



Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry

February 2019

Annex B

For all queries about this guidance — including if you require the information in an alternative format such as audio, large print or Braille — please use the number below.

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Draft

Summary

Intended audience:	<ul style="list-style-type: none"> • Food business operators (FBOs) • UK food enforcement authorities
Which UK nations does this cover?	England, Wales, Scotland and Northern Ireland
Purpose:	The purpose of this guidance is to assist FBOs in complying with food law and providing advice on roles, responsibilities and actions to take during food safety withdrawals and recalls.
Legal status:	This guidance sets out the legal requirements of Regulation (EC) No. 178/2002 and associated food law legislation. The guidance also includes best practice advice.
Key words	<ul style="list-style-type: none"> • Food law • Food withdrawals • Food recalls • Food safety • Traceability
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Revision history

This guidance follows the Government [Code of Practice on Guidance](#). If you believe this guidance breaches the Code for any reason, please let us know by emailing betterregulation@food.gov.uk. If you have any comments on the guidance itself, please call us using the contact number on page 2.

Revision No.	Revision date	Purpose of revision and paragraph number	Revised by

Draft

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Introduction

1. This guidance has been produced by the UK's Central Competent Authorities, the Food Standards Agency (FSA) with Food Standards Scotland (FSS), in association with members of working groups and a governing steering group, established as part of a UK project, to:
 - develop comprehensive UK guidance to clarify the roles, responsibilities and expectations of the key players involved in food withdrawals and recalls in the UK;
 - improve the accessibility and consistency of food recall information directed at consumers;
 - enhance business to business communications about food recalls and withdrawals; and
 - establish guidance on root cause analysis (RCA) procedures to be used by industry in the event of food withdrawals and recalls.
2. It replaces the FSA Guidance Notes for Food Business Operators on Food Safety, Traceability, Product Withdrawal and Recall produced in 2007¹.
3. Project group members included representatives from the food industry, trade bodies, consumer organisations and enforcement authorities (see Annexe A for membership).
4. FBOs are responsible for the safety of the food which they produce, distribute, store or sell and shall not place unsafe food on the market. They must ensure that the food they produce complies with food law. Food law requires FBOs to be able to trace the suppliers of their food and the business customers to whom they have supplied the food (i.e. one step forward and one step back) and to be able to remove unsafe food from the market should a food safety incident arise. FBOs should therefore have in place suitable traceability and food withdrawal/recall systems as part of their Food Safety Management System. FBOs may wish to seek advice from their enforcement authority, primary authority or a third-party consultant for assurance that any system developed for this purpose is appropriate and compliant.

¹ <https://www.food.gov.uk/sites/default/files/media/document/fsa1782002guidance.pdf>

Intended audience

5. The intended audience of this guidance is FBOs and UK food safety enforcement authorities.

Purpose and scope of guidance

6. The purpose of this guidance is to support FBOs and UK food safety enforcement authorities in establishing and implementing effective food withdrawal/recall systems to respond to food safety incidents. The guidance applies to all FBOs and aims to clarify and, where appropriate, standardise procedures to identify and remove unsafe food from the market.
7. The guidance outlines food law requirements and clarifies the roles, responsibilities and expectations of the key stakeholders involved in the withdrawal/recall of unsafe food in the UK.
8. The guidance sets out the requirements in relation to **food** safety incidents, in accordance with Regulation (EC) No. 178/2002. It does not include animal feed (including pet food). However, FBOs may wish to adopt the principles within this guidance when dealing with non-safety (non-compliant) related food incidents or animal feed incidents.

Legal status of guidance

9. This guidance has been produced to explain the legal requirements of Regulation (EC) No. 178/2002 in relation to food safety traceability and withdrawals and recalls. Advice on best practice has also been included.
10. It is **not** a legal requirement to follow best practice advice. To distinguish between the two types of information in this document, legal requirements are in bold and contained within text boxes whereas best practice advice is contained within shaded boxes with a heading of 'Best Practice'.
11. This guidance should be read in conjunction with Regulation (EC) No. 178/2002², the Food Safety Act 1990³, associated domestic food law

² <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:02002R0178-20180701&qid=1530528430965&from=EN>

³ <https://www.legislation.gov.uk/ukpga/1990/16/contents>. Equivalent legislation in NI is The Food Safety (NI) Order 1991 - <http://www.legislation.gov.uk/nisi/1991/762/contents/made>

legislation⁴, EU Food Hygiene Regulations⁵, domestic food hygiene regulations⁶ and other established official guidance.

12. The advice in this guidance on legal requirements cannot cover every situation and FBOs may need to refer to the relevant legislation to see how it applies in any given circumstance. FBOs with specific queries may wish to seek the advice of enforcement authorities or seek their own legal advice.

⁴ The General Food Law Regulations 2004 in Scotland and Wales -<http://www.legislation.gov.uk/uksi/2004/3279/contents/made> the Food Safety and Hygiene (England) Regulations 2013 in England-

<http://www.legislation.gov.uk/uksi/2013/2996/schedule/9/made> and the General Food Regulations (NI) 2004 in NI -

<https://www.legislation.gov.uk/nisr/2004/505/contents/made>

⁵ Regulation (EC) No.s 852/2004 – <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02004R0852-20090420&qid=1545304105490&from=EN>

Regulation (EC) No. 853/2004 - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02004R0853-20171121&qid=1545304143432&from=EN>

Regulation (EC) No. 854/2004 – <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02004R0854-20170101&qid=1545304202861&from=EN>

Regulation (EC) No. 2073/2005 - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02005R2073-20180101&qid=1545304256862&from=EN>

⁶ the Food Safety and Hygiene (England) Regulations 2013 - <http://www.legislation.gov.uk/uksi/2013/2996>, the Food Hygiene (Wales) Regulations 2006 - <http://www.legislation.gov.uk/wsi/2006/31/made>, the Food Hygiene Regulations (Northern Ireland) 2006 -<http://www.legislation.gov.uk/nisr/2006/3/contents/made> and the Food Hygiene (Scotland) Regulations 2006

<http://www.legislation.gov.uk/ssi/2006/3/contents/made>

Definitions

13. A full list of comprehensive and legal definitions is provided in Annexe B. In addition, simplified definitions of the key terms that are routinely used throughout the guidance have been produced and these are outlined below:

'consumer' means a member of the public who purchases food or drink for personal use;

'consumer organisation' means an organisation that has a role in keeping their members/ supporters informed of relevant food safety issues. Examples include Coeliac UK, Allergy UK and Anaphylaxis Campaign;

'business customer' means a food business who buys food from another food business;

'enforcement authority' means local or port health authority, FSA, FSS or the Department of Agriculture, Environment and Rural Affairs in NI, depending on the type of food business;

'food' means all processed or unprocessed food, including drink. It does not include animal feed or pet food;

'food business operator (FBO)' means a food processor, manufacturer, distributor, wholesaler, broker, agent, importer, exporter, retailer (including caterer/out of home business) or any charity organisation providing food;

'food withdrawal/recall plan' means a written document detailing the FBOs system for withdrawing or recalling unsafe food;

'food (safety) incident' means an event where there are concerns about actual or suspected threats to the safety of food that could require intervention to protect consumers' interests;

'food waste' means food that is not intended for human consumption due to it being unsafe or unfit for human consumption;

'recall' means the process by which food is removed from the supply chain **and** consumers are advised to take appropriate action, for example to return or dispose of the food;

'retail' means the handling, processing and storage of food at the point of sale or delivery to the consumer;

Retail can be further categorised to cover:

- **'food retailers'** means businesses that sell food to consumers, such as supermarkets, but covers any other business that sells or gives food to consumers (e.g. newsagents, pharmacies, gyms, online stores); and

- **'out of home'** means all businesses carrying out catering, including pubs, restaurants, leisure, cafes, hotels, fast foods, mobile vendors, public sector catering and food service sector;

'root cause analysis' means a method of problem solving used to identify the cause of the food incident;

'traceability' means the ability to trace and follow a food and drink, through all stages of production, processing and distribution;

'unsafe food' means food that may cause illness or physical harm if consumed, e.g. food contaminated with pathogenic (food poisoning) bacteria or food that has inadequate allergen information;

'withdrawal' is the process by which a food is removed from the supply chain, where the food has not reached the consumer.

Traceability

14. Traceability is a means to identify food in the event of a food safety incident.

An effective traceability system allows for corrective actions to be taken efficiently and effectively should an incident occur. It enables FBOs to target any withdrawals and/or recalls, to give information to enforcement authorities and can help minimise the level of disruption and scale of the withdrawal/recall to the business.

Legal requirements: Article 18 of Regulation (EC) No. 178/2002

FBOs must be able to identify who has supplied them with food, food producing animals, or any substance intended or expected to be incorporated into food products and to whom they have supplied food products (one step forward and one step back in the supply chain). Food must be labelled or adequately identified by FBOs to facilitate traceability.

FBOs are legally required to:

- **identify their suppliers of food, food-producing animals and any other substance intended to be or expected to be incorporated into food;**
- **identify the business customers to whom they have supplied products; and**
- **produce this information to the enforcement authorities on demand.**

NOTE: FBOs are not required to keep records of sales to the final consumer.

Best Practice

It is recommended that FBOs trade with suppliers and business customers who also have effective traceability systems and procedures in place.

Each segment of the supply chain should be able to quickly trace all the foods received and dispatched (one step forward and one step back). For manufacturers of food, this will include being able to quickly trace, as required, the ingredients and packaging materials used to manufacture the finished products they distribute and/or sell.

Key Steps in Developing Food Traceability Systems

15. The following information details the various steps involved in developing an effective food traceability system.

Step 1. The system

FBOs are legally required to record information on the traceability of food purchased from suppliers and sold to business customers (this does not include food that is sold directly to the consumer). This information is detailed below and can often be found on a variety of documents, including invoices or delivery documents.

Step 2. Defining batches of food

Defining batches of food is essential for good traceability. In the event of a food safety incident Regulation (EC) No. 178/2002 considers a whole batch, lot or consignment unsafe unless demonstrated otherwise.

In defining the scope of a food withdrawal/recall, FBOs must be able to demonstrate the reasons for limiting the withdrawal/recall to certain batches and that other batches are not unsafe.

Step 3. Traceability information

Traceability information for food (one step forward and one step back in the supply chain) is required by law. The following information should be recorded:

- name and address of supplier/business customer;
- details of product, to enable its identification, and quantity in which supplied;
- the date of the transaction and delivery.

FBOs may wish to use the template document in Annexe C to record the required information.

In addition to the above, all FBOs that handle *products of animal origin (POAO)* or *sprouted seeds* **must** also comply with more specific traceability requirements⁷. These are outlined in Annexe D.

Additional information, such as internal process traceability can be recorded as a matter of best practice.

Best Practice

Effective traceability systems will also include internal traceability within a business.

Process traceability information

Process traceability, or internal traceability, is the traceability of food within the business' own operations. The following process traceability information may be recorded as best practice:

- identification of a product batch;
application of a unique batch code identifier to all packs of that particular batch and internal documentation;
- recording of batch codes of all ingredients used in the production of that batch of product;
- recording of production and quality information relating to the product batch – examples would include:
 - product name
 - product batch code

⁷Commission implementing Regulation (EU) No 931/2011 <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1540286809065&uri=CELEX:32011R0931>. Commission Implementing Regulation (EU) No 208/2013 <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1540286887876&uri=CELEX:32013R0208>

- date of production
- time of start and end of production (where appropriate)
- saleable product size
- food contact packaging
- number of packs per case
- number of cases
- linking the product batch code to all raw materials used in its production

Step 4. Record Keeping

Legal requirements: Article 18 of Regulation (EC) No. 178/2002

Traceability records must be made available to the enforcement authority on demand.

To ensure that an effective food withdrawal/recall can be implemented in the event of a food safety issue, FBOs must record traceability information. It is for FBOs to decide how long they keep their traceability records; however, the period should be appropriate for the nature of the food, its product life, and the circumstances under which they might be required to produce records. When information can be retrieved quickly in the case of a food safety incident, the higher the chance of protecting public health and avoiding reputational damage to the business.

Best Practice

As a minimum, FBOs should keep traceability records for pre-packed foods for the shelf life of the food plus 12 months. Traceability requirements for foods pre-packed for direct sale, loose foods and foods served as a meal should be considered on a case by case basis, in consultation with the enforcement authority.

Food retailers are not required to keep records of sales to the consumer (since consumers are not food businesses). Wholesalers supplying to retail outlets are required to keep records. Where a retailer knows that it is supplying directly to

another food business, e.g. a catering outlet, traceability requirements must be adhered to. Caterers, such as restaurants, must keep traceability records of food supplied to them but are not required to keep records of food sold to consumers because consumers are not food businesses.

Step 5. Reviewing traceability systems

It is important that FBOs review their traceability systems to ensure that they remain effective, and that information can be easily retrieved in a timely manner.

Best Practice

FBOs should review their traceability systems on an annual basis. It is recommended that checks are carried out on supplier and business customer traceability (customer traceability n/a for FBOs selling directly to consumers).

Making a decision to withdraw or recall food

Legal requirements: Articles 14 and 19 of Regulation (EC) No. 178/2002

Food shall not be placed on the market if it is unsafe.

In determining whether any food is unsafe, regard shall be had:

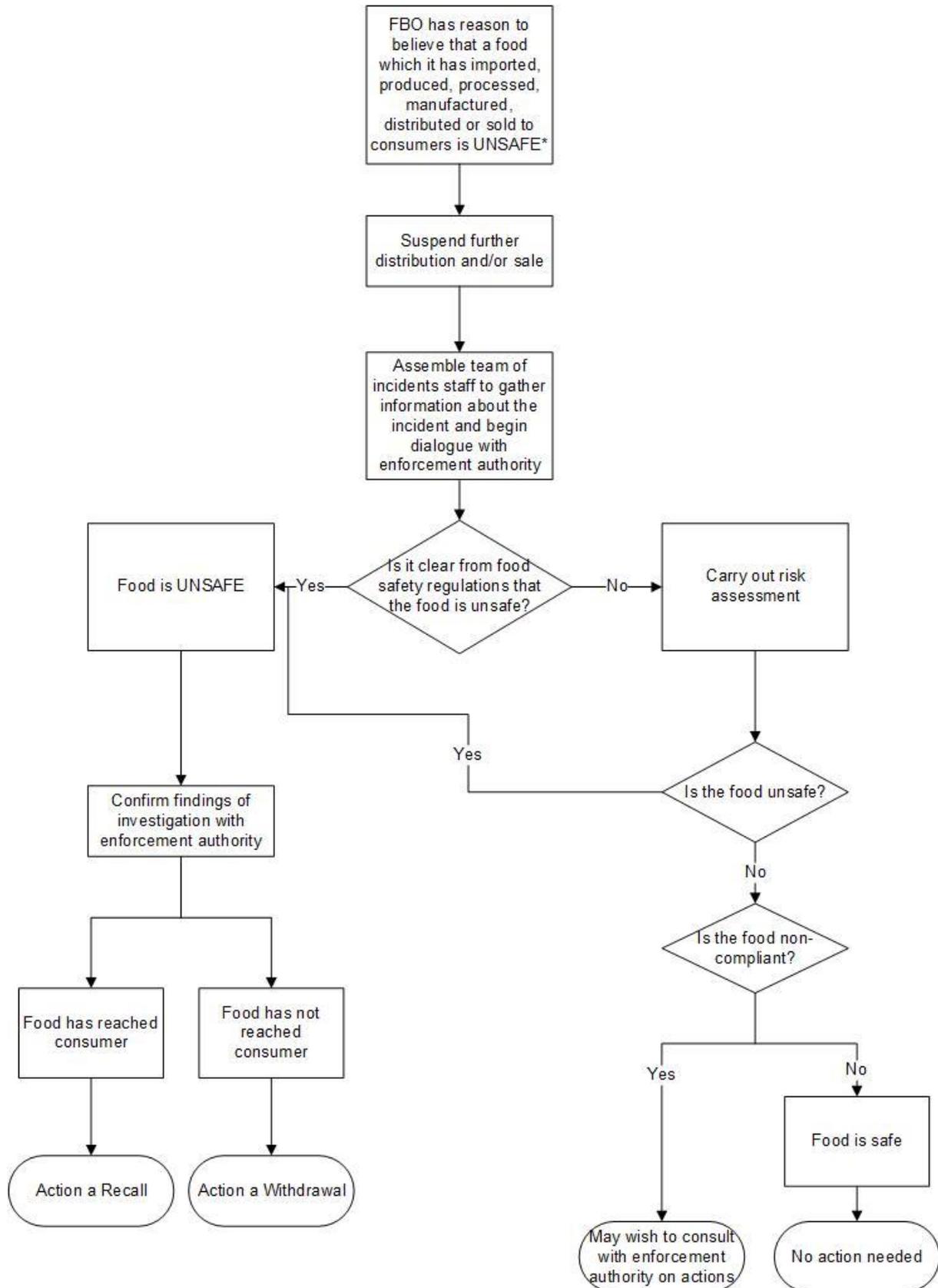
(a) to the normal conditions of use of the food by the consumer and at each stage of production, processing and distribution, and

(b) to the information provided to the consumer, including information on the label, or other information generally available to the consumer concerning the avoidance of specific adverse health effects from a particular food or category of foods.

If a FBO considers or has reason to believe that a food which it has imported, produced, processed, manufactured or distributed is not in compliance with the food safety requirements, it shall immediately initiate procedures to withdraw the food from the market where the food has left the immediate control of that initial FBO and inform the competent authorities.

Where the product may have reached the consumer, the operator shall effectively and accurately inform the consumers of the reason for its withdrawal, and if necessary, recall from consumers products already supplied to them when other measures are not sufficient to achieve a high level of health protection.

16. In the event of a food incident, FBOs are required to determine if the food is unsafe and whether a withdrawal and/or recall is necessary.
17. FBOs who initiate a food withdrawal/recall as a result of a food safety incident must notify their enforcement authority immediately with details of the incident (nature of the problem, food affected, quantity etc) and of the action taken or proposed to prevent the risk.
18. The decision tree below and the questions in Annexe E outline a process for establishing if food is unsafe and the necessary actions to take.



*The above process may also be followed for non-safety related food incidents

Performing a risk assessment

19. FBOs may be able to quickly identify that a food is unsafe due to certain food safety regulatory limits being exceeded, however if this is not the case a risk assessment may need to be carried out to establish the level of adverse effect a food can have on consumers.
20. FBOs are required to carry out risk assessments and make decisions regarding the safety of the food. Technical expertise is required in carrying out a risk assessment to understand the hazards involved and the adverse effects that can arise. FBOs may need to seek advice from technical experts and are advised to work with their enforcement authority to determine the information needed and the steps necessary to carry out an effective risk assessment. In all situations, FBOs should liaise with the enforcement authority without delay to determine the appropriate action that needs to be taken.
21. A risk assessment should include the following:
- hazard identification: identifying known or potential health effects associated with a particular food;
 - hazard characterisation: the qualitative and/or quantitative evaluation of the nature of the adverse effect;
 - exposure assessment: the qualitative and/or quantitative evaluation of the likely intake of the particular food; and
 - risk characterisation: the integration of hazard identification, hazard characterisation and exposure assessment to estimate the risk and its associated uncertainties.
22. As part of the risk assessment, consideration should also be given to the target consumer group of the food and the potential risk and sensitivities associated with that group in consuming that food.
23. An example of how a risk assessment could be conducted is outlined in Annexe F.
24. FBOs should record the outcomes from their risk assessment and supporting evidence as this will assist in determining the need for and extent of a withdrawal/recall.

Roles and responsibilities of key players

25. The roles and responsibilities of key stakeholders involved in the withdrawal/recall of unsafe food are outlined below. Roles and responsibilities are outlined for FBOs, depending on where they are in the chain when a food safety incident occurs, regulators and consumer organisations.

FBOs initiating a food withdrawal/recall

26. **Any** FBO in a food supply chain could be responsible for initiating a food withdrawal/recall, depending on where in the chain the food safety incident is identified. Examples may include producers, processors or manufacturers. There may be more than one FBO involved and FBOs may need to refer to commercial agreements with brand owners regarding roles and responsibilities.

27. The table below outlines the actions to be taken by FBOs initiating a food withdrawal/recall as a result of a food safety incident:

Actions	Withdrawal	Recall
If appropriate, liaise with the supplier who has supplied the unsafe food to establish withdrawal/recall procedures	✓	✓
Immediately notify their enforcement authority, FSA/FSS and business customers, providing information about the food safety incident, why the food is being withdrawn (if the unsafe food has not yet reached the consumer) or recalled (if the unsafe food has reached the consumer) and action taken/proposed	✓	✓
Provide advice to business customers on action to be taken to withdraw/recall food	✓	✓
Prepare 'Point of Sale' (POS) recall notifications for consumers and send it to all relevant business customers	n/a	✓
Keep all relevant parties informed throughout the withdrawal/recall process	✓	✓
Make arrangements with business customers for the return/disposal of the unsafe food	✓	✓
Ensure unsafe food is clearly identified, handled, re-worked/re-labelled effectively (if salvageable) or disposed of in accordance with corresponding waste requirements	✓	✓
Maintain appropriate records and monitor the withdrawal/recall process	✓	✓
Carry out a review to determine the cause of the food safety incident (e.g. RCA) and implement corrective measures to be shared with the enforcement authority	✓	✓
Review the effectiveness of the withdrawal/recall and document the outcomes and any action points	✓	✓

Best Practice

FBOs that initiate a food withdrawal/recall should check that the information has been received by business customers and action is being taken to withdraw/recall the food.

FBOs receiving notification of a food withdrawal/recall (excluding retailers)

28. FBOs that have received notification from a FBO who has decided to initiate a food withdrawal/recall may include distributors, importers, wholesalers and brokers (retailers are covered in the section below).

29. The table below outlines the actions to be taken by FBOs who have been notified of a food withdrawal/recall:

Actions	Withdrawal	Recall
Liaise with the FBO initiating the withdrawal/recall in relation to the affected food and remove the affected batch of unsafe food from the supply chain, ensuring it is clearly identified and kept separate from non-affected food	✓	✓
Contact business customers that have received the affected food from them and provide advice on withdrawal/recall action. This advice should be in line with the information received from the FBO initiating the withdrawal/recall	✓	✓
Send POS recall notification to business customers as received from FBO initiating the recall	n/a	✓
Return the affected food to the FBO or dispose of it, if requested and in accordance with corresponding waste requirements (taking direction from the FBO who has initiated the withdrawal/recall)	✓	✓

Retailers

Retailers (including out of home businesses selling prepacked food)

30. This section is for retailers, where activity is limited to purchasing food products and selling them directly to the consumer. It also includes caterers, where prepacked food is sold to take away.

31. Where retailers sell a branded product that is subject to withdrawal/recall, they should co-operate as necessary with the FBO responsible for the management of the incident.

32. The table below outlines the actions to be taken by retailers:

Actions	Withdrawal	Recall
Remove all unsafe food from sale and ensure it is stored separately from other non-affected food	✓	✓
Inform consumers of a recall (where appropriate using material provided by FBO initiating the recall) and facilitate the retrieval of the unsafe food	n/a	✓
Accept returns of the affected food from consumers, clearly identify and store such food separately from non-affected food	n/a	✓
Return the affected food to the FBO or dispose of it, if requested and in accordance with corresponding waste requirements (taking direction from the FBO who has initiated the withdrawal/recall)	✓	✓

Out of Home sector (caterers)

33. Out of home businesses must ensure that unsafe food is not sold or served to consumers as part of the food service.

34. The table below outlines the actions to be taken by FBOs in relation to food served in service:

Actions	Withdrawal	Recall
Ensure that the unsafe food is removed, clearly identified, kept separately from non-affected food and not used in service	✓	n/a
Return the affected food to the FBO or dispose of it, if requested and in accordance with corresponding waste requirements (taking direction from the FBO who has initiated the withdrawal/recall)	✓	n/a

Best Practice

All FBOs should keep records of actions taken during a food withdrawal/recall.

Enforcement Authorities

35. The main role of enforcement authorities is to protect public health and verify FBO compliance with food law. Enforcement authorities are responsible for:
- setting up and implementing a documented procedure for dealing with food incidents within their area;
 - providing advice to FBOs in a timely manner to assist in risk assessment and control measures regarding the food safety incident;
 - providing advice on withdrawal/recall actions to be taken;
 - checking that FBOs have removed affected food from sale and have issued a consumer notification to recall any affected food that has been sold to consumers, as appropriate;
 - liaising with the primary/home authority, if appropriate, in exercising regulatory functions;

- overseeing the re-working/re-labelling or disposal of the unsafe food (in line with the requirements laid down in the Food Law Code of Practice⁸ or the Manual of Official Controls⁹ (or equivalent));
- notifying FSA/FSS, when required, via FSA/FSS incidents team mailbox, direct contact or FSA/FSS website¹⁰;
- ensuring that FBOs take action in accordance with any advice issued by FSA/ FSS;
- verifying that food businesses have carried out a review to determine the cause of the food safety incident and have implemented corrective actions that are shared with FSA/FSS.

36. Enforcement authorities are responsible for taking the appropriate enforcement action if FBOs are not complying with food law. In accordance with Article 54 of Regulation (EC) No. 882/2004¹¹, enforcement authorities have the power to order a withdrawal/recall of a food if FBOs do not fulfil their legal obligations regarding the safety of food. The authority also has the power to detain, seize and destroy food deemed unsafe.

Primary and Home authorities (where applicable)

37. The role of a Primary/Home authority is to:

- work in partnership with FBOs or with a co-ordinator supporting a group of FBOs (e.g. trade associations) to co-ordinate their regulation and support compliance, including providing advice when dealing with food incidents;
- act as a key point of contact in respect of a Primary/Home Authority partner FBO and source of information for FBOs, co-ordinators and local authorities;

⁸ England Food Law CoP - https://signin.riams.org/files/display_inline/45497

Wales Food Law CoP - https://signin.riams.org/files/display_inline/48645/Wales-Food-Law-Code-of-Practice---August-2018-02082018.pdf

NI Food Law CoP – https://signin.riams.org/files/display_inline/45498

FSS Food Law CoP – <http://www.foodstandards.gov.scot/publications-and-research/food-law-code-of-practice-2015>

⁹ FSA England and Wales MOC - <https://www.food.gov.uk/business-guidance/manual-for-official-controls>

DAERA VPHP MOC - <https://www.daera-ni.gov.uk/publications/manual-official-controls-vphp>

FSS MOC - <https://www.foodstandards.gov.scot/publications-and-research/publications/manual-for-official-controls>

¹⁰ England - FoodIncidents@food.gov.uk / Tel: 020 7276 8448, Wales - Wales.FoodIncidents@food.gov.uk / Tel: 02920 678961,

NI - incidents.ni@food.gov.uk / Tel: 02890 417700, Scotland - incidents@fss.scot / Tel: 01224 288379

FSA website - <http://www.food.gov.uk/enforcement/enforcework/report>

FSS website - <http://www.foodstandards.gov.scot/business-and-industry/safety-and-regulation/food-incidents>

¹¹ Regulation (EC) No. 882/2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules - <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02004R0882-20180701&qid=1545159845271&from=EN>

- provide support to local authorities to determine actions to be taken when dealing with food incidents;
- guide local authorities on how they interact with partnering FBOs.

Central Competent Authorities (FSA and FSS)

38. FSA and FSS have the responsibility for public health protection and are the central competent authority for food safety in the UK. FSA and FSS have a role in:

- co-ordinating national and international food withdrawals/recalls – being the central point of contact;
- co-ordinating activities in the case of unsafe food being exported from the UK to other countries;
- liaising with relevant enforcement authorities/primary authority regarding food withdrawals/recalls;
- liaising with other relevant stakeholders, as required, during food incidents;
- overseeing the risk assessment and risk management of food safety incidents, where appropriate;
- providing information to the public about the food recall on its website, via email/SMS alert and social media;
- where appropriate, providing information to the public about a food safety withdrawal.

Consumer organisations

39. Consumer organisations have a role to play in ensuring their members/supporters are kept informed on issues of interest to them, including food incidents that may often pose a risk to their health.

40. On receipt of a notification of a food recall relating to their area of interest, consumer organisations can:

- issue an email alert to signed up members/supporters;
- provide information on food recall and necessary action on their website;
- publish information about the food recall on social media.

Food withdrawal/recall plan

41. There are a number of actions that often need to be carried out simultaneously during a food withdrawal/recall, so advance planning is essential.
42. A withdrawal/recall plan can help FBOs when dealing with food incidents. It can include procedures and documentation that can facilitate an effective food withdrawal/recall.

Best Practice

It is good practice for FBOs to develop a food withdrawal/recall plan as part of their Food Safety Management System. An example of a food withdrawal/recall plan may include procedures and documentation covering the following:

- list of team members involved in implementing the plan;
- definition of their roles and responsibilities;
- contact details;
- notification procedures;
- communication templates;
- food incident log;
- testing/review procedures.

Establishing a team to deal with food withdrawals/recalls

43. Depending on the size and complexity of the food business, there may be one or more people involved in dealing with food withdrawals/recalls. The following areas of the business could be represented, where applicable:

- business owner;
- production;
- quality/technical;
- engineering/maintenance;
- planning;

- purchasing;
- accounts;
- sales/marketing;
- legal;
- distribution;
- public relations/media.

44. It may be the case that some of the above inputs will be provided from outside the business, e.g. legal advice and expert technical help. The team will be responsible for managing food withdrawals/recalls and developing, implementing, managing, evaluating and updating the withdrawal/recall plan.

Team roles and responsibilities

45. To ensure the effective withdrawal/recall of unsafe food, all team members involved in managing food incidents should be clear about their roles and responsibilities, which can be detailed in the food withdrawal/recall plan. An example diagram is outlined in Annexe G.

Best Practice

Team members should be appropriately trained in dealing with food safety incidents.

Contacts list

46. It is important that an up to date contact list of internal and external contacts is maintained in the food withdrawal/recall plan. FBOs should take into account data protection requirements for obtaining, storing, handling and disposing of personal data.

47. The following contact details are examples of what should be recorded (main contacts plus deputies):

- senior management;
- team members dealing with food incidents;
- suppliers of all food products;

- business customers;
- hauliers/depots/cold stores;
- sources of technical advice and support;
- enforcement authorities;
- consumer organisations.

48. It is often the case that food incidents occur outside of normal business hours, so it would also be helpful to retain out of hours contact details. An example contact list is outlined in Annexe H.

Notification procedures

49. When FBOs make a decision to withdraw/recall a food, it must be communicated in a timely manner to be effective. Notification procedures should be outlined in the withdrawal/recall plan.

50. FBOs are required to notify:

- enforcement authorities and the FSA/FSS;
- suppliers and business customers;
- consumers (only in the case of a recall, when the unsafe food has already been sold to the consumer).

Best Practice

FBOs should notify the relevant consumer organisations, as appropriate, when food is being recalled.

Allergy UK (all 14 allergens)¹²

Anaphylaxis Campaign (all 14 allergens)¹³

Coeliac UK (gluten and wheat)¹⁴

¹² <https://www.allergyuk.org/>

¹³ <https://www.anaphylaxis.org.uk/>

¹⁴ <https://www.coeliac.org.uk/home/>

Notification to enforcement authorities

Legal requirements: Article 19 of Regulation (EC) No. 178/2002

A FBO must immediately inform the competent authorities if it considers or has reason to believe that a food which it has placed on the market may be injurious to human health. Operators shall inform the competent authorities of the action taken to prevent risks to the final consumer.

51. FBOs must notify enforcement authorities and FSA/FSS. Support and advice from the authorities will be advantageous to the business from the outset of a food incident. The following information should be provided by the FBO:

- food business details;
- description of food safety incident;
- description of product, including:
 - type of product;
 - product name;
 - brand name;
 - batch codes/durability dates;
 - product size and type of packaging;
 - country of origin of the product;
- distribution details, including:
 - manufacturers details, import and export details, where applicable;
 - list of business customers supplied to;
 - quantities, batch codes and pack sizes sent to each business customer;
 - when first placed on the market and whether the food has reached consumers;
- actions taken or proposed.

NOTE: Notification should not be delayed if all information is not readily available.

52. An example communication template for notifying the enforcement authority is provided in Annexe I. FSA¹⁵/FSS¹⁶ reporting mechanisms should be used.

¹⁵ <http://incidents.foodapps.co.uk/login.aspx>

¹⁶ <https://www.foodstandards.gov.scot/business-and-industry/scottish-food-crime-and-incidents-unit/food-incidents/reporting-a-food-incident-guidance>

Notification to suppliers and business customers

53. FBOs must notify suppliers and affected business customers of the food incident and the actions to be taken in handling the affected food (e.g. return or destroy). Procedures should be set up to outline methods of communication to ensure that unsafe food is removed from the supply chain and recalled from consumers if it has been sold. See Annexe J for best practice guidance on trade notifications.

Notification to consumers

Legal requirements: Article 19 of Regulation (EC) No. 178/2002

Where an unsafe product may have reached the consumer, the FBO must effectively and accurately inform the consumers of the reason for its withdrawal, and if necessary, recall from consumers products already supplied to them.

54. If FBOs identify or have reason to believe that unsafe food has reached consumers, they are required to accurately inform consumers of the reasons for its removal from the market and the action to be taken. Information provided to consumers should be accurate and the communication method effective in informing them of the food recall and action to take. See Annexe K for key principles and best practice templates that may be used by FBOs when communicating with consumers.

Food incident log

55. A food incident log is a useful document for food businesses to capture all relevant information regarding a food withdrawal/recall. An example log can be found in Annexe L.

Best Practice

FBOs should log details of the incident, food product(s), conversations, decisions made, and actions taken. Communications can be logged by the team managing the incident and kept within the withdrawal/recall plan.

Review and testing of food withdrawal/recall plan

56. A way of ensuring that suitable systems and procedures are in place to deal with a food safety incident is to carry out a periodic review and testing of the plan and procedures.

Best Practice

FBOs should review a food withdrawal/recall plan and its procedures on an annual basis. This could include a mock exercise, involving business customers (including retailers), as it is easier to challenge and audit the plan following a mock exercise than during a real-life situation.

Managing a Food Withdrawal/recall

57. Once a decision has been made to initiate a food withdrawal/recall there are a number of key aspects that need to be considered to manage this process, including:

- information management;
- monitoring progress of a food withdrawal/recall;
- closing a food withdrawal/recall;
- media management;
- handling of the unsafe food;
- reviewing the food withdrawal/recall; and
- RCA.

Information Management

58. It is essential for FBOs to gather information regarding the food safety incident, including food details, the nature of the hazard and the extent of the problem so that effective decisions can be made.

59. This information can come from a variety of sources, both internal and external, including:

- production records;
- sales records;
- employees;

- suppliers;
- business customers;
- audit;
- sampling analysis;
- complaints; and
- enforcement authorities.

60. FBOs should collate the relevant information and keep it together as it may be requested by the enforcement authority. It is important to ensure adequate back up of stored information.

Monitoring progress of a food withdrawal/recall

61. In order to monitor the progress of the withdrawal/ recall, FBOs should attempt to reconcile food removed from the market against known quantities of affected food distributed. By monitoring the quantity of product removed from the market this will give information about any additional actions that may be required to re-iterate the messages or to indicate when the withdrawal/ recall has been completed.

62. FBOs should keep enforcement authorities and business customers updated throughout the incident.

Closing a food withdrawal/recall

63. FBOs should work with enforcement authorities in determining when a food withdrawal/recall can be closed, but consideration should be given to the level of public health risk and the mitigating action that has been taken to protect this risk.

64. FBOs will benefit from formally closing the withdrawal/recall and advising the enforcement authority that the incident has ended and the reason for closure.

Handling of unsafe food

65. After a food withdrawal/recall, FBOs may have unsafe food that will need to be dealt with.

66. To ensure the control of unsafe food, FBOs should consider the following:

- keeping unsafe food at a central site;
- storing unsafe food away from non-affected food in a quarantined area;
- labelling of quarantined food; and
- maintaining accurate traceability and disposal records of recovered unsafe food.

Making unsafe food safe

67. It may be possible for FBOs to re-work or re-label unsafe food that enables it to become compliant with food law. FBOs should seek agreement from their enforcement authority before any food that has been previously recalled or withdrawn is re-worked or re-labelled.

Disposal of unsafe food

68. If it is not possible to make the unsafe food safe, it will be determined as food waste. If the unsafe food contains POAO, FBOs should be aware of the requirements laid down in the Animal By-Product Regulations¹⁷.

69. Waste must be clearly identified and disposed of in a secure and controlled manner, in accordance with Animal By-Products Regulations or other relevant waste disposal legislation. FBOs should have regard to any required certification that needs completing.

70. For more information on the disposal of waste, please contact the relevant waste enforcement body.¹⁸

71. FBOs may wish to seek advice from their enforcement authority regarding the handling of withdrawn or recalled food.

Reviewing the food withdrawal/recall

72. Each food withdrawal/recall that is initiated must be reviewed to assess the effectiveness of the FBO's actions. If a food business has developed a food withdrawal/recall plan the review may be done in accordance with its review procedure, but should consider:

¹⁷ Regulation (EC) No. 1069/2009 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02009R1069-20140101&from=EN>

¹⁸ DEFRA in England and Wales, DAERA in NI and SEPA in Scotland.

- robustness of the withdrawal/recall plan and procedures;
- effectiveness of communications;
- timeliness of actions taken;
- roles and responsibilities;
- incident log;
- appraisal of decisions made;
- timelines;
- future improvements.

Root Cause Analysis

73. Following a food safety incident, FBOs are advised to undertake a RCA to determine the reason(s) why the food withdrawal or recall occurred. This will enable the identification of corrective actions which, in turn, will help to mitigate reoccurrence of the food safety incident.

74. RCA is a method that can be used to determine how and why food safety issues occur, allowing more effective long-term preventative actions to be identified and applied. The analysis performed should identify the initial cause that led to the food withdrawal/recall and the stage at which intervention could be implemented to prevent future recurrence.

Best Practice

Different tools can be used when performing RCA, the oldest, and perhaps simplest, is the '5 whys'. The development of this process was originally attributed to Sakichi Toyoda, and later utilised by the Toyota Motor Corporation. This technique requires an investigator to ask a series of 'why' questions. Each time a cause is identified, the question 'why did it happen?' is applied until the root cause is identified.

The findings of the RCA can be used to review the business's Food Safety Management System (FSMS) to ensure that it remains appropriate and effective. The FSMS is a holistic system of prevention, preparedness and own-check activities to manage food safety and hygiene in a food business, including the traceability and recall of unsafe food.

75. Background information on RCA is detailed in Annexe M.

Annexe A: Food Recalls Steering Group and Working Group Members

Acknowledgement is given to the following organisations that were involved in the development of this guidance as members of the Food Recalls Steering Group and/or Working Groups:

<p>Aberdeen City Council Allergy UK Anaphylaxis Campaign Anthony, Rowcliffe & Son Argyll and Bute Council Asda Association of Convenience Stores Bart Ingredients Belfast City Council Braintree District Council BRC Global Standards British Federation of Frozen Foods British Retail Consortium Cambridge City Council Campden BRI Chartered Institute of Environmental Health Chartered Trading Standards Institute Chilled Foods Association City of Edinburgh Council Coeliac UK Co-Op Cranswick Foods Cropwell Bishop Creamery Department for Business, Energy Industrial Strategy Federation of Wholesale Distributors Food and Drink Federation Food Standards and Labelling Focus Group</p>	<p>Fresh Produce Consortium Gluten Free Industry Association Greencore GS1 Lynher Dairies Mendip District Council Mondelez Morning Foods National Food Hygiene Focus Group Neals Yard Dairy Nestlé Ocado Oscar Mayer Pepsico Premier Foods Provision Trade Federation SALSA Scottish Food Enforcement Liaison Committee Southwark Council Stichelton Dairy Ltd Tesco UK Hospitality Which Wrexham County Borough Council Wycome District Council</p>
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Annexe B: Definitions

This annexe includes extended and legal definitions of those terms set out in the guidance document and definitions of other key terms.

'brand' means a product manufactured by a FBO under a particular name in order to define it in the eyes of the consumer;

'consumer' means the ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity;

'consumer organisation' means Coeliac UK, Allergy UK and Anaphylaxis Campaign;

'business customer' means a food business who buys food from another food business;

'durability date'** means the date of minimum durability of a food until which the food retains its specific properties when properly stored;

'enforcement authority' means the authority, or delegated authority, which is responsible for executing and enforcing Regulation (EC) No.178/2002;

'food'* or ('foodstuff') means any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans. 'Food' includes drink, chewing gum and any substance, including water, intentionally incorporated into the food during its manufacture, preparation or treatment. It includes water after the point of compliance as defined in Article 6 of Directive 98/83/EC and without prejudice to the requirements of Directives 80/778/EEC and 98/83/EC.

'Food' does not include:

- (a) feed;
- (b) live animals unless they are prepared for placing on the market for human consumption;
- (c) plants prior to harvesting;
- (d) medicinal products within the meaning of Council Directives 65/65/EEC and 92/73/EEC;
- (e) cosmetics within the meaning of Council Directive 76/768/EEC;
- (f) tobacco and tobacco products within the meaning of Council Directive 89/622/EEC;

(g) narcotic or psychotropic substances within the meaning of the United Nations Single Convention on Narcotic Drugs, 1961, and the United Nations Convention on Psychotropic Substances, 1971;

(h) residues and contaminants.

Food can be further categorised thus:

- **'prepacked food'** means food and the packaging into which it was put before being offered for sale, whether such packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging;
- **'prepacked for direct sale'** means food that is packed at the same premises from which it is being sold;
- **'loose food'** means food that is sold or displayed without packaging - for example, ice cream displayed in a freezer and served into a tub;

'food business'* means any undertaking, whether for profit or not and whether public or private, carrying out any of the activities related to any stage of production, processing and distribution of food;

'food business operator'* (**FBO**) means the natural or legal persons responsible for ensuring that the requirements of food law are met within the food business under their control;

'food incident' means any event where, based on the information available, there are concerns about actual or suspected threats to the safety, quality or integrity of food that could require intervention to protect consumers' interests;

'food law'* means the laws, regulations and administrative provisions governing food in general, and food safety in particular, whether at Community or national level; it covers any stage of production, processing and distribution of food;

'food safety management system' means a systematic approach to controlling food safety hazards within a food business in order to ensure that food is safe to eat;

'food withdrawal/recall plan' means a written document detailing a food business' food withdrawal/recall system for withdrawing or recalling unsafe food;

'foreign object' means something that is found in a food product but does not belong there, making it unsafe;

'hazard' means an allergenic, biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect;

'market' means all parts of the supply chain where an affected food may be located;

'non-compliant' means food that does not comply with food law or customer specification, but is not necessarily unsafe;

'products of animal origin'†† (**POAO**) means:

- food of animal origin, including honey and blood;
- live bivalve molluscs, live echinoderms, live tunicates and live marine gastropods intended for human consumption; and
- other animals destined to be prepared with a view to being supplied live to the final consumer.

'placing on the market'* means the holding of food for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves;

'product batch' means a defined quantity of product processed in one process or series of processes so that it could be expected to be homogeneous;

'recall' means the process by which food is removed from the supply chain *and* consumers are advised to take appropriate action, for example to return or dispose of food;

'retail'* means the handling and/or processing of food and its storage at the point of sale or delivery to the final consumer, and includes distribution terminals, catering operations, factory canteens, institutional catering, restaurants and other similar food service operations, shops, supermarket distribution centres and wholesale outlets;

'Retail' can be further categorised thus:

- **'food retailers'** means businesses that sell food to consumers, such as supermarkets, but can also be newsagents, pharmacies, gyms, online stores or any other business that sells or gives food to consumers as either their main business or part of their business;
- **'out of home'** means all catering businesses **providing food to consumers**, including pubs, restaurants, leisure businesses, cafés, hotels, fast food and take-away outlets, mobile vendors, public sector catering and food service sector;

'risk'* means a function of the probability of an adverse health effect and the severity of that effect, consequential to a hazard;

'risk assessment'* means a scientifically based process consisting of four steps: hazard identification, hazard characterisation, exposure assessment and risk characterisation;

‘risk management’* means the process, distinct from risk assessment, of weighing policy alternatives in consultation with interested parties, considering risk assessment and other legitimate factors, and, if need be, selecting appropriate prevention and control options;

‘root cause analysis’ (RCA) means an assessment to determine the main cause of the food safety incident;

‘sprouted seeds’ means the product obtained from the germination of seeds and their development in water or another medium, harvested before the development of true leaves and which is intended to be eaten whole, including the seed;

‘traceability’* means the ability to trace and follow a food, feed, food-producing animal or substance intended to be, or expected to be incorporated into a food or feed, through all stages of production, processing and distribution;

‘unsafe food’ means food that is injurious to health or unfit for human consumption, as described in Article 14 of Regulation (EC) No. 178/2002;

‘waste’† means any substance or object that the holder discards, intends to discard or is required to discard;

‘withdrawal’ means the process by which a food is removed from the supply chain, where suspect food has not yet reached the consumer.

* Definitions laid down in Regulation (EC) No. 178/2002

† Definition laid down in the Waste Framework Directive (2008/98/EC)

**Definition laid down in Regulation (EU) No. 1169/2011

††Definition laid down in Regulation (EC) No. 853/2004

Annexe D: Specific food traceability requirements

In addition to the mandatory traceability requirements as outlined in Regulation (EC) No. 178/2002, all FBOs that handle *product of animal origin or sprouted seeds* **must** comply with the following specific traceability requirements:

Products of animal origin (POAO)

- an accurate description of the food;
- the volume or quantity of the food;
- the name and address of the FBO from which the food has been dispatched;
- the name and address of the consignor (owner), if different from the FBO, from which the food has been dispatched;
- the name and address of the FBO to whom the food has been dispatched (if applicable);
- the name and address of the consignee (owner), if different from the FBO, to whom the food has been dispatched (if applicable);
- a reference identifying the lot, batch or consignment, as appropriate; and
- the date of dispatch (if applicable).

Sprouted seeds

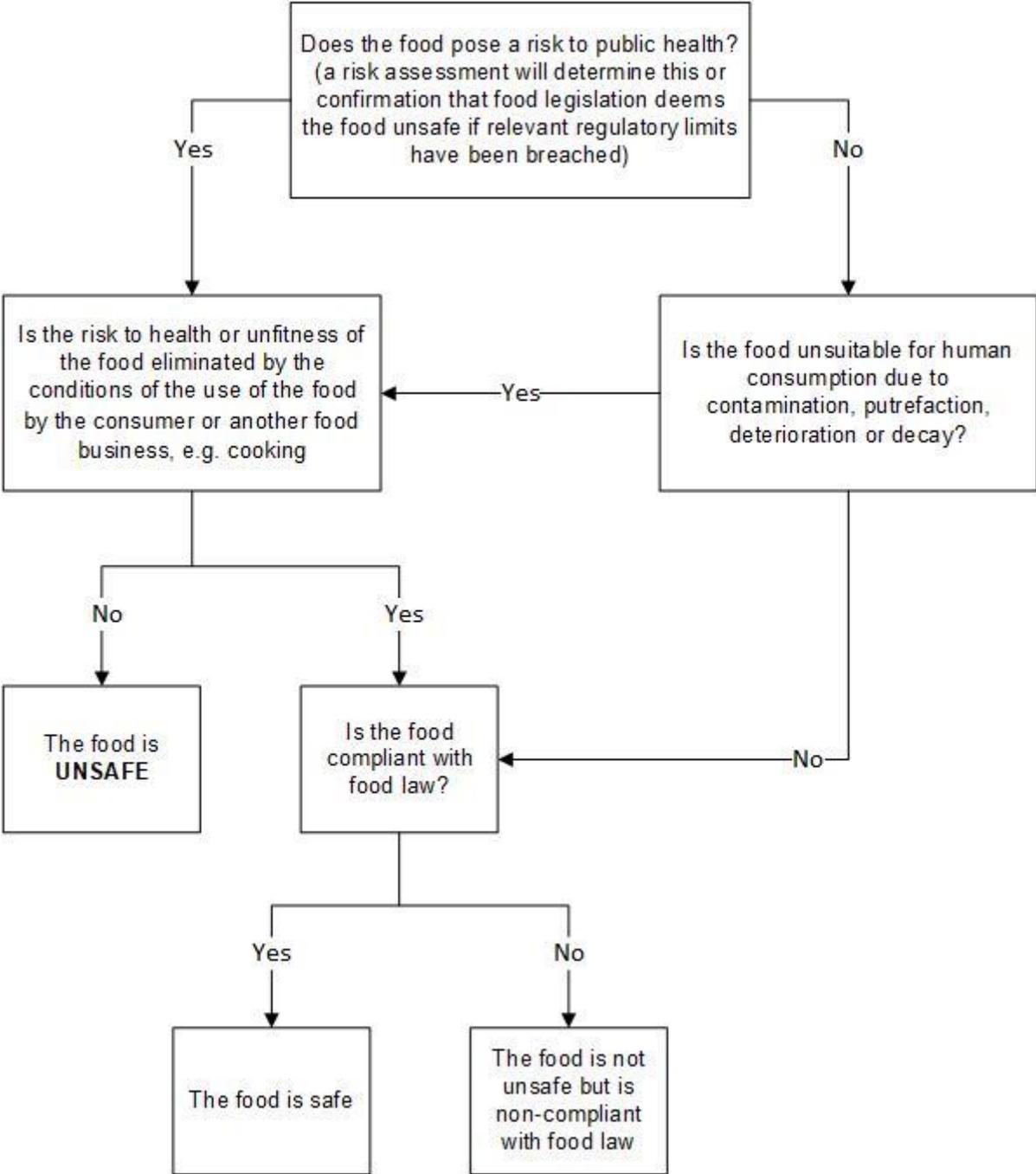
NOTE: This additional information is not required for sprouted seeds after they have undergone a treatment that eliminates microbiological hazards.

- an accurate description of the seeds or sprouts, including the taxonomic name of the plant;
- the volume or quantity of the seeds or sprouts supplied (if applicable);
- where the seeds or sprouts had been dispatched from another FBO, the name and address of:
 - (i) the FBO from which the seeds or sprouts have been dispatched
 - (ii) the consignor (owner) if different from the FBO from which the seeds or sprouts have been dispatched
- the name and address of the FBO to whom the seeds or sprouts are dispatched (if applicable);
- the name and address of the consignee (owner), if different from the FBO to whom the seeds or sprouts are dispatched (if applicable);
- a reference identifying the batch, as appropriate; and
- the date of dispatch (if applicable).

Traceability information of products of animal origin and sprouted seeds must be updated daily.

Annexe E: Identifying unsafe food

To determine if a food is unsafe FBOs may wish to consider the following questions:



Annexe F: Risk assessment considerations

Points that may be considered in microbiological risk assessments

NOTE: this is not an exhaustive list of all points that need to be included in a risk assessment and not all points may be applicable/relevant, as it will depend on the type of food safety incident.

Hazard identification

- definition of the hazard and the food product(s) it is linked to;
- levels of the hazard present in the food and notable results from laboratory reports;
- species and/or serotype if known and relevant.

Exposure Assessment

- the population at risk and whether any particular groups, including vulnerable groups, are of particular concern;
- dose consumed;
- prevalence of contamination in the batch;
- shelf-life of product(s) involved and potential for frozen storage which would extend shelf-life;
- any cooking instructions and whether these would be sufficient to destroy the hazard;
- any other processing or handling of the product which could increase or decrease risk;
- cross-contamination potential;
- distribution; large or small scale, and types of establishments the affected food product is sent to;
- quantities of the affected food product that has been sold/used;
- possibility of other batches or products being affected.

Hazard characterisation

- symptoms caused by hazard and severity of illness or injury;
- incubation period;
- infectious dose;
- dose-response relationship;
- evidence of outbreaks/illness associated with hazard (and food product).

Risk characterisation

- combining the qualitative or quantitative information of the previous components to produce a risk estimation and estimation of overall uncertainty;

- the probability and severity of illness or injury occurring, taking into account the given population(s);
- list of uncertainties.

Draft

Annexe G: Example roles and responsibilities chart for a Food Business incidents team

Production	<ul style="list-style-type: none"> - Identify batch - Cease production - Identify raw materials affected/implicated - Identify finished products affected
Distribution	<ul style="list-style-type: none"> - Block affected stock and stop distribution - Carry out traceability and prepare inventory and distribution details - Establish if product has reached consumer Arrange for product returns - If necessary, arrange disposal of blocked or returned affected stock
Quality/Technical	<ul style="list-style-type: none"> - Carry out food safety risk assessment - Notify enforcement authority and FSA/FSS - Root cause analysis
Purchasing	<ul style="list-style-type: none"> - Identify and contact suppliers of raw materials/ affected product
Sales & Marketing	<ul style="list-style-type: none"> - Contact business customers and advise how food should be handled - If necessary, arrange for pick up at retail outlets
Legal	<ul style="list-style-type: none"> - Handle legal issues
PR	<ul style="list-style-type: none"> - Handle communications and media queries - Place media adverts and press release - Other PR activities, as needed

Annexe H: Example contact list for a food business withdrawal/recall plan

Supplier contacts	A N Other	Tel: Out of hours Tel: Mobile:	Email: Fax:
Business customer contacts	A N Other	Tel: Out of hours Tel: Mobile:	Email: Fax:
Local Authority contacts	A N Other	Tel: Out of hours Tel: Mobile:	Email: Fax:
Consumer organisation contacts	A N Other	Tel: Out of hours Tel: Mobile:	Email: Fax:

Annexe I: Example template for notifying the enforcement authority

Food Incident Report Form

1. Food business name and address:

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2. Food business operator (FBO) details:

Name of FBO	
Contact details (business hours)	Telephone: Email: Fax:
Contact details (out-with business hours)	Telephone: Email:

3. Description of food safety incident:

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Description of product

Type of Product:

Product Name:

Brand Name:

Batch Code(s)/Durability date(s):

Product Size and type of packaging:

Country of Origin of food:

4. Distribution details:

Manufacturer details (including contact details):

Import/Export details (including contact details):

List of business customers supplied to:

Quantities, batch codes and pack sizes sent to each business customer:

When food first placed on the market and has food reached consumer?

5. Action for dealing with incident?

6. Any additional information:

Annexe J: Business-to-business communications for food safety withdrawals and recalls across the supply chain

Overview

Effective communication within the supply chain is essential for ensuring a successful food withdrawal/recall. Each point in the supply chain has a responsibility for effective and timely communications to their business suppliers and business customers.

It is key for FBOs to have a good communications plan in place to ensure the intended audience is reached.

Each communication should be;

- clear;
- factual;
- easily understood; and
- include the relevant action to take.

Audience

The audience for this best-practice guidance is food businesses trading with business customers (i.e. businesses purchasing and supplying food for sale to consumers in store or online). The guidance applies at each point in the supply chain when food is being withdrawn for food safety reasons and when food is ultimately being recalled from the consumer.

Examples of food business operators (FBOs) that would initiate communications regarding food withdrawals/recalls include:

- manufacturers who are required to notify business customers and, where appropriate, suppliers about the food safety withdrawal or recall and why action is being taken;
- wholesalers/Distributors who are required to inform business customers and, where appropriate, suppliers of a food withdrawal/recall.

Examples of business customers can include:

- wholesaler/distributor including where appropriate hauliers, storage depots and coldstores;
- retailers;
- 'Out of Home' sector;

- contract catering;
- national accounts;
- third party agencies;
- exporters where affected product may go for export or sale in third countries.

Guidance for FBOs initiating a food withdrawal/recall

All FBOs should maintain an up to date and comprehensive list of relevant trade contacts to use in the event that a withdrawal or recall needs to be initiated.

Responsibility for the withdrawal or recall communications should be taken by a nominated individual. A nominated deputy should also be identified.

The point of contact at each business customer will differ but could include:

- business owner;
- responsible senior managers;
- technical services;
- account managers;
- third party agent.

FBOs initiating the withdrawal/recall should use traceability and/or sales information to help identify suppliers of (if relevant) and those business customers who have received affected product.

A communications plan, which can form part of the business's withdrawal/recall plan, should be put in place setting out which business customers will be contacted, how they will be contacted and with what messages, including the relevant action to take.

This plan should identify what information is to be provided to business customers, where it is available and should include, where appropriate:

- product (including product description);
- size, weight and packaging format (which distinguishes the affected product from similar products or formats not affected i.e. 100g not 200g etc);
- batch codes affected;
- other product identifying codes;
- best before or durability codes;
- reason for withdrawal or recall (including where recalls are occurring, any available 'Point of Sale' notices);
- information about where to find batch/date code (e.g. photograph or location of the code on the pack, possibly including cases);

- instruction on next steps (e.g. take off sale/return or securely destroy);
- contact details – who to contact for more information, or where to return affected product.

FBOs should also advise their business customers that where there is further onward distribution of affected product, they should communicate to their own customers that a withdrawal/recall is underway and request that appropriate action is taken to cascade the withdrawal/recall action.

Communication should be clear, concise, factual and easily understood, using pictures where possible, showing the product packaging and the location of the product identifying code.

Communications could be direct or via a third-party agency. A single approach may not be effective in all cases.

Methods of communication could include:

- email (if email is being used for communication, read receipts should be turned on);
- telephone (if supported by one of the other methods of communication);
- letter;
- *via* trade association.

Key elements of the communication, and a suggested template, is outlined below:

ACTION REQUIRED	
PRODUCT WITHDRAWAL / RECALL [<i>Specify</i>] NOTIFICATION	
Product Name and Description (including pack size)	Product A, 100g (e.g.)
Product Identifying Code (eg EAN Code)	12345
Product type	Retail grocery
Reason for notification	Incorrect allergen labelling
Type of packaging, possibly including wholesale case or traded unit	
Accurate and up to date pictures of product and location of batch code, possibly including pictures of wholesale case or traded unit.	
Full Batch code information: 1. Pack and, where different: 2. Pallet 3. Case 4. Pack	123 (located...) 456 (located ...) 789 (located ...)
Action required by when: (specify action by customer channel if different)	Contact business customers and initiate withdrawal/recall process Include POS template, where required Return affected product to xxxx

Contact information:	<p>xxx@producta.co.uk</p> <p>Ask for the Withdrawal Team on 020 124 4567</p> <p>PRODUCTA@PRODUCTA.CO.UK</p> <p>We will respond to your query as soon as we are able.</p>
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Guidance for FBOs who are business customers

A clear plan should be in place by business customers which can be used should a withdrawal or recall need to be actioned.

FBOs should use their traceability/sales transactions systems to identify products purchased, at what time, what quantities and by whom.

Business customers should be advised on the withdrawal/recall action through contact by one or more of the following methods:

- email (if email is being used for communication, read receipts should be turned on);
- telephone (if supported by one of the other methods of communication);
- letter;
- advertisement in trade press (only as a supporting mechanism);
- signage at point of sale in depot.

FBOs who are notified of a food withdrawal/recall should also advise their business customers that where there is further onward distribution of affected product, they should communicate to their own customers that a withdrawal/recall is underway, and that appropriate action is required to cascade the communication.

Key elements of the communication, and a suggested template, is outlined below:

Dear x

(Company or Brand Name) are currently initiating a Product Withdrawal/Recall* for the Product A 100g. You have been identified as purchasing/receiving the affected products. No other products from Company or Brand Name are affected by this withdrawal/recall*.

We apologise for the inconvenience caused.

* Select appropriate option

Product Name and Description (including pack size):	Product A
Product Identifying Code (and EAN/barcode information if appropriate):	123456 Barcode 001234567890
Supplier:	Product A
Pack Size	100G
Pictures of product, including wholesale case	
Best Before/Use by Date:	XX/XX/XXXX
Batch Code (and location on case/consumer unit):	Pallet Case Pack
Reason for withdrawal/recall:	Incorrect allergen labelling
Action required by when:	Contact business customers and initiate withdrawal/recall process Include POS template, where required Return affected product to xxxx

Annexe K: Key Principles and Best Practice Template for accurate and effective consumer recall notifications

Businesses are recommended to follow this guidance when communicating food recalls to consumers.

Research has established that there are a number of ways to communicate food recall messages to consumers, so that they can make informed choices about products they have bought which are unsafe. The different aspects to consider in creating effective recall messages to consumers include:

- style and appearance;
- necessary content;
- effective channels for communicating recall messages to consumers, including best location for displaying point of sale notices.

Point of sale notices have been identified through the research as a key way of communicating food recalls to consumers and should therefore also take the following into consideration.

Style & Appearance

Communication that grabs the attention of consumers makes it easier for them to identify what the communication is and what it means for them.

Communication should be:	For example:
Clear and easy to read	<ul style="list-style-type: none"> - Simple layout - Large, legible font that can be read easily - Headings and sub-heading for longer notices
Bright and eye catching	<ul style="list-style-type: none"> - Use red colour and iconography (exclamation mark) associated with alert and risk - Use of banners, boxes and bordering to draw attention

Concisely worded	- Lay out information in clear, simple language with use of bullet points
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Necessary Content

Communicating the right information will help consumers clearly identify the unsafe product and what to do if they have bought it.

Recall information should include:	For example:
The reason for recall	- Use clear title to indicate what this is and what the danger or risk to consumers is
Product details	- Brand and product name(s) - Pack size(s) - Durability dates of affected product(s) - Batch code(s)
How to identify the product(s)	- Where the durability or batch code information is found on the packaging
Product image	- A clear picture, preferably in colour - Where multiple products are affected, pictures should be presented vertically with the associated product details aligned
Clear direction on what consumers should do if they have bought the product	- Do not eat this product - Return the product to the store where you bought it from - How to obtain a refund
Where to go for more information	- A contact number that consumers can contact for more information

Reassurance that appropriate action has already been taken	- This product has already been removed from shelves
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The research conducted has shown consumers prefer language that is simple and easily understood. Examples of suggested wording include the following:

Reason for alert	Suggested wording
Confirmed contamination of product with salmonella / listeria monocytogenes / E.coli etc	“X product” is being recalled because salmonella / listeria monocytogenes / E.coli etc has been found
Inadequate procedures to control Clostridium botulinum	“X product” is being recalled because of concerns over procedures to control Clostridium botulinum
Confirmed contamination of product with foreign objects	“X product” is being recalled due to the presence of “foreign object”
Allergens not mentioned on the product label	“X product” is being recalled because it contains “allergen ingredient” which is not mentioned on the label. This means the product is a possible health risk for anyone with “an allergy to / an intolerance to / a sensitivity to” “allergen”

There will be occasions when food is recalled because the food business has reason to believe that food placed on the market is unsafe, but there are uncertainties as follows:

- the recall is being undertaken on the basis of a presumptive (and not confirmed) result;
- there are issues which reduce the confidence in sampling or laboratory analysis; and/or
- there is uncertainty around contamination of all recalled batches.

In these instances, the food business may wish to use wording as indicated below:

Reason for alert	Suggested wording
Possible contamination of product with salmonella / listeria monocytogenes / E.coli etc	“X product” is being recalled as the product may contain salmonella / listeria monocytogenes / E.coli etc
Possible contamination of product with foreign objects	“X product” is being recalled which may contain “foreign object”

The wording advice stated above **should not** be used in any incident where product is known to be contaminated. This includes product being recalled as part of a batch that is considered unsafe, in line with the Article 14 (6) of Regulation (EC) No 178/2002.

Effective Channels of Communication

Consumers expect to be notified of recalls via a number of channels to ensure widespread awareness. Examples of these include the following:

Communication channels:	Detail:
In-store point of sale notice	<ul style="list-style-type: none"> - Located in a position where they are: <ul style="list-style-type: none"> - Prominent and visible - In colour - Eye-level - Examples of locations include <ul style="list-style-type: none"> - At the tills - At customer service desks
On retailer’s website	<ul style="list-style-type: none"> - For example, displayed on a dedicated product recalls web page
Via social media	<ul style="list-style-type: none"> - Shared through social media channels by the recalling businesses
Allergy & Patient Support Organisations	<ul style="list-style-type: none"> - For example, displayed on website / social media and through other

	communications channels such as text / e-mail alerts.
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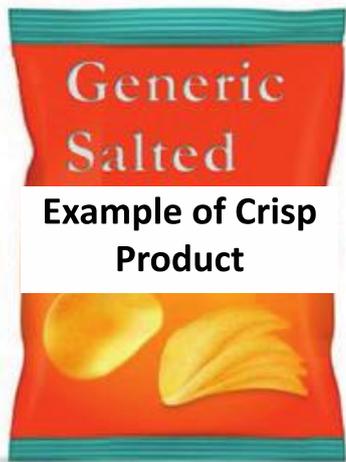
To assist businesses in communicating food recalls in-store, examples of completed point of sale notices are provided below. Editable point of sale notice templates for are available at: <https://www.food.gov.uk/news-alerts/consultations/guidance-on-food-traceability-withdrawals-and-recalls-within-the-uk-food-industry>

Draft

Food Recall Alert



Salmonella Alert



The Generic Co, Generic Salted Crisps.

We are recalling our Generic Salted Crisps because salmonella has been found in them.

The Generic Co, Generic Salted Crisps

Pack sizes, batch codes and best before dates affected:

Pack Size: 25g

Batch Code: AB1234

Best Before Date: 30/11/2018



Check the batch code and best before date of the product. The batch code and best before date can be found on the back of the packaging at the bottom right corner.

Affected product has already been removed from the shelves.

What you should do

If you have bought Generic Salted Crisps as detailed above, do not eat them.

Instead:

- Check if you have bought the affected batch code and best before date of Generic Salted Crisps.
-  You can do this by taking a picture of this notice or writing down the batch code and best before date for reference at home.
- Return the product to the store for a full refund (with or without a receipt).

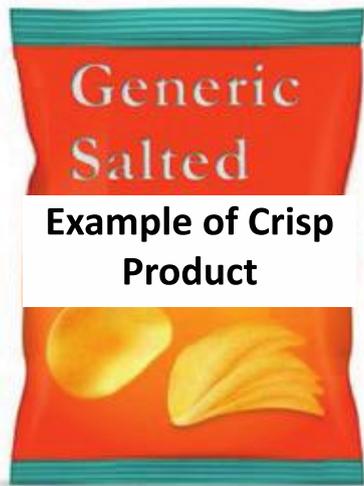
Want more information?

For more information contact us on 01234 567890 or e-mail generic.co@generic.com

Date 09/01/2019

Allergy Alert

Allergen - Egg



The Generic Co, Generic Salted Crisps

We are recalling a batch Generic Salted Crisps because they contain egg which is not mentioned on the label. This means it is a possible health risk for anyone with an allergy to egg.

The Generic Co, Generic Salted Crisps

Pack sizes, batch codes and best before dates affected:

Pack Size: 25g

Batch Code: AB1234

Best Before Date: 30/11/2018



Check the batch code and best before date of the product. The batch code and best before date can be found on the back of packaging at the bottom right hand corner.

Affected product has already been removed from the shelves.

What you should do

If you have bought Generic Salted Crisps as detailed above and you have an allergy to egg, do not eat them.

Instead:

- Check if you have bought the affected batch code and best before date of Generic Salted Crisps.
-  You can do this by taking a picture of this notice or writing down the batch code and best before date for reference at home.
- Return the product to the store for a full refund (with or without a receipt).

Want more information?

For more information contact us on 01234 567890 or e-mail generic.co@generic.com

Date 09/01/2019

Annexe L: Example food incident log

Date	Time	Activity (Action, Communication, Decision)	Name of contact	Description

Annexe M: Background to Root Cause Analysis

Root Cause Analysis (RCA) is based on the principle that problems are best solved by attempting to eliminate the root causes of an outcome, as opposed to merely addressing the immediately obvious symptoms.

If performed successfully, RCA identifies the initiating cause in a causal chain which leads to an outcome or effect of interest. Commonly, root cause is used to describe the depth in the causal chain where an intervention could reasonably be implemented to change performance and prevent an undesirable outcome.

RCA can influence the approach to problem solving encouraging desired behaviours that are proactive rather than reactive. As such it is believed that RCA can be used to determine how and why food safety issues occur, allowing more effective long-term preventative actions to be identified and applied.

Different tools can be used when performing RCA, the oldest, and perhaps simplest, is the '5 whys'. The development of this process was originally attributed to Sakichi Toyoda, and later utilised by the Toyota Motor Corporation, this technique requires an investigator to ask a series of 'why' questions. Each time a cause is identified, the question 'why did it happen?' is applied until the root cause is identified.

The principles of RCA have long been recognised in fields such as the petrochemical industry, environmental management, aviation and vehicle accident investigation, and engineering. Key UK governmental organisations, including the National Health Service (NHS), the Health & Safety Executive (HSE), and the Department for Environment, Food & Rural Affairs (DEFRA) all routinely make use of RCA. The British Retail Consortium (BRC) also recognises the use of RCA in their Global Standard for Food Safety.