
CHIEF EXECUTIVE'S REPORT

Report by Catherine Brown, Chief Executive

1 GENERAL ACTIVITY UPDATE

- 1.1 Since my last report to the Board in March, I have continued to meet a wide range of stakeholders; including colleagues and partners from the Regulatory Policy Committee, the Environment Agency, the Medicines and Healthcare Products Regulatory Agency, Advertising Standards Authority, Ofqual and the Food and Drink Federation. Our discussions have continued to focus on areas of shared interest including regulatory strategy and sustainable future delivery models that protect the interests of consumers and meet the needs of responsible businesses.
- 1.2 I have also met with the Dairy UK, Fera Science Ltd, British Veterinary Association, National Pig Association and the National Farmers Union to discuss consumer interests in regard to campylobacter reduction, animal welfare, anti-microbial resistance and the role of the meat industry with an increasing range of stakeholders. Last month, Tom Hollands and I visited Greencore's newly commissioned dedicated M&S sandwich manufacturing site in Northampton.
- 1.3 I also enjoyed meeting Hubbub, the Eating Better Alliance, the Vegetarian Society, and Which? to continue to develop our strategic approach to wider consumer interests around food security and sustainability.
- 1.4 I attended a Westminster Food & Nutrition Forum event, in March, on priorities for the UK food, drink and farming industry, and spoke about our approach to regulation in the future. The event covered a broad range of future food issues, and it was an excellent opportunity to position our regulatory work within that broader landscape, to an informed and engaged audience of parliamentarians, industry representatives and academics.
- 1.5 I also spoke at the 'Taking Control of *Listeria*' conference organised by Leatherhead Food Research, an interesting event with a number of links to the FSA's work on vulnerability and behavioural science.
- 1.6 On 6 April, the FSA hosted a joint workshop on Vulnerable Groups, in collaboration with the Social Science Research Committee (SSRC), bringing together FSA policy, academics, social scientists and a number of Government departments with an interest in this area. The broad aims of the workshop were to help scope future work and wider questions in the context of open policy making. FSA received positive feedback from Policy Lab (Cabinet Office) at the event and we are working with Policy Lab in reflecting on the workshop outputs and determining our next steps for the vulnerable groups work.

2 **CAMPYLOBACTER UPDATE**

- 2.1 As noted in the last Board discussion on Campylobacter, the recent move by many processors and retailers to reduce Campylobacter levels by trimming the neck skin of whole fresh chicken is recognised to be a positive public health intervention, as this removes the most contaminated part of the bird and reduces cross contamination risks in the home. In the light of this development, we are reconsidering the methodology for the retail analysis that we undertake to ensure it is meaningful for consumers and equitable in allowing comparisons between retailers.
- 2.2 As a result, we have suspended the retail survey while we develop a new analytical protocol and hope to recommence the retail survey in August with a new protocol. We will however, publish the results of the third quarter (January-March 2016) of the current survey on 26 May. As with previous quarters, publication of the data follows Office of National Statistics rules. Because of the issues outlined above, we will simply be giving an overall industry figure for the amount of Campylobacter on chicken and on the packaging and will not this time be breaking the figures down by individual retailer. Since we have temporarily suspended sampling from 1 April, we will not be publishing a final quarter set of results within this survey.
- 2.3 We have worked with UK consumers to explore and understand their knowledge and acceptance of levels of Campylobacter contamination in chickens at retail sale. Using stimulus material (e.g. infographics and data tables on Campylobacter etc.), we have explored what consumers would consider an acceptable level or range of Campylobacter on chickens at retail from an informed consumer perspective. This work is due to report in the summer.
- 2.4 At the last Board meeting, I mentioned that we held a Campylobacter Research Workshop on 8 and 9 March with interested stakeholders where they were given the opportunity to question those undertaking our research on Campylobacter. We held a research review on 5 May at which independent reviewers assessed the quality and value of the work done against the specific objectives of each project. It is expected that the written report from this will be available in the summer.

3 **BURGERS SERVED RARE IN CATERING OUTLETS – UPDATE ON IMPLEMENTATION OF SEPTEMBER 2015 BOARD DECISION**

- 3.1 At its meeting in March, the Board asked for updates, at each of its meetings until its substantive discussion scheduled for July 2016, on the action to implement its decision of September 2015.

Advice to producers, caterers and local authority enforcement

- 3.2 On 6 May, the FSA published its resource page aimed at the catering industry and local authorities following consultation with industry and local authority regulators. This resource page contains the revised and consolidated advice

to the catering sector, plus additional materials targeted at those food businesses involved in the supply chain from slaughter through to mincing, such as Model HACCP Plans and updated guidance on clean livestock. FSA has continued to work closely with BIS Regulatory Delivery colleagues on the development of the advice.

- 3.3 The feedback from both catering industry and enforcement partners is that the guidance provides greater clarity and it enables FBOs to have a clear understanding of what is required of them should they choose to produce burgers less than thoroughly cooked. It provides LAs with clarity on the expectations on FBOs and therefore what advice and support they can provide, but also when their intervention is required to deal with FBOs with either a poor understanding of the hazards and controls required to mitigate them, or those unable to implement a HACCP based approach effectively.

Consumer awareness

- 3.4 We have completed qualitative and quantitative consumer research to gauge levels of existing consumer understanding of the FSA message around cooking burgers thoroughly in the home. This will allow us to establish a baseline and we will be tracking impact on consumers in terms of awareness and behaviour change following FSA communications campaigns.
- 3.5 Initial analysis of the research indicates that attitudes to consumption of burgers less than thoroughly cooked remain relatively unchanged since we first considered consumer attitudes 2 years ago, with 40% of consumers claiming to be unwilling to accept a burger cooked to anything less than well done under any circumstances. (We need to be cautious regarding direct comparisons to data from 2014 because the questions used in that survey were not identical.) Now that we have established a baseline using more targeted questions in this latest wave of research we are better placed to monitor changes in attitudes moving forward. The demographic of those who would be considered acceptors or advocates of burgers less than thoroughly cooked remains heavily skewed to males aged 16-34, though we will track a representative sample of the UK population.
- 3.6 The level of awareness of FSA messaging regarding consuming burgers less than well done, both when eating at home and dining out, was low with less than 1% of those questioned spontaneously claiming to be aware of the FSA advice, but when prompted this rose to 17%. We will track this after further communications activity.
- 3.7 Plans for the consumer campaign are in development and we will develop compelling content to promote through news and social media.

Consumer messaging

- 3.8 Fieldwork with consumers to assess the effectiveness of model consumer advice on menus has now been completed and analysis is underway. This has compared the effectiveness of different elements of possible model

statements in informing and affecting the behaviour of 1500 burger “acceptors¹”. Initial findings are that including messaging which explains the difference between a burger and a steak has an impact on the choices consumers make. The results from this study will inform our work with LAs and the food industry to develop a basis for the wording of messages to consumers at the point of order to ensure they can make informed, risk-based decisions.

Risk modelling

- 3.9 We have secured the APHA quantitative risk assessment (QRA) model, previously used to estimate the impact on human health from the consumption of VTEC O157 within a beef burger. This model will be used to evaluate the effectiveness of interventions both individually and collectively throughout the food chain. We have prioritised the interventions whose effects we are able to subject to the model and those where further information or research will be required to produce model inputs. An ACMSF sub-group has met twice to set the direction of this work, with modelling of the impact on selected interventions due to be undertaken in May.

ACMSF Work

- 3.10 Data relating to thermal death of STEC and other pathogens were presented to a sub-group of ACMSF members and various scenarios and assumptions regarding the time/temperatures for a 4-log reduction were considered. Proposals will be developed for consideration at the full ACMSF meeting in June.

STEC triggers

- 3.11 Discussions have been held with PHE regarding their enhanced surveillance for STEC and how this might inform the risk associated with burgers. We are awaiting further information and advice from PHE including appropriate triggers that would lead to us reviewing our position.

4 OUR PEOPLE

- 4.1 Over the course of the strategic plan period we will continually look at how we use our finite resources – especially our people - in the best possible way, to achieve our goals.
- 4.2 We have undertaken a review to ensure that our people resource is being focused in the right areas both now and in the future. We have identified that there are some new areas we need to work on, and some skills that we need to reinforce to put us into the strongest position possible to deliver Food We Can Trust. Some of the areas where we need more people and or new skills

¹ Consumer research identified three main groups of characteristics of consumers who eat burgers – rejecters do not like rare burgers and would send one back if served one, acceptors will accept what is served but have some concerns about risk, advocates have a strong preference for rare burgers

include data science, the work on designing the new model for consumer protection that we call "Regulating our Future," and policy and campaigning work - on antimicrobial resistance for example. We are in the process of recruiting an experienced Senior Programme Manager to deliver the Regulating our Future programme.

- 4.3 A number of staff have been redeployed to roles identified as priority and recruitment campaigns have commenced where the skills are not available internally. A number of small restructures will take place over the next few months to ensure that teams are fully aligned to meet our commitments. We are reviewing all of the corporate support functions across the FSA to ensure that we are delivering services to a consistently high standard and that we are performing these functions as efficiently as we can. The result of the review will be the creation of a new Corporate Support Unit

5 ALLERGY AWARENESS WEEK

- 5.1 Around 2 million people in the UK suffer from food allergies, including 2% of adults and 8% of children. A further 600,000 are estimated to have coeliac disease (1 in 100).
- 5.2 To mark Allergy Awareness Week (25 April-1 May 2016), we worked with Allergy UK to commission consumer research² on the experience of eating out with an allergy. Top line results showed that despite improvements, one in four people has suffered a reaction while eating out and nearly one in five of those reactions resulted in a hospital visit.
- 5.3 We launched a campaign to raise awareness of the issue with consumers and business. Our spokesperson Chun-Han Chan appeared on ITV's Good Morning Britain and ITV Wales, and our story trended in their 'top five' for the day. We also scored over 160 pieces of print/online/broadcast coverage in the Sky News Radio, Daily Telegraph, Metro and regional press, with more to come in magazines. We produced film on the importance of compliance; you can view them on the FSA's Youtube channel³.
- 5.4 We were pleased with the level and calibre of online engagement we achieved. The FSA toolkit page, for local authorities⁴ was visited over 420 times, while our new personalised allergy alert service (email and SMS) received over 10,000 subscriptions.
- 5.5 Our messages during the week were shared by other government departments and partners such as Aldi, Cooperative, Women's Institute,

² An online poll of 1,223 food allergic consumers and their carers from across the UK was carried out in March 2016 by Allergy UK. This can be accessed at: <http://www.food.gov.uk/sites/default/files/eating-out-with-a-food-allergy.pdf>

³ <https://www.youtube.com/user/FoodStandardsAgency>

⁴ http://www.food.gov.uk/enforcement/enforcework/allergy-awareness-week-2016-la-toolkit?utm_campaign=allergy-awareness-week2016&utm_medium=referral&utm_source=local-authority&utm_content=hidden-resource-page

TUCO, NCASS, Sodexo, PTA, Irwin Mitchell and others. We also worked with the Anaphylaxis Campaign.

6 SCIENCE UPDATE

Antimicrobial Resistance (AMR)

- 6.1 We have been involved in extensive discussions with the Department of Health and others on the issue of AMR and how we can contribute to the cross-government work on reducing the threat it poses.
- 6.2 In my report in March 2016, I mentioned that we have commissioned the Royal Veterinary College (RVC) to conduct a systematic review on the occurrence of AMR in food at retail. The draft technical report was received at the end of March 2016 and has undergone peer-review by the FSA and six external AMR experts and we anticipate publishing in early autumn 2016.
- 6.3 AMR is clearly a global issue and two FSA officials took part in a workshop in China, to facilitate networking between China National Centre for Food Risk Assessment (CFSA), the FSA, other UK government departments and academic representatives. Attendees shared current practices in both countries on how they identify, analyse and manage risks arising from AMR in the food chain. A further aim was identifying contacts in China for future collaborations. The information from China will contribute to a better understanding of the extent of AMR issues globally.
- 6.4 FSA Chief Scientific Adviser Professor Guy Poppy attended a summit on AMR on 26 and 27 April 2016, titled '*Integrating science and policy for decisive action on AMR.*' The event was organised by and held at the Wellcome Trust and included representation from 35 countries.
- 6.5 Last week, the Chair and I attended the Global Leaders Conference on One Health and AMR, hosted by the UK Chief Medical Officer Professor Dame Sally Davies and Chief Veterinary Officer Professor Nigel Gibbens, at the Royal Society in London. This event brought together Ministers and global leaders in both human and animal health sectors to focus on animal health and plans to address antimicrobial resistance in the context of the One Health approach.

CSA report on whole-genome sequencing

- 6.6 The third CSA report, on whole-genome sequencing, was published in April.⁵ The report examines how the increasing speed and decreasing costs of whole-genome sequencing has transformed scientists' ability to investigate foodborne disease outbreaks, providing faster identification and control of outbreaks. The report also looks at how whole-genome sequencing is being used in other countries for tracking certain pathogens, such as listeria, and its

⁵ <http://www.food.gov.uk/news-updates/news/2016/15064/chief-scientific-advisor-science-report>

potential for checking the authenticity of food. The report also looks at FSA research in the human microbiome and the importance of understanding how changes to the microbiota in our gut can shape immune responses to both physiological and pathological conditions.

Workshop with regulators on acceptability of risk

- 6.7 In conjunction with HowSAFE (a pan-European research group focusing on risk-based decision-making), the FSA organised a workshop with other regulators, to look at how acceptable levels of risk are assessed, managed and enforced. As well as the FSA and HowSAFE, there was representation from the Health and Safety Executive, the National Institute for Health and Care Excellence, Food Standards Scotland and the Met Office. Sharing experiences of how regulators set acceptable levels of risk, and then seek to ensure that these are met in practice across a range of policy domains should help identify new approaches and best practice.

Measuring the economic impacts of foodborne disease

- 6.8 The FSA has commissioned a study that will develop quality adjusted life year (QALY) and willingness to pay (WTP) measures to more directly measure the economic impacts of microbiological foodborne disease (FBD) and the value of reductions in averted illness.

Update on data science

- 6.9 As reported in previous updates, the FSA has developed an approach to use Twitter responses to give an early warning of Norovirus outbreaks. We monitor Tweets weekly, looking for potential outbreaks. There were no signs of a Norovirus outbreak over the course of the winter, before a prearranged backup date, to launch the public information campaign. However, we plan to continue to develop the method in two ways: to look at the possibility of a more location-specific alert; and to improve the method for monitoring the build-up of outbreaks over time. David Milson from FSA's Analytics Unit recently gave a presentation on this work at the 'Data science for government and policy' conference, run by the Alan Turing Institute, at Oxford University. The presentation received very positive feedback and was named 'the day's best talk' by the Director for Analysis at the Ministry of Justice.
- 6.10 The Hartree Centre is funded by the Science and Technology Funding Council, and aims to provide 'Insight and value through intense computing'. FSA are working with them to see if there are food-related projects where they could help. Potential projects include gaining understanding from industrial fridge sensors, and insights into different strains of Campylobacter.
- 6.11 In the coming weeks the FSA will publish the outputs of the projects on the Internet of Things (IoT), which we funded through the IT as a Utility Network plus (and outlined in an earlier update). All the projects have been completed and peer review of the outcomes is in its final stages. Shortly after publication of the reports, the network will host a workshop on the potential for IoT to help

achieve food safety, and a Rapid Evidence Review on the subject will be published.

7 FOOD HYGIENE RATING SCHEME

- 7.1 New regulations will come into force in Wales in late November which will require all takeaway food businesses to publish a bilingual statement on certain hardcopy publicity materials directing customers to the food hygiene ratings website. If a takeaway leaflet or menu shows food for sale, the price and a way of ordering the food without visiting the premises, it will also have to show a statement which will remind customers they can check the food hygiene rating of the food business on the food hygiene ratings website. The statement will also remind consumers they have a legal right to ask the food business for their food hygiene rating when they order.
- 7.2 In terms of extending mandatory display to England, we have built a strong case for this using evidence from Wales where display is already mandatory. We are now exploring how a statutory scheme could be delivered within the context of reducing local government resources in England. It is anticipated that proposals will be ready for presenting to the Government by the end of the year.
- 7.3 The scheme was recently featured on BBC's Rip Off Britain which questioned why it was not already mandatory in England to display stickers. The programme provided a good explanation of how the scheme works and helped raise the profile with consumers.

8 FOOD CRIME

- 8.1 The first Food Crime Annual Strategic Assessment (FCASA) was published on 23 March. The FCASA highlights the broad current understanding of food-related criminality in the UK, exploring the range of harm to consumers, industry and other UK interests. It also covers a review of reported threats and an assessment of the risk they pose. The assessment identifies a wide range of vulnerabilities and risks across the food industry but found little to suggest that organised crime groups have so far made substantial inroads into UK food supply chains. The publication attracted a good level of press coverage across a variety of platforms.
- 8.2 Informed by the FCASA, the Unit's Strategic Intelligence Team is putting the finishing touches to the 2016/17 UK Food Crime Control Strategy which sets out the priority areas for the current year.
- 8.3 FSA Wales has now taken key steps to proceed with the review agreed with the Welsh Food Fraud Coordination Governance Group (WFFCGG). The scope to undertake the review of the food fraud delivery model in Wales has now been agreed and work will commence by engaging with Local Authorities in Wales to assess the nature and extent of the food fraud demand within Wales. The review will take account of what the food fraud threat and response looks like in Wales and where the gaps are.

9 INCIDENTS

- 9.1 There have been significant recalls relating to salmonella in spices, hygiene issues in branded snack products, and the presence of undeclared allergens in biscuits. In each of these cases the European notification (RASFF) system has been used to ensure that consumers are effectively protected across Europe.
- 9.2 On 30 March the FSA published a summary of food incidents handled between October and December 2015. This is the first quarterly publication of incidents, a measure it is hoped will make it easier for consumers to access incident information. The publication summarises alerts issued by the FSA to recall or withdraw products, along with information about where the FSA supported foodborne outbreak investigations. Information provided includes overall details of the incident, the level of risk to consumers and what action we, industry and/or local authorities took. The next summary will be published this month (May), for the quarter covering January to March of this year.
- 9.3 The FSA is conducting a project to review the efficacy of current product traceability, withdrawal and recall processes to ensure that they provide effective consumer protection. The FSA will be working in collaboration with industry, local authority and consumer stakeholders, and we are therefore in the process of establishing a Stakeholder Reference Group to support this. Initial briefing of industry stakeholders about the review and the establishment of the Group has been positively received.

10 SIMPLY HALAL/HILLSIDE ANIMAL SANCTUARY UNDERCOVER FILMING

- 10.1 On 1 May 2106, The Sunday Mirror ran a story about secretly filmed footage taken by Hillside Animal Sanctuary at Simply Halal in Norfolk which showed apparent animal cruelty by slaughterers.
- 10.2 We immediately halted slaughter operations at Simply Halal and launched urgent investigations. We have suspended personal licences to slaughter/handle animals (known as certificates of competence) for 5 individuals, as we do not consider them to be fit and proper persons to handle animals. The Official Veterinarian and the Meat Hygiene Inspector working in the premises at the time of these incidents have also been suspended from their duties pending immediate investigations.
- 10.3 Simply Halal was previously a member of the Association of Independent Meat Suppliers (AIMS). In light of the footage, AIMS has withdrawn membership, and issued an update to its members saying the “behaviour seen in the footage was unacceptable and indefensible”.
- 10.4 We started an immediate review of the business’s approval to operate on the basis of the serious deficiencies seen, and we are looking to conclude this review by the end May 2016. The abattoir will not be able to operate in the meantime. We are carrying out a further review of our own procedures to

identify what further improvements we can make to our ability to swiftly and consistently identify breaches of welfare rules by food business operators.

11 SENTENCING FOR FOOD HYGIENE AND FOOD SAFETY OFFENCES

- 11.1 I would like to highlight the excellent result secured at Leeds Crown Court in April, at the end of two years of complex and challenging investigations by the FSA, Bradford Metropolitan District Council and the Police. The case emphasises the positive benefits that can be gained from working with our enforcement partners to tackle serious criminality in the food chain.
- 11.2 Yakub Yusuf has an extensive record of non-compliant operation in the meat trade. Following his conviction for a number of food hygiene offences in 2004, he received a custodial sentence and was issued with a Prohibition Order that prohibits him from being involved in the management of a food business. Over subsequent years, Yusuf has breached the terms of that Order on a number of occasions and been subject to further prosecution action for the illegal operation of food businesses. He has also been prosecuted by the Crown Prosecution Service for other offending not linked to food hygiene.
- 11.3 Upon release from his most recent spell in prison, the FSA quickly started to receive intelligence that he was operating a new food business. Working with colleagues at Bradford Council, who led the enquiry, we were able to build the case that Yusuf was again illegally operating a food business in breach of his Order. At the same time, the FSA Investigations Team was undertaking enquiries into corporate ID fraud that was being perpetrated against a number of legitimate food businesses, who believed that they were supplying goods to another legitimate company. In fact, Yusuf and an associate, Zulfiqar Alam, had stolen the ID of the second legitimate company to obtain the goods and payment was never made. Having compiled a large volume of evidence in relation to the fraud, we were able to convince the Police that it merited their attention and the matter was taken forward by the Yorkshire and Humberside Regional Fraud Team and a prosecution was taken by the CPS.
- 11.4 Yusuf pleaded guilty to both food hygiene charges brought by Bradford Council and fraud charges brought by the CPS. At Leeds Crown Court on 14 April, he was sentenced to a total of 5 years and 10 months in prison. His accomplice in the fraud matters, Zulfiqar Alam, was sentenced to 3 years and 10 months in prison.
- 11.5 This was a complex investigation that went beyond the usual enforcement action taken by the FSA or the local authority and the Judge particularly commended the FSA Senior Investigation Officer and three officers from Bradford Council.

12 RESILIENCE

- 12.1 An FSS/FSA emergency exercise, Exercise Joint Venture, took place on 22 March in Aviation House. Participants from across both organisations were presented with a scenario involving a cross-border foodborne disease

outbreak and asked to consider how they would react with respect to three specific facets of the revised Incident Management Plan (IMP) and associated Standard Operating Procedures, namely strategic decision-making, risk management, and briefing cell management. A debrief held immediately after the event identified further areas to work on to embed the revised arrangements, but highlighted that the new procedures represented good progress against the recommendations arising out of Exercise Prometheus.

13 OFFICIAL FEED CONTROLS IN WALES

- 13.1 A new feed delivery model was introduced on 1 April 2015, which included a risk-based inspections programme for Wales.
- 13.2 The work programme in Wales for 2015/16 consisted of a target of 2386 inspections with 2431 (102%) reported as completed. In addition to this there were also 235 interventions that resulted in the discovery of feed establishments no longer trading, thereby improving the accuracy of animal feed establishment registers.
- 13.3 A risk-based all Wales feed sampling plan was developed and agreed by the six regions. The number of samples taken has been reported as 163 out of a target of 166 (98.2%). The returns demonstrate a huge improvement in the delivery of animal feed official controls in Wales and also indicate that feed inspections are being carried out across all feed regions and in all local authority areas. A full spend against the budget of £490,000 has been reported.