

# Efficacy of Withdrawals and Recalls:

## Introduction

### 4.1 Background

Before this system redesign, there was limited evidence on the application or effectiveness of legal requirements for food businesses and Competent Authorities (CA) against which to base decisions for change and improvement. The FSA/FSS also recognised that they did not have a clear understanding of consumer awareness of the recall procedure, as well as their behaviours in relation to the current food [\(footnote 1\)](#) recall system.

The aim of the withdrawals and recalls system redesign was to elucidate learning and implement improvements to the withdrawals and recalls system. Improvements aligned to the FSA/FSS overarching ambition to protect public health from risks that may arise in connection with the consumption of food, and making sure that “food is safe and what it says it is”. [\(footnote 2\)](#)

### 4.2 Overview of withdrawals and recalls incidents pre and post system redesign

This section outlines the most common types of incident categories, product types and notifiers pre system redesign (April 2018 – March 2019) and post system redesign (April 2021- March 2022).

**Incident category:** Prior to the system redesign, the largest incident categories reported by the FSA were pathogenic micro-organisms (16%), followed by allergens (13%). For the FSS, the largest categories were allergens (19%) and regulatory breaches (16%). These categories remained consistent post-system redesign.

**Product type:** Prior to the system redesign, the two product types that accounted for the biggest proportion of incidents reported by the FSA were meat & meat products (16%) and fruits & vegetables (11%). For the FSS, meat & meat products (16%) and products not attributable to a particular food commodity (e.g. outbreaks (no food source identified) and fire/spill damage to crops) (18%) were the two product types accounting for the biggest proportion of incidents. Post system redesign, for the FSA, poultry meat and poultry meat products (15%) represented the biggest incident category, followed by meat and meat products (15%). For the FSS, meat and poultry (13%) were the most common categories, followed by feed for animals (10%)

**Notifiers:** Prior to the system redesign, the four biggest notifiers of incidents to the FSA were local authorities (16%), Border Inspection Posts (13%), Rapid Alert System for Food and Feed (12%) and Industry (12%). For FSS-led incidents, the biggest notifiers of incidents were local authorities (41%), Other organisations, such as Health Protection Scotland and the EU Administrative Assistance and Cooperation System (29%) and the FSA (23%). Following the system redesign, for the FSA, the biggest notifiers were RASFF (the Rapid Alert System for Food and Feed) (33%), and local authorities (24%). For the FSS, local authorities (32%) remained the biggest notifier, followed by RASFF (31%) and the FSA (14%).

### 4.3 Overview of this evaluation

The FSA and FSS jointly commissioned a process evaluation to understand how effective the processes involved in developing the new system have been, and the efficacy of the package developed, as well as the effectiveness of implementation. The evaluation also assesses whether the four planned outcomes were realised. An impact evaluation was outside of the scope due to the challenges in attribution.

This final report outlines our findings on the two evaluation main objectives:

**Objective 1:** To evaluate the internal programme process, which featured a partnership approach with stakeholders (sections 6 and 7).

**Objective 2:** To evaluate the success (or otherwise) of achieving the four planned outcomes (section 8).

Section 9 outlines findings from recent anonymised case studies, Section 10 outlines the effectiveness of the system to respond to future food trends, and Section 11 provides key conclusions and suggestions for the future.

The system covers the jurisdictions of England, Northern Ireland, Scotland and Wales, and FBOs of all sizes are within scope for the evaluation.

### **4.3.1 Planned outcomes of the project**

Within the design phase of the system redesign, four key outcomes were agreed upon with FSA/ FSS Boards. These outcomes were linked to planned improvements across the four delivery workstreams.

#### **Outcome 1**

A withdrawals and recall system founded on a clear and distinct set of roles and responsibilities agreed and commonly understood by all participants.

#### **Outcome 2**

Information to consumers is consistent and accessible, based on proven best practice and underpinned by cross industry sharing of approached and impact.

#### **Outcome 3**

The public are aware of the recall process and what actions they should take.

#### **Outcome 4**

Feedback loops and a philosophy of continuous improvement amongst stakeholders underpins the withdrawals and recall system

1. 4 The term 'food' refers to all food products and drinks
2. Food Standards Agency (2015) "[Food We Can Trust: Food Standards Agency Strategic Plan 2015-20](#)" FSA