

Proposals for delivering FSA/FSS led workstream 1 – Guidance Clarifying Roles and Responsibilities

Issue

1. This paper sets out proposals for an FSA/FSS led workstream 1, to develop a comprehensive UK guidance document that clarifies roles and responsibilities and takes account of the principles detailed in the Food and Agriculture Organization of the United Nations (FAO)/ World Health Organisation (WHO) guide for developing and improving national food recall systems¹.
2. The paper suggests the establishment of a working group to support this workstream and seeks views on the proposed approach and timeline for the work and actions to ensure appropriate membership to the working group.
3. The paper also suggests areas that should be included in the guidance document, and seeks views on whether these should be included.

Stakeholder Reference Group action

4. The Stakeholder Reference Group is asked to:
 - **Discuss and agree** the approach and timeline to delivering the FSA/FSS led workstream 1
 - **Discuss and agree** the proposed membership of the working group for workstream 1 and agree how members will be identified for the working group

Background

5. The project to review the withdrawal and recall system in the food retail sector commenced in 2016 and was split across four stages. The first two stages – pre-planning and gathering evidence of the current system – have now been completed.
6. The FSA/FSS executive brought a paper to the FSA and FSS Boards in September 2017 to inform members of the results of the evidence gathering stage and to seek agreement for the Executive to work collaboratively with other key stakeholders to deliver on four identified streams of work to enhance the current system. These areas were agreed in advance with the ESRG.

¹ <http://www.fao.org/docrep/017/i3006e/i3006e.pdf>

7. Members at the FSA/FSS Board meetings agreed that the four areas of work should be progressed and gave their authorisation for the remaining stages of the project to commence - stage 3 - delivering improvements to the system and stage 4 evaluation of changes.

8. The Board agreed the work should be delivered with the aim of delivering four key outcomes (which align with the 4 areas of work):

- ***A withdrawal and recall system that is founded on a clear and distinct set of roles and responsibilities, agreed and commonly understood by all participants***
- ***Information to consumers is consistent and accessible, based on proven best practice and underpinned by cross-industry sharing of approaches and impact***
- ***The public are aware of the recall process and what actions they should take***
- ***Feedback loops and a philosophy of continuous improvement amongst all stakeholders underpins the withdrawal and recalls system***

9. This paper discusses an approach to delivering the first outcome, that a withdrawal and recall system is founded on a clear and distinct set of roles and responsibilities, agreed and commonly understood by all participants.

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10. A proposed high-level plan for a FSA/FSS led workstream 1 is set out in Annex A. Members of ESRG are being asked to discuss and agree the plan.

11. Members of ESRG are asked to consider the memberships of the working group to deliver this workstream and to agree how suitable members should be sought.

**Stakeholder Reference Group Secretariat
December 2017**

Annex A

Recall project

FSA/FSS led Work stream 1 – Guidance Clarifying Roles and Responsibilities

Background

1. The Food Standards Agency commenced a project to review the withdrawal and recall systems in the UK food retail sector to identify if improvements needed to be made to enhance the current system.
2. A number of research reports were commissioned to baseline the current system, including a qualitative benchmarking exercise² of food recall systems in other countries and a report commissioned by Kantar Public³ to understand perspectives and views from consumers, industry and enforcers.
3. The research found there was no agreed standard or level of understanding on roles and responsibilities and expectations of key players in the system. A main finding from the international bench marking exercise was that the UK did not have sufficient guidance from the Central Competent Authority. The FSA's current guidance⁴ dates back to 2007 and concentrates on interpretation of Regulation (EC) 178/2002 only, rather than additionally providing guidance on the necessary requirements for an effective withdrawal and recall system. Guidance is an important part of the process as it ensures that all parties know their (and other's) responsibilities and the appropriate way to fulfil them.
4. In addition, the Kantar research with food businesses identified varied knowledge on recall processes in a number of areas including: a lack of understanding on roles and responsibilities; a lack of clarity from some businesses on when to inform/notify the competent authorities; and uncertainty from some businesses on what should be communicated to consumers in the event of a recall. Some businesses also reported perceived variation in the application of guidance and decision making by FSA and FSS, and identified risk assessments as an area where further guidance would be required.

Purpose and scope

5. The purpose of a FSA/FSS led workstream 1 is to develop a comprehensive UK guidance document that clarifies the roles, responsibilities and expectations of the key players.
6. The scope of this workstream includes those supporting action 1 agreed at the FSA/FSS Board meetings on 20 September as follows:

² <https://www.food.gov.uk/sites/default/files/recall-systems-comparison.pdf>

³ <https://www.food.gov.uk/sites/default/files/recalls-efficacy-report.pdf>

⁴ <https://www.food.gov.uk/sites/default/files/multimedia/pdfs/fsa1782002guidance.pdf>

- Action 1: FSA/FSS should work with industry and local authorities to develop a comprehensive UK guidance document that takes account of the principles detailed in The World Health Organisation (WHO) (2012) document “FAO/WHO guide for developing and improving national food recall systems”.

Working Group for FSA/FSS led workstream 1 and proposed membership

7. A working group will be established to deliver the objectives and will report progress regularly to the ESRG.
8. Membership of the group will include representatives from:
 - FSA workstream lead – Delyth Murray- Lines FSA
 - FSA and FSS (delivery and social science representatives)
 - the food industry at a business working level
 - consumer representatives
 - representation from the enforcement community.
 [Detailed membership to be included once agreed and included as an appendix].

Objectives

9. The following objectives will be delivered by the workstream 1:

Objective 1	The working group will agree the areas to be included in the guidance document. In deciding the areas to be included, the working group will take into account existing guidance by FSA/ FSS and others.
Objective 2	The working group will consult on the guidance and review comments from the consultation before final publication of the guidance.
Objective 3	The working group will consider how the guidance and its implementation should be evaluated.
Objective 4	The working group will identify measures of success against which the work can be evaluated.

Resources

10. The FSA and FSS will allocate a budget to procure the services of a technical drafter to produce the competent authority guidance.
11. Working group members will be expected to attend meetings and correspond via email. It is anticipated that meetings will be held every 2 months, with additional meetings being scheduled as necessary depending on deadlines and work progress. To minimise resource input meetings will be held remotely via

TC and only where necessary, as work demands, through face to face meetings.

Benefits and measures of success

12.[To be discussed and agreed by workstream working group members]

Timeline

13.The workstream working group is a task and finish group, with the work commencing in January 2018 and completing by March 2019, with publication of guidance. A more detailed time line is detailed in appendix 1.

Appendix 1 – Timeline for FSA/FSS led Workstream 1 – Publish Guidance Clarifying Roles and Responsibilities

Project	2017/18						2018/19									2019/20															
	Q3			Q4			Q1			Q2			Q3			Q4			Q1			Q2			Q3			Q4			
	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	
FSA led work stream 1 – Publish Guidance Clarifying Roles and Responsibilities	Establish Working group			Develop Guidance									Consult on guidance			Reflect on consultation and publish guidance			EU Exit	Embed implementation of guidance						Evaluate guidance and implementation					