

FSA RESPONSE TO COVID-19

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1. Summary

- 1.1. The COVID-19 pandemic is an unprecedented global crisis necessitating central and devolved government coordination and response. The Food Standards Agency's (FSA) objective throughout our emergency response has been to ensure food safety so that the high level of consumer protection in the UK is preserved. We have also supported industry in maintaining food supply thereby keeping wider consumer interests in mind. As the UK hopefully moves into the next phase of the COVID-19 pandemic response, the FSA, working closely with Food Standards Scotland (FSS), will seek to maintain this approach.
- 1.2. The COVID-19 pandemic has altered the socio-economic and political context in which the FSA operates across England, Wales and Northern Ireland, and the impacts and effects have created a "new normal" to which we must adapt.
- 1.3. This paper reflects upon the FSA's response to the pandemic and details how we have organised ourselves to ensure a robust, effective yet flexible response whilst supporting our own staff in protecting themselves and others throughout the outbreak. It also provides a roadmap for the FSA moving from the Emergency Response phase to Business as Usual (BAU) in the post-COVID world.
- 1.4. The Board is asked to:
Note, comment and discuss the progress made and the ways in which the FSA should approach the future in the light of the COVID-19 pandemic.

2. Introduction

- 2.1. The UK food system including both industry and local authorities has responded really well to the crisis putting food safety at the forefront. The FSA has played an important and varied role in the response working hard to keep consumers safe, food businesses and local authorities informed, whilst supporting the cross-government effort to maintain food supply. In parallel, we have also taken the necessary steps to protect our staff, not least, those in front line roles.

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- 2.2. The FSA has developed principles that guide all the decisions that the FSA takes in order to ensure that a safe food supply can be maintained during the COVID-19 pandemic. These are:
- To protect consumers interests and support the supply of safe food by taking a proportionate, risk-based approach to ensure that critical FSA and local authority/port health authority functions and their supporting services remain operational and appropriately resourced.
 - To support FSA staff to protect themselves and others, following current government advice and guidance.
 - To apply risk management measures within the risk appetite set by the Board, seeking Board approval if decisions alone or in combination would require a deviation from this framework
 - To apply risk management measures (including any easements) for as short a time as needed to manage the impact of COVID-19.
 - To retain control and accountability at all times, with clear mechanisms for recording measures in place and monitoring the impact.
 - To ensure consistency as far as possible between countries and regions, whilst taking into account specific local needs.
 - To work in partnership with stakeholders across governments, the wider public sector and food business operators and representatives to ensure that measures are integrated within the whole of government response.
- 2.3. These principles are anchored in the key strategic objectives for the FSA's response to COVID-19. They make explicit that at all times we work within the agreed risk appetite and set out how the FSA will retain control and accountability and ensure that decisions are integrated within the whole of government response.

3. Emergency Response (Progress to Date)

Risk Considerations

- 3.1. The FSA is a science-based organisation and, given the large-scale health impacts of COVID-19, it is essential that all of the department's actions, as well as its communications with industry, local and port health authorities and consumers, are predicated on the best available evidence. This evidence is used as the basis for informed decisions on risk management, taking into account wider consumer interests such as accessibility and affordability of a healthy and varied diet.
- 3.2. Our scientific evidence³ and guidance on COVID-19 in relation to food was first published on 26 March 2020. The risk of transmission of COVID-19 through consumption or handling of food, or handling of packaging, is very

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low. Our risk assessment and corresponding guidance remain under close review and further information will be provided if new evidence arises.

- 3.3. The FSA has drawn on the extensive expertise and support of our scientific advisory committees to ensure we are sighted on new evidence as it becomes available and that we are making the best use of our expert networks. For example, members of the FSA's Advisory Committee on the Microbiological Safety of Food reviewed the department's risk assessment on the risk of food or food contact materials as a transmission route for SARS-CoV-2, the virus that causes COVID-19.
- 3.4. Importantly, the FSA does not believe there has been any specific challenge to food safety as a result of the pandemic. Current evidence suggests that there have been no significant safety issues and no major food safety shocks to the system as evidenced by our surveillance processes and incident monitoring activities. We also do not believe that the robustness of the food supply chain has been compromised by any regulatory actions the FSA has taken. This suggests that the actions that we have taken in response to this pandemic have been pragmatic and proactive with the food industry being collaborative in flagging issues that need to be addressed.

Risk Management

- 3.5. In addition to providing advice to consumers and food businesses about COVID-19 in relation to food, the FSA has adopted a number of measures aimed at maintaining food safety standards across the UK whilst supporting industry in keeping the food supply chain flowing. These include (see Annex A for further details):
- Regular guidance updates to local authorities from the 27 March 2020 to ensure minimal disruption to the UK's food supply chain by introducing non-critical easements and flexibilities by, for example, deferring some planned food hygiene, food standards and feed inspections.
 - Adoption of EU Temporary Emergency Legislation (EU) 2020/466 which took effect from 30 March 2020 providing easements for exceptional use with respect to persons eligible to carry out official controls.
 - Taking actions to support the continued availability of Official Veterinarians (OVs and Meat Hygiene Inspectors (MHIs) to deliver Official Controls at meat plants through both FSA and its delivery partner, Eville and Jones.
 - Making policy easements by, for example, enabling limited flexibilities in relation to permitting approved establishments to temporarily have their product produced, processed, wrapped or packaged in alternative premises in addition to introducing limited flexibilities for businesses in relation to non-food safety critical labelling.

- Working closely with the Department for Environment, Food and Rural Affairs (Defra) to reduce the burden upon import inspections by for example, rescheduling sampling and easing some of the paperwork requirements around documentation checks.
- 3.6. Whilst the FSA's key message sets out that the risk of transmission of COVID-19 through consumption or handling of food, and packaging is very low, there are some potential food safety risks which have required consideration as a result of this pandemic. These include, for example, incorrect allergen labelling potentially resulting from ingredient substitution due to supply difficulties. In response to this, the FSA is monitoring specific high-risk commodities using tools to monitor trade patterns, trade routes and volumes of materials entering the UK.
- 3.7. The FSA's National Food Crime Unit (NFCU) has been focussing on potential criminal activities arising from the COVID-19 pandemic. They are targeting for example, the illegal substitution of ingredients for financial gain, the sale of unsafe or deceptive food supplements and the theft of animals for illegal slaughter. Appropriate action is being taken when such activities are identified.
- 3.8. The scale, intensity and duration of the COVID-19 pandemic has caused the FSA to reassess our approach in responding to this incident. We have adopted modified response structures as outlined in Annex B Our response continues to be based upon C3 Emergency Response processes and central government CONOPs Guidance². These revised measures provide the necessary governance structures needed for a crisis of this scale.
- 3.9. This major incident has also necessitated a duty of care to support our FSA staff and contractors in protecting themselves and others during the outbreak. Annex A further details our operational delivery in this context.

Risk Communication

- 3.10. The FSA's central objective regarding external communications is to ensure that businesses, local and port health authorities and consumers have the most up-to-date, accurate and useful information possible relating to food and feed safety, and that we are making it as easy as possible for businesses and consumers to get the information they need at this time.
- 3.11. We have continued to amplify central government guidance to the public on steps to minimise the transmission of coronavirus and have provided generic messaging around key issues such as food storage and food waste. Additional guidance has been made available on the FSA website on a range of food and feed safety issues that have arisen during the pandemic including community cooking and food delivery. We have also developed a business

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and industry hub where we have brought together in one place all our advice and guidance for food businesses looking to operate during the pandemic (see Annex C for a list of publications involving the FSA and relating to COVID-19).

- 3.12. Our regular engagement with industry through a variety of fora, has helped determine where possible food and feed chain disruption linked to COVID-19 might affect UK food safety or lead to food crime. It has identified “pain points” and allowed the FSA to develop potential temporary flexibilities. These have been implemented either directly by issuing guidance and information or indirectly by helping partners in their own communications with industry or consumers such as working with PHE in co-developing communications.

4. Enhanced Recovery (Forward Planning)

- 4.1. The impacts of the COVID-19 pandemic and the resulting “lockdown” have necessitated a restart which is not just simply a reversal of the response steps that we have taken to date. It is likely to involve as many if not more stakeholders and decisions as in the response phase and is likely to take as long or if not longer to be completed in order to deliver the “new normal” across our four countries.
- 4.2. Some of the decisions taken (see Annex A) during the response phase may not need to be reversed entirely; with a need to revisit and consider a new approach to some of the decisions made. Further issues may present themselves which might require separate targeted responses and it will be key for us not to lose the benefits and opportunities that have been realised as a result of the agency’s COVID-19 response.
- 4.3. Consequently, the FSA is developing a Forward Plan with the objective of de-escalating and closing our incident response to COVID-19. The first steps of this are to move out of Phase 1 (Emergency Response) and into Phase 2 (Enhanced Recovery). From Phase 2, we will then move to the “new normal” BAU. There will be some overlap between phases to enable smooth transition as demonstrated in the below diagram;



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- 4.4. In this plan, the FSA is aligning its approach with HMG's COVID-19 recovery strategy¹ and the devolved administration recovery plans. This will set the pace of Phase 2 and determine what actions need to be taken whilst taking into account different rates of recovery and different actions taken by the four nations thereby ensuring potential divergence is accounted for.
- 4.5. It is important that we also consider the lessons learnt from our experiences so that they can be actively taken into account in our future approach to incident management. This work is currently ongoing although, to date, we have identified four areas where with hindsight, we believe future responses could be enhanced. These areas are:
- Contingency Planning: Whilst the agency had developed contingency plans in place and was quick to respond, consideration of how the scale, intensity and duration of the pandemic caused the FSA to reassess our approach to emergency response and to embed such learnings in order to improve our preparedness.
 - Strong Consumer Voice: While the FSA, as part of wider government, has quickly identified issues with food businesses to support the supply of food, more granular and real-time information would help the Government be more responsive.
 - Working across the Four Nations: The ability to act as a joined-up entity across government ensuring inclusivity of the all "Four Nations" administrations is vital in responding effectively and in a timely fashion to this type of crisis. Maintaining the improved ways of working during our response will be an invaluable benefit from this incident.
 - Food legislation flexibilities: The four governments of the UK could examine the design of some food legislation to make it more flexible, without compromising safety, integrity, traceability and health. This may allow certain less important practices to be suspended or amended for short periods under similar crisis conditions without delay.
- 4.6. During our response to the pandemic, there have been many occasions when we have worked more closely with other government departments and colleagues across Whitehall and the devolved administrations for example, in supporting Defra in developing face covering advice and with Public Health England (PHE) in terms of developing industry sector and consumer hygiene guidance. These have been valuable experiences which we must embed into our BAU activities and, going forward, continue to exploit this level of cross-government engagement in the "new normal".
- 4.7. A further item for consideration will be how the EU Exit transition phase and, a scenario where the Northern Ireland Protocol comes into effect can be managed alongside Phase 2 of the COVID-19 response. These workstreams will be interlinked and feed into one another, as appropriate.

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- 4.8. The FSA's Strategy Directorate are considering the future regulatory landscape to ensure our strategic prioritisation reflects the actions required to prepare ourselves for the "new normal". This work is running simultaneously with the work of our incident management response in de-escalating and closing the emergency response.
- 4.9. The FSA's horizon scanning capability is capturing intelligence and identifying potential issues, so that impacts of changes to the food supply chain including consumer or business behaviours can be modelled. Insights from this work are being used for scenario development, firstly, to inform FSA strategic activity as we enter the short-term forward planning restart phase and, secondly, to better understand the potential lasting effects of the outbreak and the "new normalisation" as we move into the next 3 to 5 years.
- 4.10. International Engagement includes ongoing discussions with the US, Canada, Australia, New Zealand and the EU through weekly Strategic Food Safety Dialogue (SFSD) meetings allowing us to exchange information and insights on how we are each dealing with food safety issues relating to COVID-19.

5. Conclusions

- 5.1. The exceptional nature of this pandemic has found the FSA adapting to and dealing quickly with many differing emerging issues. Throughout, we believe that we have acted in a pragmatic, effective and appropriate manner in resolving the issues as they occur without compromising either consumers' safety or that of our own staff. We have continually strived to communicate the facts and be open and transparent in our actions.
- 5.2. The health and wellbeing of our staff is of the utmost importance. As essential Key Workers they are critical to national service delivery ensuring that the UK food supply chain keeps flowing. The incident has also put significant demands upon FSA personnel in running a 24/7 incident response at a time when many of us have our own personal concerns relating to the pandemic. Put simply, our staff have been superb, as have those working across the whole food system.
- 5.3. As we face the future with confidence, we continue to hold consumers interests at the heart of everything we do, making it easier for businesses to work while harnessing opportunities through learnings as we go.
- 5.4. The Board is asked to:
 - **Note, comment and discuss the progress made and the ways in which the FSA should approach the future in the light of the COVID-19 pandemic.**

ANNEX A: OPERATIONAL DELIVERY

Emergency Response

1. The FSA's main areas of activity to date have been.
 - Providing advice to businesses, local and port health authorities and consumers about COVID-19 and its relationship with food.
 - Helping food businesses to continue operating in line with wider Government guidance;
 - Taking steps to ensure that food safety and authenticity are not compromised;
 - Minimising disruption to business and helping maintain the food supply chain, through the introduction of flexibilities in the delivery of Official Controls legislation, by local authorities and port health authorities in collaboration with DEFRA and the Department of Agriculture, Environment and Rural Affairs (DAERA) in Northern Ireland;
 - Working on urgent policy issues to support the supply of food;
 - Focusing on the wider implications and the medium-term impact of the pandemic through our horizon scanning group; and
 - Looking after the health and wellbeing of our staff, and by extension those of our main contractor, Eville and Jones.

Operational Measures Introduced
<p><u>EU Temporary Emergency Legislation (EU) 2020/466</u> These measures are for use 'exceptionally and only when necessary' and require notification to the Commission and other Member States (referred to as Stage 3 in section 3.19.)</p> <ul style="list-style-type: none">• Persons with appropriate qualifications, training and practical experience are authorised to carry out official controls other than as stipulated in the Official Controls Regulation. These persons must also be impartial and free of conflicts of interest.• Laboratories other than official laboratories can be designated for analysis, testing and diagnoses (not required to date in the UK).• Certain official controls by "distance communication" i.e. no physical presence can be carried out.
<p><u>Identification Marking</u> Enabled limited flexibilities in relation to Identification Marks permitting approved establishments to temporarily have their product produced, processed, wrapped or packaged in another approved establishment. Identification marks provide unique identification of the food establishment used for manufacture and are critical to ensuring traceability of product is maintained.</p>
<p><u>Food Labelling</u> Flexibilities for businesses in relation to non-food safety critical labelling</p>

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2. The potential lack of available resources to maintain Official Controls has been a focus for the FSA. We have developed contingency plans to ensure the continued supply of Official Veterinarians (OVs) and Meat Hygiene Inspectors (MHIs) in meat plants. We are also supporting local authorities who deliver these controls in the majority of food and feed businesses on an ongoing basis, by providing operational guidance and direction on the approach that should be taken in relation to these duties.

FSA Field Operations

3. In order to ensure that food safety is not compromised, the FSA has taken actions to support the continued availability of Official Veterinarians (OVs and Meat Hygiene Inspectors (MHIs) to deliver Official Controls at meat plants through both FSA and its delivery partner, Eville and Jones. Food legislation means that meat cannot leave these premises without the relevant Official Controls being carried out. Any reduction in staff availability may have a significant impact upon the safety or availability of meat to UK consumers.
4. The FSA's priority is to protect our staff and they remain able to maintain an effective regulatory workforce in meat plants to keep food supply chains moving without compromising food safety. Although the FSA is not the enforcement body for social distancing, we have provided advice to make sure that our own staff and others had suitable measures in place to help protect them. Subsequently, the importance of social distancing has become paramount to the government's overall response to the pandemic.
5. Extensive engagement with meat industry stakeholders has taken place including daily contact with industry partners to assess, discuss and work to resolve issues as they present themselves. A joint statement between the FSA, FSS and representatives of the meat industry has been published demonstrating a commitment to working together in a flexible, pragmatic and proportionate way to maintain the supply of safe food across the 4 Nations.
6. We have further worked collaboratively with industry technical representatives to identify steps which could help support the meat industry, under increasing resource pressure, to maintain safe food production and protect animal welfare. To do this, we have developed a four-tiered approach;
Stage 1: Prioritisation of current activity, redeployment of officials and recruitment of additional OV / MHI capacity.
Stage 2: Utilisation of the existing Official Controls legislative framework (Regulation [EU] 2017/62) and associated implementing regulations) to support a reduced workforce;

Stage 3: Additional measures under new Implementing Regulation (EU) 2020/466 (authorisation of persons, designation of laboratories, official controls by distance communication), and;

Stage 4: Further Contingency planning enabling FSA / FSS to continue to keep these measures under review and consider and plan for any further contingency arrangements that may be necessary.

Operational Measures Introduced
<p><u>Emergency Instructions in Meat Plants</u></p> <p>The following easements are in place at meat plants (referred to as Stage 2 in section 3.19)</p> <ul style="list-style-type: none">• Delayed Post-mortem Inspection (PMI) (i.e. cold inspection) at low capacity establishments – poultry and red meat – by an Official Auxiliary (OA)• Authorisation of trainee OAs to undertake certain low risk inspection tasks under the supervision of an OV or OA• Ante-mortem inspection to be undertaken by an Official Auxiliary (OA) that is a member of the Royal College of Veterinary Surgeons (MRCVS)• Delayed PMI (i.e. cold inspection) at low capacity establishments – poultry and red meat- by an OV• PMI undertaken by PIAs under the supervision of an OA at low capacity poultry slaughterhouses• PMI at low capacity establishments – poultry and red meat – by an OA under the responsibility of the OV• OA assistance with Ante-mortem Inspection (AMI) in full throughput red meat slaughterhouses• OA assistance with AMI in low capacity red meat slaughterhouses• Sample AMI in poultry abattoirs (<i>exports impact to be considered when applying this</i>)
<p><u>Resource Modelling in Field Operations</u></p> <p>FSA developed a scenario modelling process to help predict resourcing requirements for OVs and MHIs in meat plants as the COVID-19 pandemic unfolded and demand changed.</p>

Local & Port Health Authorities

7. The FSA have been issuing regular guidance using a dedicated communications platform to local authorities who deliver Official Controls outlining the approach that should be taken in response to the COVID-19 pandemic.
8. To ensure that there is minimal disruption to the food supply chain, we have introduced non-critical easements and flexibilities to support local and port health authorities by, for example, deferring some planned food hygiene, food standards and feed inspections. This is to limit footfall in food and feed establishments thereby allowing resources to be potentially focused on urgent reactive work.

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9. To further support port health authorities during the pandemic, we have also been working closely with DEFRA and the Animal and Plant Health Agency (APHA) and have been holding daily meetings with port health and border control officials to understand emerging issues and provide suitable mitigations.
10. Going forward, we must remain proactive in our discussions with other government departments as we look to revise contingency measures that have been taken such as those under the new Implementing Regulation (EU) 2020/466 (authorisation of persons, designation of laboratories, official controls by distance communication) for example.

Operational Measures Introduced
<p><u>Food / Feed Law Codes of Practice</u> FSA obtained approval from Ministers in England, Wales and Northern Ireland to permit specific deviations from the direction given to local authorities in the statutory Food Law Codes of Practice in each country and the Feed Law Codes of Practice in England and Wales. These Codes prescribe the frequency of inspections and other interventions for most food and feed establishments.</p>
<p><u>Serious Public Health Risks</u> Local authorities to focus on urgent reactive work to address potentially serious public and animal health risks relating to food/feed. This includes following up on food or feed incidents, investigating foodborne disease outbreaks, proactively checking businesses that are less than broadly compliant with food hygiene requirements and following up on intelligence that suggests a potential public or animal health issue</p>
<p><u>Local Authority Interventions</u> The deferral of all planned food hygiene, food standards and animal feed interventions by local authorities. The exceptions to this are for high risk establishments, or where there are specific legislative requirements on the nature or frequency of controls (approved establishments, shellfish controls and imported food/feed controls).</p>
<p><u>FSA Requirements of Local Authorities</u> The temporary suspension of certain requirements including for example, submission of LEAMS/feed returns, and the local authority audit programme. Guidance has also been given on flexibilities for operation of the Food Hygiene Rating Scheme (FHRS).</p>
<p><u>High Risk Products of High-Risk Foods of Non-Animal Origin (HRFNAO)</u> The frequency of checks for HRFNAO listed under Annex 1 of Regulation 2019/1793 can be delayed providing the overall sampling frequency is maintained over a 6-month period.</p>
<p><u>Documentation for Imported Food</u></p> <ul style="list-style-type: none">• Border Control Posts (BCP) / Public Health Authorities (PHA) can, subject to specified criteria being met, accept scanned copy documents in lieu of original documents for imported products of animal origin (POAO) and high-risk food not of animal origin (HRFNAO).

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- Officials at Border Control Posts can undertake remote checks using tablet or phone cameras.

Communications

11. The FSA Communications approach has been on the front foot from the start with the central objective to ensure that businesses and consumers have the most up-to-date, accurate, and useful information about food safety during the current crisis. Our key message has been around reassurance on food supply and the very low risk of transmission of coronavirus from food.
12. The FSA has worked closely with colleagues across government in all three countries to co-ordinate messaging and stakeholder engagement and to ensure that food safety issues are factored into decision-making. Relationships have been excellent, and we have been able to benefit from the work we put in to developing links with our colleagues in Whitehall, Belfast and Cardiff before the crisis.
13. The sheer weight of advice and information that central government has had to process means that initially getting our advice to consumers, communities and businesses cleared by the centre and published on GOV.UK took longer than we would have liked. Since then we have developed a better understanding of the processes involved and secured quicker passage for new advice and amendments to existing guidance.
14. The FSA's guidance for food businesses on GOV.UK has received more than 100,000 unique views and on average, 86% of users found our guidance helpful. More than 1,200 organisations are carrying a link and driving traffic to the guidance.
15. We have also made it easier for businesses to find existing online guidance in response to issues arising from the epidemic such as food safety for food delivery and food safety for community cooking and food banks. Our published guidance has been distributed to our key stakeholders, ensuring, for example that industry contacts are aware of relevant direction and guidance we have given to local authorities. The open letter to the meat industry and our subsequent joint statement on the UK meat industry response to coronavirus received positive coverage in the trade press
16. The FSA has developed guidance to improve the understanding of the basic hygiene measures consumers should follow on food safety in relation to coronavirus. The guidance has received over 40k unique visitors and 97% of users found the guidance helpful. It was widely covered in the national and regional press, tv, radio and online.
17. We have continued to amplify central government advice to the public on steps to take to minimise transmission of coronavirus and have pushed out more generic

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messaging for consumers around key issues such as food storage and food waste.

18. Mainstream and social media has been carefully monitored to quickly identify and rebut any inaccuracies and false information. For example, the Sun carried a story about a woman who was showing how to cook KFC-like chicken at home, but it involved washing the chicken. We responded immediately on Twitter, reinforcing our key food safety messages around not washing your raw chicken.
19. The FSA have produced and are regularly updating internal FSA guidance and communications to keep staff informed. This is prepared in line with advice from GOV.UK and Civil Service Employee Policy (CSEP) and includes a manager and staff information pack and Q&A, bringing together updates from a variety of sources and which acts as a central hub for information for FSA employees.
20. As well as all staff calls with the Chief Executive, the Communications team have produced a weekly newsletter devoted to coronavirus, a dedicated COVID-19 Hub page and Q&A. We have also launched #HiddenHeroes, an internal campaign that recognises and celebrates colleagues across the FSA and the wider food chain.

ANNEX B: ORGANISATIONAL STRUCTURE

Immediate Response

1. The scale, intensity and duration of the COVID-19 pandemic has caused the FSA to reassess our approach when responding to this incident. In particular, the measures taken by the governments to reduce the Reproductive Rate of the virus have had a wider range of impacts than those considered in a normal incident. For example, the need for staff in meat plants to maintain social distancing, while trying to maintain and respond to pressures within the food supply chain, was outside of our usual planning parameters. Therefore, the FSA has adopted modified response structures and measures to meet these challenges and respond effectively.
2. Although these changes, which included the creation of a new temporary Directorate to lead the response, deviated from our normal Incident Management Plan (IMP) for food and feed incidents, our approach has continued to be based upon C3 Emergency Response processes and central government CONOPs Guidance². These revised measures provide the necessary governance structures needed for a crisis of this scale.
3. The new framework consists of four-tiers namely:
 - Strategic Response Group (SRG) dealing with strategic issues and guiding principles including strategic intent, risk appetite, longer term opportunities and strategic priorities.
 - Immediate Response Group (IRG) focussing upon our tactical and operational response dealing with issues emerging in the short term (up to six weeks hence) including the collective demand for staff, immediate communications, operational and HR decisions, immediate prioritisation and incident response
 - Daily Bird Tables (BT) to share and collect information between FSA staff, other government departments and industry.
 - Business Continuity (BC) arrangements across the FSA with directorate BC Champions in place to coordinate planning and activities.
4. Over the past two years, much has been learnt from our preparations for a 'no deal' EU Exit and this has greatly enhanced our preparedness in terms of capacity and capability. This has also enabled us to put plans in place to be able to manage several incidents in parallel, giving us confidence that the FSA would be able to respond to a further serious food safety incident if it was to occur simultaneously with our response to the COVID-19 pandemic.

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Strategic Response through the SRG

5. From the outset of the COVID-19 pandemic, the FSA has adopted a four-strand strategic approach, namely:
- Protecting consumers interests and supporting the supply of safe food by taking a proportionate risk-based approach to ensure that critical FSA and local authority / port health authority functions remain operational and appropriately resourced.
 - Providing Duty of Care guidance and support to FSA staff in protecting themselves and others during the outbreak.
 - Responding in line with HMG's COVID-19 Action Plan and those of the devolved administrations supporting the wider government effort by amplifying central advice and communications.
 - Identifying potential long-term effects of the pandemic on our ways of working and responding strategically so that the FSA continues to define its role in food safety resilience without compromising food and feed safety controls.

ANNEX C: List of FSA publications relating to COVID-19 (*list is not exhaustive*)

- **Guidance for food businesses on coronavirus (COVID-19)**
Provides guidance emphasising the importance of maintaining good hygiene practices (published 25 March 2020, updated 25 April 2020)
<https://www.gov.uk/government/publications/covid-19-guidance-for-food-businesses/guidance-for-food-businesses-on-coronavirus-covid-19>
- **Food safety for food delivery**
Provides guidance emphasising the importance of maintaining good hygiene practices and provision of allergen information (published 26 March 2020, updated 21 April 2020)
<https://www.food.gov.uk/business-guidance/food-safety-for-food-delivery>
- **Food safety for community cooking and food banks**
Provides guidance for those preparing or donating meals for:
 - those in self-isolation due to coronavirus (COVID-19) symptoms
 - vulnerable groups who are being shielded
 - community groups and local organisations
 - NHS staff.(published 7 April 2020, updated 28 April 2020)
<https://www.food.gov.uk/safety-hygiene/food-safety-for-community-cooking-and-food-banks>
- **Guidance for consumers on coronavirus (COVID19) and food**
Provides guidance to consumers on food hygiene and food storage at home (published 17 April 2020)
<https://www.gov.uk/government/publications/guidance-for-consumers-on-coronavirus-covid-19-and-food>
- **Qualitative risk assessment on the risk of food or food contact materials as a transmission route for SARS-CoV-2** (published 17 April 2020)
<https://www.food.gov.uk/research/research-projects/qualitative-risk-assessment-on-the-risk-of-food-or-food-contact-materials-as-a-transmission-route-for-sars-cov-2>
- **Open letter to the meat industry in England in response to coronavirus** (published 07 April 2020)
<https://www.food.gov.uk/news-alerts/news/open-letter-to-the-meat-industry-in-england-in-response-to-coronavirus>
- **An open letter to those working in the meat industry in Wales** (published 09 April 2020)
<https://www.food.gov.uk/news-alerts/news/an-open-letter-to-those-working-in-the-meat-industry-in-wales>
- **Joint statement on UK meat industry response to coronavirus** (published 14 April 2020)
<https://www.food.gov.uk/news-alerts/news/joint-statement-on-uk-meat-industry-response-to-coronavirus>

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- **Bulk freezing of ambient and chilled foods**
(published 15 April 2020)
<https://www.food.gov.uk/business-guidance/bulk-freezing-of-ambient-and-chilled-foods>
- **Legal clarifications on reformulation and animal feed production establishments**
Signposting content included on all related pages in animal feed section of website (published 15 April 2020)
<https://www.food.gov.uk/business-guidance/legal-clarifications-on-reformulation-and-animal-feed-production-establishments>
- **FSA publishes guidance for consumers on coronavirus (COVID-19)**
(published 17 April 2020, updated 25 April 2020)
<https://www.food.gov.uk/news-alerts/news/fsa-publishes-guidance-for-consumers-on-coronavirus-covid-19>
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The term 'food' should be taken as meaning reference to 'food and feed' throughout this paper