

# Food incidents, product withdrawals and recalls

How to report, respond to and prevent an incident, including how to withdraw or recall unsafe food products.

#### What a food incident is

A food incident occurs when concerns around the safety or quality of food (and/or feed) may require action to protect consumers.

Incidents broadly fall into two categories:

- contamination of food or animal feed in processing, distribution, retail and catering
- environmental pollution incidents such as fires, chemical/oil spills and radiation leaks

#### Product withdrawals and recalls

As a result of a food incident, a food product may have to be withdrawn or recalled.

A withdrawal is when unsafe food is removed from the supply chain before it has reached consumers.

A recall is when unsafe food is removed from the supply chain and consumers are advised to take appropriate action, for example to return or dispose of the unsafe food.

## Reporting a food incident

If you believe food or feed you have supplied is either harmful to health, unfit for people to eat or does not meet legal requirements, you should:

- immediately withdraw or recall the food from the market
- <u>tell your competent authority</u> (local authority or port health authority), which will advise you of any further action you might need to take

If you believe unsafe food has reached consumers, <u>tell the FSA incidents team</u>. A recall notice may need to be issued by us.

To help with this, you need to be able to identify your suppliers and food business customers.

## Traceability, withdrawals and recalls guidance

Our 'Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry' explains what the law requires and what businesses need to do.

#### PDF

View Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry as PDF(Open in a new window) (1.18 MB)

It includes advice and best practice on:

- · traceability systems
- making a decision and carrying out a withdrawal or recall
- roles and responsibilities
- how to inform consumers of a food recall

#### **Important**

#### References to EU legislation in FSA guidance

Directly applicable EU legislation no longer applies in GB. EU legislation retained when the UK exited the EU became assimilated law on 1 January 2024, published on <a href="legislation.gov.uk">legislation.gov.uk</a>. References to any legislation in FSA guidance with 'EU' or 'EC' in the title (e.g. Regulation (EC) 178/2002) should now be regarded as assimilated law where applicable to GB. References to 'Retained EU Law' or 'REUL' should now be regarded as references to assimilated law.

For businesses moving goods from Great Britain to Northern Ireland, information on the Windsor Framework is available on GOV.UK.

The Windsor Framework was adopted by the UK and EU on 24 March 2023. The Framework provides a unique set of arrangements to support the flow of agrifood retail products from Great Britain (GB) to Northern Ireland (NI), allowing GB standards for public health in relation to food, marketing and organics to apply for pre-packed retail goods moved via the NI Retail Movement Scheme (NIRMS).



The following tools will help when carrying out a recall:

WORD

<u>View An example contacts template (Annexe Ei) as Word(Open in a new window)</u> (19.31 KB) WORD

View An example food incident key decision log (Annexe Eii) as Word(Open in a new window) (18.23 KB)

WORD

View An example template for notifying the enforcement authority (Annexe F) as Word(Open in a new window) (20.12 KB)

WORD

<u>View A business to business template (Annexe G) as Word(Open in a new window)</u> (19.72 KB) WORD

<u>View Editable allergy alert template for point of sale as Word(Open in a new window)</u> (165.16 KB) WORD

<u>View Editable product recall template for point of sale as Word(Open in a new window)</u> (165.44 KB)

A quick reference guide has also been developed to further assist businesses, this complements the main guidance:



#### **PDF**

<u>View Quick reference guide: Food traceability, withdrawals and recalls as PDF(Open in a new window)</u> (630.59 KB)

## **Undertaking Root Cause Analysis (RCA)**

Following a food safety incident, you are advised to undertake a Root Cause Analysis (RCA) exercise.

RCA is a method that can be used to determine how and why the food incident occurred and to help identify actions to prevent future incidents. The results of the RCA can be used to review how you manage food safety and hygiene in a your food business, including the traceability, withdrawal and recall of unsafe food.

Different methods can be used when performing RCA and you should liaise with your enforcement authority for further advice.

To help businesses understand RCA, we have developed a root cause analysis e-learning course

WORD

View Root cause analysis form as Word(Open in a new window) (80.87 KB)

View Root cause analysis best practice example as PDF(Open in a new window) (176.91 KB)

## Root cause analysis - single point lessons

Root cause analysis findings have been used to identify common factors that resulted in particular types of incidents reoccurring.

Using this information, we have developed some initial Single Point Lessons (SPL) to help better target those areas where intervention will have most effect and to promote 'best practice' relating to incident prevention.

PDF

<u>View RCA single point lesson - metal contamination as PDF(Open in a new window)</u> (116.11 KB)

<u>View RCA single point lesson - salmonella contamination as PDF(Open in a new window)</u> (93.01 KR)

PDF

View RCA single point lesson - undeclared allergens as PDF(Open in a new window) (125.8 KB)

## Protecting and defending food and drink from deliberate attack

The British Standards Institution has developed a user-friendly guide to help businesses if you don't have access to specialist advice in this area. This guide is designed to help food businesses and others avoid and lessen threats at all points in the food and drink supply chain.

#### **PDF**

View Publicly Available Specification (PAS 96) 2017 Guide to protecting and defending food and drink from deliberate attack as PDF(Open in a new window) (5.88 MB)

The guide can help you to assess potential vulnerabilities to fraud, ideologically motivated individuals and other 'insider' threats. There is also advice on cyber threats.

## Our incident management plan

The Incident Management Plan (IMP) shows you how we are meeting our responsibilities in response to non-routine food-related incidents. The IMP will be regularly updated and will be continually tested.

Read the full Incident Management plan for non-routine incidents.

## Incidents response team phone number

As well as by email the Incidents response team in England can be contacted by phone, including out of hours, at <u>020 7276 8448</u>. This team handles food incidents reported by Food Business Operators, Local Authorities and Other Government Departments.

If you are a consumer, please use our Report a Food Problem service for details on how to contact your local food safety team.

## Video transcript

Meet Joe. Joe owns and operates a bakery in his small market town. His business is successful and it's growing. So he's employed a team of bakers to help keep up with demand. Joe works hard to ensure he supplies his customers with accurate allergen information so that more people can enjoy his fabulous creations. One of his most popular cupcakes is his Coconut Dream. Oh, it's good!

After a busy day selling cakes, Joe receives a call from the local authority informing him that a member of the public had an allergic reaction to one of his cakes. It was his Coconut Dream!

The customer has an allergy to almonds, but these aren't in the coconut dream. The cakes that Joe does sell that contain almonds are clearly labelled. Joe's rightly concerned, but he wants to find out why this has happened and what he can do to prevent it happening again. Joe can think of a few reasons why it might have happened.

The almonds and coconut do look very similar when they're chopped up, but that might be the symptom of a higher-level problem. Joe needs to use Root Cause Analysis. Root Cause Analysis is a collective term for a number of structured methods that can be used to determine how and why a problem has occurred, allowing more effective, long-term preventative actions to be initiated and applied.

These structured techniques are practical and can be easily applied when there is a food safety issue. Joe needs to find the root cause of the mistake so that he can keep his customers safe, avoid any future costs associated with food recalls, protect his reputation and minimise the financial impact the solution might require. To begin a root cause analysis. Joe needs to firstly define the incident.

Next, he needs to categorise the immediate causes. Then he'll need to determine the root cause, define the preventative actions needed and finally, review the process.

But how does Joe determine the root cause of the problem? One way that Joe can do this is to use the Five Whys Root Cause Analysis method. The Five Whys is arguably one of the simplest yet most effective Root Cause Analysis methods. It requires Joe to ask a series of 'why' questions each time a cause is identified.

The question 'why did it happen' is applied until the root cause is identified. So let's try it, using the best practice example on the FSA website. Why were almonds incorrectly added to the coconut green cake instead of coconut? The baker couldn't tell them apart. They both looked similar and neither were labelled.

Why weren't the ingredients labelled? The labels were removed during the last clean but weren't replaced. Why weren't they replaced? The cleaning staff didn't consider the impact of this, and it wasn't on any of their cleaning checklists. Why did the baker not spot the error?

It turns out he was unfamiliar with the complete production procedure. Why was the baker unfamiliar with the procedure? The baker was trained, but there was no sign-off process to determine whether the training was satisfactory. Why might the training not have been satisfactory?

The baker's understanding of the process or the impact of adding the wrong ingredient wasn't confirmed. From this line of questioning, Joe now has a better idea of the root causes. There are other methods that Joe could have used, but for now, the Five Whys method was sufficient.

You can find out more about these other methods at <a href="www.food.gov.uk">www.food.gov.uk</a>. Joe's ready to implement solutions to correct the problem.

He's identified several different issues that need corrective actions to prevent mistakes in the future. The solutions that Joe has decided he needs to implement are: To redesign his staff training procedure and include an assessment of the trainee's understanding, and this will be documented in Joe's records.

Joe's going to redesign the storage area in the kitchen and make sure that all ingredients are kept in separate, dedicated locations and replace the labels with ones that can't be removed by the cleaning staff. He's introduced a sign-off step in the baking procedure where the baker must cross-check the ingredients being used with the ingredients in the recipe, and he's adding a step to the cleaners line checks to ensure the ingredient stations are clearly labelled and a post-cleaning check sheet is being introduced.

These solutions need to be monitored to ensure that they've had an impact and they need to be embedded into the business process. If it's not worked, then Joe can go back and investigate further. Joe now needs to document the investigation and the changes he's made.

Documentation is essential because it provides evidence that an investigation has been conducted, the appropriate inputs have been considered, that methods and techniques have been suitably selected and employed. And that a thorough, balanced and objective study has been completed. Food businesses should inform enforcement authorities of the action taken in the event of a food safety incident to prevent risks to the final customer.

Enforcement authorities are being asked to forward the results of the food business's root cause analysis assessment to the Food Standards Agency for further analysis to enable long-term preventative actions to be identified and best practices to be applied across the food industry. This could help businesses to introduce preventative measures without first having to suffer the financial and reputational damage a food incident may bring about. Joe's now back to selling his Coconut Dream cupcake and they're as popular as ever.

Joe is confident that the steps he's taken will prevent the mistake from happening again because he found the root cause of the issue instead of simply tackling the symptom. Joe understands the importance of Root Cause Analysis and the merits of sharing the documentation with his local authority, who have shared it with the Food Standards Agency. In turn, others in the industry have learned from Joe's experience, and Joe's learned from others, too.

He's implemented further changes based on other businesses' experiences. This means he has more time to better serve his customers and fewer operational issues, holding him back from growing his business. For more information on root cause analysis and a helpful free e-learning course for you and your staff, visit www.food.gov.uk.