INCIDENTS & RESILIENCE ANNUAL REPORT 2020/21

Report by Colin Sullivan & Rajwinder Ubhi

For further information contact:

Colin Sullivan, Tel: 07977 818 414: Email: Colin.Sullivan@food.gov.uk
Rajwinder Ubhi, Tel: 07919 397 026: Email: Rajwinder.Ubhi@food.gov.uk

1 Summary

- 1.1 The paper outlines the work undertaken by the Incidents & Resilience Unit (IRU) and Consumer Protection teams across England, Northern Ireland and Wales to ensure that the UK's capability to detect, respond and prevent food and feed safety incidents is optimal, given the impact of the Covid-19 pandemic and the end of the EU Exit transition period.
- 1.2 The Business Committee members are asked to:
 - Note the work undertaken since last year's Annual Incidents and Resilience report to the Business Committee, and
 - **Discuss and endorse** the continued development of the FSA's incident management capability for the post pandemic period and after the UK leaving the EU.

2 Introduction

- 2.1 Food Standards Agency's (FSA) incidents teams in England, Wales and Northern Ireland coordinate the response to food* incidents and foodborne outbreaks, ensuring that products not in compliance with safety legislation are removed from the market.
- 2.2 The FSA works closely with local authorities (LAs) who take enforcement action to protect consumers. LA responsibilities are laid out in the Food Law Code of Practice¹ and Feed Law Code of Practice². Food businesses must meet their responsibilities to ensure that food placed on the market is safe and complies with all relevant legal requirements.
- 2.3 The FSA's Incident Management Plan³ outlines the plans and procedures for managing non-routine food incidents⁴. Similar arrangements are maintained by Food Standards Scotland (FSS) and the FSA has a memorandum of understanding in place with FSS outlining our commitment to a '4 Nations' approach for the management of incidents and foodborne outbreaks.
- 2.1 Occurring simultaneously, the Covid-19 pandemic and the end of the EU transition period have presented an unprecedented challenge to the FSA throughout the reporting period. For much of this time, our Emergency

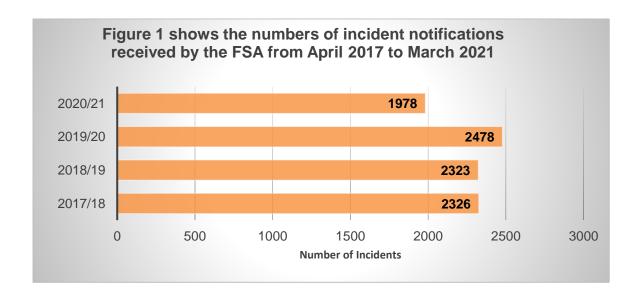
^{*} The term 'food' should be taken as meaning reference to 'food and feed' throughout this paper

Response procedures were activated, which impacted heavily upon our priorities, resources and business as usual pursuits.

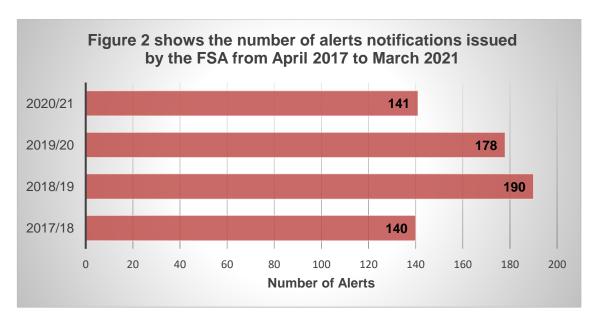
2.4 To maintain the UK's world class expertise in managing food incidents in the 'new normal' resulting from these extraordinary events, several new approaches were introduced. In doing so, we have strengthened our ability to detect, respond and prevent incidents. For example, we have adapted our processes to use the International Food Safety Authorities Network (INFOSAN) to enable us to build strong stakeholder relationships with food safety authorities worldwide.

3 Incidents and Outbreaks During 2020/21

3.1 In total, the FSA was notified of and investigated 1,978 food, feed and environmental contamination incidents in England, Northern Ireland and Wales during the 2020/21. This represents a 20% decrease when compared to 2019/20 (see Figure 1).



3.2 The number of alerts issued also decreased from 178 in 2019/20 to 141 in 2020/21. This included 67 Allergy Alerts, 73 Product Recall Information Notices and 1 Food Alert for Action and represented a year-on-year decrease of 21% (see Figure 2).



- 3.3 The number of incidents and alerts recorded in any given year can be affected by many factors, including new consumer trends, technological developments, legislative changes, the amount of testing carried out, and even the weather. The numbers of incident notifications received by the FSA are only those which have been notified to us. **Annex A** provides additional information relating to the types of incidents managed by the FSA and includes a case study.
- 3.4 We believe the 20% downturn in incident notifications received and the 21% decrease in the alerts in 2020/21, was caused by the pandemic driving changes in consumer behaviour; the streamlining of food production lines; fewer food businesses operating and a reduction in the complexity of the product ranges on offer. The number of incidents reported has now increased following the easing of the national lockdown and is returning to near pre-pandemic levels.
- 3.5 Some of the decrease in the number of incidents reported to the FSA is a result of changes in reporting procedures for clandestine travellers (stowaways) and chemical environmental incidents, whereby notifications are now directed to local authorities for appropriate action.

4 Incident Detection

- 4.1 The Receipt and Management Team (RAM), established in 2019 to mitigate the loss of access to EU incidents systems, monitors key data sources including trusted media sources for potential risks to the UK. These signals are received *via* the Signals Prioritisation Dashboard, which is an innovative and bespoke open-source data predictive tool developed by the FSA's Strategic Surveillance Team. During 2020/21, the RAM team processed 9,497 signals (see **Annex B**).
- 4.2 Signals are processed daily to check for issues which might impact the UK. The types of signals can be split into:
 - immediate risks which are processed as incidents
 - issues relating to goods available to the UK only via internet sales platforms

- emerging issues where further investigation is required to determine UK risks
- investigating the broader context of existing incidents to understand how to prevent similar issues recurring, and
- Rapid Alert System for Food and Feed (RASFF) checks where the UK is cited to ensure the RASFF has been received and to minimise delays.
- 4.3 Signals falling under all categories may involve collaborative input from others to resolve for example LA or port action may be needed to reduce the risk, or industry initiatives may be encouraged. The Team liaise with various stakeholders to investigate and resolve these signals, including internal FSA Teams, other government departments (OGDs), industry and other country competent authorities.

5 Incident Response in the 'New Normal'

5.1 Leaving the EU and the Covid-19 pandemic have both altered the landscape in which the FSA operates across England, Wales and Northern Ireland.

EU Communication Systems

- 5.2 The UK lost full access to EU systems, RASFF and AAC (Administrative Assistance Cooperation), at the end of the transition period. However, we continue to receive RASFFs impacting the UK.
- 5.3 The FSA in England and Wales now aligns its food safety incident responses to the World Health Organisation (WHO)/ Food Safety Authorities (FAO) INFOSAN network (more than 180 countries) with communications being made directly with other countries. This has been working well and examples of recent incidents where the FSA has demonstrated collaborative working with INFOSAN, and other countries, can be found in **Annex C.** These changes have not impacted the number of international notifications received nor the overall incident figures compared to the previous year.
- 5.4 Northern Ireland (NI) continues to be part of to the RASFF network under the terms of the Northern Ireland Protocol. However, both Great Britain (GB) and NI only have third country access to RASFF. NI notifies the EU Commission *via* an Alert Cooperation Network notification template and receives notifications via a single contact point email address. Monitoring is in place to ensure ongoing effectiveness of the UK incidents response to protect consumers.

Working with INFOSAN

5.5 The FSA's main forum for international engagement is now INFOSAN where the IRU team interact with trade partners globally *via* INFOSAN International Working Group meetings.

- 5.6 During 2020/21, 4 separate workshops were held with relevant members from the INFOSAN community. The workshops had global representation and covered: food recalls, allergens, food authenticity and crisis co-ordination. Best practice was shared, and areas identified where INFOSAN might play a role in offering easily accessible guidance / process to achieve greater consistency of approach across countries and improve standards.
- 5.7 The INFOSAN Community Website has been developed to ensure greater accessibility for all global network users. The new site facilitates rapid cross-country communication of food safety issues, allows scope for building themed networks within the larger member network, and offers the possibility of use of country profiles to increase understanding of member country arrangements for food safety controls.
- 5.8 Since the last annual report, we have extended the placement of our INFOSAN secondee who has been working hard to smooth the FSA transition from using the EU risk communication systems to the use of the INFOSAN food safety notifications. The secondee has also helped us develop operating procedures for use of the INFOSAN network and ensured the implementation of effective processes post transition.
- 5.9 The INFOSAN Advisory Group met twice during the reporting period. The meetings covered: guidance for food operators relating to Covid-19, progressing recommendations of the 2019 INFOSAN global meeting for addressing barriers to INFOSAN use, updates on technical food safety webinars available for member countries and other matters of relevance to the UK.

Stakeholder Engagement

- 5.10 Incidents teams from the UK 4-nations, including FSS, meet on a weekly basis to discuss incident matters of mutual interest. The UK has developed a much-valued relationship with counterparts at the Food Safety Authority in Ireland. The IRU has also formed strong alliances with QUAD countries (The grouping of four democracies India, Australia, US and Japan) and continues to benefit from the bilateral liaison that started as part of our EU Exit preparations.
- 5.11 Stakeholder engagement with industry in the new landscape is critical. We have formed a new Importer Working Group to sit alongside the already established Food Industry Liaison Group. These groups are represented by industry trade associations and meet monthly to discuss and share any imports and exports issues arising as a result of the UK leaving the EU.
- 5.12 The FSA and FSS are hosting a UK Global Food Safety Incidents and Emergency Response Conference between 13 and 15 October 2021. It will be a virtual conference, for professionals from the international food safety community, to come together to influence future food systems and improve global food safety. The conference, under the theme of 'Enhancing Food Safety and Security in a Changing World', will bring together international

regulators, food safety scientists, food laboratory experts and technical experts from the food industry across the world.

Strengthening Resilience

- 5.13 The FSA adopts a comprehensive approach to strengthening its resilience and emergency preparedness to cover all aspects of our incidents response arrangements. Its impacts are measured through our increased capability and capacity to invoke our incident response and emergency protocols efficiently; deliver a proportionate response and enable the organisation to return to our normal operations as quickly as possible.
- 5.14 The FSA is continuing to strengthen resilience by learning from the emergency response to Covid-19, the Winter Planning activity and real incidents (see Annex D); including outbreak management, updating our response plans and embedding best practice and lessons learned.
- 5.15 The FSA's response to the Covid-19 pandemic impacted on the delivery of the 2020/21 planned programme of training and exercising. Learning from our response to the pandemic and winter planning, has been used to inform the FSA's 2021/22 Exercise Programme and will support the continual improvement of our incident response capacity, capability and organisational resilience. The IRU continue to be involved in multi-agency exercises which provide an opportunity to emphasise to those involved the role of the FSA as well as sharing best practice.
- 5.16 Several Cross-Government reviews in respect of lessons learnt from the pandemic, are currently taking place across Whitehall. This is likely to result in changes to central government preparedness processes to further strengthen the UK's resilience and updates to both the Governments Concept of Operations (CONOPS) and Emergency Preparedness Resilience and Response (EPRR) core standards. Any changes required following these reviews will be considered and reflected in the Agency's plans and process.
- 5.17 The DHSC SEP (Department of Health and Social Care Strategic, Emergency and Preparedness) Board provides assurance on emergency planning, resilience and response across the health and care system, the FSA contributes as a member of the Board. The programme of work being undertaken following lessons learned will provide assurance to SEP of our emergency preparedness and demonstrate our compliance with EPRR arrangements across government.

Signal and Incident Management System (SIMS)

5.18 The new IT system, Signals and Incidents Management System (SIMS) went live in November 2020. It provides the FSA with an end-to-end approach for signal and incident management. Signals are automatically downloaded into the system and can be managed to closure or escalated to a food incident. Food incidents can also be created by users or received directly from LAs,

Food Businesses or OGDs using a new and improved online Incident Report Form on the FSA Website.

6 Incident Prevention and Root Cause Analysis

- 6.1 The FSA is in the process of reviewing its strategies around incident prevention with an initial focus on root cause analysis (RCA) data and the determination of viable options for the sharing of trending information with industry. The inclusion of RCA in the Food Law Code of Practice (March 2021) further asserts its need following an incident. The Feed Law Code of Practice (Feed Codes) and associated Practice Guidance (PG) for England and Wales is also being updated with references to RCA.
- 6.2 Following the earlier Efficacy of Recalls programme⁵ an Incident Prevention Discovery (a 'deep-dive' investigative process with active input from stakeholders) was completed to investigate and refine the end-to-end RCA process. Progression to a development phase was recommended, to ensure RCA data are exploited to maximum benefit and funding has been secured for a dedicated resource to further improve processes and stakeholder engagement mechanisms. This system will further improve the FSA's capability to detect potential incidents earlier and manage our incident response more efficiently.
- 6.3 Almost half of the RCA responses received related to allergen incidents (46%), with the remainder associated with foreign bodies (29%), pathogenic microorganisms (23%) and miscellaneous incidents (3%). Analysis and categorisation of these RCAs enables learning from real incidents and embedding developed 'best practice' will continue to strengthen resilience and prevent food safety incidents occurring. **Annex E** includes some examples of our incident prevention outputs.

7 Future Challenges

- 7.1 There are now changes in the UK regulatory system following the implementation of the NI Protocol. The NI Protocol is a significant change for the FSA, as EU food and feed law continues to apply in respect of NI.
- 7.2 Although functions have been developed and are in place to manage the different policy requirements in terms of risk management advice in NI compared to GB, further work is ongoing to understand the common framework and identify any devolved variances.
- 7.3 As time progresses and domestic legislative reviews occur, we expect this to be an increasing area of focus. We envisage that divergence may occur as the UK moves forward with two regulatory systems and we continue to review and monitor UK wide incidents.

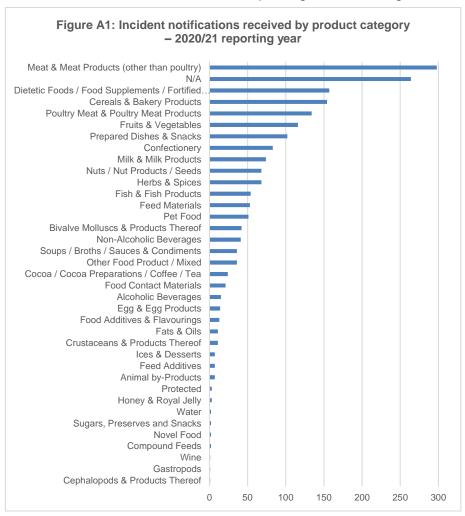
- 7.4 A major focus of our international work is to ensure a consistent approach globally to food safety incident and emergency response. Our new relationship with the EU and the rest of the world, as well as the Covid-19 pandemic, has altered the way we interact with other countries but also created an opportunity for change and highlighted the need for a global approach.
- 7.5 We will continue to engage with competent authorities in the INFOSAN network to drive forward standardisation and co-ordination this area. The FSA plan to deliver a number of enhancements to SIMS in the coming months that will improve the performance of the system and will consist of users from outside of the Incident Management and RAM functions.
- 7.6 We will also continue to adapt to and integrate new processes and capabilities in incident management and emergency response, keeping abreast of developments in other areas of the Agency.

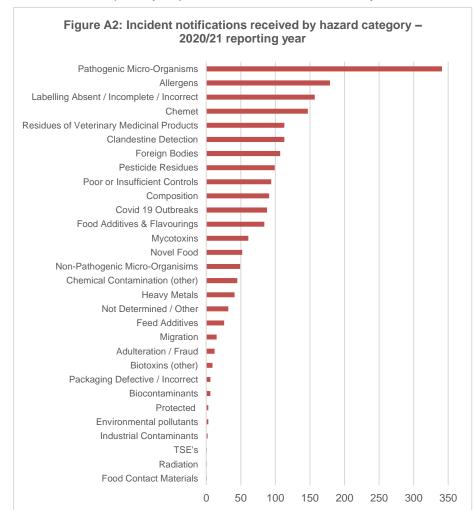
8 Conclusions

- 8.1 Incident numbers for 2020/21 show a reduction compared to previous years, mainly because of impacts of the Covid-19 pandemic on businesses. These numbers are now returning to pre-pandemic levels as lockdown restrictions are lifted.
- 8.2 Following the end of the EU exit transition period, the IRU continues to evolve and embed new ways of working in the 'new normal'. At the same time, the IRU continues to monitor any impacts from the lifting of easements in relation to Covid-19.
- 8.3 Stakeholder engagement is at its highest level and the team continues to develop key relationships with industry and OGDs, as well as strengthening our international liaison with INFOSAN emergency contact points and developing a new relationship as an incident team in a third country.
- 8.4 We continue to ensure that we maintain incident capacity and capability across GB and NI in relation to the Northern Ireland Protocol following the end of the transition period.
- 8.5 The Business Committee members are asked to:
 - Note the work undertaken since last year's Annual Incidents and Resilience report to the Business Committee, and
 - **Discuss and endorse** the continued development of the FSA's incident management capability for the post pandemic period and after the UK leaving the EU.

Annex A: Incident Data

Figures A1 and A2 show that Meat & Meat products remain the most common food category involved in food incident notifications received whilst contamination with pathogenic microorganisms remains the most frequently reported hazard to food safety.





ANNEX A: Case Study of a Malicious Tampering Incident

Malicious tampering: Conviction following the MTI Baby Food Incident

The FSA and Food Standards Scotland (FSS) worked with UK law enforcement agencies and Public Health England (PHE) in response to an attempt to blackmail a high-profile supermarket company based in the United Kingdom through malicious tampering with retail food products. The investigation resulted in a prison sentence of 11 years for the offender in relation to this specific incident.

The FSA was initially notified by UK law enforcement agencies that they were investigating a blackmail demand received by a supermarket company, threatening the contamination of baby food products from a food producer.

Following the discovery of the first tampered product, eight varieties within the specific baby food range sold by the supermarket company were voluntarily recalled as a precautionary measure following close cooperation and discussion between the companies and agencies. A Product Recall Information Notice (PRIN) to the public highlighting the recall was undertaken by the FSA and FSS.

A further threat was received in January 2020 in relation to jars of baby food, produced by a second food company. Fifteen varieties within that baby food range were again voluntarily recalled as a precautionary measure, and the FSA and FSS again issued a PRIN to the public.

There was a successful investigation and prosecution with the FSA and FSS co-operating with UK law enforcement agencies, in what became the UK's largest ever blackmail investigation.

The offender was convicted of offences related to this incident as well as other offences.

In October 2020, the offender received a sentence of 14 years in prison, including an 11-year sentence in relation to this incident.

ANNEX B: Examples of Signal Detection of Issues Impacting the UK

Early identification of incidents affecting the UK

Signal: December 2020, undeclared milk and incorrect expiry date for macarons from Belgium.

Action: RAM team identified sale of product in UK, primary authority informed and listings removed from online marketplace. RAM team identified further distribution to the UK. Follow up requests were made to Belgium who subsequently notified the UK via RASFF. The Incidents Team then led the Incident and published an allergy alert.

Identification of trends / emerging issues

Signal: October 2020, significant increase in the number of signals concerning sesame seeds originating in India, found to contain high levels of the Ethylene Oxide.

Action: The RAM team flagged the increasing trend to the Incidents Team to make them aware of the issue 2 days prior to EU authorities formally confirming UK distribution. UK distribution was confirmed, and the RAM team continued to support the Incidents Team by monitoring levels of related international and EU alerts and the types of products affected. Engagement with stakeholders were undertaken to support management of the issue and risks associated with it.

Online marketplace referrals

Signal: During the daily processing of signals, the RAM team identifies food and feed products that are subject to recalls in other countries available for sale in the UK via online marketplaces

Action: Signals are followed up with the relevant local authority (LA) to confirm whether sellers have sold or stocked the products. The LA liaises with the online platform to make aware of product recall and undertakes checks with marketplace sellers to ensure unsafe products are not being marketed to consumers in the UK. Any delisting of products is notified to the RAM team.

Annex C: Collaborative Working with Others

Salmonella in Frozen chicken products from Poland

Since January 2020, there have been 520 reported cases of *Salmonella* Enteritidis linked to 2 outbreaks and sadly one death in January of this year. UK investigations linked the outbreaks to imported Polish poultry products.

Responding to the outbreak required sustained and enhanced international engagement through INFOSAN, the Commission and directly with Polish authorities. This allowed the FSA to respond quickly to the outbreak and help develop a strategy for Polish authorities to mitigate future risks.

Poland have developed a risk mitigation and management plan and have put in place additional controls to reduce *Salmonella* at agricultural and food manufacturing stages. Enhanced measures will be in place for the next 12 months. Polish authorities will report on progress on an 8 weekly basis and the FSA has set up a steering group to monitor the progress in advance of a review at the end of the period of enhanced controls.

Outbreak of feline pancytopenia suspected to be linked to cat food

FSA's responsibilities include animal feed including that for pets such as cats.

On 24 May 2021, the Royal Veterinary College (RVC) alerted Department for Environment, Food and Rural Affairs (Defra) and FSA to a spike in clinical signs of feline pancytopenia, an illness which causes a deficiency in blood cells. As of 23 August 2021, the FSA have been advised that 563 cats in the UK have been identified, the mortality rate is 62.5%.

Cat exposure data identified epidemiological links to three brands of cat foods, commonly fed to affected cats, which were all manufactured by one feed manufacturer. A precautionary product withdrawal and recall was undertaken. Products were distributed in the UK, as well as a small amount to Republic of Ireland, (ROI). The FSA published a Product Recall Information Notice on the same day.

The cause of feline pancytopenia is being investigated and cat food is one line of enquiry, whilst other sources still cannot be excluded.

This investigation has relied on direct communication with the ECPs in the Netherlands, Germany and Russia, including a number of diplomatic exchanges. The FSA continues to work with the business and other regulators to investigate.

Salmonella Braenderup linked to melons

The FSA and PHE are currently investigating an outbreak of Salmonella Braenderup in the UK linked to melons. Since April 2021 there have been 102 cases reported (as of 17 June 2021).

Current investigations are focusing on the supply chain of 3 melon types: galia, cantaloupe and honeydew, to the UK, from Honduras, Costa Rica and Brazil.

Implicated UK retailers have undertaken a voluntary product withdrawal of galia, honeydew and cantaloupe melons from Honduras, Costa Rica and Brazil. A quick rise in confirmed cases occurred during week commencing 24 May 2021, which led to the need for rapid action. The FSA subsequently took a precautionary approach, publishing proactive communication on 29 May 2021 to alert consumers of the outbreak, reminding them on the safe hygiene and handling of melons and advising them to avoid consumption of the specific melons under investigation.

The FSA has been working with the emergency contact points for other countries known to be affected via the WHO and the International Food Safety Network, INFOSAN, to share information about our respective food chain investigations. As of July 2021, 12 EU/European Economic Area (EEA) and rest of the world countries, including the UK are reported to be affected by the same outbreak strain.

Annex D – The FSA Winter Plan and Response to Covid-19

The FSA Winter Plan Response

From November 2020 to February 2021, the FSA stood up its emergency response arrangements on a precautionary basis in anticipation of the end of the EU Transition Period and a potential resurgence of Covid-19 over winter.

The Winter Plan Response reinstated the Strategic Response Group (SRG), Immediate Response Group (IRG), Bird Table and Briefing Cell response structure in line with our initial response to Covid-19 earlier in the year. Details of this response structure can be found in our paper to the FSA Board in June 2020⁶ entitled <u>"FSA Response to COVID19"</u>.

The response was supported by a Cross-Agency Continency Planning Group, who in the autumn developed a Winter Plan which identified and suggested mitigations for key risks the FSA may face over the winter period.

Key areas addressed by the Winter Plan

- Sufficient resourcing of FSA, service delivery partner and third-party staff
- The FSA was prepared to respond to supply chain disruption and/or economic shock
- The FSA had the capacity and capability to manage impacts relating to Covid-19 and EU Transition concurrently with usual winter pressures, such as absence due to seasonal flu and the impact of extreme weather events
- The mitigations recommended by the group were implemented by the IRG throughout the response and enabled the FSA to provide a prompt and flexible response over the 2020/21 winter period.

Covid-19 Plant Outbreaks

Throughout 2020/21, the FSA continued to manage food production plants experiencing outbreaks of Covid-19 among staff.

The FSA continue to receive notifications for a small number of outbreaks and cases of Covid-19 that occur in food processing plants. Both meat and non-meat plants are being observed but overall, the number of premises affected represents a small proportion of the total food industry. The risk of transmission of Covid-19 through consumption or handling of food, or handling of packaging, by our assessment remains very low.

Annex E: Incident Prevention Activities

Root cause analysis (RCA) requests for specific incident notifications and alerts have been embedded into routine incident management activities and the inclusion of RCA in the Food Law Code of Practice (March 2021)³, allows enforcement authorities to further assert its need from food business operators (FBO) following an incident.

The collection and analysis of RCA data continues, enabling trend identification of common causal factors, providing direction for incident prevention activities and informing FSA policy decisions (see Figure 1).

Figure 1: Summary of Incident RCAs received

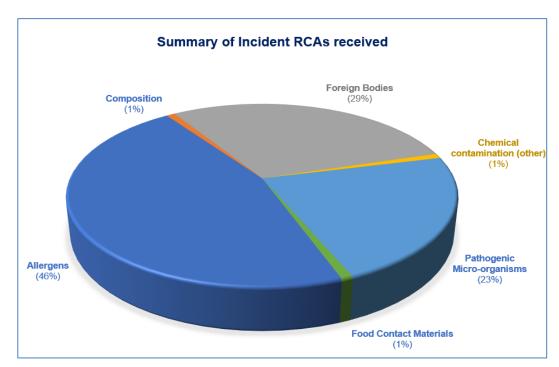
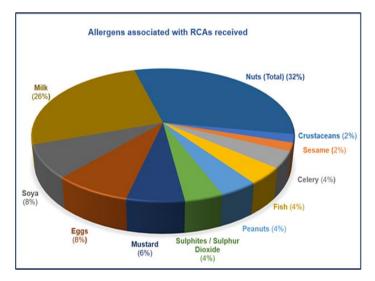
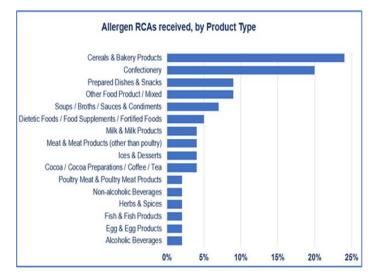


Figure 1 illustrates the distribution of RCAs received with almost half relating to allergen incidents (46%). The remainder were associated with foreign bodies (29%), pathogenic microorganisms (23%) and miscellaneous incidents (3%).

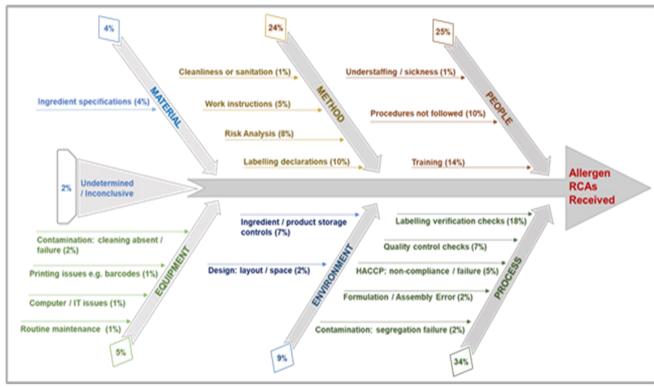
This type of analysis enables the identification of 'best practice' to prevent recurrence, allowing better targeting of areas where intervention will have most effect and the subsequent dissemination of information to those involved in food chain management.

Figure 2: Allergen Incidents RCA



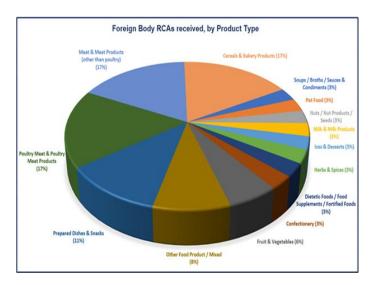


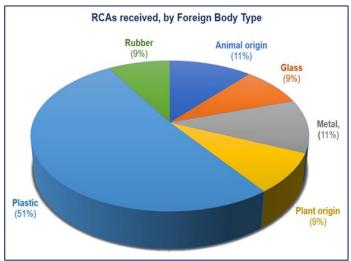
'Cereal & Bakery Products' and 'Confectionery' product categories accounted for almost half of the allergen RCAs received, with 58% of allergenic issues associated with 'Nuts' (total) and 'Milk'.



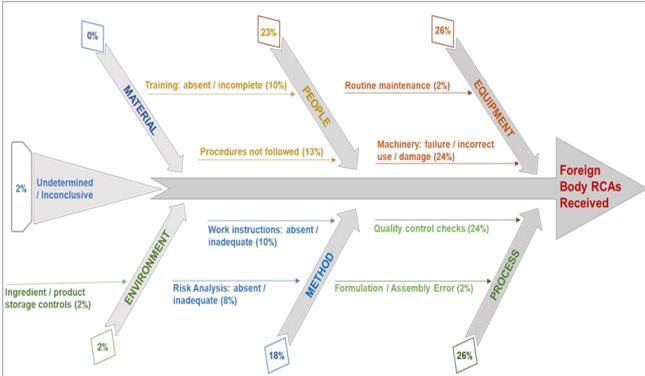
Detailed analysis of the root causes of allergen incidents indicates labelling verification and declaration control errors (28%), underlying training issues (14%) and process control issues (10%) are the major contributors.

Figure 3: Foreign Body RCA



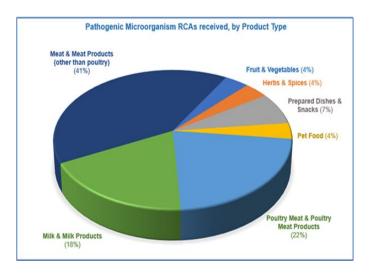


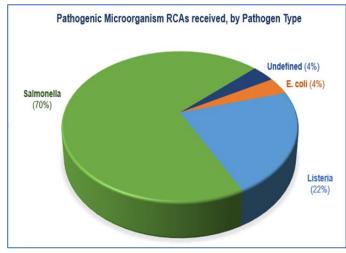
'Cereal & Bakery Products', 'Meat & Meat Products' and 'Poultry Meat & Poultry Meat Products' categories each accounted for 17% of the foreign body incident RCAs received. Plastic contamination overwhelmingly dominated the RCAs submitted, representing 51% of the incident issues notified.



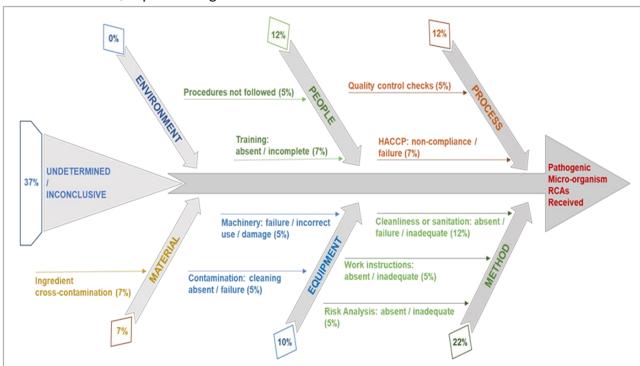
Equipment issues (29%), and quality control issues (21%) formed the majority of RCAs for foreign body incidents, although there were considerable procedural and training issues observed.

Figure 4: Pathogenic Microorganism RCA





'Meat & Meat Products' accounted for 41% of the pathogenic micro-organism incident RCAs received, followed by 'Poultry Meat & Poultry Meat Products' (22%) and 'Milk & Milk Products' (18%). Salmonella contamination predominates the vast majority of RCAs submitted, representing 70% of the incidents notified.



The corresponding root causes determined were spread relatively evenly. However, over a third of investigations (37%) were inconclusive, with the root causes of incidents remaining undetermined.

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