

Efficacy of Withdrawals and Recalls: How effective was the system redesign in delivering the planned outcomes? (Objective 2)

8.1 Outcome 1: a withdrawal and recall system founded on a clear and distinct set of roles and responsibilities, agreed and commonly understood by all participants

8.1.1 Evidence from consumer focus groups

Consumer understanding of their role during the recall process differed between those who had and those who had not experienced a food product recall. The majority of consumer group participants regarded food manufacturers and retailers as responsible for handling a recall, as opposed to the FSA/FSS and/or local authorities.

The majority had personal experience of a food product recall, and this group was clear about the roles of consumers and retailers. As one participant stated, “I didn’t have a receipt, but I took them back to the supermarket, and they were happy enough to accept them.” The majority of participants’ recall experience involved a recent high-profile recall of chocolate products, while a smaller number of participants had experience of smaller product recalls (including chicken pieces, bread, pastries and beef jerky).

Those who had not experienced a recall were less certain of the process and their role – some were under the impression that a product had to be returned to the manufacturer as opposed to the retailer, and some suggested that they would “just throw away, wouldn’t go back to store for sake of a pound or two”.

8.1.2 Evidence from ESRG interviews

ESRG members indicated that the new recalls guidance is accessible, with a clear explanation around roles and responsibilities. Additionally, positive feedback was received by ESRG members from FBOs: “an issue was identified by a Scottish FBO and they went straight to guidance document and followed the processes set out in the guidance, told their Local Authority contact, and the Local Authority informed the FSS. So, they followed guidance and it worked well.”

Some ESRG members felt that the guidance was less useful for consumers, but that its existence was a positive step as it “advises them as to how it is being managed and gives them some assurance”.

Some ESRG members shared that the new guidance worked for large businesses but raised concerns about smaller FBOs that have fewer resources and understanding of the processes. This group may require additional support (such as sharing of best practice). One ESRG member noted: “We struggle to get businesses to do the legal requirements, the fact it isn’t mandatory

means that it's tricky to get businesses to do it.”

8.1.3 Evidence from FBOs

All FBOs interviewed reported that roles and responsibilities during the recall process were clearly stated by both the local authority and the FSA/FSS. Contrary to many micro FBOs' expectations (ie businesses with one-nine employees), the process was less daunting than expected, due to the responsiveness of the regulators to FBO queries, in addition to support and guidance received from local authorities.

One FBO was surprised that the decision to recall a product was determined by the FBO rather than the FSA/FSS, and would have preferred that regulators make the decision to recall a product. In the small number of cases where other agencies were involved, for example the Health Security Agency (HSA), FBOs suggested that the process was slightly less clear, and that they would like to see a system for sharing information. FBOs considered the guidance to be clear and straightforward (if somewhat lengthy). It was unclear if FBOs were aware of the quick reference guide that accompanied the guidance ([footnote 1](#)).

8.1.4 Evidence from enforcement officers

Local authority officers considered roles and responsibilities to be generally clear. – “[in this case] everyone knew what they needed to do, there was clear and concise communication... everything was well documented”.

One officer suggested that some FBOs were not sufficiently aware of their responsibilities and assumed that the decision to recall a product was always determined by their local authority. Another suggested that roles could be blurred if additional agencies (such as public health bodies) were involved, but did not provide a specific example.

The majority of enforcement officers regarded the guidance as clear, and the recall templates as helpful for providing consistency. However, they suggested that many small FBOs were unaware that guidance was available, and that local authorities were required to signpost them to the FSA/FSS website.

The majority of enforcement officers were not in post in 2019 when the previous recall system was in place, and therefore could not compare it with the redesigned system. One officer who had experienced both suggested that the redesigned system provided better clarity and guidance on the type of information that point of sale notices should contain.

8.1.5 Evidence from data

Survey data suggests that FBO awareness of the guidance is relatively low, but that communication from local authorities and/or the FSA/FSS was regarded as clear.

In November 2021, the FSA commissioned IFF research ([footnote 2](#)) to conduct the FBO Tracker Wave 3 which comprised 700 interviews with small (10-49 employees) and micro (fewer than 10 employees) FBOs. This indicated that:

- only 37% of businesses were aware of the FSA online guidance and templates for dealing with withdrawals and recalls. There was little difference across sector, size or country
- 94% of businesses who had experienced a recall rated the communications they received to be clear/very clear. These results indicate a significant improvement in the clarity of communications as only 42% of respondents stated 'very clear' in 2018.

How effective was the programme in delivering outcome one?

Overall, the system redesign was effective in ensuring that there is a clear understanding of roles and responsibilities among all stakeholders taking part in a food recall.

- FBOs, ESG members and enforcement officers considered there to be a clear understanding of the roles and responsibilities, but with some areas for development.
- Enforcement officers suggested that not all FBOs were aware of the guidance. Findings from the FBO Tracker Wave 3 endorse this, as only 37% of FBOs were aware of this guidance.
- ESG members from industry expressed concerns that smaller FBOs may have fewer resources to implement the new processes and understand the legalities underpinning them, and that more focus on providing tailored support to this group may be required.
- Consumers who had experienced a recall suggested that they had a clear understanding of the roles of the different organisations, while those who had no experience were less confident of roles during a food recall.

What does this mean for FSA/FSS?

The agencies should:

- continue to raise awareness of the guidance and templates with FBOs (for example, via trade organisations)
- continue to raise consumer awareness of the steps to take during a food recall
- consider further promotion of the current FSA/FSS text alert service, as focus group participants were responsive to this idea (as long as the alerts received were tailored to their food consumption habits).

8.2 Outcome 2: Information to consumers is consistent and accessible, based on proven best practice and underpinned by cross industry sharing of approaches and impact

8.2.1 Evidence from consumer focus groups

Evidence from consumer focus groups suggested that information for consumers is inconsistent. Focus groups suggested that consumer awareness of a recall was often dependent on chance – “I only found out about it when I happened to be in [a] lift”. One group argued that more effort should be made by retailers to ensure that all consumers were notified of a recall.

Those who had experienced a food recall had been notified of the recall in different ways, suggesting that FBOs are using a variety of methods to inform consumers. This included:

- notices in supermarkets
- online news websites
- social media
- emails from supermarkets and online retailers
- print newspaper
- television and radio news alerts.

Focus groups were shown two examples of recent point of sale notices, one which used the updated non-mandatory template, and one that did not. Both these notices were obtained from the FSA and FSS websites. The content and visual appearance of the updated point of sale notice template was then discussed, and the comments are shown on the image below:

All focus groups noted that the red

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LA
0cdyp0yzR5YyQA43oylhn5llJyDXzr4mhXwt4F8P+Btf8G63L4ttfizZ6s2qNpMxsSJ9eEsd+t6V8ly8E6x+WrtKpcqy
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To improve the accessibility and consistency of information available to consumers, focus groups suggested the following recommendations for point of sale notices:

- **Use of QR codes:** This would enable consumers to read the notice in more depth at home as “a lot of people don’t have time to stand and read it” in store. In addition, it was noted that post Covid-19 pandemic, more people were familiar with the use of QR codes. Others suggested that the QR code could link to the FSA/FSS website, and noted that “a QR code could actually get you to a website with all the recalls on it”.
- **Place notices on shelves alongside recalled products:** “if it was a recall on biscuits, put it [the notice] in the biscuit aisle... rather than just an area where they all are gathered.”
- **Include a clear image of the recalled product and place a clear ‘recall’ title on the notice:** “if it doesn’t clearly state that there’s a problem, it could just be a poster for the products really”
- **Uniformity of notices was a positive idea:** “surely the format should be consistent, and you should know the parts of the poster or whatever that you can automatically look at and expect to get that information from.”
- **Include advice on next steps in the event of consumers having consumed the product** (for example, telephone numbers of relevant health services or allergy groups)

Many focus group participants were members of supermarket loyalty schemes and considered these to be an accessible way of alerting consumers to a product recall. There was a strong preference for loyalty schemes to contact consumers via text as opposed to email, as it was suggested that emails from supermarkets could be considered spam. One participant outlined their experience: “I didn’t read it as soon as it said it landed in my inbox and maybe if I’d have been contacted by another way, I may have taken more prompt action”.

No focus group participant was registered to receive allergen or food recall text alerts from the FSA/FSS, and all groups suggested that the service should be better promoted by the FSA/FSS to raise consumer awareness. Once the principles of the text alerts were discussed, participants considered this to be a useful service, particularly for those with food allergies. Participants stressed that they would want these alerts to be tailored (for example, by region or food type), as many were concerned that “my phone would be pinging all the time if not”.

8.2.2 Evidence from ESRG members

ESRG members considered the system redesign to have improved the consistency and accessibility of consumer information. ESRG members identified the point of sale notices as positive, as they are more concise, clearer and more colourful. The template had initial input from consumers, and then later draft notices were tested with consumer groups, suggesting that best practice had been deployed. Generally, ESRG members felt that point of sale notices are now more accessible on the website and in store.

Several ESRG members mentioned that the displaying point of sale notices is dependent on the individual FBO, resulting in inconsistency for consumers. One ESRG regulator noted challenges in how notices are displayed “The difficulty is where these are displayed – noticeable that some major retailers are more willing to display the notices in full view, whereas others can hide them behind backs of doors etc. This is difficult to manage.”

ESRG members also noted that consumer uptake of the FSA/FSA alert text service was generally low; “food alerts subscriptions are very low – more likely to be people in the food industry or those with severe allergies. The general public doesn’t engage...there’s an assumption that food is safe.”

8.2.3 Evidence from FBOs

As the majority of FBOs had only been involved in a specific recall, they were unable to comment on whether consumer information was generally more consistent or accessible. Interviews with FBOs indicates that a range of methods were used to alert consumers of a recall. This included contacting suppliers directly to remove products, emailing consumers and creating in-store recall notices.

One large FBO suggested that the consistency of consumer information could be improved by providing guidelines for the wording of the point of sale notices (eg adopting 'may contain' or 'contains' as standardised terminology). FBOs interviewed indicated that time pressures and limited awareness of opportunities to share lessons learned, prevented more approaches to recalls being shared with others in the industry.

8.2.4 Evidence from enforcement officers

Enforcement officers suggested that point of sales notices were clear, and contained all the relevant information for consumers. Going forward, they suggested that in-store notices should be retained, but there should also be increasing use of social media posts to raise consumer awareness.

8.2.5 Evidence from data

Evidence from the 2018 FSA-commissioned Public Attitudes Tracker (Wave 17) [\(footnote 3\)](#) and 2021 Food and You 2 (Wave 3) [\(footnote 4\)](#) suggests that consumers are receiving information about recalls from a variety of sources.

Survey data from pre and post system design indicates that consumers are still largely unaware of recall alerts: 79% of consumers reported that they were not aware of any in 2018, compared to 77% in 2021. In 2018, 81% of consumers never checked for food recall alerts, decreasing to 61% in 2021. This indicates that recall information may not always be consistent or accessible.

Both surveys indicated that consumers were unlikely to be signed up to food/allergy alerts or food recall information – only 1% of consumers received these.

Further information on access to FSA social media can be found in Appendix B.

As illustrated in the graph below, consumers are increasingly gaining recall information from a variety of websites (41%). Both in-store point of sale notices and TV/radio announcements continue to be key information channels.

Figure 6: Source of information for adults who were aware of any food recall alerts in the past 12 months, 2018/19 vs 2021/22

LAHAADgMcleAACAxwh7AAAAHiPsAQAAelywBwAA4DHCHgAAgMclewAAAB4j7AGeuHJI+ZPxRwAAUoQ9w
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LA
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LA
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HVCCP95C7PZMhfTSI2P/MPbXRmbe2B0Hd+LyOCHsAABfCHtCCBD15PdetQXBzNEU96uNq/JiPrgl7P7ry8zc
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lg5wh66kHqDwFX5K1+G20Zm3tseBPV4ZvvUNUMzb7Uso+pya0ZaRJoX1HtQV7ltwh7DWg2Vw56EutEDyavgt
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lx1jyj3KxlzzgeobJ6GftaEWEPaCW6Pk+9dku6ZOV3dfTA+2k3rozHAU+W1q/ZG/r48dulFbB+47furo8evCJ/kKXIA
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Source: Public Attitudes Tracker (2018), n = 352; Food and You Wave 3 (2021), n=698

How effective was the programme in delivering outcome two?

On the whole, the consistency of information for consumers has improved, but there are still some areas for future consideration.

- Consumers were less likely to regard information as accessible than enforcement officers and ESG members. Consumer focus groups indicated that awareness of the recall process can be dependent on chance (for example, if a consumer happened to see a notice in store or read about a recall in a newspaper), indicating that information is not

always consistently available. Consumers maintained that the onus was on retailers (as opposed to regulators) to inform consumers of a recall, using a range of communication methods.

- ESRG members suggested that having a standardised template for the point of sale notice was a positive step in ensuring consistency. Some FBOs had used this template during their recall experience, and appreciated that it had saved time and effort in creating something from scratch.
- Enforcement officers considered the point of sale notice template to be clear, and containing all the relevant information for consumers. Consumers themselves would welcome the addition of a QR code, as well as guidance on what consumers should do in the event of food consumption. Additionally, FBOs could ensure that loyalty scheme members were automatically emailed/contacted via loyalty apps regarding food recalls. However enforcement officers noted that there is currently no regulation covering where recall notices are placed within a store, and use of the template is not mandatory. They suggested that further thought should be given to how the system can adapt to changing consumer shopping habits (i.e. as there is more online shopping how best to display point of sale notices online).
- There is little current evidence of cross-industry sharing of approaches.

What does this mean for FSA/FSS?

The agencies should:

- consider working with retailers to ensure that recall notices are also placed online.
- ensure that FBOs are aware that a recalls notice template is available on the FSA/FSS website.
- consider making use of this template mandatory for FBOs to improve consistency, and consider guidance on where this should be displayed in store.

8.3 Outcome 3: the public are aware of the recall process and what actions they should take

8.3.1 Evidence from consumer focus groups

As outlined in Outcome 1, the majority of participants were clear on the steps involved in a recall. They suggested that consumers did not require any additional support during the process (for example, a specific recalls/withdrawals helpline). Those who had not experienced a recall suggested that they would be more likely to dispose of the product at home than return the product to the store, so additional help was not required.

Consumers in the focus groups discussed how best to alert consumers of a product recall, to further raise awareness of the process. There was a consensus that a range of different online and in-store methods should be used to ensure that as many consumers as possible from different demographic groups were informed of a recall. There was also a sentiment that consumers would prefer to be notified on a number of occasions rather than potentially miss an alert – “there’s nothing wrong with them contacting you in as many ways as possible”. Ideas for notifying consumers included:

- placing recall notices on shelves alongside affected items (as opposed to on notice boards/at the store entrance) “you need signs near the products that there has been a problem with”
- placing notices in supermarket newsletters “pop it in the deals of the week brochure”
- creating pop-up alerts on supermarket website homepages
- placing the alert on the affected item’s webpage on supermarket websites

- placing alerts on the homepage of supermarket shopping apps “if it’s through an app notification you wouldn’t miss it”
- placing alerts in free local newspapers
- issuing text messages to loyalty scheme members “a text would capture my attention”
- Supermarket staff informing consumers at the till of a recall.

8.3.2 Evidence from ESRG interviews

Several ESRG members indicated that the system redesign had not necessarily raised consumer awareness, but had widened the range of information that consumers now have access to. A small number of ESRG members noted that historically consumer awareness of the recall process was low, making this outcome more challenging to achieve.

They suggested that the way in which consumers receive information has changed over time, and that the alert system needed to reflect this. For example, traditional point of sale notices and newspaper advertisements should be supplemented with online notices, to further raise awareness: “Newspapers are no longer used. Folk get their news online – could be better, for example text alerts systems could have bigger take-up, there could be better advertisement of this service.”

8.3.3 Evidence from FBOs

FBOs considered the majority of consumers to be largely unaware of the actions required during a recall. They highlighted that consumers often contacted them directly to ask about next steps during their recall. Other FBOs suggested that public awareness was often dependent on chance, for example if consumers encountered a recall notice in store or interacted with FBO social media or websites.

8.3.4 Evidence from enforcement officers

Enforcement officers considered consumer awareness of the recalls process to be limited, as:

- many consumers do not see in-store notices (particularly as consumers moved increasingly to online shopping during the Covid-19 pandemic);
- it depends on consumers returning to the same store again (which was often not the case with smaller retailers, such as convenience stores); and
- consumers are unlikely to be aware of alerts placed on the FSA/FSS website;
- “stuff on the website – who sees that?”.

8.3.5 Evidence from data

Data indicates that consumers are now more aware of the actions they should take during a recall. In 2021/22, Food and You 2 (Wave 3) research found that 22% returned the item to the store, and 31% of consumers took no action ([footnote 5](#)). This is an increase from 2018/19, where 59% of consumers took no action; 6% disposed of the product and only 2% returned the item to the store for a refund ([footnote 6](#)).

How effective was the programme in delivering outcome three?

On the whole, the evidence suggests that those consumers who had experienced a food recall were aware of the process. However, those who had not experienced a recall were less aware of what steps to take.

- Perceptions of consumer awareness differed between enforcement officers, FBOs and ESRG members, and consumers themselves.

- Focus groups with consumers suggested that those who had experience of recalls were knowledgeable about the process, however this may be due to the majority of participants having experienced a high-profile chocolate recall, where steps were outlined in the media. Those who had not experienced a recall were less aware of what steps to take, and many suggested they would dispose of the product.
- ESRG members, FBOs and enforcement officers were less confident about consumer awareness, suggesting that it was dependent on consumers seeing notices in-store.
- Data suggests that consumers increasingly return food items: in 2021/22, 22% of consumers returned items to the store, compared to only 2% in 2018/19.
- FBOs highlighted that consumers often contacted them directly to ask about next steps during the recall, suggesting limited awareness of the required actions.
- Several ESRG members indicated that the system redesign had not necessarily raised consumer awareness. They indicated that delivering the consumer awareness campaign that was envisaged was a challenge due to the pressures of Brexit and Covid-19.

What does this mean for FSA/FSS?

The agencies should:

- use a combination of communication channels to notify consumers – promote the use of point of sale notices, online notices and social media posts.
- understand that consumers require greater awareness of why they should return a product during a food recall as opposed to disposing of it themselves.

8.4 Outcome 4: feedback loops and a philosophy of continuous improvement amongst all stakeholders underpins the withdrawal and recall system

8.4.1 Evidence from consumer focus groups

Consumer focus groups indicated that they would welcome FBOs sharing learnings from food recalls with the public, and that this would further instil confidence in the UK food system. A number of focus group participants suggested that FBOs who initiated food recalls should be praised as opposed to demonised as “[the system] should encourage companies to come forward and own up... companies should be congratulated rather than trashed in press”.

8.4.2 Evidence from ESRG members

The development of RCA (see section 6.2.1) was considered to have largely worked well by regulation ESRG members, with the e-learning course and guidance package ensuring consistent standards and more detail being reported for incidents.

However, some ESRG members indicated that more information and learnings on how to carry out an RCA needed to be shared more widely. One regulation member added that the RCA should be made mandatory to improve compliance and sharing of good practice. One industry ESRG member noted that it was compulsory in the frozen food industry, and was surprised it was not required by other parts of the food system.

Broadly ESRG members viewed the feedback loops as a good approach to reducing the number of incidents and to highlight best practice. However, ESRG members suggested that more needs to be done to reach SMEs;

“The feedback loops are a really good approach in terms of reducing the number of incidents and getting best practice out there. But there is a long way to go in terms of getting best practice out

there, that businesses see this, that it is implemented, and that Local Authorities make sure that the processes are used.”

8.4.3 Evidence from FBOs

All those FBOs interviewed had undertaken an RCA to determine the root cause of the recall incident. Some commented that this was a helpful process, and that their experience had led to a number of internal changes/improvements within their businesses, including:

- changing suppliers
- altering food preparation practices
- updating labelling
- providing additional staff training
- reviewing internal recall procedures and organising annual mock recalls.

Following these incidents, the FBOs interviewed did not share their RCA with others within their industries, due to a limited awareness of industry forum where these could be shared, uncertainty over who was responsible for sharing RCAs (i.e. FBOs themselves or enforcement officers) and a focus on business demands. Only one FBO had spoken to their industry representation group about the recall. None of the FBOs were familiar with e-learning course on RCA, although a few indicated that they would be interested in undertaking it.

8.4.4 Evidence from enforcement officers

Enforcement officers suggested that RCAs were being routinely conducted by larger FBOs, but that there was still some further work required to ensure that smaller FBOs also took part in this process; “It’s normally the smaller ones where you have to go back and ask... they normally do some kind of process internally, but not a written document”.

Enforcement officers interviewed indicated that widespread analysis of RCAs and/or recall trends was not routinely conducted within their local areas, due to resourcing constraints. They suggested that it would be useful for the FSA/FSS to share high level RCA findings with local authorities on an annual basis, to enable enforcement officers to monitor any emerging trends/ explore good practice.

8.4.5 Evidence from data review

RCA records were updated after the system redesign, and now contains additional information and categories compared to the 2018/19 version (which only had the root cause and corrective actions). Currently, the FSA records the following categories:

- incident type
- hazard type
- product type
- 5 Why's
- root cause
- corrective actions
- RCA categorisation

In 2021/22, the root cause for every incident was categorised using the ‘PEMPEM’ model. This uses six commonly observed areas associated with food production: Process, Equipment, Material, People, Environment and Method; with associated sub- categories providing further descriptive information regarding the root cause type.

Between April and September 2021, only 10% of incidents in the RCA database had not determined root cause suggesting that, overall, the industry is being successful in finding the

cause [\(footnote 7\)](#). Moreover, 99% of the FBOs who determined the root cause shared their corrective actions with the FSA. This shows that more FBOs are now sharing their corrective actions.

Data from the FSA indicates that, between March 2021 and February 2022, 2,643 FBOs and 463 enforcement officers completed the RCA training. This was supplemented by a further 563 completions by FBOs and 60 completions by enforcement officers between March and July 2022. The training course does not currently collect information regarding FBOs, so we cannot determine if uptake is higher within certain sectors, size of FBOs or locations.

How effective was the programme in delivering Outcome 4?

There is limited evidence that there is an ongoing commitment to continuous system improvement, although there clearly has been an increased focus on the completion of the RCA as a result of this system redesign.

- Prior to the system redesign, not all businesses clearly defined the 'root cause' of their incidents and the level of understanding across industry sectors was variable. Therefore the development of the Root Cause Analysis (RCA) guidance and the e-learning course were viewed positively by ESG members.
- FBOs considered the completion of RCAs as beneficial for individual businesses, as it helped to identify the root cause of the incident and enabled them to put specific measures in place to avoid future recall incidents.
- Enforcement officers suggested that RCAs are being routinely conducted by larger FBOs, but there was still some further work required to ensure that smaller FBOs also took part in this process
- However, the programme is not as effective in ensuring that the learnings from the RCA are being used to help other businesses avoid the same problems. There is currently no process that could be followed to share the learnings more widely.
- Enforcement officers and FBOs suggested that greater clarity is required regarding who is responsible (FSA/FSS, local authorities or FBOs) for sharing RCA findings
- There appears to be limited awareness of the e-learning course amongst FBOs, with ESG members reporting limited completion.

What does this mean for FSA/FSS?

The agencies should:

- consider the development of a national database of RCAs, accessible by all local authorities to better share findings nationally.
- potentially share the corrective actions with FBOs from the same industry or at conferences (eg the FSA and FSS Food Safety conference) as this potentially can prevent future incidents.
- provide greater clarity in documents listing who is responsible (FSA/FSS, local authorities or FBOs) for sharing RCA findings to ensure continuous improvement within the system.
- increase uptake of the RCA e-learning course. Local authorities could be requested to share the RCA e-learning course with FBOs as part of the recalls process.

1. [Food incidents, product withdrawals and recalls](#) | Food Standards Agency
2. [FSA Small and Micro FBO Tracking Survey Wave 3 \(2021\)](#)

3. [Biannual Public Attitudes Tracker Wave 17, FSA \(2018\)](#)
4. [Food and You 2: Wave 3, Ipsos MORI for the FSA \(2022\)](#)
5. [Food and You 2: Wave 3, Ipsos MORI for the FSA \(2022\)](#)
6. [Biannual Public Attitudes Tracker Wave 17, FSA \(2018\)](#)
7. The FSA does not request this for all incidents, but for those where an alert is issued, all allergy incidents and micro incidents