FOOD TRACEABILITY, WITHDRAWALS AND RECALLS WITHIN THE UK FOOD INDUSTRY

QUICK REFERENCE GUIDE

JUNE 2019

INTRODUCTION

This is a quick reference guide for food businesses. It complements the main guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry, which has been produced to explain the legal requirements in relation to food traceability, withdrawals and recalls. The guidance can be found at:

Food Standards Agency:
https://www.food.gov.uk/business-guidance/food-incidents-product-recalls-and-withdrawals#withdrawals-and-recalls-guidance

and

Food Standards Scotland:
https://www.foodstandards.gov.scot/publications-and-research/publications/guidance-on-food-recalls

FOOD BUSINESSES' RESPONSIBILITIES

As a Food Business Operator (FBO), you are responsible for the safety of the food which you produce, distribute, store or sell. You must:

✓ Not place unsafe food on the market (food is unsafe if it is injurious to health or unfit for human consumption)

✓ Comply with food law in the production, distribution, storage and sale of food

✓ Be able to trace suppliers of your food and the business customers that you have supplied

✓ Remove unsafe food from the market in the event of a food safety incident

TRACEABILITY

Traceability helps keep track of food in the supply chain, which supports the accurate withdrawal/recall of unsafe food, if required. The more information you keep, the easier and quicker it will be to identify the affected food, mitigate risks to consumers and save time and money.

WHAT THE LAW SAYS

You must have **traceability information** for your suppliers and business customers (one step back and one step forward)

Retailers, including caterers, are not required to keep traceability information where they sell to the final consumer. However, where they supply food businesses, **all traceability requirements** must be adhered to

You must have systems and procedures in place to allow for traceability information to be made **available** to enforcement authorities **on demand**

You must **label** or **identify** food placed on the market to facilitate its traceability

Products of animal origin and sprouted seeds are subject to **specific** traceability requirements.

KEY STEPS IN DEVELOPING A FOOD TRACEABILITY SYSTEM

1. THE SYSTEM

You must be able to trace food/ingredients purchased from suppliers and then supplied to business customers (excluding food supplied to final consumer).

2. DEFINING BATCHES OF FOOD

This will help to ensure good traceability and can limit the amount of food to be withdrawn/recalled.

3. TRACEABILITY INFORMATION

- Business name
- Business address
- Description of foods purchased and sold
- Quantities
- Transaction dates

4. RECORD KEEPING

You must ensure your traceability information can be made available on demand.

BEST PRACTICE

HAVE YOU ALSO THOUGHT ABOUT...?

- Trading with suppliers who have good traceability systems in place
- Internal process traceability to enable you to match up inputs and outputs and ensure better visibility throughout your supply chain
- Length of time to keep traceability information
- Periodically reviewing the traceability system

For more information please refer to the TRACEABILITY section of the main guidance.

FOOD WITHDRAWALS/RECALLS

If a food safety incident happens and the food has been supplied, it will have to be 'withdrawn' and if necessary 'recalled'.

A **withdrawal** is the process by which unsafe food is removed from the supply chain, where unsafe food has not yet reached the consumer.
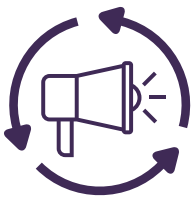
A **recall** is the process by which unsafe food is removed from the supply chain and consumers are advised to take appropriate action, for example to return or dispose of the unsafe food.

WHAT THE LAW SAYS

If you believe a food that you have imported, produced, processed, manufactured or distributed is unsafe you should **immediately withdraw and/or recall** the food where it has left the immediate control of your business

You must **inform** enforcement authorities, FSA/FSS, suppliers (if relevant), business customers and consumers (consumers only when a recall is necessary) of the food safety incident and necessary actions.

MAKING A DECISION TO WITHDRAW OR RECALL FOOD

In the event of a food incident, where the food has left your immediate control, you will need to determine if the food is unsafe and a course of action. The decision tree below outlines the process to follow.
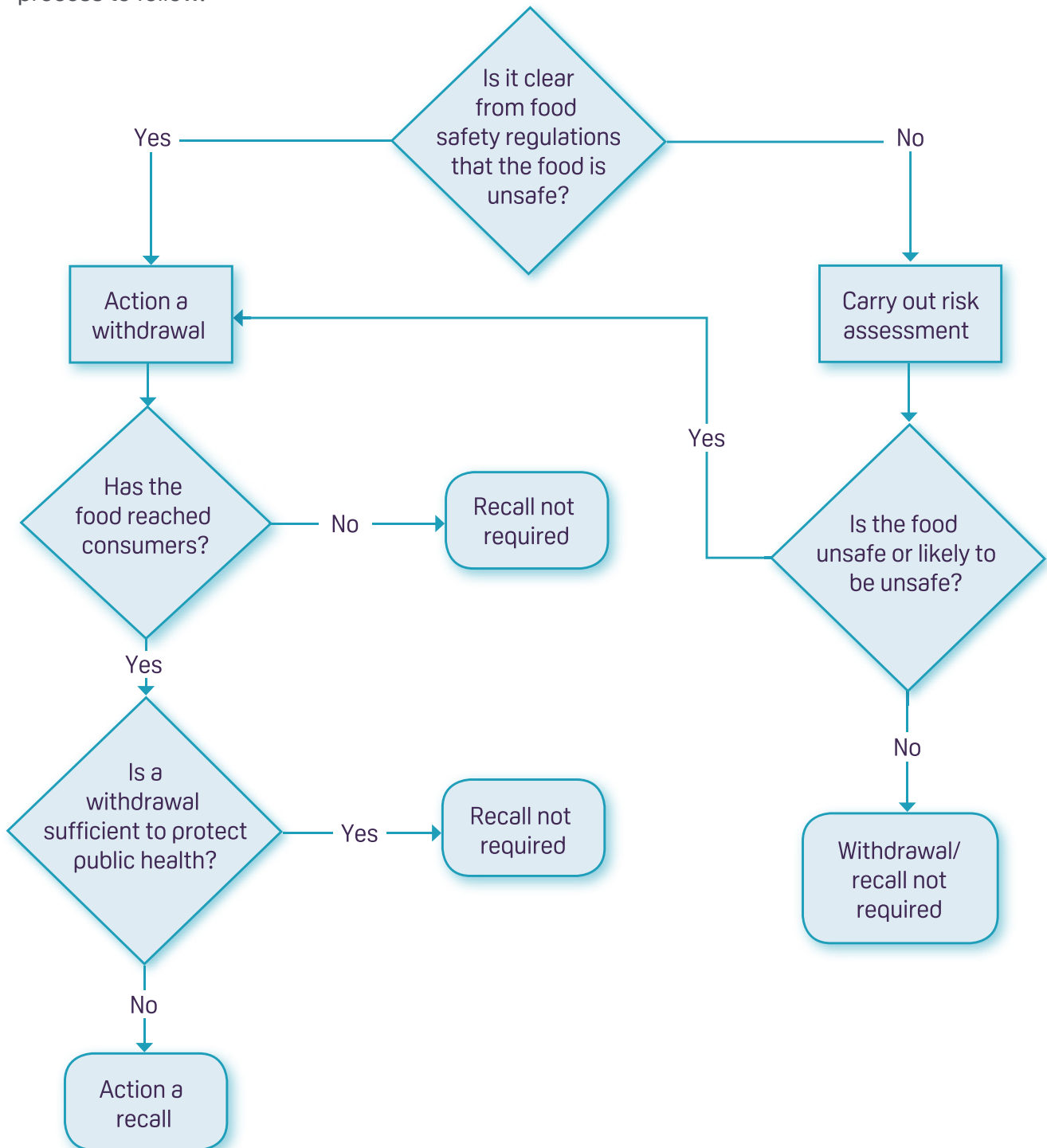
In some cases, you may be able to easily identify that a food is unsafe. However, not all hazards that might be found in food are specified in food safety regulations and therefore you may be required to carry out a risk assessment.

For more information on the decision-making process and carrying out risk assessments please refer to the MAKING A DECISION TO WITHDRAW OR RECALL FOOD section of the main guidance.

INITIATING AND MANAGING A FOOD WITHDRAWAL/RECALL

A number of key aspects need to be considered when initiating and managing a food withdrawal/recall:

INFORMATION GATHERING/ INVESTIGATION	NOTIFICATION	MONITORING PROGRESS	HANDLING UNSAFE FOOD
• Know the details of the problem • Know which product and which batches are affected • Carry out risk assessment (if necessary) • Stop supply • Ensure product is withdrawn and, if necessary recalled	• Inform enforcement authorities, FSA/ FSS, suppliers, business customers and consumers (if a recall is required)	• Throughout the food safety incident maintain communication with all relevant parties	• Label affected food clearly to show it should not be sold • Make unsafe food safe if a product can be re-worked or re-labelled • Dispose of unsafe food as waste

KEY DECISION LOG TEMPLATE:
Downloadable through link below

NOTIFICATION TEMPLATES:
1. Enforcement Authority
2. Business to Business
3. Allergy Alert Point of Sale Notice
4. Food Recall Alert Point of Sale Notice
All downloadable through link below

https://www.foodstandards.gov.scot/publications-and-research/publications/guidance-on-food-recalls

BEST PRACTICE

HAVE YOU ALSO THOUGHT ABOUT...?
• Notifying consumer, allergy and patient support organisations
• Monitoring progress of and closing a withdrawal/recall
• Reviewing the effectiveness of the withdrawal/recall and carrying out root cause analysis

For more information please refer to the **INITIATING AND MANAGING A FOOD WITHDRAWAL/ RECALL** section of the main guidance.

ROLES AND RESPONSIBILITIES

	FBO initiating withdrawal/recall	Non-retail FBO receiving notification	Retailer receiving notification (inc caterers selling prepacked food)	Caterers receiving notification
Stop supply	✓			
Notify relevant parties (enforcement authority, FSA/FSS, customers)	✓			
Arrange for return/ disposal of food	✓			
Identify/label unsafe food and dispose of or re-work	✓			
Remove unsafe food from supply chain/sale/service	✓	✓	✓	✓
Advise business customers on actions to take	✓	✓		
Return unsafe food to FBO / dispose		✓	✓	✓
Prepare and issue/send POS notification RECALL ONLY	✓	✓	✓	
Inform consumers of recall / retrieve unsafe food RECALL ONLY			✓	
Accept return of affected food from consumers RECALL ONLY			✓	

BEST PRACTICE

HAVE YOU ALSO THOUGHT ABOUT...?
- Preparing additional communications material e.g. Q&A for consumers
- Checking that business customers are taking appropriate action

For more information please refer to the **ROLES AND RESPONSIBILITIES OF THOSE INVOLVED IN A WITHDRAWAL/RECALL** section of the main guidance.

USEFUL CONTACTS

To stay up to date with information on **food recalls/allergy alerts** please see:

For England, Wales and Northern Ireland:
https://www.food.gov.uk/news-alerts/signin

For Scotland:
https://www.foodstandards.gov.scot/subscribe

FSA
Incidents Response Teams
England
Tel: 020 7276 8448
Email: foodincidents@food.gov.uk

Wales
Tel: 02920 678961
Email: wales.foodincidents@food.gov.uk

Northern Ireland
Tel: 02890 417700
Email: incidents.ni@food.gov.uk

Online Notification
https://incidents.foodapps.co.uk/IncidentReportForm/login.aspx

FSS
Scotland
Scottish Food Crime and Incidents Unit
Tel: 01224 285138
Email: incidents@fss.scot

Online Notification
www.foodstandards.gov.scot/report-a-food-incident