

Incident Management Plan: Definition of an incident

This plan sets out the strategic, tactical, and operational command and control structure and procedures for managing food and feed safety incident.

2.1 The Food Standards Agency (FSA) defines an incident as:

“any event where, based on the information available, there are concerns about actual or suspected threats to the safety, quality or integrity of food and/or feed that could require intervention to protect public health and/or consumers’ interests. Quality should be considered to include food standards, authenticity and composition.”.

2.2 The following section covers the alerting process for the FSA to respond to an incident, as well as the activation and escalation process which ensures the incident is managed at the appropriate level of authority.

Detection of an incident

2.3 Initial incident detection may originate from many sources. An incident may be notified by an internal division, such as Field Operations, FSA surveillance, horizon scanning or signal monitoring. Additionally, an incident may be identified through intelligence received or generated by the National Food Crime Unit (NFCU). Relevant information indicating a food or feed incident is communicated to the Incidents Team; this may be immediately after the receipt of information, or at a later point in the development of a strand of intelligence, particularly if a current safety concern relating to food (or feed) on the market becomes apparent. Any incident with potential indications of food crime is promptly referred to the National Food Crime Unit (NFCU).

2.5 External notifications such as those from Industry and food business operators (FBOs) are reported directly to the incidents teams across England, Wales and Northern Ireland. Incidents can be reported to the FSA incidents teams in England, Wales and Northern Ireland regarding food and/or feed-related and environmental contamination incidents on a 24/7 basis. Members of the public can report food safety concerns to the FSA General enquiries helpline (0330 332 7149) or [submit an enquiry](#) via email.

2.6 Information on incident reporting is available on the FSA’s website [report an incident](#) page. Food Standards Scotland (FSS) has its own reporting process in place as detailed within the [Food Standards Scotland Incident Management Framework](#).

2.7 Local Authorities have a responsibility under the [Food Law Code of Practice and Feed Law Code of Practice](#) (with separate codes for England, Scotland, Wales and Northern Ireland) to inform the FSA/FSS of national (non-localised) or serious localised incidents. Find the relevant [Scotland Codes of Practice](#) on the FSS website.

2.8 Some incidents, such as serious foodborne, feed borne or animal health related outbreaks may also be notified by the public health or animal health authorities in each nation. The FSA is also informed of incidents via Other Government Departments (OGDs), including FSS, and the emergency services if they consider an incident or cross cutting issues may potentially impact on food and/or feed safety.

2.9 The International Food Safety Authorities Network (INFOSAN) and Import of Products, Animals, Food and Feed System (IPAFFS) are also important sources. Since the EU Transition on 1 January 2021, the UK has third country access to the EU Commission Rapid Alert System for Food and Feed (RASFF) network. This allows the UK to only receive food and feed safety related information where the UK is affected.

Classification of incidents

2.10 The FSA is responsible for responding to all food and feed incidents that it is notified of and in the initial stages all incidents will be regarded as a suspected risk to public or animal health until there is evidence to the contrary.

2.11 On receipt of an incident notification, classification of the incident is carried out by means of an Incident Classification Assessment (ICA), Figure 1 below.

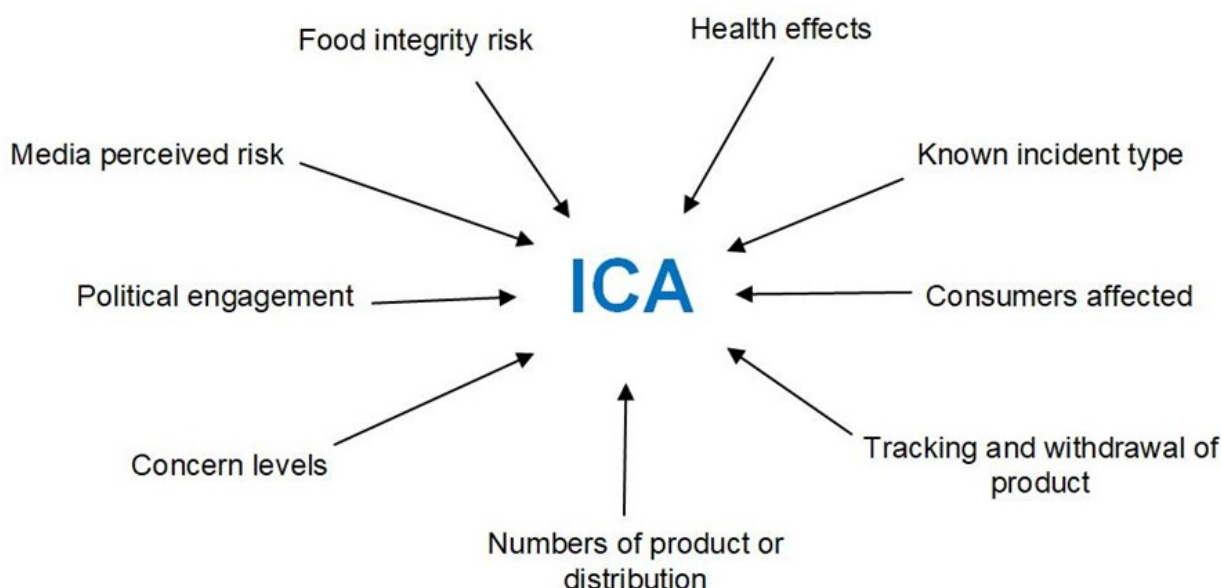


Figure 1: Incident Classification Assessment

2.12 If during a routine incident it is considered that successful management requires levels of resources and authority beyond those available for normal incident handling, then a decision will be made based on set criteria whether to escalate to non-routine incident classification levels.

2.13 An incident response may also be activated for issues relating to food chain integrity, food authenticity, food crime, business continuity or as part of a multi-agency response to an emergency or crisis.

2.14 Further information on incident classification and assessment can be found in [annex A](#).

Escalation criteria

Incident assessment

2.15 In responding to an Incident, there is an assessment of the risk associated with the incident, the purpose of which is to determine the potential scale, scope, nature and impact of the incident. There are several components of incident assessment, the main part is the Incident Classification Assessment (ICA).

2.16 Risk management advice and food or feed safety risk assessment can contribute to the classification of an incident; they are, however, rarely conducted for the purposes of incident classification, and would more likely be performed during the incident response. Further information on how the ICA prioritises and classifies an incident can be found in [annex A](#).

Risk management

2.17 The process, distinct from risk assessment, is the weighing of policy alternatives to accept, minimize or reduce assessed risks and to select and implement appropriate options. Risk Management is carried out in consultation with all interested parties, considering risk assessment, and other factors that are relevant for the health protection of consumers or animals and for the promotion of fair-trade practices, and, if needed, selecting appropriate prevention measures.

Scientific risk assessment

2.18 A scientific risk assessment will be undertaken to determine human and/or animal health risks associated with an incident and informs the ICA. The risk assessment is co-ordinated by the FSA's Incidents Team in England and Consumer Protection teams in Wales and Northern Ireland and in liaison with APHA, Defra and FSS Scientific Risk Assessment Teams where appropriate. They liaise with the relevant policy teams, who will commission a risk assessment from the Risk Assessment Unit (RAU), if required internally. The involvement of OGDs such as Department of Health and Social Care (DHSC) or Department of Environment and Rural Affairs (Defra) may be required. Risk assessment may also be commissioned by other government departments, to inform FSA response, for example, by the National Response Centre (NRC) who are responsible for UK public health security. In general, FSA risk assessment involves the following steps:

Hazard identification

Involves identifying biological, chemical, radiological, physical agent(s) and/or allergens capable of causing adverse health effects. In toxicology, hazard identification involves identifying the type and nature of adverse effects that an agent has an inherent capacity to cause in an organism, system or (sub)-population.

Hazard characterisation

Involves evaluating the nature of the adverse health effects associated with the hazards. In toxicology, hazard characterisation involves describing the inherent properties of an agent or situation having the potential to cause adverse effects.

Exposure assessment

Characterises the amount of a hazard that may be consumed by members of the exposed population(s). It evaluates the likely intake of hazards via food as well as exposures from other

sources if relevant.

Risk characterisation

This step draws together the information from the stages of hazard identification, hazard characterisation and exposure assessment to give an overall assessment of the nature of the hazard and the extent to which people are likely to be exposed. It estimates the likelihood and severity of known or potential adverse health effects in a given population to produce an overall risk estimate. The overall uncertainty associated with the risk estimate is described during this stage.

Criteria for escalation

2.19 Whilst many incidents and outbreaks are dealt with using routine arrangements, there are incidents that, due to their complexity, scope, scale and impact require strategic leadership and additional resource. These incidents are escalated to non-routine status and defined as non-routine serious, severe or major; in line with escalation criteria set out in the supporting Incident Management Co-ordination Group Standard Operating Procedures. Escalation of incidents within FSA meet a combination of impact threshold triggers and is confirmed in a written problem statement, to be agreed by the Strategic Incident Director and/or the Chief Executive. An example of escalation criteria within FSA is demonstrated in Figure 2 below. Further detail on Incident classification can be found at [annex A](#).

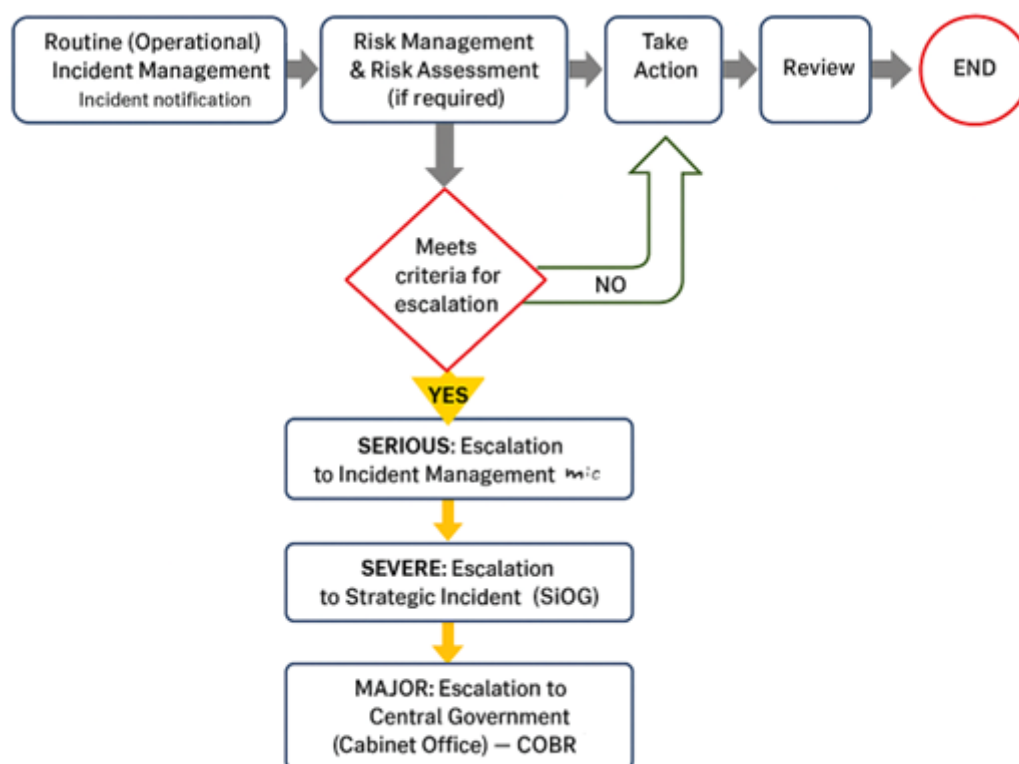


Figure 2: Incident escalation process

2.20 There are also levels of emergency response, set out in the Amber Book (previously known as UK Central Government Concept of Operations (CONOPs)) that may necessitate FSA involvement in a co-ordinated central government response. This could include leading a central response as the lead government department (LGD) for food or, where FSA may be required to

provide input to ensure the remediation of that incident/emergency and the longer-term recovery. For example, through providing guidance, co-ordination, people, expertise or specialised advice depending on the nature of the emergency and its impact.

2.21 Making sure an incident, emergency or business continuity event is managed at the appropriate level is key to a successful response. Depending on the issue it is the responsibility of the following individual to consider escalation:

- Food and feed safety incidents - Incident Manager or Head of Incidents / Consumer Protection Division (CPD)
- Business Continuity – Head of Resilience
- Emergency – Any member of the senior or Executive Management Team

2.22 Escalation to non-routine status may be considered even when the FSA is not the LGD. A strategic and/or tactical response from FSA may be required for the co-ordination and remediation of that incident, despite being led by another Government Department. An example of this may be an animal health related incident (for example, infectious and/or notifiable disease) or a pandemic. Figure 2 above sets out the incident escalation process.

2.23 Rapid escalation: In the case of an obvious severe incident the escalation steps may be taken rapidly. The CEO and other relevant Directors may be responsible for escalation.

2.24 Major incidents: Escalation to a Major incident will occur if the severity of the incident is such that it may threaten serious damage to human and/or animal health, or serious damage to the environment or have long term impacts on the food/food supply chain. In such cases it may be classed as an ‘Emergency’ in the terms of the Civil Contingencies Act (2004). Those with FSA strategic oversight responsibility will communicate with Cabinet Office and the COBR Unit who will then decide whether a central co-ordinated government response is required, and Cabinet Office Briefing Room (COBR) should be activated or devolved equivalents. This level of emergency is defined in The Amber Book as Serious Level 2.

2.25 Escalation to International stakeholders: In the event of a major food or feed related incident occurring at international level, the FSA’s UK and International Affairs Directorate are responsible for the coordination of communication and engagement at cross-government, EU and international level.

2.26 Refer to [annex A](#) for further information on how the scale of impact affects the level of the FSA’s response. The table below sets out an example of escalation triggers that would need to be met for escalation purposes. These are required to be a combination of impacts rather than a singular trigger.

Escalation triggers / Classification	Serious	Severe	Major
Media	Increasing regional interest requiring co-ordinated briefings, statements, media monitoring and engagement with OGDs.	Continuous national interest necessitating comprehensive media monitoring, regular briefings and statements, as well as coordinated engagement with other government departments.	Sustained national and/or international interest requiring government level statements.
Public health	Widespread (UK) or multi-country cases of serious or prolonged illness, some requiring hospitalisation, or isolated deaths in vulnerable groups.	UK wide or multi-country serious and prolonged illness, high number of deaths or isolated deaths in vulnerable groups.	Widespread national and/or international deaths.
Industry Products / impact	Number of batches affected / widespread complex food supply chain involving numerous manufacturers / issues with compliance from several sources requiring closure of plant(s).	Numerous to widespread batches affected, requiring several plant closures for detailed investigation or multi-country impact, food supply issues.	Widespread national and/or international closures threatening import/export markets and loss of confidence in integrity of food supply chain in the UK.

Escalation triggers / Classification	Serious	Severe	Major
Consumer concern	Heightened loss of consumer confidence in one or some aspects of the food chain requiring specific internal investigations.	Significant national loss of confidence in aspects of the integrity of the food supply chain in the UK requiring co-ordinated cross government briefings/statements and/or FSA wide investigation / reputational risk to role of FSA as a regulator.	Widespread loss of public / industry / international confidence in the integrity of the food supply chain in the UK.