INCIDENTS & RESILIENCE ANNUAL REPORT 2018/19

Report by Colin Sullivan & Philip Randles

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1. SUMMARY

1.1. This paper details the activities progressed by the Incidents & Resilience Unit (IRU) during the last year and the work undertaken to ensure that the UK's food incident response capability is the best possible and is effective after the UK leaves the EU.

1.2. The Business Committee are asked to;

- Note the work of the IRU since the 2017/18 report to the Board
- Discuss and endorse;
- The preparations made in advance of the UK leaving the EU
- The direction of travel of the continued development of the IRU's capability

2. INTRODUCTION

2.1. Incident, resilience and consumer protection teams across England, Wales and Northern Ireland manage and coordinate the FSA's response to food[#] incidents and foodborne outbreaks ensuring that products not in compliance with safety legislation are removed from the market. The FSA's Incident Management Plan[1] outlines the plans and procedures for meeting our responsibilities in response to non-routine food-related incidents. Local and port health authorities play a key part in this by taking enforcement action[2] where necessary to protect consumers. Food producers must also understand and meet their responsibilities to ensure that 'food is safe' and 'food is what it says it is'. To ensure consistency across the UK, we take a '4 Nations' approach with similar arrangements being maintained by Food Standards Scotland (FSS)[3].

2.2. A priority for the IRU is to continue performing the 'day job' exceptionally well. We seek to build upon the already successful foundations of our incident management capability so as to continue protecting the health and interests of consumers. EU Exit preparedness planning continues to be a priority for the teams.

3. INCIDENTS AND OUTBREAKS DURING 2018/19

3.1. In total, the Food Standards Agency (FSA) was notified of and investigated 2,323 food, feed and environmental contamination incidents in the UK during

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the 2018/19 reporting year. This represents a small (0.2%) decrease in the number of notifications when compared to 2017/18. The number of alerts issued increased from 140 in 2017/18 to 190 in 2018/19. The numbers of incident notifications received and alerts issued are only a measure of how many incidents the FSA has been made aware of. Therefore, these numbers are not necessarily indicative of a change in the food safety profile of the UK, but instead reflect the variability in incident type that we see from one year to the next. Annex A includes further details and trends relating to the types of incidents managed by the FSA.

Figure 1 shows the numbers of incident notifications received by the FSA from April 2015 to March 2019

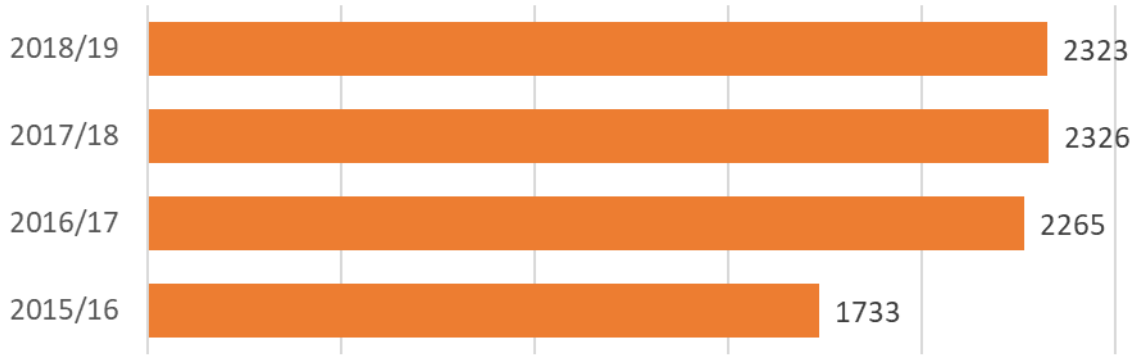
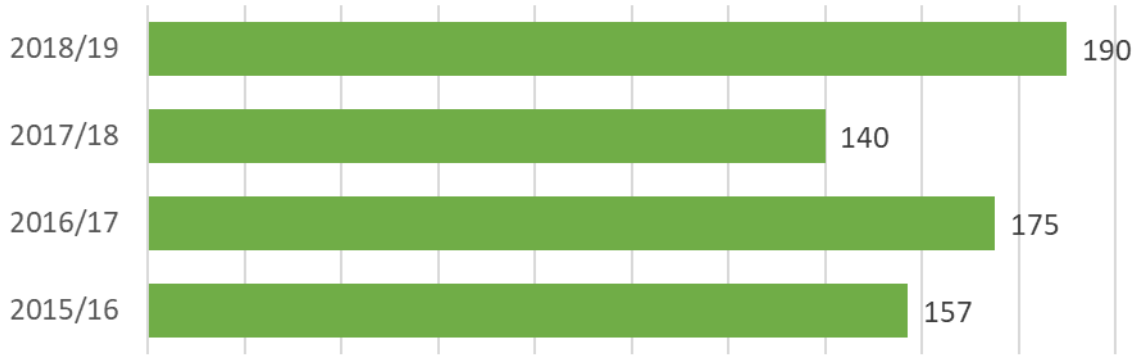


Figure 2 shows the numbers of alert notifications issued by the FSA from April 2015 to March 2019



3.2. The rise in the number of alerts issued in 2018/19 may be aligned to the increase in profile and reporting of incidents associated with allergens. Annex B provides a summary of allergen incidents managed by the FSA. Detailed analysis of the root causes of 73 allergen incidents which occurred in 2018/19 indicates that technical errors, process control issues and labelling control errors are the major contributors although there are also underlying training and

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management issues (see Figure 3). This type of analysis is helping to inform FSA policy decisions as well as providing direction for incident prevention activities by identifying 'best practice' to prevent recurrence.

3.3. The FSA continues to work closely with Public Health England (PHE) to investigate the causes of national foodborne outbreaks in the UK. In total we

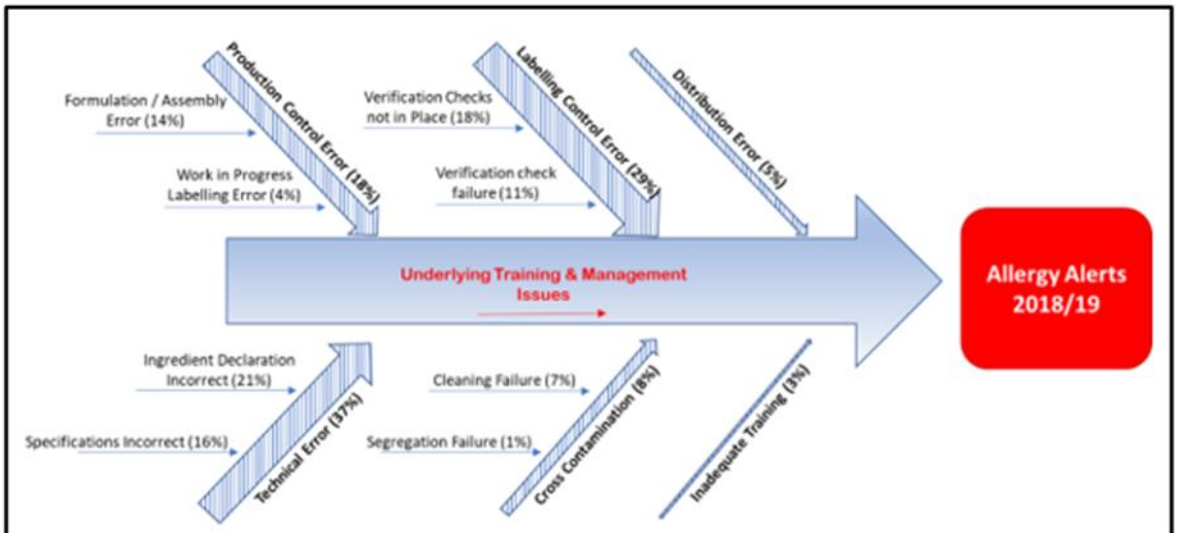

Figure 3 shows an Isikawa diagram (fish bone diagram) identifying the main failures associated with allergen alerts that occurred in 2018/19.

conducted food chain traceability investigations into over 40 outbreaks during 2018/19 with the most serious involving an outbreak of listeriosis associated with sandwiches and ready to eat foods. The outbreak was identified using whole genome sequencing analysis (WGS) and involved a number of vulnerable patients with underlying health issues that had attended NHS Trust hospitals. The food chain investigation for this outbreak was particularly complex and progressed for over three months with nearly 4,000 pieces of information being recorded and analysed.

3.4. WGS continues to show its usefulness in linking cases of foodborne illness to both contaminated food and hygiene issues at food processing plants. In previous years such issues may have largely remained unidentified as they were addressed on a localised basis and consequently may have passed without significant attention. Interestingly, the FSA has seen a slight decrease in the number of notifications involving listeria with 40 incidents being recorded in 2018/19 compared to 52 in 2018/19 providing an indication that the food safety landscape in this area is not necessarily worsening despite the recent outbreak.

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4. EFFICACY OF RECALLS PROJECT

4.1. The FSA and Food Standards Scotland (FSS) have been working in partnership with food businesses, enforcement authorities and consumer interest groups to strengthen the UK's food safety withdrawal and recall system, through the Efficacy of Recalls and Withdrawals project. Recommendations made during the earlier research phase of the project have now been delivered. These include the publication of enhanced 'Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry'[4] in March of this year. This guidance is designed to help food businesses carry out food safety withdrawals and recalls with greater ease and effectiveness. It explains what the law requires and how to comply as well as including templates to ensure key information such as 'Point of Sale Alerts' to consumers are clear, eye catching and consistent in design. A Quick Reference Guide which complements the main document has also been developed to further assist businesses. Both documents have been well received by industry colleagues.

4.2. Tools to help businesses conduct root cause analysis (RCA) after food recall incidents occur so that learnings can be shared, have also been developed. RCA allows food businesses to identify the initiating cause, in a causal chain, which led to a product recall and additionally, the stage at which intervention can reasonably be implemented to mitigate risk and prevent future recurrence. The tools developed include an 'Introduction to Root Cause Analysis' e-learning course[5], a 'best practice' example of a completed RCA and a Report Form that businesses can use to share RCA learnings with the FSA / FSS *via* their competent authorities.

4.3. Further work is underway to raise awareness of consumers, food businesses and enforcement authorities to these new tools. The project has now entered the final evaluation phase.

5. EXITING THE EUROPEAN UNION (EU)

5.1. The IRU's preparations for the UK leaving in the EU were completed as planned at the end of March 2019. As previously reported these included the development and implementation of an enhanced stakeholder engagement programme focussed on further building relationships with food safety competent authorities in other countries as well as establishing a food industry liaison group in the UK to advise during major incidents.

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5.2. A secondee from the team has been embedded in the International Food Safety Authorities Network (INFOSAN) which is managed jointly by the FAO and the WHO of the United Nations. This provides the UK with extensive communications reach to over 180 countries across the globe. We are further working with INFOSAN to help them upgrade their Community Website to facilitate improved communications between members.

5.3. To ensure that when the UK leaves the EU the FSA can maintain and improve upon our high standards of food safety, the IRU has strengthened its incident management processes. This has included establishing additional systems with capacity and capability to proactively identify signals indicative of potential food safety risks to the UK which might require mitigation. Additional staff have been recruited and trained to support the new functions and are now fully operational and embedded in our 'business as usual' processes.

5.4. The FSA's Incident Management Plan (IMP) was triggered in March 2019 to provide Emergency Response capability to support and deal with any eventuality as the UK leaves the EU. Working with other Government Departments, these processes have been validated through a range of exercises and following the extension to Article 50 in March, further enhancements have been made to improve resilience. It is our intention to again have this Emergency Response capability in place as a precaution when the UK leaves the EU on 31 October 2019.

6. STRENGTHENING RESILIENCE

6.1. The resilience functions across the '4 Nations' are invaluable to the success of the incidents and consumer protection teams in that they provide the foundation and framework for everything that we do. Throughout 2018/19, they have consistently strived to ensure that the plans to which we operate relating to incident management, food defence and business continuity are documented, trained out and validated to ensure that the IRU remains fit for purpose and has the capacity and capability to meet our responsibilities.

6.2. During the reporting year, our resilience teams have conducted an extensive programme of training and exercising which has been largely driven by our preparations for EU Exit. Working extensively with other Government Departments, this involved learning from incidents and foodborne outbreaks and then embedding best practice to continually enhance our processes so that we can provide the best incident management service that we can.

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6.3. As we approach the UK's exit from the EU, the resilience teams are continually adapting to, and integrating new processes and capabilities as they evolve in other areas across the FSA such as food crime investigation, science, surveillance, risk assessment and risk management. It is vital to ensure that we all work together to be the best organisation that we can.

7. CONCLUSIONS

7.1. The current reporting year has seen further development of the FSA's systems for incident and resilience management. As the UK prepares to leave the EU, we have enhanced our capacity and capability so that we can continue to conduct the day job in the best way that we can. We must continually review capacity and capability to ensure that we meet the challenges of incident and outbreak management thereby providing the best service possible as the UK leaves the EU and ensuring that our performance remains the same (or improved) post Day1.

7.2. Going forward we are looking to develop the way in which we gather, analyse and share data and information so that we can continue to develop both our incident detection expertise and our incident prevention capability using RCA as a foundation.

7.3. Preparing for EU Exit and providing the best incident management service that we can remain our key objectives as we progress into the new year.

7.4. The Business Committee are asked to;

- Note the work of the IRU since the 2017/18 report to the Board
- Discuss and endorse;
    - The preparations made in advance of the UK leaving the EU
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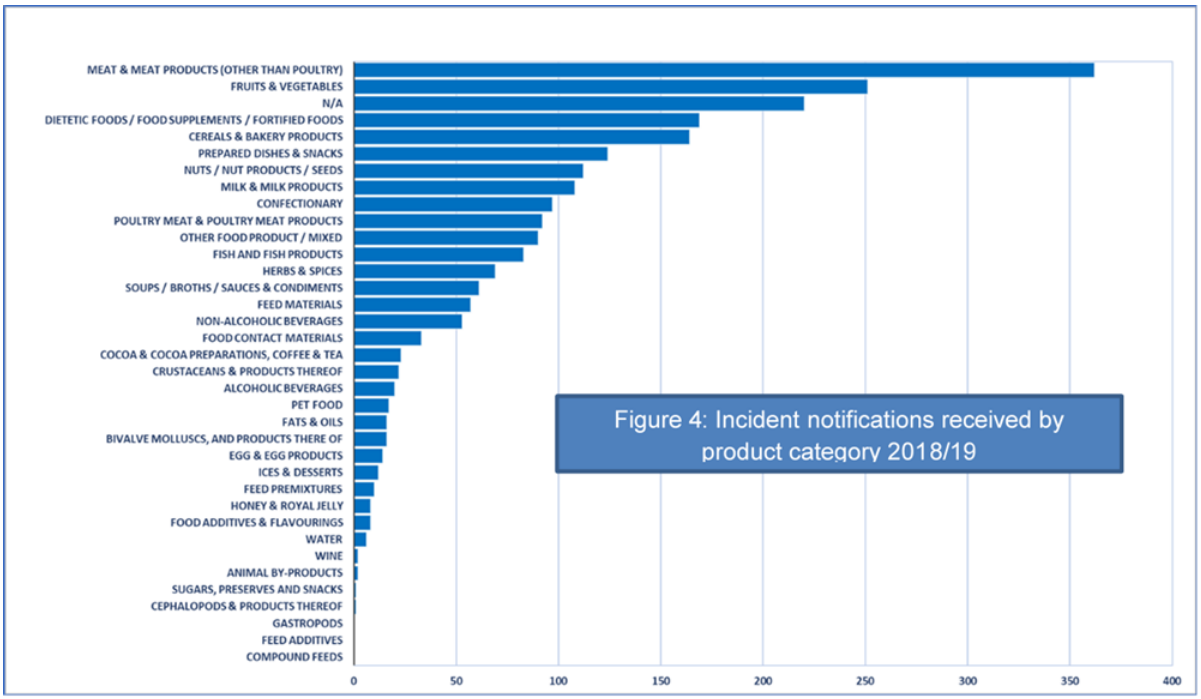
ANNEX A: INCIDENT DATA

The number and profile of incident notifications received by the FSA has not greatly changed in 2018/19 when compared to 2017/18. Figures 3 and 4 show that meat and meat products remain the most common food category involved in food incidents whilst contamination with pathogenic microorganisms remains the most frequently reported hazard to food safety.



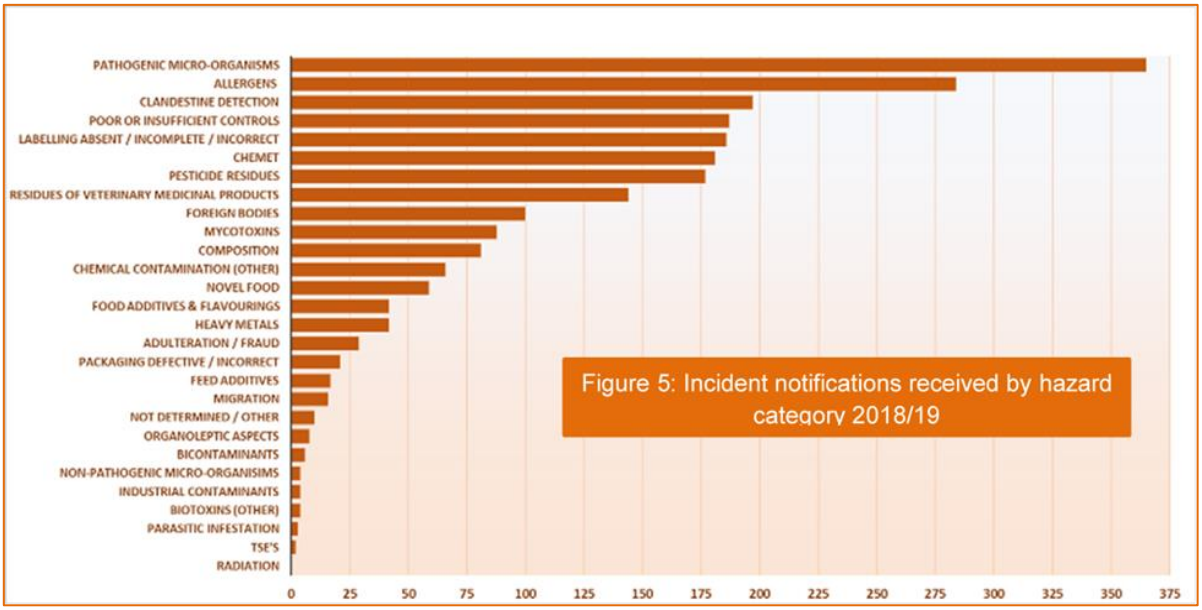


Figure 6 shows trends observed in incident notifications received by the FSA over the past four years. There have been increases over time in notifications relating to pesticide residues, labelling incidents and allergen issues. These are most likely due

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to improvements in reporting and do not necessarily reflect a downturn in controls associated with these areas.

Areas showing a decreasing trend in the numbers of notifications received include incidents involving pathogenic microorganisms, dietetic food supplements, veterinary residues and poor food safety controls. Interestingly these areas have been a focus of attention for the FSA in recent times.

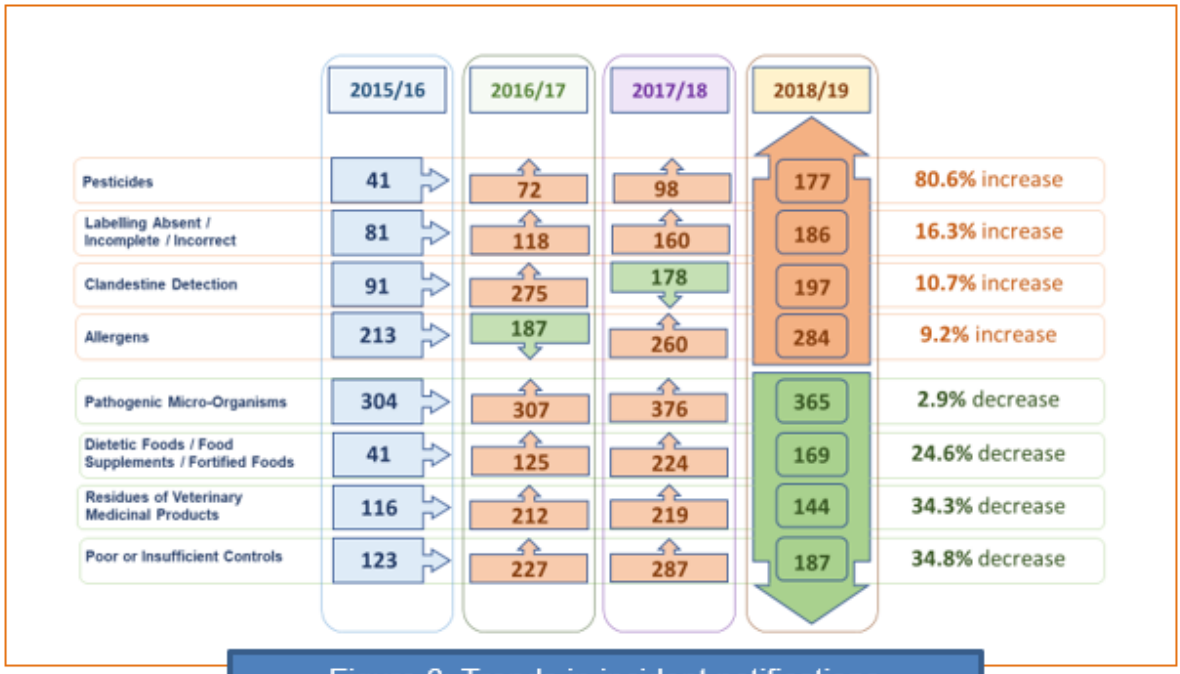
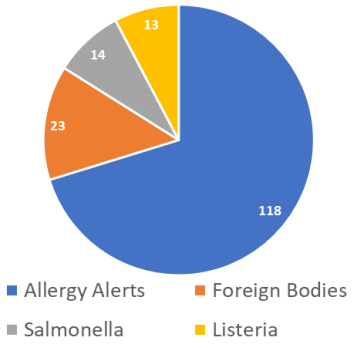


Figure 6: Trends in incident notifications

Aside from allergen issues, the three most common issues associated with food safety alerts for the 2018/19 were physical contamination (foreign bodies) and product contamination with either salmonella or listeria monocytogenes.

Figure 7: Number of FSA alerts Issued 2018/19



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ANNEX B: INCIDENTS INVOLVING ALLERGENS

Figure 8 shows the number of incident notifications received by the FSA between April 2010 and March 2019. Numbers of incidents have steadily increased over time with a significant rise occurring in 2015/16 reflecting the introduction of new Food Information Regulations in December 2014.

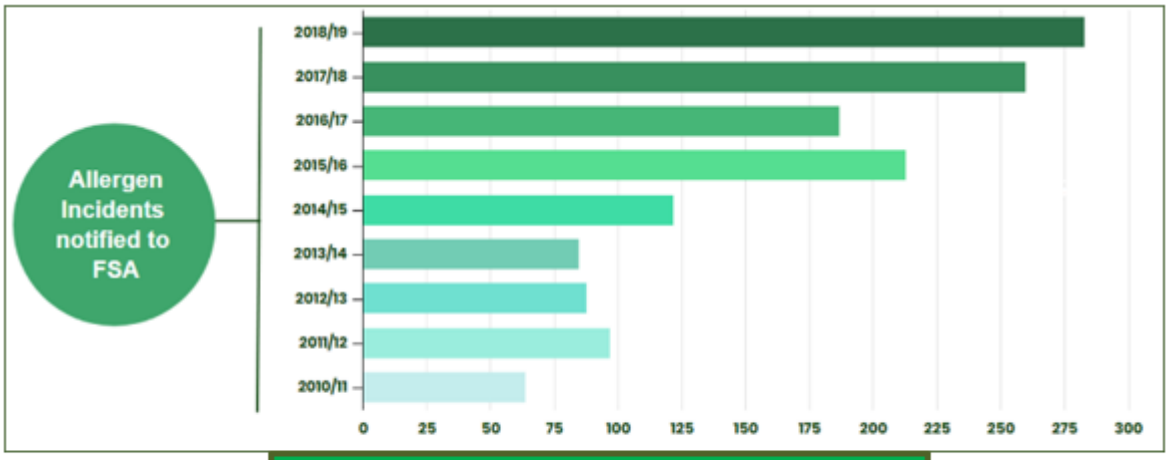

Figure 8: Incident notifications received by the FSA (April 2010 - March 2019)

Incidents involving milk, nuts and gluten make up the majority of allergen notifications that the FSA have received in 2018/19 (see Figure 9).

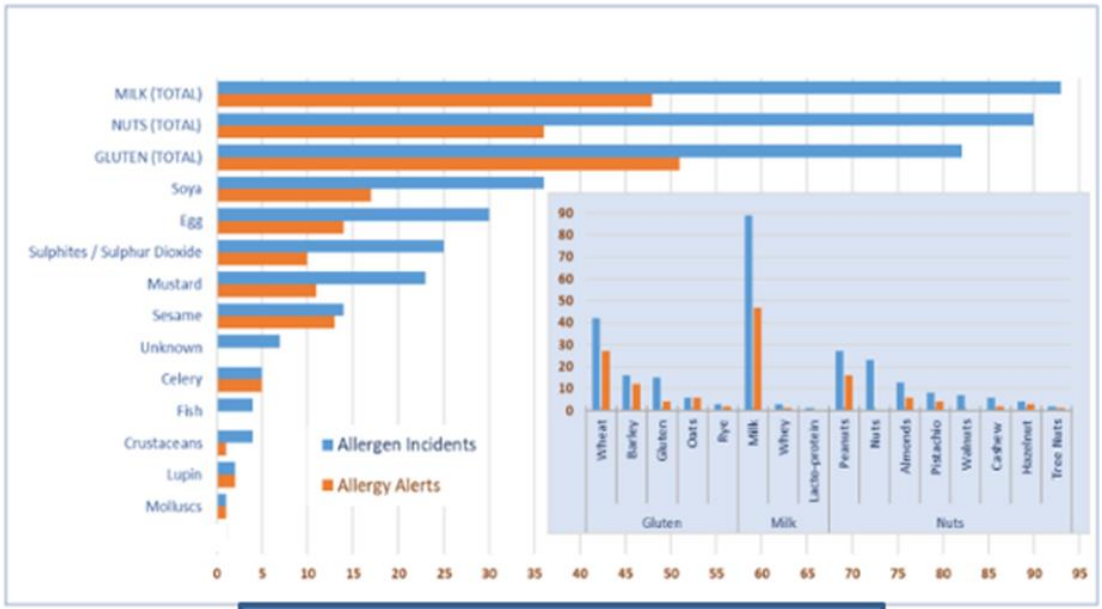

Figure 9: Allergen incident notifications received / allergy alerts issued in 2018/19

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Prepared dishes, snacks and bakery products remain the most common food categories involved in allergen food incidents reflecting the more complex composition of these foods resulting in greater opportunity for errors by food businesses during technical assessment, manufacturing and labelling (see Figure 10).

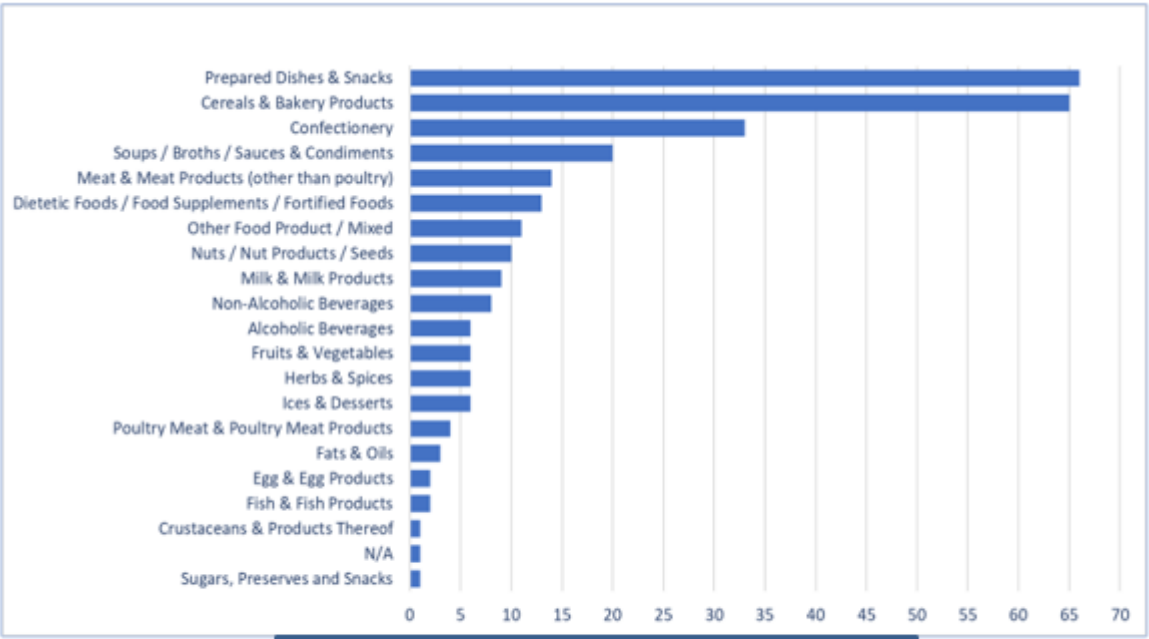

Figure 10: Allergen incidents by product category – 2018/19

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ANNEX C: GLOSSARY

Abbreviation	Definition
Day 1	The UK's first day outside of the EU
FAO	Food and Agriculture Organisation of the United Nations
FBO	Food Business Operator
INFOSAN	International Food Safety Authorities Network
IRU	Incident & Resilience Unit of the Food Standards Agency (FSA)
PHE	Public Health England
RASFF	Rapid Alert System for Food and Feed
RCA	Root Cause Analysis – performed following an incident to identify the 'root cause' (a factor is considered a root cause if removal thereof from the problem-fault sequence prevents the final undesirable outcome).
WHO	World Health Organisation of the United Nation

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REFERENCES

[1] FSA Incident Management Plan (accessible via):
https://www.food.gov.uk/business-guidance/food-incidents

[2] Food Law Code of Practice:
https://www.food.gov.uk/about-us/food-and-feed-codes-of-practice

[3] FSS Incident Management Plan
http://www.foodstandards.gov.scot/downloads/Food_Standards_Scotland_-_Non-routine_Incident_Management_Plan_-_May_2015.pdf

[4] Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry

https://www.food.gov.uk/sites/default/files/media/document/10850-fsa-guidance-on-food-recalls_accessible-master-ln.pdf

[5] Introduction to Root Cause Analysis' e-learning course

https://rcatraining.food.gov.uk/#home

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