

## INCIDENTS & RESILIENCE ANNUAL REPORT 2019/20

### Report by Colin Sullivan & Philip Randles

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## 1. SUMMARY

1.1. This paper details the activities undertaken by the Incidents, Resilience and Consumer Protection teams across England, Wales and Northern Ireland during the last year. This work is to continue to ensure that the UK's food incident response capability is the best possible, not least in light of two major issues which can have a bearing upon our response - the COVID-19 pandemic and arrangements with the EU countries and the Commission following the EU exit transition period.

1.2. The Business Committee are asked to:

- Note the further work on the emergency response to the COVID-19 pandemic and the work of the IRG since the 2018/19 report to the Business Committee and;
- Discuss and endorse the continuing development of the IRU's capability and the preparations being made in advance of the end of the EU exit transition period

## 2. INTRODUCTION

2.1. Incident, resilience and consumer protection teams across England, Wales and Northern Ireland manage and coordinate the Food Standards Agency's (FSA) response to food<sup>#</sup> incidents and foodborne outbreaks ensuring that products not in compliance with safety legislation are removed from the market.

2.2. The FSA's Incident Management Plan<sup>1</sup> 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<sup>2</sup> 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

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\* The term 'food' should be taken as meaning reference to 'food and feed' throughout this paper

Standards Scotland (FSS)<sup>3</sup>.

- 2.3. The COVID-19 pandemic has been an unprecedented event with the FSA's Emergency Response commencing in January of 2020 and only now de-escalating. Clearly, this has had a major influence upon work priorities and resourcing. This report details activities undertaken from 01 April 2019 to 31 March 2020 but to provide the latest picture, it also includes reference to events occurring more recently in 2020/21, to give context.

### **3. FSA RESPONSE TO COVID-19 UPDATE**

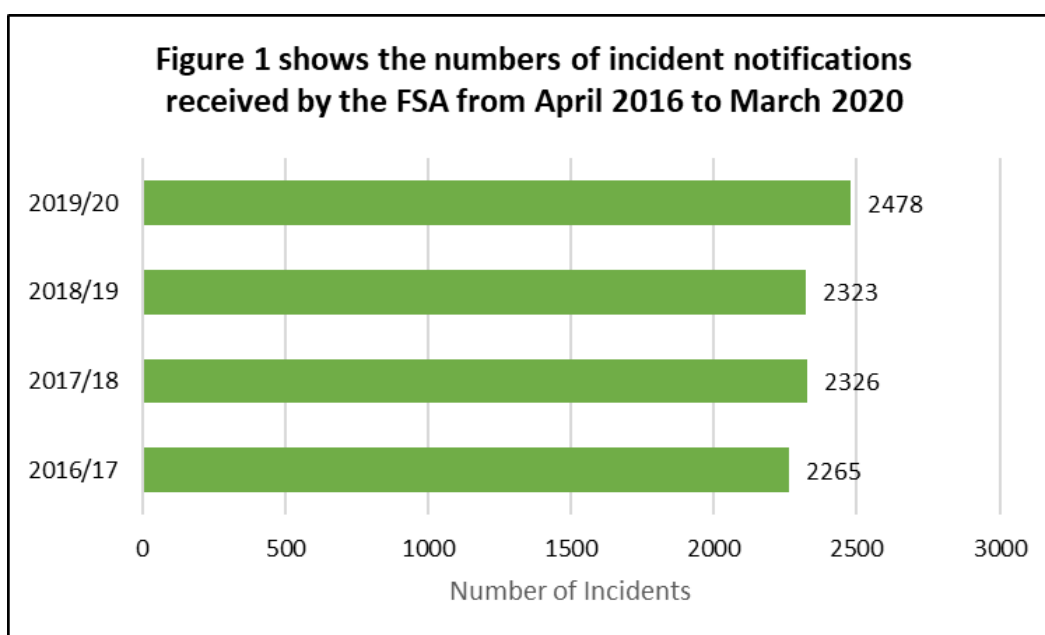
- 3.1. The FSA's objective throughout our emergency response to the COVID-19 pandemic has been to ensure food safety so that the high level of consumer protection in the UK is preserved. We have provided a robust, effective yet flexible response supporting industry in maintaining food supply and our own staff in protecting themselves and others. Details of this response can be found in our paper to the FSA Board in Jun 2020<sup>4</sup> entitled "*FSA Response to COVID-19*".
- 3.2. The pandemic has altered the socio-economic and political context in which the FSA operates across England, Wales and Northern Ireland, and the impacts and effects are creating a "new normal" to which we must adapt. We remain aligned to HMG's COVID-19 recovery strategy<sup>5</sup> and the devolved administration recovery plans and continue to implement our Forward Plan to enable us to deliver this "new normal" across the three countries.
- 3.3. As we progress, we are looking to reverse, amend or embed the contingency measures implemented during the pandemic taking into account different rates of recovery and different actions taken by each nation to ensure potential divergence is accounted for. A summary of the decisions and actions that we have taken since our previous report to the Board in June are included in Annex A.
- 3.4. We continue to be alive to the relatively small number of outbreaks and cases of COVID-19 associated with food processing plants. Cases have been observed in both meat and non-meat plants but overall, the number of those premises affected represents only a very small proportion of the total food industry. Our assessment of the risk of transmission of COVID-19 through consumption or handling of food, or handling of packaging, remains very low.
- 3.5. Whilst it is not the FSA's role to do health and safety monitoring of workplaces, where we have staff (i.e. in meat plants), we follow related issues particularly

closely to ensure that our employees are suitably protected. Community transmission remains the most likely vector for most infections although work remains ongoing to understand any potential drivers for transmission in the workplace.

- 3.6. To ensure that a consistent approach to outbreak containment and management is taken in food plants where cases are detected, the FSA has been contributing as part of a cross-government task force led by the Department for Environment, Food & Rural Affairs (Defra). Updated guidance for food businesses has been published on GOV.UK by this task force<sup>6</sup>. The guidance is intended for all workplaces involved in the manufacturing, processing, warehousing, picking, packaging, retailing and service of food. It includes information about the risk of community transmission from transportation and accommodation arrangements. We have also contributed to the Welsh Government Guidance for meat and food plants on prevention and management of coronavirus (COVID-19)<sup>7</sup>.
- 3.7. We remain prepared with available capability and capacity to address any future resurgence of COVID-19 should that occur even if it should happen concurrently with the end of the EU exit transition phase when the Northern Ireland protocol comes into effect (see Section 6 for further detail)

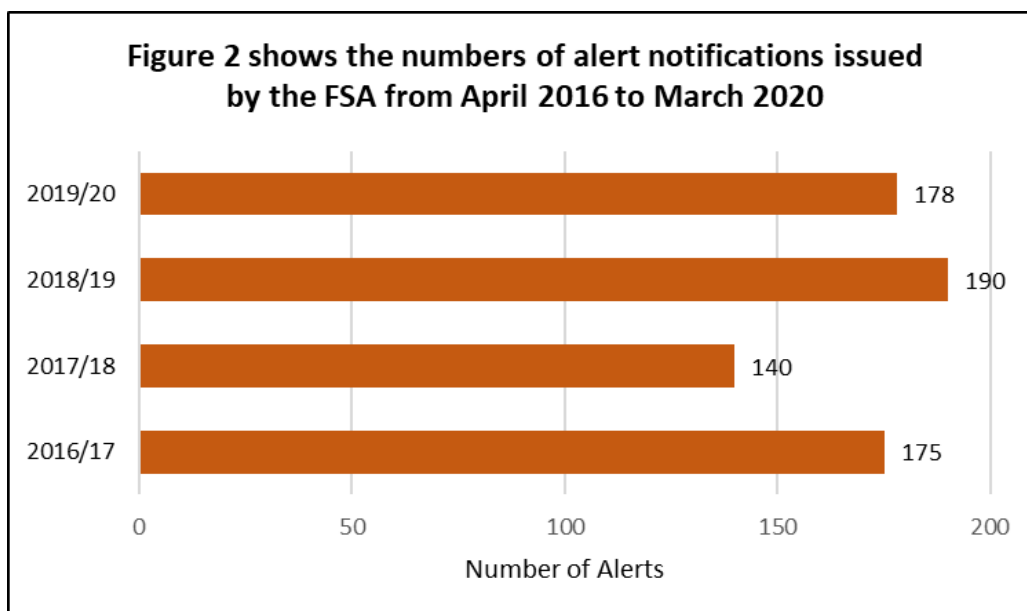
#### **4. INCIDENTS AND OUTBREAKS DURING 2019/20**

- 4.1. In total, the FSA was notified of and investigated 2,478 food, feed and environmental contamination incidents in England, Northern Ireland and Wales during the 2019/20 Reporting Year. This represents a 6.7% increase when



compared to 2018/19 (see Figure 1).

- 4.2. The number of alerts issued decreased from 190 in 2018/19 to 178 in 2019/20. This included 106 Allergy Alerts, 70 Product Recall Information Notices and 2 Food Alerts for Action and represented a year-on-year decrease of 6.3% (see Figure 2).



- 4.3. 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 B includes further details and trends relating to the types of incidents managed by the FSA.
- 4.4. During the recent emergency response to the COVID-19 pandemic, we became aware of fluctuations in the numbers of incidents being notified to the FSA and as a result, a downturn in the number of alerts that we issued (see Figure 3). Overall, we saw a 23% decrease in notifications and a 45% decrease in alerts

**Figure 3: Fluctuations in Incident Notifications received, and Alerts issued during the recent Pandemic**

Incidents	Apr	May	Jun	Jul	Total	Var
2019/20	196	192	195	261	844	
2020/21	137	167	164	185	653	-23%

Alerts	Apr	May	Jun	Jul	Total	Var
2019/20	18	16	15	13	62	
2020/21	6	12	9	7	34	-45%

when compared to the previous year.

- 4.5. We have reviewed the potential causes for this and have concluded that this downturn reflects the fewer number of food businesses trading over the pandemic as well as factors such as fewer new products coming to the market and a reduction in the complexity of the product ranges offered during this period. The number of incidents being reported has increased as the national lockdown has been eased and is now returning to pre-pandemic levels.
- 4.6. Our Receipt and Management (RAM) function has been fully operational since April 2019, and processes incoming signals of potential emerging incidents on a daily basis. Throughout the pandemic the team have produced regular emergency response intelligence reports detailing issues for consideration and where necessary, mitigation.
- 4.7. The number of signals processed by the RAM team during 2019/20 totalled 14,035. A 'signal' is an alert or information received from various sources such as other competent authorities, industry or EU Member States relating to potential food and feed safety risks to the UK. The signals are then validated for distribution to the UK and referred for further investigation or for information as appropriate. The process has been validated against the output from the EU Commission's Rapid Alert System for Food and Feed (RASFF) and in some cases RAM are identifying incidents in advance of RASFF notifications.

## **5. INCIDENT PREVENTION & ROOT CAUSE ANALYSIS**

- 5.1. Historically the IRU have been largely focused on reactive response to incidents, with considerations around emerging risks. The teams in England Wales and Northern Ireland have now shifted focus to place greater emphasis on the prevention of incidents. Resources in this area have been increased with the recruitment of two further officers to further develop and deliver an end to end incident prevention process as part of IRU routine activities. We are currently refreshing our incident prevention strategy with a view to develop improved systems to influence incident occurrence both on a national and international level throughout the 2020/21 reporting year and beyond.
- 5.2. In the meantime, the collection and analysis of data to identify trends and develop solutions with stakeholder input, and subsequent dissemination to those involved in food chain management, continues. Root cause analysis findings are being requested for all incident notifications and alerts, and to help local authorities and businesses understand and adopt this process, e-learning training on root cause analysis techniques has been developed and published

on our website. This information is being used to identify common causal factors where mitigating action can be taken and we continue to develop a gallery of single point lessons based on specific types of recurring incidents and are using these to promote best practice. This is helping to focus our prevention strategy so that we can better target those areas where intervention will have most effect. Annex C includes some examples of our incident prevention outputs.

## **6. PREPARATION FOR THE END OF EU EXIT TRANSITION PERIOD**

- 6.1. Future access to the EU Commission's Rapid Alert System for Food and Feed (RASFF) is subject to the outcomes of the ongoing negotiations. The IRU is using a range of outcome scenarios to inform planning to ensure resilience of incident management in the face of uncertainty. At the heart of this will be co-ordination and consistency of approach across the 4 nations, which is key to UK incident handling. As such, consolidation of FSA's incident management approach across the three Nations (England, Northern Ireland and Wales), and in line with Food Standards Scotland, is being sought which takes into account the emerging requirements of the NI protocol and other proposed frameworks which facilitate flow of goods through the internal UK market.
- 6.2. Work is being carried out in the lead up to the end of the transition period with the overall aim of building on existing achievements such as our RAM systems and the processes for international stakeholder engagement that we introduced in 2019. This will further mitigate for any loss of EU incident risk communications systems and EU coordination mechanisms in order to protect consumers from food safety incidents and foodborne illness outbreaks. Our portfolio of work focuses upon delivering a bespoke system which will incorporate the new Signals Prioritisation Dashboard, an open source data predictive tool which has been developed in close co-operation with the FSA's Strategic Surveillance Team.
- 6.3. This system will further the development of the FSA's capability to detect, respond to and prevent food safety incidents, ensuring that as the UK adjusts after exiting the EU, we remain '*ahead of the curve*' in maintaining the UK's world class incident management reputation. It will also foster resilience in providing the ability to respond to requirements of the changing regulatory landscape as well as helping to facilitate trade with other countries by demonstrating the world class quality of UK food incident management systems which underpin UK food safety standards.

6.4. As we approach the end of the EU exit transition period in December 2020, we are aware that it is not realistic to predict and plan for every risk or eventuality that could impact upon food safety or food crime. It is also possible that the end of the transition period may occur concurrently with other events such as a re-emergence of COVID-19 or a winter influenza outbreak across the UK. It is therefore our intention to activate our Emergency Response processes as a precaution from the end of November 2020 in preparation for any potential supply chain disruption or resourcing issues that might occur. This will provide us with the capability to rapidly respond to any corresponding food safety problems that might fall into our remit.

## **7. IRU CAPABILITY DEVELOPMENT (THE NEW WORLD)**

- 7.1. We continue to strengthen our internal end-to-end incident management systems capability. Work is on-going to ensure we have the best possible system in place to increase our ability to receive, investigate and manage incidents following an actual or potential threat to the safety, quality or integrity of food. The end-to-end approach enhances our ability to better detect potential incidents earlier and manage our incident response more efficiently, whilst delivering additional benefits such as improving data sharing across the FSA.
- 7.2. Work continues to further develop and enhance our capability and capacity to respond to multiple serious incidents through an extensive programme of activities that includes exercising, drilling and training opportunities. During 2019/20, we participated in over 40 activities that varied in size and complexity, working both internally, and with other organisations. Over 300 staff from across the agency participated in these opportunities that enabled us to improve our incident response capability and skills, as well as continuing to build our surge capacity and improve our response plans and processes. Involvement in multi-agency exercises also provided an opportunity to emphasise to those involved the role of the FSA as well as sharing best practice. Going forward, we will continue to strengthen resilience by learning from real incidents and embedding best practice developed during incidents such as the COVID-19 pandemic.
- 7.3. IRU stakeholder engagement is at its highest level, with the COVID-19 response demonstrating the benefits of frequent and forthright exchange with industry and other government departments. This has resulted in closer relationships and more direct communication which we are utilising in preparations for the end of the EU exit transition period. We will maintain trusted forums such as the Food Industry Liaison Group (FILG), industry-led

FDF Roundtable and DEFRA-led Food Chain Emergency Liaison Group to identify and address potential threats the food supply chain, leading up to the end of the transition period and beyond.

- 7.4. Working closely with International Food Safety Authorities Network (INFOSAN) and their international membership, we have developed a multi-country dedicated working group. This group brings together the INFOSAN members most frequently involved and engaged during international food safety incidents, with an overall aim to set and encourage development and sharing of best practice across the whole network. In the initial meeting the group identified themes and topics to take forward (see Figure 4).

**Figure 4: Themes & topics for Infosan working group to progress**

<b>Food recalls</b>	<b>Best practice for emergencies (learning from COVID-19)</b>
<b>Outbreak management</b>	<b>Root cause analysis</b>
<b>Benchmarking of different practices in different countries</b>	<b>Allergens management</b>
<b>Communication in emergencies and incidents</b>	<b>Food fraud</b>
<b>Emergency guidance and expectations within regions</b>	<b>Potential for a ‘Buddy Program’ where advanced members of the group support other members</b>

- 7.5. IRU has a seat on the INFOSAN Advisory Group and as part of this role played an active role in the INFOSAN 2<sup>nd</sup> Global meeting in Abu Dhabi in Dec 2019, with 285 participants from 135 countries attending the event. The meeting highlighted the importance of operating the international food safety network in an increasingly globalised world and how a local outbreak of food borne illness can rapidly evolve into a global crisis. The Advisory group also met during the COVID-19 Crisis to discuss the development of a series of discussion threads on the INFOSAN network website with the aim of sharing information and guidance with other countries relating to COVID-19 and food production including: food control management; food law and regulations; social distancing in food plants; inspection regimes; laboratory services for food monitoring; and education and training.



7.6. The FSA has also embedded a secondee into the INFOSAN offices in Geneva offering insight into how INFOSAN functions which allows the UK to engage with the network to maximum benefit. This secondee has helped to deliver initiatives which have a UK and a global food safety impact. For example, they have been instrumental in upgrading the INFOSAN community website to be delivered in Sept 2020, which will enhance the current function to a level expected of current technology capability, to facilitate better communication between countries.

## **8. CONCLUSIONS**

8.1. Incident numbers for 2019/20 show a similar profile to previous years although the overwhelming feature of recent months has been our emergency response to the COVID-19 pandemic which has had a major influence over work priorities and resourcing.

8.2. The IRU continues to evolve and adapt to the changing landscape which is largely being driven by the UK's exit from the EU and the imminent end of the transition period as well as the potential for a resurgence of COVID-19 pandemic.

8.3. The team continues to develop winter plans to mitigate these issues and as we go forward past the end of the transition period, we must ensure that our incident response capability and capacity across GB and NI remains effective and timely.

8.4. The Business Committee are asked to:

- **Note the further work on the emergency response to the COVID-19 pandemic and the work of the IRG since the 2018/19 report to the Business Committee and;**
- **Discuss and endorse the continuing development of the IRU's capability and the preparations being made in advance of the end of the EU exit transition period**

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**ANNEX A: COVID-19 DECISIONS TAKEN SINCE JUNE REPORT TO BOARD**

<b>EMERGENCY RESPONSE</b>
Regularly updated <b>Internal FSA Guidance and Communications</b> to keep staff informed
<b>Lessons Learnt</b> exercise conducted to learn from our experiences so that they can be actively taken into account in our future approach to incident management
<b>De-escalation of Incident</b> with Briefing Cell standing down
<b>FSA FIELD OPERATIONS &amp; POLICY</b>
<b>EU Temporary Emergency Legislation (EU) 2020/466</b> extended to 01 October 2020 – Articles 3 and 5a revoked bringing to an end easements around authorisation of persons, designation of laboratories and official controls by distance communication
FSA advice on <b>Glassware Washing</b> and efficiency at deactivating COVID-19
<b>LOCAL &amp; PORT HEALTH AUTHORITIES</b>
Easements around <b>General Labelling Requirements</b> reversed by FSA – temporary retention of identification mark flexibility in response to clusters of positive cases in food production sites
FSA provided further guidance and advice to local authorities on the <b>Prioritisation of Food and Feed Law Official Controls</b> until 30 September, including guidance on initial remote assessments and the resumption of physical inspections.
FSA confirms intervention frequency requirements in the <b>Feed Law Code of Practice</b> reapplied from 18 July, following period of deferral of all but urgent activities.
<b>COMMUNICATIONS</b>
<b>Portal on FOOD.GOV</b> where FSA has brought together in one place all our advice and guidance for food businesses looking to reopen or operate during the pandemic (average of 6,000 views per day in July and now is receiving an average of 2,500 views)
FSA “ <b>Here to Help Campaign</b> ” providing guidance and promoting best practice to support food businesses to stay compliant with food hygiene and safety requirements and best response to the impacts of COVID-19.
FSA contribution to the refresh of <b>PHE Guidance for Food Businesses</b> published on GOV.UK and providing practical advice to food businesses
FSA publish guidance for food businesses undertaking a <b>Rapid Shut-Down</b> in response to coronavirus (COVID-19)
FSA published scenarios where <b>Registration</b> may be required when providing food in the community

**ANNEX B: INCIDENT DATA**

The number and profile of incident notifications received by the FSA has not greatly changed in 2019/20 when compared to the two previous years. Figures B1 and B2 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. The number of allergen-related incident notifications received and progressed in England, Wales and Northern Ireland in 2019/20 was 350 representing a 24% increase when compared to the 283 notifications during 2018/19.

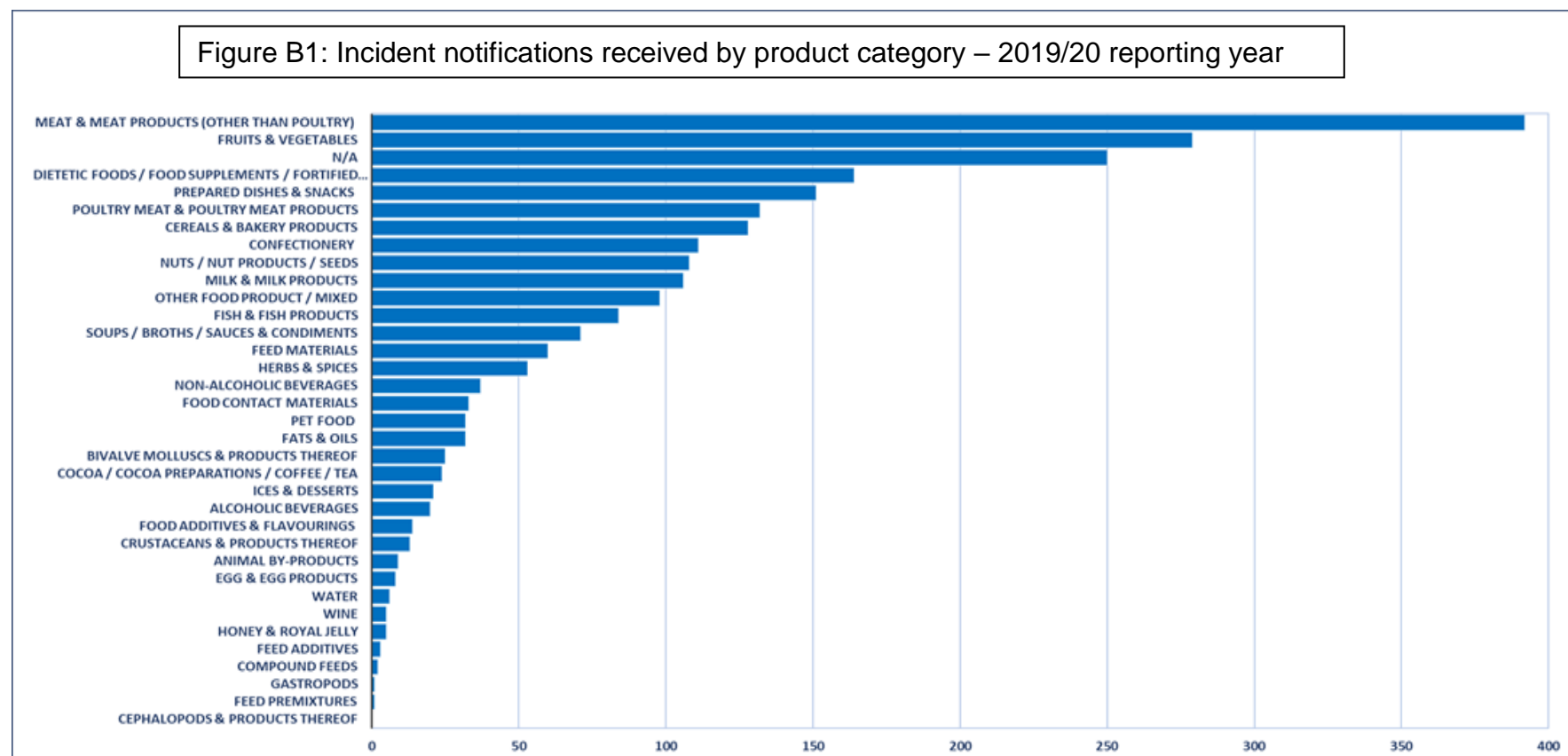
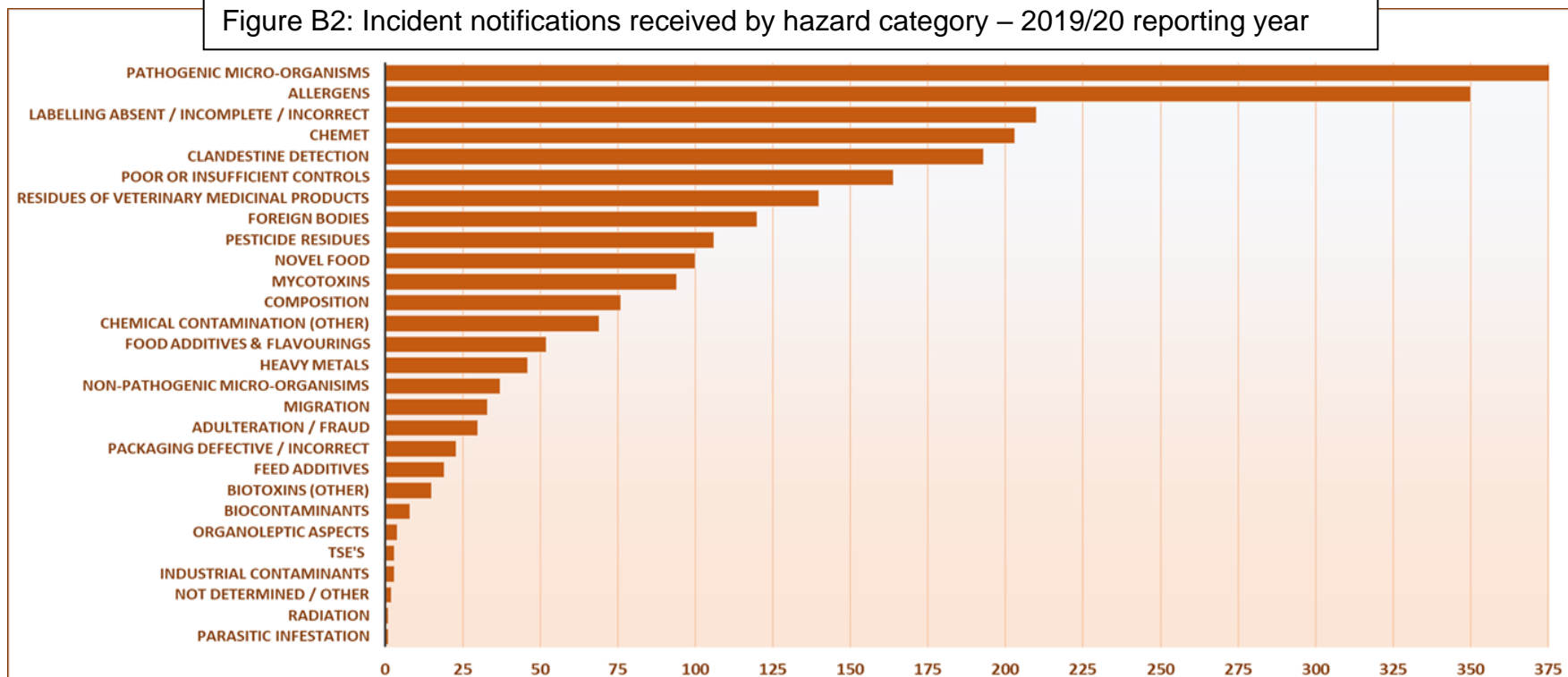
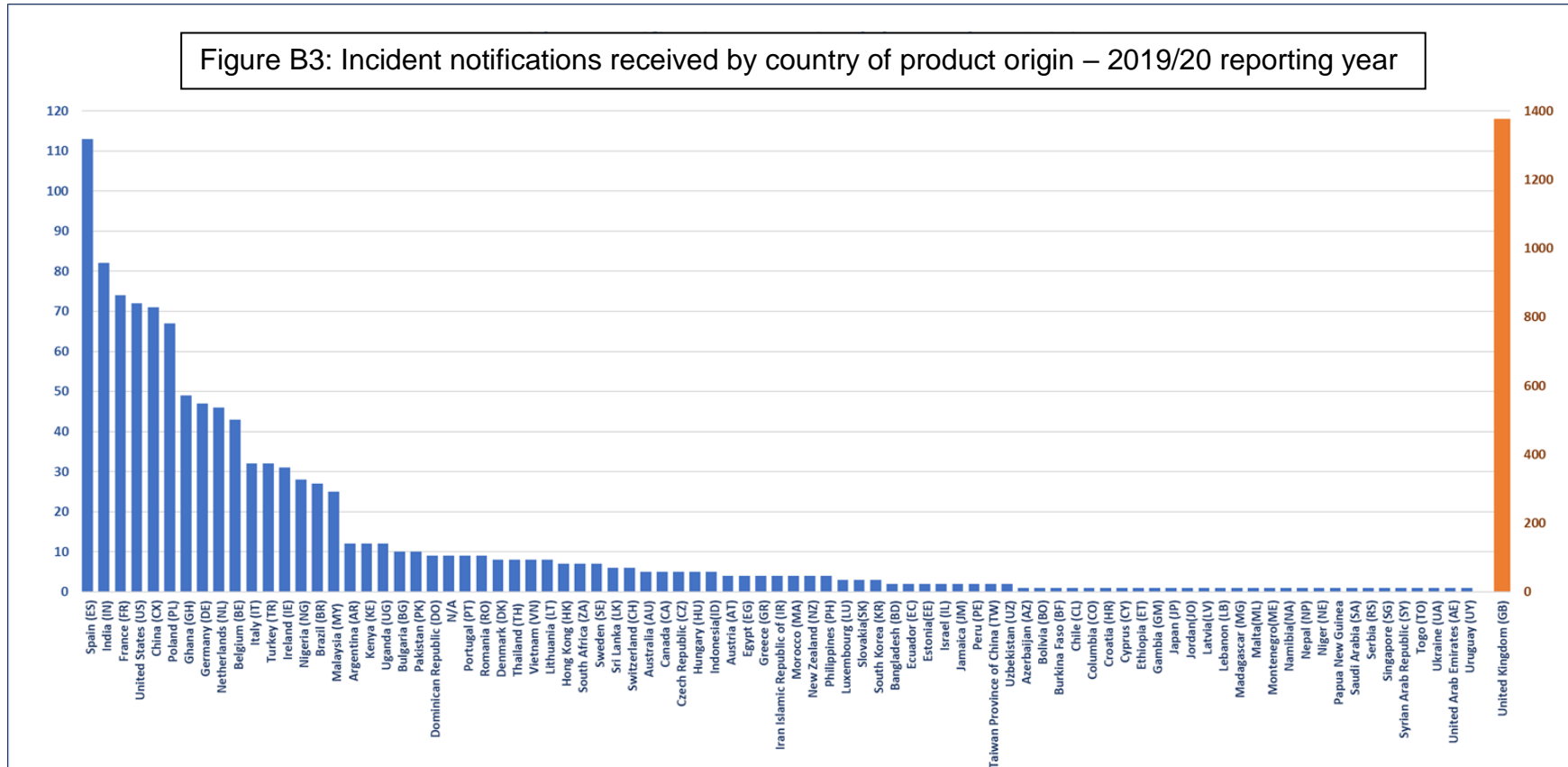


Figure B2: Incident notifications received by hazard category – 2019/20 reporting year



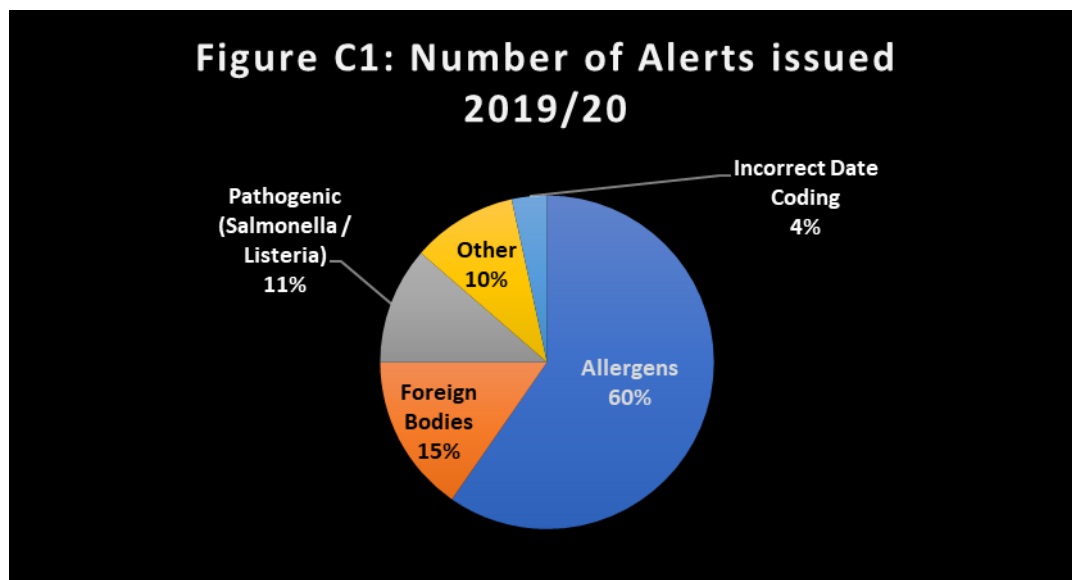
The numbers of incident notifications and alerts are only a measure of how many incidents that have been reported to the FSA. These numbers can be affected by many factors, including new consumer trends, technological developments, legislative changes, the amount of testing carried out, and even the weather.

The top 5 countries of origin of product involved in incident notifications during 2019/20 were Spain, India, France, United States and China (see Figure B3).

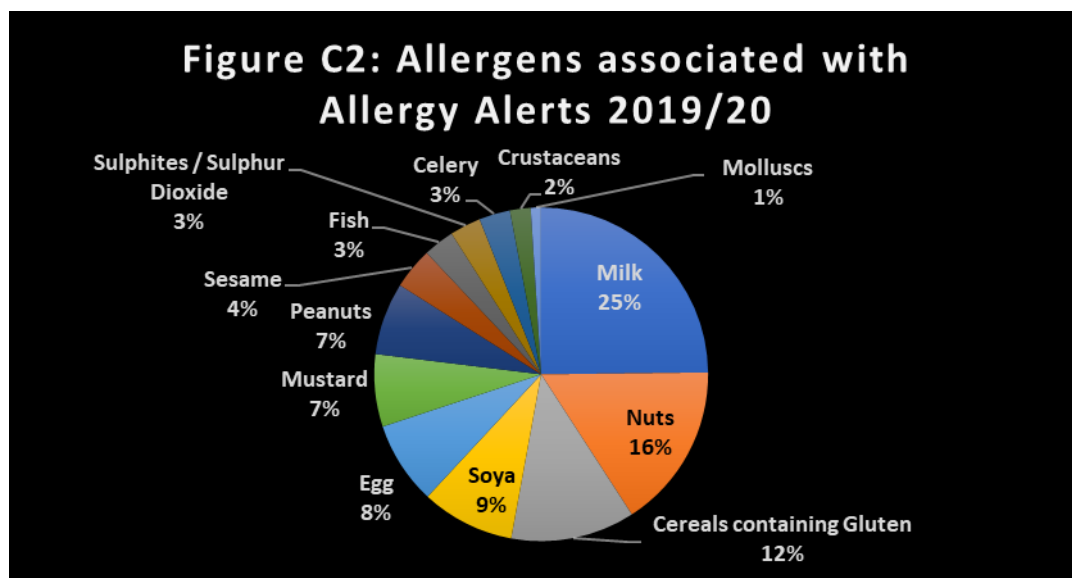


### ANNEX C: INCIDENT PREVENTION ACTIVITIES

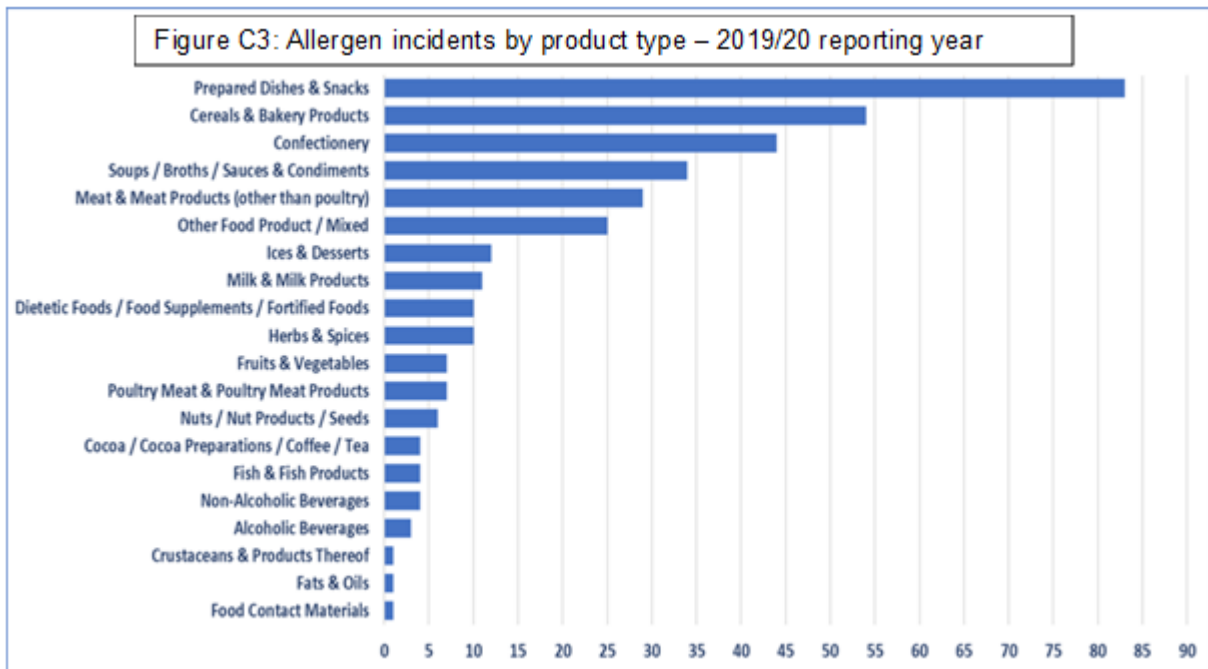
The top three hazards associated with alerts issued by the FSA in 2019/20 are allergens, foreign bodies and pathogenic bacteria (see Figure C1).



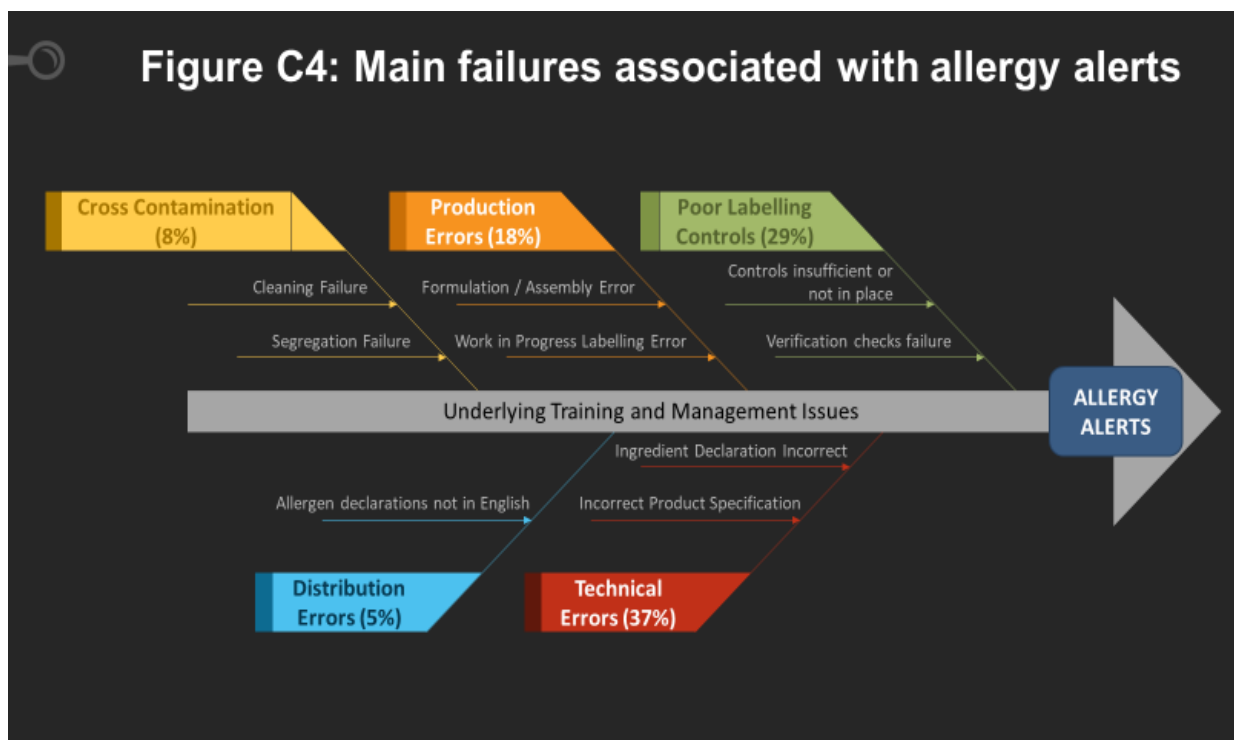
Allergy Alerts accounted for 60% of the total alerts issued in the reporting year. Milk, tree nuts and cereals containing gluten were associated with over 50% of the Allergy Alerts issued by the FSA in 2019/20 (see Figure C2).



Further analysis has shown that the most commonly associated foods with allergen incidents are prepared dishes and snacks, cereals and bakery products and confectionery (see Figure C3). These are generally more complex foods as they usually contain larger numbers of ingredients and in many cases are produced using more complicated processes offering more scope for error.



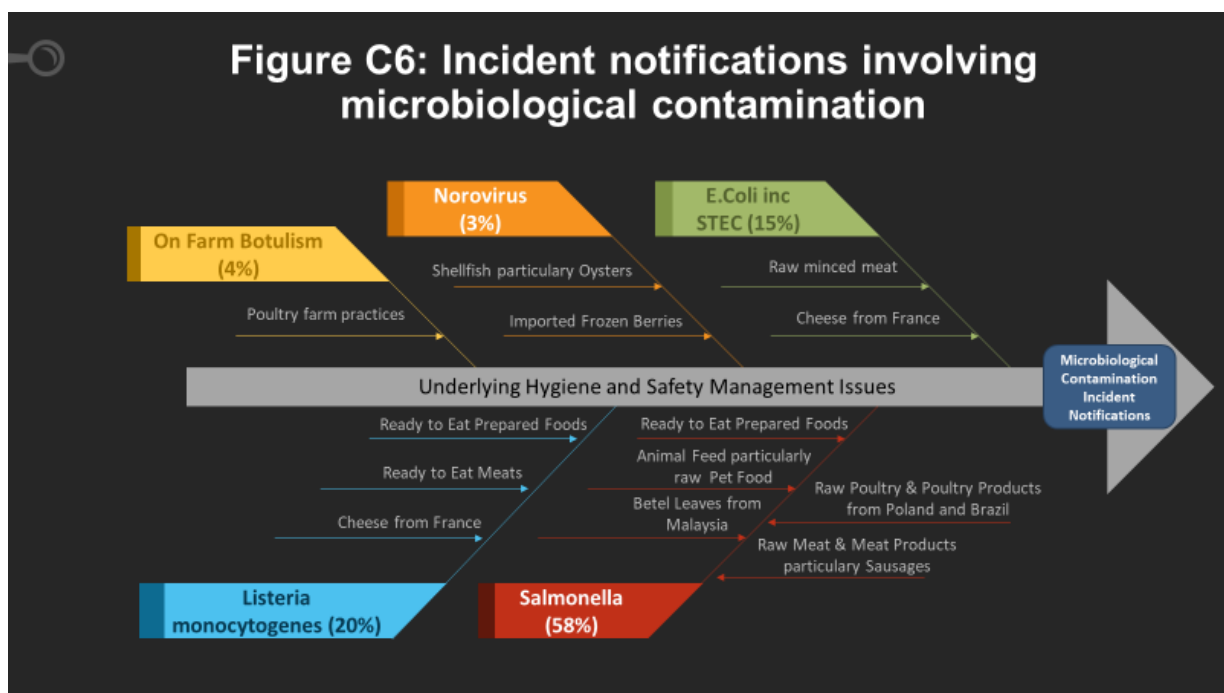
Earlier analysis indicates that technical errors, process control issues and labelling control errors are the major contributors although there are also underlying training and management issues. This type of analysis is helping to inform FSA policy decisions as well as providing direction for incident prevention activities (see Figure C4).



Using this information, we are identifying ‘best practices’ to prevent recurrence of incidents using tools such as Single Point Lessons (see Figure C5). This particular type of incident reoccurs regularly despite the fact that it should be relatively easy to eliminate if food safety management systems are working effectively.



In a similar manner, we have looked at the main types of incident notifications involving microbiological contamination. Salmonella predominates with 58% of incidents in this category involving this pathogen (see Figure C6).





Figures C7 and C8 show two further Single Point Lessons providing examples of best practice to help prevent recurrence of incidents by food businesses. Both examples are based on real incidents which show regular recurrence.

### C7: Single Point Lesson – Salmonella Contamination

WHY?	WHY?	WHY?	WHY?	WHY?
<b>01</b>	<b>02</b>	<b>03</b>	<b>04</b>	<b>05</b>
<b>Why did RTE houmous contain Salmonella?</b>	<b>Why did tahini contain Salmonella?</b>	<b>Why was tahini insufficiently processed?</b>	<b>Why was the risk of contamination not identified?</b>	<b>Why was the humous manufacturer unaware of the risk?</b>
Tahini (ground sesame seed paste) contaminated with Salmonella had been used to produce houmous	The tahini had been produced by a third-party supplier from sesame seeds which had not been sufficiently heat treated	The best quality tahini is slow roasted to optimise flavour. The supplier of this product had reduced processing time to command the highest market value	The houmous manufacturer was unaware of the process used to produce tahini	The tahini had been purchased from an unapproved supplier and the manufacturer did not appreciate that heat treatment was a critical control

**Best Practice: Understand your supply chain particularly the critical controls that are necessary – know your suppliers and their products**

As our work on incident prevention progresses, we plan to continue to add to these Single Point Lessons and establish a “gallery of best practice” for food businesses to refer to.

### C8: Single Point Lesson – Metal Contamination

WHY?	WHY?	WHY?	WHY?	WHY?
<b>01</b>	<b>02</b>	<b>03</b>	<b>04</b>	<b>05</b>
<b>Why was metal present in the product?</b>	<b>Why was the rejection system not functioning?</b>	<b>Why did the compressed air system fail?</b>	<b>Why was the compressed air system not maintained?</b>	<b>Why was there no preventive maintenance routine in place?</b>
The metal detector rejection system was not functional	The compressed air reject system operating the reject mechanism failed	The system was inadequately maintained	There was no preventive maintenance routine in place	The compressed air system had recently been purchased and routine maintenance requirements had not been assessed.

**Best Practice: New equipment introduced into the workplace should undergo a preventive maintenance assessment**

## REFERENCES

**<sup>1</sup> FSA Incident Management Plan** (accessible via):

<https://www.food.gov.uk/business-guidance/food-incidents>

**<sup>2</sup> Food Law Code of Practice**

<https://www.food.gov.uk/about-us/food-and-feed-codes-of-practice>

**<sup>3</sup> FSS Incident Management Plan**

[http://www.foodstandards.gov.scot/downloads/Food\\_Standards\\_Scotland\\_-\\_Non-routine\\_Incident\\_Management\\_Plan\\_-\\_May\\_2015.pdf](http://www.foodstandards.gov.scot/downloads/Food_Standards_Scotland_-_Non-routine_Incident_Management_Plan_-_May_2015.pdf)

**<sup>4</sup> FSA Response to COVID-19; FSA Board Paper June 2020**

<https://www.food.gov.uk/sites/default/files/media/document/fsa-20-06-04-fsa-response-to-covid-19.pdf>

**<sup>5</sup> HM Government; Our Plan to Rebuild - The UK Government's COVID-19 Recovery Strategy**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/884760/Our\\_plan\\_to\\_rebuild\\_The\\_UK\\_Government\\_s\\_COVID-19\\_recovery\\_strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/884760/Our_plan_to_rebuild_The_UK_Government_s_COVID-19_recovery_strategy.pdf)

**<sup>6</sup> Guidance for food businesses on coronavirus (COVID-19)**

<https://www.gov.uk/government/publications/covid-19-guidance-for-food-businesses/guidance-for-food-businesses-on-coronavirus-covid-19>

**<sup>7</sup> Welsh Government Guidance for meat and food plants on prevention and management of coronavirus (COVID-19)**

<https://gov.wales/guidance-meat-and-food-plants-prevention-and-management-coronavirus-covid-19>

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