relation to local authorities, and it was suggested by one ESG member that more could be done to raise awareness of the guidance and tools with this group.

7.2.1.2 Outcome 2

Information to consumers is consistent and accessible, based on proven best practice and underpinned by cross-industry sharing of approaches and impact

Outputs delivered to achieve Outcome 2:

The guidance on Traceability, Withdrawals and Recalls within the UK food industry including:

- best practice guidance on communicating food recalls to consumers and template point of sale notices; and
- best practice guidance on communicating withdrawals and recalls from business to business, across the supply chain.

Evidence from the desk review

The Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry includes the following Annexes G and H.

Annex G: Business-to-business communications for food safety withdrawals and recalls across the supply chain. This Annex outlines guidance for FBOs initiating a food withdrawal/recall and for FBOs receiving notification. Both guidance detail key elements of the communication and provide suggested templates for FBOs.

Annex H: Key principles and best?practice template for accurate and effective consumer recall notifications. This Annex outlines the key aspects to consider when creating effective recall messages, such as:

- style and appearance;
- necessary content; and
- effective channels for communicating recall messages to consumers, including best location for displaying point of sale notices.

It also includes some examples of suggested wording and provides links to the editable point of sale notice templates. Annex H also illustrates examples of completed point of sale notices.

Insights from interviews with ESRG members

These adjustments were said by ESRG members to provide more accessible, consistent and clear information to consumers, due to the availability of templates and the best practice guidance.

However, industry ESRG members and those involved in enforcement were less confident in addressing whether this objective has been met, as in some ways the impact of this intended outcome is outside of regulator control. Other than mandating that a point of sale notice must be displayed, regulators do not control where they are placed within a store, meaning that the availability of information to consumers can be variable. It was, therefore, suggested that there is still some way to go in achieving this objective due to the relative freedom in implementation for FBOs.

7.2.1.3 Outcome 3

The public are aware of the recall process and what actions they should take

Insights from ESRG members

ESRG members were least confident in assessing whether this objective had been delivered in the design of the new system. One suggested that there is some increased awareness due to the text alert system and the widened scope in how consumers can access information, including the updated website with guidance on making product complaints. Another suggested that while there has been limited use of this guidance, the fact that this has been made available and highlighted to consumers is a positive step.

Several ESRG members indicated that the system redesign struggled with increasing consumer awareness and had not delivered the consumer awareness campaign that was envisaged. One ESRG member suggested that this was potentially an overambitious objective. Others highlighted the impact that EU Exit and Covid-19 have had on the system redesign's ability to engage consumers and the focus placed on these activities.

7.2.1.4 Outcome 4

Feedback loops and a philosophy of continuous improvement amongst all stakeholders underpins the withdrawal and recall system

Outputs delivered to achieve Outcome 4:

- Root Cause Analysis Package
- Revised Food Law Codes of Practice in England and Northern Ireland

Evidence from the desk review

On the Food incidents, product withdrawals and recalls webpage ([footnote 2](#)), the FSA published a section on Undertaking Root Cause Analysis which presents three elements of the RCA package:

1. An Introduction to Root Cause Analysis Course online ([footnote 3](#)). This online course offer two pathways: for enforcement authorities and for food businesses.
2. The RCA Report Form ([footnote 4](#))
3. Best Practice Example ([footnote 5](#)).

The Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry also includes Annex I: Background to root cause analysis. There is very limited information available on the RCA in the main Guidance and it does not direct the reader to the Report Forms or e-learning course on the FSA/FSS websites.

As part of this evaluation, RSM also received a copy of the Root Cause Analysis (RCA) Guidance for Local Authorities, Industry and FSA Staff [\(footnote 6\)](#). The guidance covers the following questions:

- What is Root Cause Analysis (RCA)?
- What is the '5 Whys' principle?
- Why is the FSA promoting the area of RCA?
- Why is RCA data being collected?
- Summary of the FSA Trial into RCA
- What are we expecting from Industry?
- What are we expecting from local authorities?

Insights from interviews with ESRG members

The development of RCA guidance and the e-learning course were viewed positively by regulation ESRG members, who believed that the design of these did meet the final objective for the system redesign. They suggested that the guidance includes detailed information and clarification around the processes, with good examples of RCA. One ESRG member suggested that retailers are using RCA to share lessons within their supply chains and ensure preventative action is taken. Another suggested that more detailed incidents reports are being seen due to the changes.

However, all ESRG members suggested that the impact could be increased. While the guidance and training were considered to be fit for purpose, focus on dissemination and awareness was highlighted as a key facilitator for increased use and impact. It was suggested that while utilisation of RCA has increased as a result of the system redesign, this uptake could be greater.

Again, the impact of EU Exit and Covid-19 were highlighted as limiting factors in the prioritisation of this work and industry's capacity to implement. One ESRG member also expressed concern over the uptake of RCA by smaller businesses and whether they are using this to extract lessons and influence actions going forward. This is linked to the limited resource within smaller organisations and the capacity and capabilities to conduct such analysis. ESRG members suggested that the system redesign tried to address this issue by ensuring that the e-learning course is as simple as possible, but that it would take time for industry to adopt these new processes. By contrast, one enforcement ESRG member considered whether the guidance could be simplified or shortened to encourage implementation in practice. They reflected that longer guidance is less likely to be utilised by local authorities.

1. Food Standards Agency and Food Standards Scotland (2019) "[Guidance on Food Traceability, withdrawals and recalls within the UK Food](#)" FSA
2. Food Standards Agency (2020) "[Food incidents, product withdrawals and recalls](#)" FSA
3. Food Standards Agency (2023) "[An introduction to Root Cause Analysis Course for Enforcement Authorities](#)" FSA

4. Food Standards Agency (Unknown) "[RCA Report Form](#)" FSA
5. Food Standards Agency (Unknown) "['Best Practice' Example: Root Cause Analysis](#)" FSA
6. This guidance is not currently available online, but was instead disseminated to all local authorities by the FSA and FSS (eg via FSA's Smarter Communications platform)