

## Proposals for delivering FSA/FSS led workstream 2 – Accessible and Consistent Consumer Information

### Proposal for an industry led workstream to develop enhanced trade to trade notifications

#### Issue

1. This paper sets out proposals for an FSA/FSS led workstream 2, to ensure that there is accessible and consistent information provided to consumers about food recalls.
2. The paper suggests the establishment of a working group to deliver 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. Finally, the paper suggests the establishment of an industry led work stream, to develop systems to enable better sharing of information on withdrawal and recall notifications within the trade i.e. business to business notifications.

#### 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 2
  - **Discuss and agree** the proposed membership of the working group for workstream 2 and agree how members will be identified for the working group
  - **Discuss** how industry could lead on a separate workstream to improve trade to trade notifications of food withdrawals and recalls and who would be best placed to lead the work and be involved
  - **Discuss and Agree** that development of the industry led workstream to develop enhanced systems for trade to trade notifications is reported regularly to the ESRG

#### 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.

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 second outcome, that information to consumers is consistent and accessible, based on proven best practice and underpinned by cross-industry sharing of approaches and impact.

### **Proposals for FSA/FSS led workstream 2 – Accessible and Consistent Information to Consumers**

10. A proposed high-level plan for a FSA/FSS led workstream 2 is set out in Annex A. Members of ESRG are being asked to discuss and agree this.

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

### **Proposals for a separate Industry led workstream to develop enhanced systems for trade to trade notifications**

12. The evidence gathering stage of the project identified that industry would benefit from having an enhanced system for trade to trade notifications, i.e. for when businesses need to notify other businesses when food is being withdrawn from

within the trade and when food is ultimately being recalled from the final/end consumer. At the last ESG meeting, members agreed that this work should be taken forward by industry.

13. The FSA and FSS Boards both agreed on 20 September that FSA/FSS should work with industry to explore possible solutions to ensure that withdrawal and recall notifications are shared effectively within the food industry, including reviewing application of solutions used in other countries.

14. It is proposed that this work will not be delivered by the FSA/FSS led workstream 2. Instead it is proposed that this work would be taken forward through a separate workstream led by industry, reporting their progress directly to the ESG.

15. Members are being asked to consider how this work strand could be taken forward, who would lead this work, and who would need to be involved.

**Stakeholder Reference Group Secretariat  
December 2017**

## **Annex A**

### **Recall project**

FSA/FSS led Work stream 2 – Accessible and Consistent Information to Consumers

#### **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. The project included an evidence gathering phase to baseline the current system and to identify where improvements would best be targeted. This stage identified that information on product withdrawals and recalls could be more accessible and consistent. The table below includes some of the key findings from the evidence gathering phase.

Information directed to consumers about food recalls and trade to trade notifications on withdrawals/recalls was not always available in a format that was consistent and accessible.

Food business participants in the research involved in a food recall within the last 12 months had used point of sale notices and email/letters as the most used methods of communication to inform consumers about the recall. Those businesses participating in the research that didn't have their own consumer notification template were unclear what they should include in recall notifications.

Consumers confirmed that their preferred channels of information on food recalls were from the news, in store notices and through social media.

Consumers indicated a preference for recall notifications to be consistent and standardised throughout, so that they were instantly recognisable as a food recall notification, regardless of where they were seen.

The case review study highlighted that in store notifications were not always prominently displayed, often being more difficult to find in larger stores and located in the customer service areas which would not be visited regularly by consumers. Equally online recall notifications on company websites were not considered to be obvious and consumers would actively need to search for the information.

The international benchmarking exercise highlighted best practice, where other countries provided standardised templates for consumer notifications, supported by guidance on where these should be displayed in store or on line and guidance on proactively communicating recall notifications.

#### **Purpose and scope**

3. The purpose of a FSA/FSS led workstream 2 is to deliver a body of work to ensure that information to consumers on food recalls is consistent and accessible, based on proven best practice and underpinned by cross-industry sharing of approaches.
4. The scope of this workstream includes notifications sent from industry/food businesses to consumers (i.e. consumers purchasing food in store or online)

and from FSA/FSS to consumers and includes those supporting actions agreed at the FSA/FSS Board meetings on 20 September as follows:

- *FSA/FSS should work with industry to agree a more consistent approach for industry communications to consumers on product recalls which reflects consumer insight and exploits latest digital technology.*
  - *FSA/FSS should work with industry and others to develop and publish best practice guidance on where notifications should be displayed (both in store and digitally) and on active consumer communications, taking account of new technologies/potential solutions. This would include measures to encourage adoption of best practice guidance.*
  - *FSA/FSS should review their food alerts templates to ensure they also align with the key principles from the consumer insight. Any proposed changes to FSA/FSS food alert templates will be tested with consumers.*
5. This workstream does not include notifications sent from one business to another business customer i.e. trade to trade notifications. The research from stage 2 of the overall project did identify that industry would benefit from having an enhanced system for businesses to notify other businesses when food is being withdrawn within the trade and when food is ultimately being recalled from the final/end consumer. It is proposed that this work will be taken forward by an industry led group in a separate workstream, reporting their progress directly to the ESG.

**Working Group for FSA/FSS led workstream 2 and proposed membership**

6. A working group will be established to deliver the objectives and will report progress regularly to the ESG.
7. Membership of the group will include representatives from:
- FSA workstream lead – Kathryn Baker FSA
  - FSA and FSS (delivery and social science representatives)
  - the food industry at a business working level
  - consumer representatives
  - representation from enforcement community.

[Detailed membership to be included once agreed and included as an appendix].

**Objectives**

8. The following objectives will be delivered by the workstream 2:

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|-------------|--|
| Objective 1 | The working group will commission consumer insight work to identify best practice: <ul style="list-style-type: none"> <li>i. for consumer recall notifications in both content and style;</li> </ul> |
|-------------|--|

|             |   |
|-------------|---|
|             | <ul style="list-style-type: none"> <li>ii. in relation to where these notifications should be placed in store and online;</li> <li>iii. in relation to the preferred channels for active communication of the notifications.</li> </ul>   |
| Objective 2 | <p>The working group will develop best practice guidance that includes:</p> <ul style="list-style-type: none"> <li>i. a template for consumer notifications</li> <li>ii. guidance on where notifications should be displayed (both in store and digitally), and</li> <li>iii. guidance on active consumer communications, taking account of new technologies/potential solutions.</li> </ul> <p>This will be underpinned by better understanding existing good practice in industry and where necessary piloting approaches to assess their effectiveness.</p> <p>The working group will work with members of workstream 1 as this guidance will form a section of the overall competent authority guidance being developed through workstream 1.</p> |
| Objective 3 | The working group will consult on the guidance and review comments from the consultation before final publication of the guidance.  |
| Objective 4 | The working group will consider how the guidance and its implementation should be evaluated.  |
| Objective 5 | The working group will review FSA and FSS food alerts templates to ensure they align with the key principles from the consumer insight, making recommendations for any change and considering best approaches for how these food alerts can be actively communicated to consumers.  |
| Objective 6 | The working group will identify measures of success against which the work can be evaluated.  |

## Resources

9. The FSA and FSS will allocate a budget to deliver the consumer insight work and will procure the services of a technical drafter to produce the guidance, to be included within the overarching competent authority guidance to be delivered within the FSA/FSS led workstream 1.
10. 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

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

## Timeline

12. 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 2 – Accessible and Consistent Consumer Information

| 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 2 - Accessible and Consistent Consumer Information              | Establish Working group |     |     | Commission consumer insight work and test consumer notification approaches |     |     | Analyse findings from consumer insight work and pilot approaches with industry |     |     | Agree final consumer notification approach and draft guidance |     |     | Consult on guidance |     |     | Reflect on consultation and publish guidance |     |     | EU Exit |     |     |     |     |     | Embed implementation of guidance |     |     | Evaluate guidance and implementation |     |     |
| Industry led workstream – Improved trade to trade withdrawal / recall notifications |                         |     |     |  |     |     | Industry group to undertake work to enhance trade to trade notifications       |     |     |   |     |     |                     |     |     |  |     |     |         |     |     |     |     |     |                                  |     |     |                                      |     |     |