
Incidents and Resilience Annual Report 2015/16

Report by: **Richard Hoskin, Head of Incidents and Resilience**

For further information contact Richard Hoskin, Head of Incidents and Resilience on
Tel: 01904 232171 / 07775031103

Email: richard.hoskin@foodstandards.gsi.gov.uk

1.0 INTRODUCTION

1.1 At its meeting in September 2015 the FSA Board agreed to receive an annual report of incidents and resilience with the first of these covering the year ending March 2016. This paper therefore provides an annual report on the FSA's incidents and resilience function, including an overview of ongoing work to build capability and further improve how the function contributes to ensuring food and feed safety. **The Board is invited to discuss the paper and note and comment on the new Efficacy of Recalls project.**

1.2 The incident and resilience function is delivered through three teams based in London, Cardiff and Belfast, who work together to build resilience and respond to incidents. Similarly, well established working relationships with Food Standards Scotland are in place.

2.0 STRATEGIC AIMS

2.1 The FSA strategy 2015-2020 identifies three main themes which need to be addressed and balanced to get the best overall outcome for consumers. This includes the consumer's right to be protected from unacceptable risk.

2.2 The right of the consumer to make informed decisions about their food underpins our work to achieve the successful management of incidents relating to food and feed safety.

2.3 A key component of the FSA's strategic commitment to playing its part in achieving "**food we can trust**" is an effective, robust and proportionate system of ensuring that food businesses comply with the regulations put in

place to protect consumers' interests. The reactive and proactive work of the incidents and resilience function continues to contribute to the delivery of this commitment.

- 2.4 By strengthening our response capability both within our own organisation and in conjunction with our partners, we will help deliver the commitment given in our strategic plan to “work really well together across the whole organisation and with others”. Within the strategy it is also recognised that “responsibilities for consumer protection are shared – businesses, the FSA, other parts of central and local government, and consumers themselves all have important roles to play.”

3.0 EVIDENCE

- 3.1 This paper draws on data published in the FSA Annual Report of Incidents 2015 (<http://www.food.gov.uk/sites/default/files/annual-report-incidents-2015.pdf>) which acts as the official public record of incident levels. As outlined in the Background Quality Report that accompanies the Annual Report of Incidents, comprehensive data and trend analysis was undertaken by the FSA's analytics unit in producing the report.
- 3.2 The continuing development of our routine and non-routine incident response arrangements is informed by evidence drawn from incident reviews and the FSA Annual Exercise Programme.

4.0 RISK MANAGEMENT

4.1 Overview of resource allocation, functions and incidents data

- 4.1.1 Annex A provides details of the annual budget and an outline of the key functions that the incidents and resilience teams in London, Belfast and Cardiff deliver. Annex B provides a summary report of incidents data including incident notifications and alerts raised.

4.2 Governance

4.2.1 The incidents and resilience functions in London, Belfast and Cardiff work very closely together, as well as with their counterparts in Food Standards Scotland. To ensure consistency of approach across the UK (where appropriate), and the continual enhancement of our resilience and incidents response processes, monthly meetings take place between the team leaders of these functions.

4.2.2 Oversight of the FSA's resilience function is provided by an emergency preparedness and resilience response group comprised of senior FSA managers from across the organisation, which reports to the Executive Management Team.

4.3 Exercising and delivering lessons identified

4.3.1 This year saw significant pieces of work delivered in response to the action plan agreed following Exercise Prometheus (held March 2015 - <https://www.food.gov.uk/sites/default/files/prometheus-report-2015.pdf>). This included revisions to the Incident Management Plan, a programme of continuous improvement projects (see para 6.1), and production of a guidance paper for the high-level Scientific Advisory Group for Emergencies¹ on key issues, questions and sources of expertise for responding to a national-level incident of severe contamination of food. In delivering these outputs we are confident that the FSA has strengthened its ability to protect the consumer from risks arising from food and feed incidents.

4.3.2 The state of readiness of our response arrangements are an important indicator of effective risk management. This is tested through the FSA Annual Exercise Programme which exercises our strategic, tactical or operational arrangements at varying levels of complexity and with both internal and external partners. 2015/16 saw the delivery of a FSA/Food Standards Scotland exercise 'Joint Venture', an event which confirmed the effectiveness

¹ The Scientific Advisory Group on GE is a high-level advisory group, chaired by the Government Chief Scientific Adviser, convened to provide scientific advice to inform the government's response to national emergencies.

of the joint arrangements outlined in the Memorandum of Understanding between the two organisations.

4.3.3 Work will continue in this current year toward delivering an exercise with government partners (Department of Health, Public Health England and NHS England) and separately, with four other EU member states through a pilot exercise to assess participant member state capacity and capability to work together to deliver a harmonised response to a pan-European food safety incident. The FSA is also in discussions with the Welsh Assembly Government about their plans to convene a food incident exercise in 2016/17.

4.4 Food and feed incident reviews

4.4.1 In 2015/16 we also introduced a new incident review process which provides a framework for initiating and conducting reviews of incidents to ensure opportunities to learn are maximised.

4.4.2 The FSA will publish the outcome of a review where appropriate as illustrated in 2015/16 by the publication of the review into the soya in wheat flour incident (<https://www.food.gov.uk/sites/default/files/soya-in-wheat.pdf>).

4.5 National Risk Assessment

4.5.1 The Incidents & Resilience Unit in London led on the FSA's contribution to the National Risk Assessment (NRA). The NRA, led by the Civil Contingencies Secretariat in Cabinet Office, aims to inform capability building and contingency planning to prepare for a wide range of UK-wide emergencies that might occur. In a new approach for this year the NRA identifies and assesses civil emergency scenarios which experts agree represent the reasonable worst case scenario of civil emergency risks that the UK faces in the next five years. This work continues with senior oversight from Professor Guy Poppy, Chief Scientific Adviser, with an expected publication date of September 2016.

4.6 Collaborative working to deliver improved risk management

4.6.1 Effective risk management requires a very strong culture of collaboration with stakeholder groups. In 2015 the FSA were advised by the Seasoning and Spice Association (SSA), the Food and Drink Federation (FDF) and British Retail Consortium (BRC), that there was concern in Canada and the United States after certain batches of ground cumin and paprika tested positive for undeclared peanut protein. After the immediate issues were resolved, best practice guidance (https://www.fdf.org.uk/corporate_pubs/guidance-herbsandspices.pdf) for UK businesses was developed by an industry working group in association with the FSA which provided advice on how to identify vulnerabilities in supply chains and the types of preventative measures that should be considered. The incident review process referred to at 5.4 above identified that the handling of this incident offered a number of positive learning opportunities for the future – particularly in the strong collaboration put in place with industry players to protect consumers.

5.0 Continuous improvement

5.1 An ongoing programme of continuous improvement projects involved a collective four nations approach. Incidents and resilience colleagues across England, Wales, and Northern Ireland and Food Standards Scotland launched a review of incident management procedures in 2015. This review continues to provide renewed operating procedures which recognise the benefit of standard approaches but at the same time the need for specific arrangements at country level. An example of this was the publication of the revised Briefing Cell Operating Procedure which was subsequently tested in Exercise Joint Venture and found to offer a significant improvement in planned arrangements.

6.0 Internal audit

6.1 An audit was undertaken as part of FSA Internal Audit's plan to assess the effectiveness of the FSA's implementation of the Rapid Alert System for Food and Feed (RASFF). The audit reported in February 2016 providing a '*substantial*' assurance opinion. A second audit took place over this period on incident management and this will report shortly.

7.0 Building capability – the Efficacy of Recalls Project

7.1 Given their importance to consumer protection, the FSA has commenced a project to review and enhance the effectiveness of product traceability, withdrawal and recall processes. This has been identified as a corporate priority for 2016/17 and will be delivered as a joint initiative with Food Standards Scotland, in close collaboration with external stakeholders.

7.2 Detailed planning is currently underway with the objectives for 2016/17 being to gather the necessary evidence to assess the efficacy of current processes, both from a food business operator, competent authority and consumer perspective, and to take a systems-based approach to identifying and implementing actions required to enhance those processes in order to deliver more effective consumer protection. This will take account of any good practice currently being undertaken across the UK, other EU member states and third countries (including non-food sectors), and will tie in with work being undertaken in relation to other corporate priorities such as 'Implementing Our Regulatory Strategy'; 'Becoming a Data Driven Organisation' and our work around 'Vulnerable People'.

7.3 We are in the process of establishing a Stakeholder Reference Group to support this work. Initial briefing of stakeholders about the review and the establishment of the Group has been positively received, with a real willingness by all parties to be involved.

8.0 IMPACT

- 8.1 A number of key benefits are targeted through the efficacy of recalls project. There is currently little evidence on the effectiveness or otherwise of the current UK food recall system. Gathering and analysis of evidence will provide a baseline against which to set future policy direction. By gathering evidence around the current traceability, withdrawal and recall systems across all sectors of the UK food industry, areas for improvement can be identified in relation to industry and competent authority responsibilities. Consumer research will lead to an improved understanding of consumers' behaviours in relation to the current food recall systems. In addition, consumer research will assist in developing improved and more targeted food recalls for vulnerable groups. Using the evidence gathered, an intervention action plan will be agreed with all relevant stakeholders, setting out improvements to be made to the system by both the food industry and competent authorities. This will ultimately provide for greater consumer protection.

9.0 CONSULTATION

- 9.1 Where appropriate, incident review processes have involved cross-government, local government, industry and consumer representation.
- 9.2 The efficacy of recalls project will be delivered in collaboration with relevant stakeholders as outlined in paragraph 8.3.

10.0 DEVOLUTION IMPLICATIONS

- 10.1 The work of the FSA's incidents and resilience function is delivered through a 'four nations' approach. Systems and process development has progressed through this joint effort ensuring that any needs specific to a particular jurisdiction are factored into decisions.

11.0 CONSUMER ENGAGEMENT

- 11.1 The efficacy of recalls project will involve consumer research the details of which will be defined as the project develops.

12.0 CONCLUSION

- 12.1 2015/16 was a year in which the FSA's incidents and resilience function delivered a number of key pieces of work including the largest programme of systems and process improvement seen for many years. Against this backdrop it collectively responded to over 1500 incident notifications and managed an increasing number of recalls and allergy alerts. It also established a proven methodology for incident reviews, and developed the first Annual Exercise Programme. Collaborative working arrangements continued to be strengthened between the four nations of the UK and through active participation on the pan-European exercise project and proven performance in managing RASFFs, the FSA continued to influence at both the national and international level. These achievements, together with ambitious plans for 2016/17 will ensure that the FSA's incidents and resilience function continues to build upon its effectiveness in contributing to consumer protection.

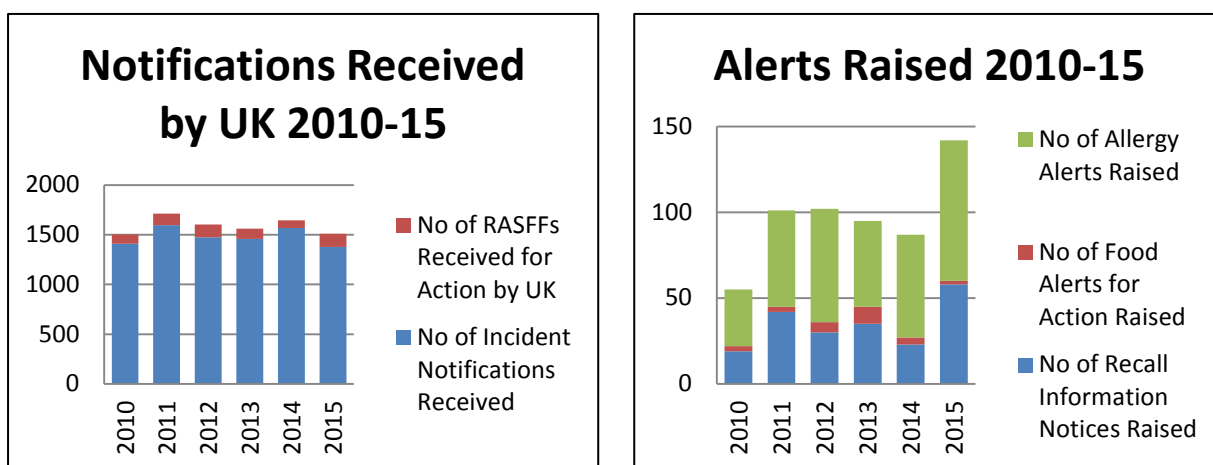
Annex A

1.0 Incidents and Resilience: Budget and Functions

- 1.1 The FSA's incident and resilience function is delivered through the Incidents & Resilience Unit in London and the Consumer Protection teams in Wales and Northern Ireland.
- 1.2 The incidents and resilience function in England, Northern Ireland and Wales had a combined budget of £1.94m in 2015/16 (£2.21m in 2016/17), representing 7% (8% in 2016/17) of the Operations Group Budget and 2% (2%) of the FSA budget.
- 1.3 In broad terms, the incidents and resilience function has four distinct responsibilities:
 - 1.3.1 It provides a '24/7' incident response capability on behalf of / or in support of the UK Government (and devolved equivalents), and the European Commission (in our role as National Contact Point for RASFF), where there are concerns about actual or suspected threats to the safety, quality or integrity of food and / or feed that could require intervention to protect consumers' interests;
 - 1.3.2 It undertakes outbreak and food chain investigations including root cause analysis to inform current prevention and enforcement strategies;
 - 1.3.3 It ensures that the FSA has the capacity and capability to effectively lead or play its part in an incident or multiple incidents regardless of scale or complexity; and
 - 1.3.4 It ensures that the FSA makes an effective contribution to UK cross-Government and, where relevant, European-wide resilience planning, including leading on UK food defence matters (food defence is defined as procedures adopted to assure the security of food and drink and their supply chains from malicious and ideologically motivated attack leading to contamination or supply disruption).

Annex B Incident data

1.0 Incident notifications received and alerts raised 2015



1.1 During 2015, the Food Standards Agency (FSA) and Food Standards Scotland (FSS) received 1,514 notifications of food, feed and environmental contamination incidents. The overall number of incidents was similar to those seen in recent years and included notifications from the European Commission, via the RASFF.

The FSA may, in the light of the information received, issue a food alert to both consumers and local authorities, who enforce food law. Only a small proportion of food incidents will lead to a food alert. These alerts are used during incidents where, for example, the distribution of a product is wide. They include:

- Product Recall Information Notices, which are issued to inform consumers and local authorities that a food product is being ‘recalled’ (when customers are asked to return the product).
- Allergy Alerts, which are issued in cases where foods are being withdrawn or recalled, either because the allergy labelling is missing or incorrect, and
- Food Alerts for Action, when an incident requires direct enforcement action by local authorities.

We have seen an increase in both the number of Allergy Alerts and Product Recall Information Notices issued in 2015 when compared to previous years.

The increase in Allergy Alerts is most probably due to the introduction of the Food Information Regulations which came into force in late 2014. The increase in Recall Information Notices reflects an improvement in incident reporting by both local authorities and the food industry.

2.0 Incidents received by category 2015

