Food in the Platform Economy
Advancing risk assessment regulatory capacities in the context of the platform economy (List of Hazards)

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List of hazards

This file enumerates issues that may contribute to food safety and integrity incidents (i.e. hazards/threats) by either online food vendors or online intermediary platforms. The list is extensive but not comprehensive or complete - more hazards likely exist. The file has not been externally revised, validated, or consulted, which is suggested as a next step.

Table 1: List of hazards.

General
Foundational: concerns applicable to all online food businesses
Imperfect registration.   - Some online food vendors may not be aware of or interested in registration. Registration expectations for platforms are unclear.   **Limited experience.**   - New entrants might be tempted to prioritise the learning of online market dynamics over food safety and integrity concerns.
Online food vendors
Vendor-101: concerns applicable to all online food vendors.
Cleanliness.   - Cleanliness is a foundational requirement. It would be good to confirm if online vendors prioritise it.   **FSMS.**   - It is unknown whether all online vendors have a food safety management system (FSMS) in place.   **FSMS (online considerations).**   - Even if a vendor has an FSMS, the vendor might be unaware of the various ways in which online operations may affect the process.   **Lack of food safety training.**   - The extent to which online food vendors pursue food safety training is unknown, but much variation across types of vendors is plausible.   **Traceability.**

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[1] Centre for Analysis of Risk and Regulation (CARR), London School of Economics (LSE); & Food Standards Agency (FSA).

- It is unknown whether many online vendors keep due records of all steps in the intermediation process.
- **Allergens (understanding).**
    - Gaps in communication vis-à-vis the platform economy may mean some vendors are only partially aware of allergens and applicable procedures.
- **Allergens (display across sales channels).**
    - Some online food vendors may not display allergen information across all online sale channels.
- **Allergens (packaging/service).**
    - Some vendors may not display allergen information in packaging or during service due to considering online declarations sufficient.
- **FHRS (coverage).**
    - Very small online food vendors may not be covered by the FHRS.
- **FHRS (herd effects).**
    - Display of FHRS by vendors covered by it may be challenged by their need to appear in listings alongside vendors not covered or not displaying FHRS.
- **Food fraud (quality of supply).**
    - Online vendors may be at increased risk of being targeted by organised crime.
- **Food fraud (lack of customer oversight).**
    - The disconnection between preparation and consumption may increase the opportunity for fraudulent behaviour by some online food vendors.

Logistics: concerns applicable to vendors involved in food delivery and/or food events' management, including those that outsource these tasks to contractors or independent partners/associates.

- **Delivery (oversight).**
    - The relation between the vendors and those fulfilling logistical needs for them may vary significantly, implying varying degrees of oversight over food delivery and/or events' management.
- **Delivery (training).**
    - Trained delivery personnel are less likely to incur food safety and integrity issues than untrained personnel.
- **Delivery (temperature).**
    - Food (including groceries) is susceptible to changes in temperature.
- **Delivery (contamination).**
    - Food (including groceries) can be unintentionally or intentionally contaminated during delivery.
- **Mix-ups (foundational).**
    - Accidental mix-ups seem likely in the context of delivery of multiple orders or management of large events.
- **Mix-ups (non-foods).**
    - Some online vendors may deliver mixed food and non-food products or manage events involving both types of products. The digital aspects of logistics involved may increase all associated risks.
- **Mix-ups (allergens).**
    - Given separation between production and consumption, products containing allergens may easily be confused during or after transport.

Personal: concerns applicable to very small 'personal' type of online food vendors.

- **Mixed activities (storage).**
  - Some small online food vendors may not store domestic and business foods separately.
- **Mixed activities (preparation).**
  - Some online food vendors may not separate the preparation of food for business and domestic consumption.
- **Nomadic practices (foundational).**
  - Some online food vendors travel or otherwise change kitchens in the process of providing services.
- **Nomadic practices (procedures).**
  - A degree of nomadic practices may be impossible to avoid, but procedures to manage the location changes involved may reduce their risk.

MSMEs: concerns applicable to micro, small, and medium enterprises.

*There are currently no additional items to include in this section of the table. During research, MiSMEs seemed to be perceived as the archetypal type of online food vendors. As a result, most applicable hazards are covered in the vendor-101 or logistics sections of this table. Additional thinking is suggested.

Large: concerns applicable to large or industrial type of online food vendors.

- **Assessment.**
  - Large food businesses often have food safety and integrity procedures in place, but it is uncertain if they have specifically assessed added risks that may arise from online operations.
- **Regulatory mismatch.**
  - Aspects of some online food vendors' online operations may fall under the remit/supervision of different local authorities (LAs), which may further challenge the regulation of online activities.

Online intermediary platforms

Intermediary-101: concerns applicable to all intermediary platforms.

- **Unregistered vendors.**
  - Platforms not requiring vendors to be registered food businesses may contribute to an increase in the number of unregistered food operators.
- **Traceability.**
  - It is unknown whether online platforms (or how many) are sufficiently close to their vendors to facilitate traceability should a need for such thing arise (this can be extended to the ability to consider complaints).
- **Communications with vendors.**
  - Platforms that regularly engage with their vendors on food safety and integrity issues can help communicate applicable guidance if/when needed; the opposite might represent a communications challenge.
- **Interest in food safety/integrity.**

- o The degree to which different platforms encourage vendors to think about food safety/integrity is not well known (especially outside the takeaway sector).

- **Interest in food safety culture.**
  - o The degree to which different platforms encourage vendors to think about their food safety culture is unknown.
- **FSA/LA communications.**
  - o Good communicate with LAs and the FSA can facilitate regulation; poor communication may represent a challenge.
- **Facilitating allergen declarations.**
  - o Functionality differentials may affect the extent to which a platform facilitates allergen declarations (and their visibility).
- **FHRS (admission).**
  - o Platforms that require vendors to have a minimum FHRS score may represent a lower risk than those that do not.
- **FHRS (display).**
  - o Functionality differentials may affect the extent to which a platform facilitates FHRS display (and their visibility).
- **Quality assurance.**
  - o Platforms with quality assurance processes may help to reduce the likelihood of unintentional incidents and fraud-related incidents.

Logistics: concerns applicable to intermediary platforms involved in food delivery and/or food events' management, including those outsourcing to contractors or independent associates.

- **Ownership.**
  - o The ownership over issues that may arise during food delivery or management of food events/experiences may vary as per the relation between platforms and contractors/associates.
- **Delivery (training).**
  - o Trained delivery or event management personnel are less likely to incur food safety and integrity issues than untrained personnel.
- **Delivery (temperature).**
  - o Food (including groceries) is susceptible to changes in temperature.
- **Delivery (contamination).**
  - o Food (including groceries) can be unintentionally or intentionally contaminated during delivery.
- **Mix-ups (foundational).**
  - o Accidental mix-ups seem likely in the context of the delivery of multiple orders and during the management of large events.
- **Mix-ups (mixed goods).**
  - o Some platforms sell food and non-food products. It is unknown if food is being mixed with other products in a way that could lead to cross-contamination.
- **Mix-ups (allergens).**
  - o Mix-ups of allergen and non-allergen items seem particularly feasible in the context of intermediated sales and outsourced delivery of food or management of food events/experiences (too many hands involved type of problem).

- **Vendor matching (foundational).**
  - Some platforms may deliver orders combining goods/services by multiple vendors, which may increase risks beyond the single-vendor model.

- **Vendor matching (traceability).**
  - Without due internal record-keeping by the platform, vendor matching activities may challenge traceability even further.
- **Meta-aggregation (foundational).**
  - Platforms that complement their listings with products or services from other platforms might face added food safety and integrity challenges.
- **Meta-aggregation (traceability).**
  - Platforms that complement their listings with products or services from other platforms might represent a particularly poignant traceability challenge.

Open/social marketplaces: concerns applicable to 'marketplace' platforms.

- **Illicit activities.**
  - Marketplaces are attractive for vendors who want to sell illegal food items.
- **Repeat offenders.**
  - Marketplaces not requiring proof of ID or registration from vendors may provide an opportunity for repeat offenders to continue business indefinitely.