

POST SUDAN I REVIEW – PROGRESS REPORT

Executive Summary

1. This paper provides a progress report on action taken by the Agency following publication of the Sudan I review report. It also provides details of how the food industry and local authority enforcement bodies intend to respond to the recommendations directed to them.
2. The Board is invited to:
 - **note** progress since September on the actions identified in the Agency response to the Sudan I Review Panel's report
 - **note** the response from the food industry and local authority enforcement bodies.

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POST SUDAN I REVIEW – PROGRESS REPORT

Purpose

1. To note progress with actions identified in the Agency's response to the recommendations made by the Sudan I review panel. To note also the actions that the food industry and enforcement authorities intend to take in response to the review.

Strategic Aims

2. Contributing to building and maintaining the trust of stakeholders in our handling of food safety issues and to reduce the risk to consumers from contaminated food.

Background

3. The Sudan I review report, and the Agency's response to it, were discussed in September [FSA 07/09/06]. The Board requested regular progress reports to ensure delivery of the various actions identified in the Agency's response. This paper provides the first such progress report.
4. Following publication of the Sudan I review report officials met with representatives from the food industry and Local Authority Enforcement Bodies to consider how they intended to respond to the Panel's recommendations directed to them.

Progress

5. The table in annex 1 lists the actions identified in the Agency response and summarises progress against each action. The main points to note are:
 - actions have been identified to ensure greater clarity on the role of scoping group meetings;
 - there has been very positive engagement with LACORS, TSI and CIEH developing a programme of action over the next 12 months to facilitate the better management of food incidents; and
 - the Agency's communication protocol will be ready for publication in mid-January.

Food Industry Response

6. The Sudan I Review Panel recommended addressing hazards associated with imported minor ingredients within companies HACCP plans; refining procedures

for sharing information; and addressing a potential loophole in traceability requirements.

7. The responses provided by the BHA, BRC and FDF can be found at Annex 2. These provide details of how the BRC global standard addresses the recommendation on HACCP. Various mechanisms are already in place to gather and share intelligence between members of these trade associations. These include the informal sharing at BHA Food & Technical Committee meetings of sensitive information related to contamination incidents; BRC sharing information on emerging issues with other stakeholders (CIAA, EuroCommerce, FEPAS, Freshfel, BEUC, etc) through the European Food Platform; and FDF's consideration of the development of a risk matrix to identify potential problem sourcing practice and supply issues. On the specific issue of traceability they note that cash and carry outlets keep records of their customers and what they bought.

Local Authority Enforcement Bodies

8. The Review Panel made 5 recommendations directed towards Local Authority Enforcement Bodies.
9. The response at annex 3 was discussed and agreed at the LACORS food policy forum meeting on 15 November. Representatives from LACORS, CIEH and TSI attend these meetings. The key points are:
 - an agreed work plan between LACORS and the Agency on food incidents;
 - a workshop to address communication with small businesses;
 - using food incident scoping group meetings to clarify lead roles and accountability; and
 - using the LACORS Food Policy Forum to further develop relations with the Agency.

Board Action Required

10. The Board is invited to:
 - **note** progress since September on the actions identified in the Agency response to the Sudan I Review Panel's report; and
 - **note** the response from the food industry and local authority enforcement bodies.

AGENCY PROGRESS WITH THE RECOMMENDATIONS OF THE SUDAN I REVIEW PANEL

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
1. 1	Develop horizon scanning mechanisms to identify emerging and re-emerging risks from contaminated food.	CSIP (Nick Tomlinson)	March 2008	Agency project established, outcomes clarified and mapping work on Agency, stakeholder and international activity underway. Full project process documentation in train.
1.2	Develop, in partnership with the food industry, a proposal for sharing data with the Agency to help identify emerging risks facilitated by promoting a rationalisation of industry self-audits.	CSIP (Nick Tomlinson)	March 2008	Meetings held with BRC, retailers and others to discuss possibility of using the concept of earned recognition to encourage data sharing amongst industry and with Agency. 3 stakeholder meetings being planned with retailers, manufacturers and caterers if sufficient interest to discuss a mechanism to facilitate sharing of information.
1.3	Develop central coordinating role for intelligence gathering and horizon scanning	CSIP (Valerie Curtis)	March 2008	As for 1.1 above.

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
2. 1	Seek comments as part of our programme of stakeholder engagement, in particular external review of incidents, as to how we might further improve operational consistency of incident response and ensure agreed updates are reflected in future versions of the Incident Task Force Guidelines on an annual basis.	EPRI (Lynne Ridler-Wall)	April 08	The best way to achieve this is through external reviews of incidents, involving relevant stakeholders. External reviews are a new initiative and the first two will take place by end of January 08. It will then be appropriate to update the Guidelines with lessons learned, starting in April 08 . We anticipate holding up to three external reviews every year.
3.1	Revise leaflet for small businesses developed by Incident Task Force in the light of feedback from pilot project in the East Midlands.	CSIP (Valerie Curtis)	March 2008	Two workshops planned in East Midlands region for Industry. Leaflets will be revised and distributed at a regional level by this project team. A further project is looking at dissemination of information more generally and will include the distribution of the updated leaflets in its scope.
3.2	Work with LACORS, CIEH, and TSI to develop short document based on food incidents Task Force guidance document.	EPRI (Lynne Ridler-Wall)	March 08	First of regular meetings with LACORS to discuss food incidents held October 07. LACORS will lead on production of the draft document by March 08.

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
4.1	Review experience of scoping group meetings and update the guidance document of the Task Force on Incidents and the FSA Incident Response Protocol accordingly.	EPRI (Lynne Ridler-Wall)	April 08	To be Taken forward as part of action 2.1. The FSA Protocol is updated at least every six months (next update due Jan 08) and an annual update of the Task Force Guidelines will reflect lessons learned from the previous year.
5.1	Issue consultation on reviewing the capability and capacity of UK official control Laboratories a joint APA/FSA consultation is in preparation.	} } } } }ARD {(Derek }Jones) } } }	Nov 2007	A shortage of staff in SDQ Branch has constrained progress with these actions. Review will make suggestions for rationalisation of PA service.
5.2	Develop a call-off system, with contracted laboratories to give priority to incident work.			Discussions with laboratories have been held. laboratories prefer to re-schedule existing contract work from the FSA.
5.3	Collate knowledge about the capability of UK food analysis laboratories and to making it available within government.			Need to address commercial sensitivity of collating such information
6.	Take forward a programme of exercises. Convene meeting of stakeholder group.	EPRI (Lynne Ridler-Wall)	On-going	A stakeholder group has been established and first meeting held, Sep 07. Initial exercise priorities have been drafted with stakeholder input. Next stage is to tender contract for contractor support. This is a long term initiative, with the first exercises likely to start in FY 08 09.

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
7.	Ensure Scoping Group meetings consider the need to give priority to speed or accuracy when such information is published.	EPRI (Lynne Ridler-Wall)	On-going	This point (on product lists) will be established in the Task Force Guidelines and FSA Incident Protocol as a discussion point for Scoping Groups.
8.1	Work with LACORS, TSI and CIEH to ensure guidance developed by the Taskforce on incidents reaches all local authorities and ensure all LAs are familiar with it.	ED (Julie Monk)	November 2007	Met with LACORS, TSI in September, agreed to pursue at LACORS policy forum.
8.2	Issue protocol for communicating with stakeholders during an incident.	Comms (Justin Everard)	Dec 2007	In final stages of consultation. Expected to be completed and being used by mid January
8.3	Where enforcement is split between two tiers of local government the Agency will make clear which authority is expected to lead	EG (David Statham)	Oct 2007	In future this point will form part of the Scoping Group agenda, where appropriate, and be included in the Guidelines.
8.4	Pursue with local authorities arrangements for more County and Regional working at a workshop to be held in October 2007.	EG (David Statham)	Oct 2007	

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
9. 1	Pilot a specific initiative with the East Midlands Food and Drink Forum and other business consortia in the region to jointly develop activities to improve knowledge, communications and expertise on preventing and handling food incidents.	CSIP (Valerie Curtis) and EPRI (Lynne Ridler-Wall)	Feb 2008	Workshops planned for February 08 to highlight the Agency's policies on incident prevention and response and the importance of open and timely communication and improved methods of communication. Depending on success, they can also be rolled out to Local Authorities.
9.2	Adopt communication mechanisms more widely if successful.	CSIP (Valerie Curtis)		
9.3	Discuss methods to get messages to SMEs, with local authority colleagues at the next meeting of the LACORS food policy forum, with a view to providing further guidance to local authorities.	ED (Julie Monk)	Jan 2008	
10.1	Talking to a number of consumer groups to develop best practice in risk communication and to learn from examples where simple language has been particularly effective.	COMMS (Justin Everard)	Early 2008	Using the recently established Citizen's Forums to discuss and test examples of simple and effective language and establish best practice.
10.2	Broaden the use of appropriate and helpful examples of risk relating to everyday life.	COMMS (Justin Everard)	Ongoing	Appropriate and helpful examples relating to risk will be considered in communication activities.

	ACTION	LEAD DIVISION	DUE DATE	PROGRESS
11.1	The Director of Enforcement will resolve any differences of opinion to avoid any misunderstanding when dealing with future incidents that might result in prosecutions.	EG (David Statham)	Mid October 2007	Both of these points – which relate to the potential for prosecution and who leads/has accountability – should properly form part of a Scoping Group discussion, or the equivalent if a Scoping Group itself is not needed. The Incident Protocol will be amended accordingly in its next update (Jan 08). On 27 and 4 December the Agency ran, in partnership with the Chartered Institute for Environmental Health, two free seminars for local authorities on Lessons Learnt From Handling Major Food Safety Incidents.
11.2	Clarify protocols developed by the Agency for local authorities to make clear that they should always be mindful that an investigation may lead to the discovery of information which could indicate that a food safety offence has been committed.	EG (David Statham)		
12.1	Take forward a programme of work to improve relations with enforcement authorities.	EG (David Statham)	Nov 2007	The LACORS Food Policy Forum meeting in November 2007 discussed and agreed a programme of work for 2008.
12.2	Arrange a facilitated workshop with senior colleagues from local authorities, local authority representative bodies and relevant professional bodies to consider these issues further and to look to tackle any problems raised.	EG (David Statham)		
13.1	Explore the possibility of secondments with various food businesses and enforcement authorities as part of the development programme for individual members of staff.	CSIP (Nick Tomlinson)	On-going	To be incorporated into the Incident Prevention Strategy and Action Plan

Annex 2

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27 November 2007

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Dear Nick,

SUDAN I REVIEW OF RECOMMENDATIONS TO INDUSTRY

Please find below the BHA's response to the recommendations made by the Sudan I review panel to be addressed by the Food Industry.

Recommendations for the food industry

- 1. Contamination of minor ingredients of distant origin should be clearly identified as potential hazards in the industry's HACCP plans and the industry should seek ways to share information based on its sourcing practices and HACCP work (paragraph 10). The industry should intensify the preparation of procedures for sharing sensitive information in contamination incidents with other businesses, through trade associations and, where appropriate, with the FSA in order to help prevent other major incidents (paragraph 23);*

The potential contamination of minor ingredients of distant origin is addressed by Food Service businesses through their HACCP plans on site and the supply chain controls in place which are regularly audited by third party auditors. The sharing of sensitive information with respect to contamination incidents occurs informally through the BHA's Food & Technical Committee meetings and as yet no formal arrangements have been put in place although discussions on this matter are continuing. We will keep the FSA informed as matters progress.

The BHA has with the FDF, BRC and NFU launched the Safe and Local Supplier Approval Scheme (SALSA) to assist small businesses in improving their food safety management systems which will encourage those businesses to improve their supply chain controls.

2. *The industry should undertake work to see how the loophole in traceability between smaller supply/distribution operations, such as 'Cash and Carry' outlets, and so-called 'micro-businesses' can be closed (paragraph 18).*

During the meetings of the Food Incident Task Force we raised the issue of how the FSA together with Local Authorities would be able to access information on food purchased by small businesses from Cash & Carry operations and communicate information about product recalls. We advised that the FSA should contact the wholesale suppliers direct and approach the Federation of Wholesale Suppliers i.e. their Trade Association.

Yours sincerely

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Dear Nick

Re: Sudan I Review recommendations to industry

The British Retail Consortium (BRC) is the lead trade association representing the whole range of retailers, from the large multiples and department stores through to independents, selling a wide selection of products through centre of town, out of town, rural and virtual stores. Our membership comprises the majority of the UK's grocery retailers, all of whom are involved in the sale of a wide range of foods. As such, we take a keen interest in the national and international initiatives in the area of food safety and prevention of incidents.

As requested, please find below our response to the two recommendations by the Review Panel specifically addressed at industry.

Recommendations for the food industry

1. Contamination of minor ingredients of distant origin should be clearly identified as potential hazards in the industry's HACCP plans and the industry should seek ways to share information based on its sourcing practices and HACCP work (paragraph 10). The industry should intensify the preparation of procedures for sharing sensitive information in contamination incidents with other businesses, through trade associations and, where appropriate, with the FSA in order to help prevent other major incidents (paragraph 23);

We agree with the Review Panel that the identification of potential hazards and sharing of information are important steps to prevent incidents. For this reason our members have procedures in place to ensure that HACCP assessments are reviewed in the light of new science and that Critical Control Points, whether they lay with the retailers or their suppliers, are regularly re-assessed. BRC members, through their membership and involvement with research laboratories, have access to the latest scientific developments and findings and have opportunities to discuss technical issues with independent and government researchers and with industry experts.

We agree with the Review Panel that trade associations such as the BRC have an important role to play in facilitating and co-ordinating the exchange of sensitive information on emerging risks and incidents. We scan RASFF alerts and FSA and EFSA updates on behalf of our members. Through the European Food Platform we share information with other stakeholders (EuroCommerce, CIAA, FEPAS, Freshfel, BEUC, etc) on emerging issues. We also organise and chair technical expert groups, e.g. on food surveillance and microbiology, tasked with exchanging information and opinions on food safety issues and potential challenges from changes to legislation and new technologies.

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After the Sudan I incident, BRC members undertook a review of their due diligence procedures through considerable dialogue with suppliers. Further to this review, one of the additional controls put in place was an externally managed traceability/audit system for those spices identified as being high risk ingredients because of the possible addition of illegal colorants.

The programme is designed as a risk reduction tool and covers the validation of controlled spice status through the examination of objective evidence (e.g. systems, procedures and records). A web-based database lists suppliers and materials that have successfully completed the programme and have been recognised by participant retailers. At present the following powdered spice ingredients are included: capsicums (paprika, chilli, cayenne pepper), turmeric and compound ingredients which include these spices such as blends, flavourings, sauces etc.

We also believe that the FSA needs to be aware that they have access to information not necessarily available to industry and retailers and should be proactive in passing on relevant anonymised information when appropriate.

2. The industry should undertake work to see how the loophole in traceability between smaller supply/distribution operations, such as 'Cash and Carry' outlets, and so-called 'micro-businesses' can be closed (paragraph 18).

With regard to the Review Panel's comments on traceability, we do recognise that a product withdrawal is only successful if there is total recovery or destruction of the affected stock.

Under Article 18 of the EU General Food Law Regulation 178/2002, it is a legal requirement for food and feed companies to have in place systems and procedures to identify from whom they have purchased a product, and to whom they have sold their product. Although there is no legal requirement for 'internal traceability', the BRC Global Standard for Food highly recommends that internal traceability systems be put in place, as evidence suggests that there are significant benefits for more targeted and accurate withdrawals.

During an incident the BRC actively engages with all its members (75% of the grocery market) but undoubtedly we have not got the capacity nor the remit to reach out to non-members and to every corner shop in the country. We do believe we have a responsibility to co-operate with the FSA and enforcement officers to ensure that public information and lists of affected products are accurate. In this way we can contribute to freeing some government and local government resources to check the gaps in the market.

Other relevant BRC initiatives

We worked with the FSA to include in the safer Food Better Business Pack (for retailers) an information sheet on recalls and withdrawals to raise awareness amongst small retailers and to explain how to act responsibly in case of an incident.

In order to address the needs of small suppliers retailers have developed, together with FDF, NFH, BHA, funded by Defra, the SALSA scheme (Safe and Local Supplier Approval) to provide small local businesses with additional services: technical support, training,

purchase of publications, assessment of premises, technical networking, start-up support, etc.

Please do not hesitate to contact me if you require additional information.

Yours Sincerely,

Barbara Gallani
Food Policy Executive

23 November 2007

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Dear Nick,

SUDAN I REVIEW OF RECOMMENDATIONS TO INDUSTRY

As requested, please find below FDF's response to the two recommendations by the Sudan I Review Panel specifically addressed at industry.

Recommendations for the food industry

- 3. Contamination of minor ingredients of distant origin should be clearly identified as potential hazards in the industry's HACCP plans and the industry should seek ways to share information based on its sourcing practices and HACCP work (paragraph 10). The industry should intensify the preparation of procedures for sharing sensitive information in contamination incidents with other businesses, through trade associations and, where appropriate, with the FSA in order to help prevent other major incidents (paragraph 23);*

Contamination of minor ingredients of distant origin is identified as a potential hazard in industry's HACCP plans and such potential hazards are controlled as part of the pre-requisite requirements and good manufacturing practices such as raw material specifications and supplier assurance. The recently launched Safe and Local Supplier Approval (SALSA) Scheme, which we were jointly involved in developing with BRC, BHA and NFU, is designed to help small suppliers improve their food safety performance, including appropriate awareness of the safety and quality of their incoming raw materials.

FDF currently circulates the RASFF notifications to FDF members and, following the melamine incident earlier in the year, we will be trialling the compilation and circulation of relevant sources of information from the USA. This will enable FDF members, where appropriate, to tighten specifications, introduce verification procedures and apply due diligence monitoring. It would be useful if FSA could share relevant information received from sources such as the WHO INFOSAN network and EFSA's emerging risks group to inform industry of developments.

Information on sourcing practices and supply issues is currently shared on an informal basis at a sector level but FDF is now giving consideration to the development of a risk matrix to identify potential problem areas. The scope of the matrix has not yet been defined but it is envisaged to identify the main contaminants by commodity and by country set against known risks. It will be available to all FDF members and updated through information received from the RASFF system, EU decisions and changes in legislation, and industry intelligence about sources of supply. We will keep FSA informed of the development of this matrix.

4. The industry should undertake work to see how the loophole in traceability between smaller supply/distribution operations, such as 'Cash and Carry' outlets, and so-called 'micro-businesses' can be closed (paragraph 18).

It is a legal requirement under Article 18 of EC Regulation 178/2002 for food and feed companies to know from whom they buy materials and to whom they sell their products and to have systems and procedures in place to allow for this information to be made available to the competent authorities on demand, so called 'one-up, one down' traceability. Manufacturers will often also have their own internal traceability systems as part of good business practice to assist in process control and stock management and to assist with the effective withdrawal and recall of products.

The issue of closing the loophole in traceability between smaller supply/distribution operations, such as 'Cash and Carry' outlets, and so-called 'micro-businesses' is not within the scope of FDF's membership activities. We would recommend that FSA discusses this recommendation with the Federation of Wholesale Distributors and representatives of small retailers and catering outlets via the Association of Convenience Stores and the British Hospitality Association. Otherwise, EHO inspections presumably include checking the traceability arrangements of micro-businesses in their area. In connection with this, FDF welcomes the fact that FSA is considering the promotion of increased levels of business registration in the context of discontinuing work on prior approval.

Yours sincerely

Helen McDermott
Corporate Policy Manager

LACORS Response to the Recommendations of the Sudan 1 Review Panel.

Recommendation

1. LACORS and the FSA should work together, where necessary with the help of the CIEH and TSI to ensure that all individual authorities are aware of the guidance document produced by the FSA's Taskforce on Incidents and any future amendments. LACORS should regularly review and update its procedures for acting as a conduit for policy and other communications between the FSA and individual local enforcement authorities. The FSA and local authority representatives should get together urgently to agree transparent, uncomplicated but effective procedures for handling issues of responsibility for dissemination of information in a future incident.

Response

LACORS will produce a simplified version of the incident Task Force Guidelines for local Councils by March 2008. This will be reviewed on an annual basis. LACORS will also produce a food contingency plan template for local councils by March 2008. LACORS will be invited to all incident scoping meetings and the FSA protocol will be updated to reflect this by December 2007. A consultation document will also be prepared to identify options for undertaking external reviews of incidents for LACORS consideration. A programme of contingency exercises will be undertaken with LACORS and local authorities from April 08 to March 2010 to ensure that the procedures are effective. The Food Safety Act 1990 Code of Practice will also be updated in the second phase of its review from January 2008 to reflect the changes in the Incident Task force Guidelines. LACORS and the FSA will also host 2 events for training of local authorities on incident management in May – June 2008. LACORS Director of Policy and senior officials from the FSA are committed to meeting quarterly from October 07 to ensure progress.

Recommendation

2. Food business registration should be fully enforced and the databases used as a resource to enable information distribution.

Response

LACORS will work with the FSA to organise a workshop in February 2008 to explore the options for enhancing registration from simplifying the application process to a high profile campaign emphasising businesses responsibility for complying with the law and to therefore register.

Recommendation

3. Local authorities and the FSA should continue to develop channels of communication with food businesses which do not belong to the major trade associations.

Response

LACORS will work with the FSA, GOEM and the East Midlands Food and Drink Forum to organise workshops to inform businesses about their various roles and responsibilities' in incident management by February 2008. The workshops will be evaluated and considered for rollout in April 2008. A leaflet will be produced from the pilot project for small businesses to identify their various roles and responsibilities in April 2008. Methods of disseminating messages to SME's with Local Authorities were discussed at the LACORS Food Policy Forum on 15th October 2007 with a view to providing further guidance to local authorities. It was recognised that there were a number of possible approaches that could be adopted to improve channels of communication with small businesses, including making more use of the media and enforcing traceability requirements. The food hygiene focus group will be considering this issue at their meeting in January 2008.

Recommendation

4. Enforcement bodies and the FSA should discuss and resolve very soon their apparent differences of opinion and approach to prosecutions so as to avoid problems in any future incidents.

Response

We have agreed with the FSA that for the more complex incidents a scoping group will be convened and that LACORS will be invited to all such meetings. The potential for prosecutions will form part of the discussion at such meetings. It is important that expectations of all parties are clear from the outset but that once an investigation is underway decisions on enforcement action have to be taken by the relevant authority in accordance with their enforcement policies and the statutory compliance code. LACORS and the FSA will develop protocols for working together during an investigation by March 2008 which will make it clear who is expected to lead where enforcement functions are split between two tiers of Government.

Recommendation

5. There should be a review of the relationships between the FSA, local enforcement authorities, and their representative bodies. We expect this to begin from the tops of the respective organisations in order to ensure an effective partnership in dealing with future incidents.

Response

This issue was discussed at the LACORS Food Policy Forum on the 15th October. We recognised that the Sudan I review reflected events that occurred in 2005. We were pleased to note that relations with the Agency have improved significantly since then. In particular we welcome the opportunity to engage with senior officials from the FSA at the LACORS Food Policy Forum. These meetings provide a valuable opportunity to

continually review the effectiveness of the relationship, and explore new opportunities for building effective partnerships, with the FSA. We have also developed an arrangement with the FSA to discuss, as necessary, issues on a one to one basis during incidents. LACORS and FSA have agreed an action plan for the next 18 months to drive forward improvements in responses to food incidents by both the FSA, LACORS and local authorities.