

FSA Covid-19 Expert Panel

We / I have been invited to join the Food Standards Agency's COVID-19 expert panel.

FSA Requests

- 1. What are the implications of the COVID-19 outbreak for food safety, food authenticity and food regulation?**

See Q1-Q9 below

Goal - To help FSA understand the full implications of the COVID-19 outbreak on food safety, food authenticity and food regulation. This work will feed directly into FSA / UK government decision-making now and over the next few months.

Output – FSA will synthesise responses under Chatham House rules and will share the initial report for additional thoughts on the 27th April (with comments requested by the 30th April). The report will be used to prioritise analytical and policy resource as well as feed into longer term horizon scanning.

- 2. Suggest additional FSA expert panel members who may be able to make a valuable contribution.**

See Q10 below.

3. On-going Support

Repeating questionnaire exercise above each month to highlight any new evidence sources and/or new implications, as well as remove those implications that are no longer a concern.

Access the expertise and knowledge of the panel where appropriate to answer key questions and to identify relevant research/evidence sources.

FSA Covid-19 Questionnaire – to be completed and returned by 14th April 2020

FSA Question	Response
<p>1. What do you think will be the most important implications of the COVID-19 outbreak for food safety in the UK?</p> <p>For each implication please indicate the proportion of the population that you think may be affected. Please focus on implications that may be experienced over the next 3 months.</p> <p>(option for 5 comments)</p>	<ol style="list-style-type: none"> 1. Food safety risks (in particular microbiological risks) arising from companies / volunteers producing or supplying food in formats where they have limited or no previous experience or technical knowledge. We believe that this is likely to specifically adversely affect low income groups and vulnerable people [e.g. the elderly], who are more likely to be the recipients of products from pop-up kitchens / volunteer groups / re-purposed hospitality operations. 2. Food processing and food hygiene controls may become overstretched beyond their effective capability - Some operations are running fewer product lines (SKU's) for longer periods of time to increase efficiencies and maximise output to food retail. This increase in running time may have implications, especially in chilled ready to eat food premises, for increased microbial growth. 3. Changes resulting from recipe reformulation, sourcing changes or distribution channel changes may result in unforeseen consequences for allergen risks. Consumers buying products from unfamiliar places and/or reformulated products may not check all product packs to see if allergen profiles have changed. 4. Other aspects of food safety, including allergens, chemical contaminants, food fraud etc, may receive less attention as the focus of overstretched technical management teams will be on risk managing business continuity generally and on the impact of SARS-CoV-2 virus specifically on both occupational health and food hygiene. 5. Reduced third party auditing and enforcement checks might allow some businesses to lower standards and/or incapable food operators to become established. This current situation is exacerbated by insufficiencies in food hygiene. food standards and public analyst resources right across the UK.
<p>2. Please detail any evidence sources that may help to monitor these implications on food safety.</p>	<p>Increase microbiology market surveillance particularly to include home-delivery meals (commercial & voluntary), and home-delivery boxed food schemes. Canvass EHO's to determine practical solutions for this.</p> <p>Accelerate FSA Strategic surveillance tool dashboard availability to government and to key stakeholders to use to identify emerging risk areas (FYI – certification bodies are not visiting sites currently, so this monitoring insight is not available)</p> <p>Increase monitoring of adverse allergic reactions – accelerate implementation of hospital admission recording, and initiate allergy action groups activity to collate self-reporting.</p> <p>Reinforce competent authority expectations of continued good practices and record keeping demonstrating due diligence across food system. Engage with food professionals indirectly and directly through bodies such as IFST, CEH, SOFHT, IGD FDF, BRC etc to ensure focus on safe and legal food isn't lost.</p>

FSA Question	Response
	<p>Businesses will continue to monitor their products for food safety issues through market surveillance – it may be possible to request that commercial food laboratories share anonymised data.</p>
<p>3. Please use this space to provide any further comments you have on the implications of the COVID-19 outbreak for food safety in the UK.</p>	<p>Food Safety in the home arising from hoarding – ignoring use-by dates, failure of domestic fridges/freezers to maintain temperature, and consuming food that is past its food safety best, especially a concern for vulnerable groups in longer term self-isolation.</p> <p>Potential food safety issues arising from prolonged working and/or prolonged shut downs, especially where food handling, processing or storage facilities are being de-commissioned and/or re-commissioned or re-purposed unsafely.</p> <p>Capability planning varies within different size and scale of food operations resulting in differing capabilities to resiliently and safely manage crisis and change.</p> <p>Food (technical) resource availability within the UK food system is scarce due to historical lack of investment in food education, training and professional careers – opportunity to raise profile of food sector workers as critical to UK resilience and to pool / share technical resources across UK wide food sector through connectivity to expert professional resources e.g. IFST food safety and food auditor/mentor registers.</p> <p>Impacting all of the above is a lack of available technical support or monitoring due to the current fundamental lack of on-the-ground food hygiene, food standards and public analyst resource across the UK.</p>

FSA Question	Response
<p>4. What do you think will be the most important implications of the COVID-19 outbreak for food authenticity in the UK?</p> <p>For each implication please indicate the proportion of the population that you think may be affected. Please focus on implications that may be experienced over the next 3 months.</p> <p>(option for 5 comments)</p>	<ol style="list-style-type: none"> 1. Real risks - Increased vulnerability to fraud (which may also impact safety) as raw materials / foodstuffs sourcing is changed reactively to shortages. 2. Real risks - Increased use of internet purchasing will allow more freedom for criminals to operate impacting both food businesses and consumers. 3. Perceived risks - Scare-mongering in social media 4. Perceived risks – Labelling mistake on food packs e.g. where country of origin no longer matches product / ingredient descriptors
<p>5. Please detail any evidence sources that may help to monitor these implications on food authenticity</p>	<p>FIIN will have monitoring insights available to share</p> <p>The Food Authenticity Network (www.foodauthenticity.uk) has a wide range of members across individuals, SME and large operators who could supply insights on request by the Network.</p>
<p>6. Please use this space to provide any further comments you have on the implications of the COVID-19 outbreak for food authenticity in the UK.</p>	<p>Reminding food operators not to normalise any deviations from risk preventive practices in buying e.g. making spot purchase usual instead of an exception</p> <p>Create advice targeted for SME food operators on food fraud prevention - base on existing industry best practice e.g. Guidance on authenticity of herbs and spices - industry best practice on assessing and protecting culinary dried herbs and spices https://www.fdf.org.uk/corporate_pubs/guidance-herbsandspices.pdf; IFST Food & Drink Good Manufacturing Practice 7th edition and PAS 96:2017 Guide to protecting and defending food and drink from deliberate attack.</p> <p>Re-issue FSA 'Selling and buying food online – Q&A' 2016</p> <p>Make Food Industry Guides to Good Hygiene Practice on TSO free of charge, especially Mail Order Food guideline</p> <p>A lot of other helpful and still relevant FSA guidance document have been lost to public access upon launch of the new FSA website e.g. Criteria for the use of the terms fresh, pure, natural etc. 2002, Allergen management and consumer information 2006. Reinstating such FSA guidance would assist food operators in continued food safety and labelling compliance.</p>

FSA Question	Response
<p>7. What do you think will be the most important implications of the COVID-19 outbreak for the regulation of food businesses in the UK?</p> <p>For each implication please indicate the proportion of businesses you think may be affected. Please focus on implications that may be experienced over the next 3 months.</p>	<p>Proliferation of small unregistered start-ups or re-purposed businesses, particularly on-line.</p> <p>Unregistered food businesses trading will become normalised as lack of enforcement continues to permit it.</p> <p>Re-purposing of hospitality into food manufacturers creating new risks to consumers. Seems commonplace for smaller independently run food service and hospitality businesses but not for larger branded food outlets.</p> <p>De-commissioning and re-commissioning unsafely leading to future issues post-lockdown. Not possible to know how many individual operations affected as no notification has been formally required.</p> <p>All of the above challenges not able to be quantified, supported, monitored or controlled due to lack of on the ground food hygiene or food standards enforcement resources.</p>
<p>8. Please detail any evidence sources that may help to monitor these implications on food business regulation</p>	<p>Web-trawling software to identify on-line sites offering food e.g. Facebook offers from individuals of food for sale, local cafes/restaurants and butchers/green-grocers/community shops going on-line.</p> <p>Leverage FSA strategic surveillance dashboard to discriminate between identifying competent authority alerts vs social media adverse reactions and complaints</p>
<p>9. Please use this space to provide any further comments you have on the implications of the COVID-19 outbreak for food business regulation in the UK.</p>	<p>In order to supplement food system enforcement resources, establish government led recruitment schemes for accredited food safety professionals e.g. IFST food safety register and auditors e.g. IFST RPFAM, accredited BRCGS auditor which includes those who are furloughed or unemployed) as well as retired EHO / EHP to provide critical workers for the food sector and for inspection/regulation (in same way NHS has been recruiting).</p> <p>Government initiative to address food sector workforce shortfalls to support UK food supply resilience e.g. Students, those furloughed from other manufacturing operations.</p>

FSA Question	Response
<p>10. Please provide your name below. This will allow us to identify who participates in the Expert Panel. Responses will be anonymous.</p> <p>Providing your name will indicate your consent for us to store this information for the length of the panel excise.</p>	<p>Rachel Ward PhD FIFST r.ward@ifst.org With inputs from IFST COVID-19 Advisory Expert Group</p>
<p>11. Finally, if you would like to nominate someone you feel would be able to make a valuable contribution to the FSA COVID-19 Expert Panel, please provide their name, email address and institution below.</p>	<p>John Points MIFST Email: john.points@btinternet.com</p> <p>Alex Kent Hon. Fellow IFST Email: alex.kent2013@gmail.com</p> <p>Peter Littleton MSOFHT, FIFST, MIAFP, RFoodSP Email: Peter.littleton@christeyns.com</p> <p>Denis Treacy FIFST Email: denistreacy62@gmail.com</p> <p>Sterling Crew Hon. Fellow IFST Email: sterlingmcrew@aol.com</p> <p>Chris Gilbert-Wood FIFST RFoodSP Email: Chris@CGWfoodtech.com</p>