

Analysis of recalls

Issue

1. This paper provides an outline of the number and types of UK food recalls over the past three years.

External Stakeholder Reference Group action

1. The External Stakeholder Reference Group (ESRG) is asked to:
 - **Note** the number and type of recalls, as background understanding when considering other aspects of the recalls review.
 - **Comment** on the research findings

Background

2. An analysis was carried out to look at the number and types of reported incidents during 2013, 2014 and 2015. This was supplemented with information on type of businesses making incident reports during 2015 only. This analysis will be updated early 2017 to include reported incidents for 2016. This will allow the research to determine whether the rise in reported incidents in 2015 was a one-off, or if that appears to be a new normal.

3. Most information was extracted from the MEMEX system as one dataset. This information was available back to 2013 only. Trends for allergies going before that time are from RASFF¹. Details on business type were extracted manually for each recall for 2015 only.

Number and cause of incidents

4. Overall there were 121 food recalls in 2015. This was more than double the number in each of the previous two years: there were 56 in both 2013 and 2014. Table 1 illustrates the rise in the number of reported incidents for 2015 across the main causes of recall.

Table 1 – Number of recalls by type and year, 2013-2015

| Recall type | 2013 | 2014 | 2015 | Total |
|----------------------------------|-----------|-----------|------------|------------|
| Allergens | 22 | 32 | 63 | 117 |
| Microbiological & hygiene issues | 15 | 14 | 28 | 57 |
| Physical contamination | 11 | 7 | 24 | 42 |
| Other | 8 | 3 | 6 | 17 |
| Total | 56 | 56 | 121 | 233 |

¹ RASFF is the EU's Rapid Alert System for Food and Feed, used for alerts where an issue identified in one country will impact on another member state.

5. About half of recalls (117 of 233 recalls) are related to Allergens. About a quarter (57) related to microbiological and hygiene issues. This includes the pathogenic and non-pathogenic micro-organisms and problems related to poor or insufficient controls. 18% of recalls (42) related to physical contamination. This included foreign bodies, packaging defective / incorrect and parasitic infestation hazards. The remaining 17 recalls related to other issues relating to the other hazard categories – mainly the ‘presence of’ something, such as unapproved colouring or pesticides.

6. There are many sub-categories under each of these top four causes of recall, which can be provided on request. For example, the biggest increases in allergy recalls were in multiple allergens, and in tree nuts. Milk allergy recalls actually saw a slight fall from 2014 to 2015.

7. It should be noted that the way the data has been recorded does affect the number of recalls. Nine incidents had more than one recall associated with it: seven incidents resulted in 20 recalls in 2015, and two incidents resulted in four recalls in 2014. For example, four of the six metal contamination recalls in 2015 relate to a single incident but are listed as separate recalls for each of the four affected retailers.

8. Initial indications based on the first three quarters of 2016 suggest that the numbers in 2016 are likely to be at least as high as 2015, if not higher. Therefore, initial indications suggest the rise in 2015 was not a one-off spike.

Notifier

9. Between 2013 and 2015, 61% of the recalls originated from incidents notified by Industry. However the proportion varied from 47% of microbiological and hygiene issues to 79% of physical contamination recalls. Notifications by Local Authorities accounted for most of the other recalls (30%). However, Local Authorities sometimes notify the FSA after being made aware of the incident by industry. Just ten recalls (4%) originated in a notification from EU Member States & central bodies, and 11 (5%) were notified by others including laboratories, government organisations, and members of the public.

Types of food being recalled

10. Recalls involved a wide number of food types, and the profile varied with the type of recall. Milk & milk products accounted for 28% of microbiological & hygiene recalls, much more than any other category. Allergen recalls were mainly associated with: fruits & vegetables; confectionery; prepared dishes & snacks; soups, broths, sauces & condiments; and cereals & bakery products (all over 10% of allergy recalls).

Time taken from FSA notification and issue of first recall

11. The data records both the date of notification to the FSA and when the first recall notice was sent out. The difference between the two will measure at least part of the time taken to inform the public. (There could have also been time between detection of the issue and its notification to the FSA). For three recalls, the recall was issued before the FSA was notified; always by industry. About 60% of recall notices were sent out on the same day or within one day of the FSA being notified, and 85% were sent out within a week. However, 8% of recalls were issued more than a

fortnight after the initial notification. Care should be taken in interpreting the data as delays are due to a range of issues such as the need for further testing to confirm the source of the problem and possibly the product.

Country of origin

12. Table 2 shows the origin of the product involved in a recall between 2013 and 2015. The number of recalls without an attributed country of origin is largest in 2015, as a result of incomplete data. This makes it impossible to characterise trends over time accurately, however, the data would still indicate a rise in recalls in 2015 from other EU member states. In 2013 and 2014, only 11% and 13% respectively were known to originate from other EU member states. However in 2015, at least 24% of recalls involved products originating from the EU.

Table 2 – Number of recalls by origin and type, 2013-2015

| Recall type | 2013 | 2014 | 2015 | Total |
|----------------------|-----------|-----------|------------|------------|
| United Kingdom | 43 | 30 | 36 | 109 |
| Other European Union | 6 | 7 | 29 | 42 |
| Imported | 4 | 12 | 12 | 28 |
| Not attributable | 3 | 7 | 44 | 54 |
| Total | 56 | 56 | 121 | 233 |

Business type (for 2015 recalls only)²

13. Of the 121 food recalls in 2015, just under half (57) originated from a small manufacturer as the principal business. Another 18 recalls were attributable to large manufacturers, while 38% of recalls (46) were from retailers, of these, all but two were large retailers. Note: the principal business may not be the business where the issue of concern originated, particularly when a large retailer takes the lead role.

14. Overall, allergen issues were the cause of just over half of recalls in this period, varying between 40 and 60% for the three largest business types. However, physical contamination was a slightly more common issue for large manufacturers (44%), but only accounted for 7% of recalls from small manufacturers. In contrast, microbiological and hygiene issues accounted for 31% of recalls for small businesses (manufacturers and retailers combined), nearly double the 16% of recalls from large businesses.

15. The proportion of the recalls originating in incidents notified by Industry varied from 93% for large retailers to 30% for small manufacturers. Notifications by Local Authorities accounted for a majority of the other recalls. With one exception, notification by others was restricted to recalls by small manufacturers and small retailers.

16. The time from notification to recall is shortest both for large retailers, and when industry makes the notification.

² The following categorisation of business type was used:

- Large retailers: national retail chains including supermarket chains
- Large manufacturers: producers of well-known brands, large producers employing many people
- Small manufacturers: local producers and those employing few people. This would include small producers selling through their own outlets
- Small retailers: retailers with few outlets

17. Recalls involve a wide number of food commodities and businesses with no sector being obviously predominant.

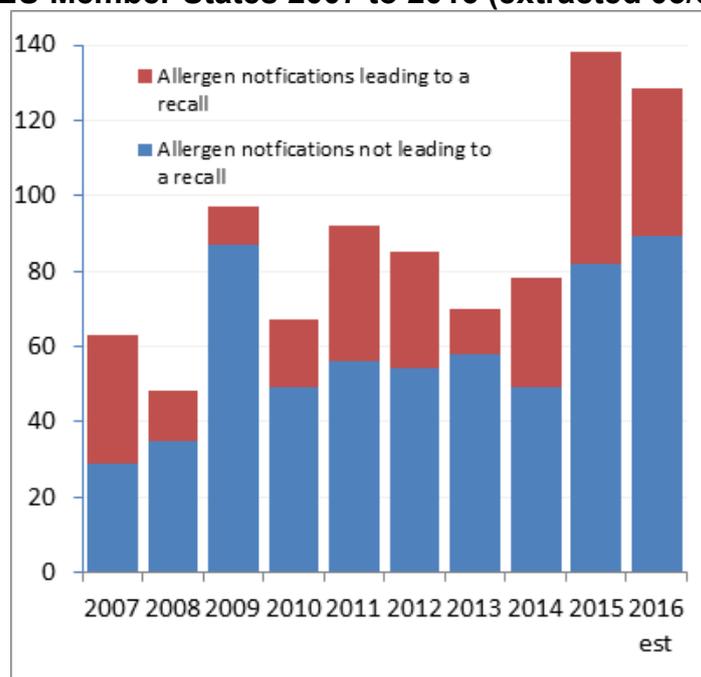
Allergies

18. Further specific analysis of allergy incidents was carried out. This showed:
- The number of Allergy Alerts leading to recalls in 2015 is three times that seen in the previous two years. However, the number of notifications leading to withdrawals has not increased.
 - The numbers of UK allergen incidents and RASFF allergen notifications across the UK have also increased substantially over this period.
 - The number of RASFF allergen notifications from company's own checks is over double that seen in recent years. The number of RASFF allergen notifications arising from official controls is greater in 2015 than in 2013 and 2014, but are within the range seen in earlier years.
 - There were no major differences in Allergy Alerts leading to recalls and withdrawals in 2013 to 2015, in terms of commodity type, contaminant or notifier.

19. There were 206 allergen incidents in 2015, of which 63 (31%) led to a recall. Both the number of allergy incidents and the proportion leading to a recall have increased over the last two years: in 2013 there were 89 incidents of which 21 (24%) led to a recall. By contrast, the number of withdrawals has decreased from 26 to 23, or from 29% in 2013 to 11% in 2015.

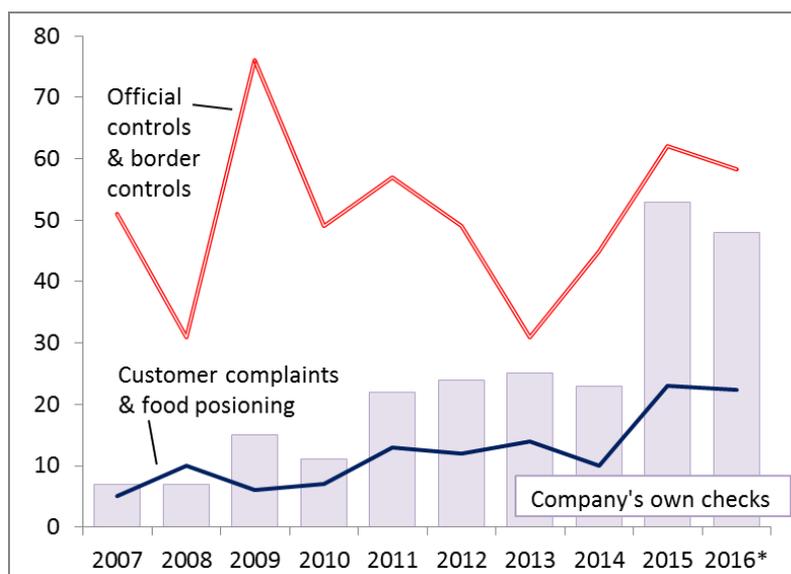
20. Details of RASFF Allergens notifications are available back to 2007, and an estimate was made for 2016 based on volume up to July. Figure 1 shows that their frequency was much higher in 2015 and 2016 than in recent years. The year-on-year variation makes the trend for Allergen notifications leading to a consumer recall less clear (red bars). However, the frequency in 2015 is almost twice the level in 2014 and much more than 2013.

Figure 1 - RASFF Notifications with a hazard classification of allergens by action type, All EU Member States 2007 to 2016 (extracted 03/08/16)



21. Figure 2 breaks down the trend by the type of notification. Most allergen notifications arise from official controls. The numbers in 2015 were somewhat higher than average, but within the considerable range seen in previous years. In contrast, the number of notifications resulting from company's own checks (shown as vertical bars) in 2015 was more than double the level seen in any previous years. The number of other allergen notifications also increased slightly in 2015, mainly due to food poisoning incidents.

Figure 2 - RASFF Notifications with a Hazard classification of Allergens by notification type, All EU member states 2007 to 2016 (extracted 08/08/16)



22. Therefore, the increase in UK allergen recalls in 2015 has occurred in the context of similar increases in Allergen RASFF notifications across the EU. This rise is not entirely driven by notifications from the UK as they only accounted for 18% of the total between 2007 and 2015. The proportion in 2015 remained at 18%.

**External Stakeholder Reference Group Secretariat
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