

4 February 2019

FDF Response to FSA Consultation on Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry

This submission is made by the Food and Drink Federation, the trade association for food and drink manufacturing. Food and drink is the largest manufacturing sector in the UK (accounting for 19% of the total manufacturing sector) turning over £97.3bn per annum, creating GVA of £28.8bn and employing over 400,000 people.

FDF welcomes the new Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry and is pleased to have been able to contribute to its development as part of the multi-stakeholder FSA / FSS project.

Our comments below are provided in response to the corresponding questions in the FSA's consultation of 7 January 2019.

Q1: What are your views on FSA's assessment regarding the costs associated with implementing the guidance and is it reflective of practice?

FDF believes that it would be reflective of best practice, and the intention of the guidance, that Food Business Operators (FBOs) familiarise themselves with it as part of their preparedness activities for handling any withdrawal or recall that may be necessary. We would therefore support the assumption that, as a minimum, at least one individual at every FBO should read the guidance, rather than assuming that it will only be read when a FBO has a food incident.

Q3: Does the guidance clearly distinguish between the legal requirements and best practice advice?

The Guidance generally distinguishes clearly between the legal requirements and best practice advice.

Q4: What, if any, barriers do you foresee in implementing the guidance?

FDF will publicise the best practice guidance to its members to assist in disseminating and embedding the guidance.

Q6: What effect will this guidance have on your ability to deal with food withdrawals and recalls?

FDF welcomes the inclusion in the guidance of advice for Food Business Operators on the points to consider when establishing a food withdrawal / recall plan as part of their Food Safety Management System. We believe that this will be helpful in facilitating business preparedness for handling any withdrawal or recall that may be necessary.

Q7: What are your views on the best practice advice and supporting templates provided in the guidance?

Is the risk assessment advice and points to consider helpful for businesses?

We believe that the risk assessment advice and points to consider set out in the body of the guidance will be a useful framework for businesses. We support the inclusion in Annexe F of an example, accompanied by the caveat that points to be included in a risk assessment will vary depending on the type of food safety incident. It might be helpful to give more emphasis to this caveat, by including in the title of this Annexe a reference to this being an example of risk assessment considerations, given that the information here is set in the context of a microbiological risk assessment.

Q8: What additional tools will assist you in effectively implementing the guidance?

FDF welcomes the intention of the FSA / FSS to provide additional guidance for Food Business Operators on the use of Root Cause Analysis.

Q10: Will implementing this guidance provide greater assurances that UK businesses can effectively manage withdrawals and recalls?

FDF welcomes the clarity and consistency which this guidance sets out to provide to support Food Business Operators in establishing and implementing effective food withdrawal and recall systems to respond to any food safety incidents.

The UK Food and Drink Manufacturing Industry

The Food and Drink Federation (FDF) is the voice of the UK food and drink manufacturing industry, the largest manufacturing sector in the country. Our industry has a turnover of £97.3 billion, which is 19 per cent of total UK manufacturing, with Gross Value Added (GVA) of £28.8 billion. Food and drink manufacturers directly employ over 400,000 people in every corner of the country. Exports of food and drink make an increasingly important contribution to the economy, exceeding £22 billion in 2017, an increase of 9.7% on the previous year. The UK's 7,000 food and drink manufacturers sit at the heart of a food and drink supply chain which is worth £112 billion to the economy and employs four million people.

The following Associations actively work with the Food and Drink Federation:

ABIM	Association of Bakery Ingredient Manufacturers
ACFM	Association of Cereal Food Manufacturers
BCA	British Coffee Association
BOBMA	British Oats and Barley Millers Association
BSIA	British Starch Industry Association
BSNA	British Specialist Nutrition Association
CIMA	Cereal Ingredient Manufacturers' Association
EMMA	European Malt Product Manufacturers' Association
FCPPA	Frozen and Chilled Potato Processors Association
FOB	Federation of Bakers
GFIA	Gluten Free Industry Association
PPA	Potato Processors Association
SA	Salt Association
SNACMA	Snack, Nut and Crisp Manufacturers' Association
SSA	Seasoning and Spice Association
UKAMBY	UK Association of Manufacturers of Bakers' Yeast
UKTIA	United Kingdom Tea & Infusions Association Ltd

FDF also delivers specialist sector groups for members:

Biscuit, Cake, Chocolate and Confectionery Group
Frozen Food Group
Ice Cream Committee
Meat Group
Organic Group
Seafood Industry Alliance