

Efficacy of Withdrawals and Recalls: Lay Summary

RSM UK Consulting LLP (RSM) was asked to piece together and understand how effective this system has been.

- **Objective 1:** To understand how the changes were carried out
- **Objective 2:** To evaluate the success of the system redesign, the roles of the agencies, how aware the public is of the safety around their food, and how the FSA/FSS can improve their work in the future

2.1 Key findings:

2.1.1 Objective 1: To understand how the changes were carried out

2.1.1.1 What we found out

The people involved in designing the new system (ESRG members) felt that the changes were successful, and those involved worked well together. Four workstreams were created, which broke down the work, and helped to make the system redesign manageable.

Overall, ESRG members thought that the process was well managed. As the system redesign was a priority for the FSA/FSS, there was good resourcing, which included a project manager. The inclusion of a range of stakeholders (for example, food industry, enforcement authorities and consumer groups) was useful in making sure different views were heard. As a result, ESRG members said that the planned outcomes were met.

2.1.2 Objective 2: The success of the system redesign, the role of agencies, how aware the public is of the safety around their food, and how the FSA/FSS can improve their work in the future.

2.1.2.1 What we found out

Outcome 1: Roles and responsibility in the new system

- Food Business Operators (FBOs), ESRG members and enforcement officers (those working for local authorities) said that there was a clear understanding of the new roles and responsibilities. This was an improvement on the previous system, which was less direct about roles and responsibilities.
- Consumers who had experienced a recall said that they had a clear understanding of their role. Those who had no experience were less confident of their role during a food recall.

Outcome 2: Accessible information provided to consumers, and cross-industry sharing of approaches and impact

- Consumers were less likely to think that the information available to consumers is accessible than enforcement officers and ESRG members.

- Consumer focus groups thought that awareness of recalls was dependent on chance (e.g. if they happened to see a notice in store or read about a recall in a newspaper). This suggests that information is not always consistently available.
- Consumers thought that the duty was on retailers (as opposed to regulators) to inform consumers of a recall, and that they should use a range of communication methods, for example via emails, loyalty schemes and posters in stores to inform consumers.

Outcome 3: Increased public awareness of food recalls and the actions they need to take

- FBOs, ESG members and consumers had different views on how aware the public are of what to do during a food recall.
- FBOs said that consumers often contacted them directly to ask about next steps during the recall. This suggests that consumers are not always aware of what to do in the event of a recall.
- Consumers who had experienced a recall were aware of the process, while those consumers who had not experienced a recall were less aware of what they should do.

Outcome 4: System improvements in the future

- There is limited evidence that all parts of the system are working together to share good practice and improve the system. For example, enforcement officers reported that not all businesses have been completing a Root Cause Analysis (RCA) after their recall, which helps to identify how the issue happened, and what they can do in the future.
- When FBOs do complete an RCA, they do not always share the findings more widely (i.e. with FSA/FSS on request in order to share with others in their industry). This is often due to limited awareness of how to share these findings. As a result, there are fewer opportunities to share learning across the food industry, local authorities and regulators.

2.1.3 Considerations for the future

The table below shows things that the FSA/ FSS might want to think about in the future:

Table 1: Things to think about in the future

Area	Consideration
Process	For any future FSA/FSS project which requires team working, the FSA/FSS should adopt a similar approach (for example, making sure that the purpose of the workstreams is clear, and engaging regularly with all key stakeholders).
Guidance	Because businesses were often not aware that guidance was available, the FSA/FSS should continue to raise awareness that the recalls guidance is available on their respective websites. When FBOs did access the guidance, they felt that it was helpful. Raising awareness could be done via trade organisations, LinkedIn posts or during local authority inspections.
Points of sale notices	Because there is often inconsistency in the style of point of sale notices, consider making the point of sale template compulsory for FBOs. As more consumers shop online, consider producing guidance on where these notices should be displayed online. The point of sales notice template could also include a QR code, as consumer focus groups thought that this would be helpful.
Consumer awareness	Continue to make consumers aware of the steps to take during a food recall (for example, at FSA/FSS stands at food shows or online advertisement campaigns), as data shows that awareness is still lower than expected. The current FSA/FSS text alert service (informing consumers about products that have been recalled), could be promoted more widely, as focus groups liked this idea.
SME support	Consider offering more tailored support for smaller FBOs, so they are clear on their role within the recall process. Smaller FBOs were less likely than larger FBOs to have internal processes or resources in place in the event of a recall. Consider promoting the Quick Reference Guide with this group.
Communicating with consumers	Going forward, FBOs should use a mixture of ways to notify consumers of a recall (including existing methods such as point of sale notices in stores and newspaper advertisements, and online methods such as emails or loyalty app notifications).

Area	Consideration
Greater sharing of root cause analysis (RCA) findings	<p>Make it clear who is responsible (either the FSA/FSS, local authorities or FBOs) for sharing RCA findings, and also how these findings could be shared. This would allow for continual improvement within the system. It may also be useful to create specific guidance for small/micro FBOs regarding RCAs.</p> <p>The FSA/FSS could also create a national database of RCAs, accessible by all local authorities. This would be useful in monitoring any current recall trends, as well as exploring any emerging trends.</p>
Further promotion of the RCA e-learning course	<p>To increase the number of people completing the RCA e-learning course, consider asking local authorities to share the RCA e-learning course with FBOs as part of the recalls process. As suggested by enforcement officers, it might also be helpful to produce simplified RCA guidance for smaller FBOs.</p>
Standardise data collection categories	<p>Consider making the FSA and FSS data collection categories the same, which will help the organisations to monitor recall trends.</p>