Food Safety
AUTHORITY OF IRELAND

AUDIT REPORT

Audit of Multiple Retailers

SEPTEMBER 2018

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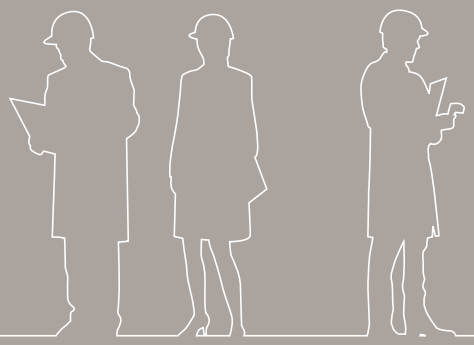

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1. GLOSSARY

FSAI	Food Safety Authority of Ireland
HSE	Health Service Executive
POS	point of sale
CDC	central distribution centre
RASFF	Rapid Alert System for Food and Feed

2. EXECUTIVE SUMMARY

Regulation (EC) No 178/2002 requires that food business operators (FBOs) satisfy themselves that all food under their control, at all stages of production, processing and distribution, meets the requirements of food law, and that food is not placed on the market if it is unsafe, i.e. injurious to health or unfit for human consumption. Where an FBO identifies that a food it has placed on the market is not in compliance with the requirements of food law, then it must immediately take action to withdraw the food from the market and inform the competent authorities. In cases where the product may have reached the final consumer, the FBO must effectively and accurately inform consumers of the reason for the recall of the product from the market.

The Food Safety Authority of Ireland (FSAI) is responsible for the management of such food incidents with FBOs. Additionally, the establishment of the Rapid Alert System for Food and Feed (RASFF) under Regulation (EC) No 178/2002 provides a platform for notification and information sharing among Member States on non-compliances identified in food products. The FSAI communicates daily with Government Departments, official agencies and laboratories, the European Commission and other Member States and third countries to coordinate and report actions taken in the Republic of Ireland, and it informs colleagues in Member States and third countries where such affected products may have originated from, and if they have been distributed to these countries.

The FSAI completed a targeted audit of food businesses by auditing seven multiple retailers operating in the Irish grocery market. Two of the seven multiple retailers audited were symbol groups that operate under franchise arrangements with small independent retailers. A total of 14 stores (two of each of these retailers) were audited, unannounced, over the course of the audit; in addition, seven announced visits were made to the head offices of the multiple retailers.

Six stores were found to have deficiencies in their procedures to withdraw or recall food from their customers. Significantly, four of these six stores had no procedures in place to effectively deal with the withdrawal or recall of a food supplied by a 'local'[1] supplier, e.g. meat products, eggs, bread or confectionery. Two of these six stores had no procedures in place to inform the competent authorities of a recall of a locally supplied product, and one store was not aware of its legal requirement to display a point of sale (POS) notice informing consumers of a product recall and the reason for the recall.

In the seven head offices audited, a total of 19 non-compliances with Regulation (EC) No 178/2002 were identified. Two of the seven head offices had findings identified in relation to the HACCP requirements of Regulation (EC) No 852/2004. The HACCP-related findings were in respect of the lack of procedures and oversight by these two head offices of their stores to verify that the withdrawal and recall procedures were operating effectively at store level. Six of the seven head offices had sufficient traceability systems in place to meet the requirements of Regulation (EC) No 178/2002. One head office did not have sufficient traceability systems in place to identify product that was implicated in a product recall. Three of the seven head offices audited had findings relating to the requirement to use an evidence-based risk assessment process to make informed risk management decisions, with two head offices having neither risk assessment nor risk management procedures in place for both central supply chain and local supply chain products should these products be identified as having non-compliances with food legislation.

[1] A 'local' supplier is one that enters into a contractual agreement with an individual store or stores in a locality to supply food products which they produce. This local supply chain is separate and distinct from the central supply and distribution chain operated by many of the multiple retailers.

3. INTRODUCTION

The Food Safety Authority of Ireland (FSAI) has overall responsibility for the enforcement of food law in Ireland, predominantly through service contracts with Government Departments and agencies. The FSAI carries out targeted audits of food businesses each year to determine the level of compliance with current food law and the effectiveness of its enforcement. This audit examined the compliance of a number of multiple retailers with the requirements to recall or withdraw from sale food that is non-compliant with food law or with which the auditors have identified an issue, e.g. incorrect labelling.

Regulation (EC) No 178/2002 requires that food business operators (FBOs) satisfy themselves that all food under their control – at all stages of production, processing and distribution – meets the requirements of food law, and that food is not placed on the market if it is unsafe, i.e. injurious to health or unfit for human consumption. Where an FBO identifies that a food it has placed on the market is not in compliance with the requirements of food law, then it must immediately take action to withdraw the food from the market and inform the competent authorities. In cases where the product may have reached the final consumer, the FBO must effectively and accurately inform consumers of the reason for the withdrawal or recall of the product from the market.

The FSAI is responsible for the management of such food incidents with FBOs. Additionally, the establishment of the Rapid Alert System for Food and Feed (RASFF) under Regulation EC) No 178/2002 provides a platform for notification and information sharing among Member States on non-compliances identified in food products. The FSAI communicates daily with Government Departments, official agencies and laboratories, the European Commission and other Member States and third countries to coordinate and report actions taken in the Republic of Ireland, and to inform colleagues in Member States and third countries where such affected products may have originated from, and if they have been distributed to these countries.

The grocery market in the Republic of Ireland is worth an estimated €9 billion, with household spending on groceries averaging €5,400 annually.[2] The most recent grocery market share data show the level of consumer spend in each of the multiple retailers.

3.1. Audit objective

The objectives of this audit were to:

(i) Assess how the multiple retailers manage food incidents, including recalls and withdrawals, in accordance with food law.
(ii) Verify that the multiple retailers effectively communicate with, and disseminate information to, their stores and distribution centres, and where necessary, to other food businesses, consumers and competent authorities.
(iii) Examine what checks the multiple retailers request from the suppliers of their own-brand products to verify compliance with food law; for example, microbiological, chemical, authenticity. To confirm that appropriate and effective action has been taken by the supplier and the multiple retailers when the result of testing is unsatisfactory.

The audit focused on the effective management of food incidents by the multiple retailers at national and local level.

[2] The Irish & UK Grocery Retail Landscape, Kantar Worldpanel, 2017

3.2. Audit scope

The audit project involved a series of visits to stores and head offices of seven multiple retailers operating in the Irish market to verify the systems they had in place to control recall and withdrawal of food from sale when non-compliances were identified.

During each audit, the team assessed whether the business operators were complying with the criteria against which the audit was being carried out.

3.3. Audit criteria and reference documents

Food Safety Authority of Ireland Act, 1998 (S.I. No. 29 of 1998), as amended.

The audit criteria that will be referred to during the audit will be, but are not limited to:

Principal audit criteria

- Regulation (EU) No 1169/2011 on the provision of food information to consumers
- Regulation (EC) No 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, as amended
- Regulation (EC) No 852/2004 on the hygiene of foodstuffs, as amended
- Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs
- Regulation (EC) No 1881/2006 setting maximum levels for certain contaminants in foodstuffs
- Guidance Note No. 10 Product recall and traceability
- Guidance Note No. 27 on enforcement of Commission Regulation (EC) No 2073/2005 on microbiological criteria for foodstuffs
-

Secondary criteria

- The FSAI HSE Service Contract
- Food Safety Authority of Ireland Act, 1998 (S.I. No. 29 of 1998), as amended.
- The National Control Plan for Ireland
- Food Information on pre-packed food

3.4. Audit methodology

This audit was undertaken using documented procedures which are included in the FSAI Quality Management System, namely the FSAI Audit Procedure and Charter. These procedures implement the FSAI audit obligations and are in accordance with the requirements of Regulation (EC) No 882/2004 (including Article 6.1 of Commission Decision 677/2006) and Section 48 (9) of the FSAI Act.

Seven multiple retailers were selected for the audit on the basis of their market share of the grocery market and the number of stores they operate in Ireland. The multiple retailers selected included five under common ownership as well as two operating under franchise arrangements. Fourteen stores (two from each of the seven retailers) were randomly selected across Ireland and unannounced audits were carried out. Following the conclusion of store audits, a programme of head office audits of each of the seven multiple retailers was

scheduled. Announced visits to audit the appropriateness of corporate systems for the management of food incidents, including recalls and withdrawals, were undertaken between July and September 2017.

3.5 Legal framework

Under General Food Law, Regulation (EC) No 178/2002, FBOs are required to ensure that they have procedures in place that will allow them to remove food from the market if it is not in compliance with food safety requirements. FBOs need to be in a position to withdraw food that has left their immediate control and contact the competent authorities and inform them of same. Where the product may pose a risk to consumer's health, the FBO must recall the product from the market and accurately inform the consumer of the reason for the recall.

4. AUDIT FINDINGS

4.1. Store-level findings on legislative requirements

4.1.1 General requirements of food law

Article 19 of Regulation (EC) No 178/2002 lays down the general principles and requirements of food law. It states that:

> "If a food business operator 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 in question from the market where the food has left the immediate control of that initial food business operator, and inform the competent authorities thereof. 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.
>
> A food business operator responsible for retail or distribution activities which do not affect the packaging, labelling, safety or integrity of the food shall, within the limits of its respective activities, initiate procedures to withdraw from the market products not in compliance with the food safety requirements and shall participate in contributing to the safety of the food by passing on relevant information necessary to trace a food, cooperating in the action taken by producers, processors, manufacturers and/or the competent authorities.
>
> A food business operator shall 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 and shall not prevent or discourage any person from cooperating, in accordance with national law and legal practice, with the competent authorities, where this may prevent, reduce or eliminate a risk arising from a food."

The 14 stores visited as part of this audit were assessed against the requirements of Article 19 of Regulation (EC) No 178/2002 to determine whether they had procedures in place to withdraw or recall food from their customers if they identified that it was not in compliance with food safety requirements. This included procedures to recall the food from consumers and the requirement to inform the competent authorities of the issue identified and to whom it had been supplied (where it had left the immediate control of the FBO).

Six stores (43%), from three of the multiple retailers, were found to have deficiencies in their procedures to withdraw or recall food from their customers. Significantly, four of these six stores had no procedures in place to effectively deal with the withdrawal or recall of a food supplied by a 'local' supplier of that food, e.g. meat products, eggs, bread or confectionery. Two of these six stores had no procedures in place to inform the competent authorities of a recall of a locally supplied product. One store was not aware of its legal requirement to effectively and accurately inform 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 (for example, display a point of sale notice informing consumers of a product recall and the reason for the recall). A second store indicated that point of sale (POS) notices are generally only displayed for between two and three days and a third store had delayed displaying a POS notice to inform consumers of a recall of a food for five days, as the communication from the store's head office had gone unnoticed by store management. This delay in displaying a POS notice could result in unsafe food being consumed, which could be avoided with timely action in stores to inform consumers of the risks.

Eight stores (57%) did not have any findings to address as a result of this audit.

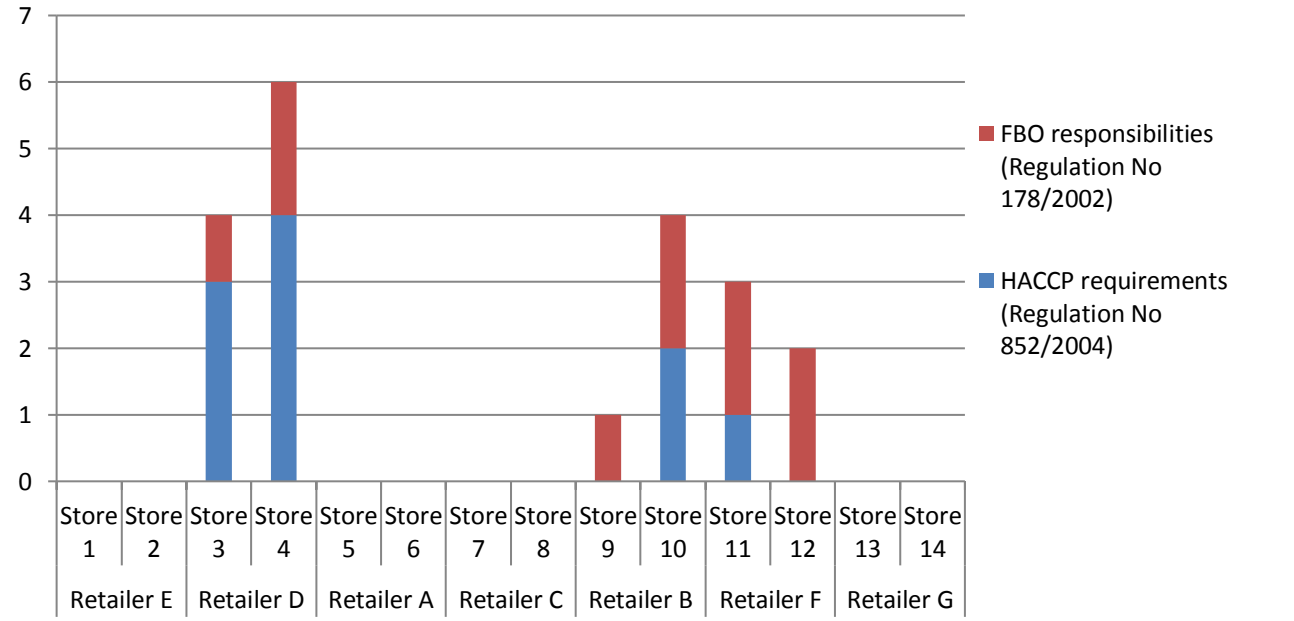
4.1.2 HACCP requirements

Article 5 of Regulation (EC) No 852/2004 on hazard analysis and critical control points (HACCPs) states that:

> "Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles."

The HACCP requirements under Regulation (EC) No 852/2004 include a provision that FBOs retain relevant documents and records for an appropriate period of time. The audit team reviewed a number of past recalls and withdrawals in the stores visited and found that two stores, which operated on behalf of one symbol group, had not kept records of previous recalls and withdrawals. The audit team did not find any evidence on the day of the audit to substantiate that these recalls had been actioned by the stores in question.

Figure 1: Numbers and types of legislative breaches identified in stores audited



4.2. Head office-level findings on legislative requirements

4.2.1. General requirements of food law

Article 19 of Regulation (EC) No 178/2002 lays down the general principles and requirements of food law. It states that:

> "If a food business operator 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 in question from the market where the food has left the immediate control of that initial food business operator and inform the competent authorities thereof. 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.
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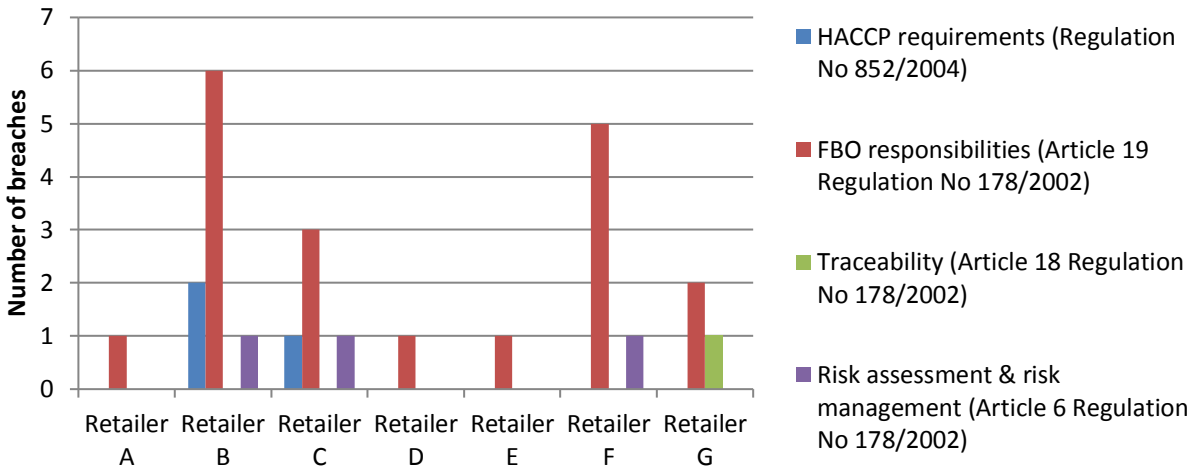
> A food business operator responsible for retail or distribution activities which do not affect the packaging, labelling, safety or integrity of the food shall, within the limits of its respective activities, initiate procedures to withdraw from the market products not in compliance with the food safety requirements and shall participate in contributing to the safety of the food by passing on relevant information necessary to trace a food, cooperating in the action taken by producers, processors, manufacturers and/or the competent authorities.
>
> A food business operator shall 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 and shall not prevent or discourage any person from cooperating, in accordance with national law and legal practice, with the competent authorities, where this may prevent, reduce or eliminate a risk arising from a food."

The most significant number of findings by the audit team in the seven head offices audited were in relation to their ability to meet the requirements of article 19 of Regulation (EC) No 178/2002. The audit team identified a total of 19 non-compliances with this requirement. This represented 73% of all non-compliances identified at head office level. Examples of the types of non-compliances identified included:

- Commercial contracts not specifying to suppliers their responsibilities when they identify a non-compliance with food safety legislation, and lack of clarity as to who is responsible for the risk assessment of hazards identified
- Lack of oversight and verification by head office that stores have received and actioned withdrawal or recall notifications; lack of reconciliation of stock returned at the central distribution centre (CDC) level
- No procedures in place at head office level or provided to stores as to requirements for stores when a local supplier identifies an issue/non-compliance with its food and needs to withdraw/recall the product from the market; no procedures to inform the competent authority of such local supplier withdrawals or recalls
- Undue delays in displaying POS notices in stores; instructions as to where POS notices should be displayed do not facilitate consumers being informed.

Figure 2: Numbers and types of legislative breaches identified in head offices audited



Each head office had put in place different processes and procedures for the display of POS notices in its stores. The audit team noted that some communication practices were more effective in informing consumers in a timely manner that a product was being recalled from sale and the reason why.

Table 1: Point of sale notices

	Display points	Other comments
Retailer A	Store entrance	Date for removal of point of sale notice indicated Delay in posting and displaying of notices (>24 hours)
Retailer B	Conspicuous location within store	No checks undertaken by head office to verify that notices were in place
Retailer C	Customer Service Desk Shelf location	Notices only sent to stores that stock implicated product
Retailer D	Store entrance[3]	Date for removal of point of sale notice indicated
Retailer E	Customer Service Desk[4]	Date for removal of point of sale notice indicated
Retailer F	Shelf location	Date for removal of point of sale notice indicated
Retailer G	Customer Service Desk	Date for removal of point of sale notice indicated

[3] The audit team was informed that FBO 4 has plans in place to extend display points to store exits also.
[4] Based on this audit's findings, FBO 5 has since made a business decision to display POS notices at other locations in store, including the shelf display point for the implicated product.

Stores that only display POS notices at the Customer Service Desk can limit the visibility of the notice depending on the location of the Desk. It was noted during the store audits that the Desk can be located some distance away from customers' usual route through the store and that this was not always the most visible and effective place to display a notice informing customers that a product was the subject of a recall. Two of the seven (29%) multiple retailers displayed the POS notice at the shelf location of the affected product. The audit team noted that this would be clearly visible to customers as they moved through the store. Five of the seven (71%) head offices had included the date for removal of point of sale notices, so that stores knew when to stop displaying the notice.

4.2.2. HACCP

Article 5 of Regulation (EC) No 852/2004 on HACCP states that:

> "Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on the HACCP principles."

The HACCP requirements under Regulation (EC) No 852/2004 include a provision that FBOs retain relevant documents and records for an appropriate period of time. In two of the seven (29%) head offices there were findings identified in relation to the Regulation (EC) No 852/2004 HACCP requirements. The three findings related to the lack of corporate procedures and oversight of their stores to verify that they were working effectively, e.g. one multiple retailer did not have any central or independent audit of its stores to verify if food law was being complied with within its store network; such compliance included the requirement to recall or withdraw food from sale when an issue was identified with it. The second retailer had such audits in place, conducted by a third party. However, the findings relating to the recall and withdrawal of food from the most recent audits of the stores within the group remained open at the time this audit was carried out.

4.2.3. Traceability

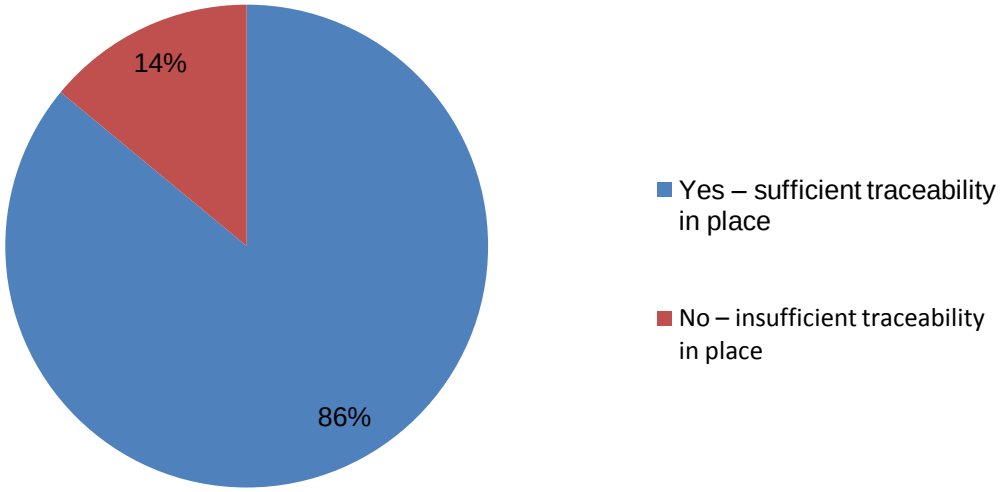
Article 18 (2) of Regulation (EC) No 178/2002 states that:

> "Food and feed business operators shall be able to identify any person from whom they have been supplied with a food, a feed, a food-producing animal, or any substance intended to be, or expected to be, incorporated into a food or feed."

Six of the seven (86%) head offices had sufficient traceability systems in place to meet the requirements of Regulation (EC) No 178/2002. One multiple did not have sufficient traceability systems in place to identify a product which was implicated in a product recall and required immediate removal from sale. The audit team noted that the head office team responsible could not identify implicated product using their own systems and procedures, and they required the supplier's assistance in order to effectively and accurately identify the implicated batches of product on sale in the multiple's stores in Ireland.

This lack of an effective traceability system caused additional confusion when the multiple concerned contacted the FSAI to inform it about a product recall and gave incorrect information initially, which was then corrected in subsequent communications with the FSAI.

Figure 3: Findings on traceability requirements



4.2.4. Risk assessment and risk management procedures

Article 6 of Regulation (EC) No 178/2002 lays down the general principles and requirements of food law. It states that:

> "(1) In order to achieve the general objective of a high level of protection of human health and life, food law shall be based on risk analysis except where this is not appropriate to the circumstances or the nature of the measure. (2) Risk assessment shall be based on the available scientific evidence and undertaken in an independent, objective and transparent manner. (3) Risk management shall take into account the results of risk assessment, and in particular, the opinions of the Authority referred to in Article 22, other factors legitimate to the matter under consideration and the precautionary principle where the conditions laid down in Article 7(1) are relevant, in order to achieve the general objectives of food law established in Article 5."

Three of the seven (43%) head offices audited had findings relating to the requirement to use an evidence-based risk assessment process to make informed risk management decisions, with two of them (29%) having neither risk assessment nor risk management procedures in place. This was the case for both central supply chain and local supply chain products, should those products be identified as having non-compliances with food legislation. The third had dual procedures for risk assessment and risk management processes, but there was no requirement to document the outcome of these processes. This resulted in there being no record of the basis of decisions and actions taken. Examples reviewed by the audit team found that product withdrawals were undertaken, almost exclusively, when non-compliance was identified. The lack of a documented reasoning for the risk management decision to withdraw these products meant that the audit team could not assess the basis for these risk management decisions.

Table 2: Risk assessment and risk management procedures

	Risk assessment procedures		Risk management procedures	
	Central supply chain	Local supply chain	Central supply chain	Local supply chain
Retailer A	Yes	N/A[5]	Yes	N/A[2]
Retailer B	No	No	No	No
Retailer C	Dual procedures[6]	N/A	Dual procedures[3]	N/A
Retailer D	Yes	N/A[2]	Yes	N/A[2]
Retailer E	Yes	N/A[2]	Yes	N/A[2]
Retailer F	No	No	No	No
Retailer G	Yes	N/A[2]	Yes	N/A[2]

All of the head offices audited had assigned a senior person within the organisation to make decisions when non-compliances with food legislation were identified. Despite the lack of procedures, or limited procedures, in place in three of the head offices, this person was empowered to make decisions as to whether products should be withdrawn or recalled from consumers, based on the information available. The audit team also found that all of the head offices communicated product recalls and withdrawals to the competent authority (FSAI), and also communicated the reasons for these actions in a timely manner.

4.3. Reasons provided for non-compliance

The main reasons given by stores for the findings identified during this audit were that they were unaware of the legal obligations regarding informing consumers of the recall of product (for example, by displaying POS notices) or having procedures in place to recall/withdraw products that had been supplied to them by local suppliers. It was also clear to the audit team that the head offices of these multiple stores had not identified the use of local suppliers by their stores as an area of responsibility that was within their remit. This lack of oversight of local suppliers had resulted in significant gaps in their systems and procedures to manage product recalls and withdrawals as required under Regulation (EC) No 178/2002.

[5] There is only one central supply chain in this multiple retailer.
[6] Risk assessment and risk management outcomes not documented.

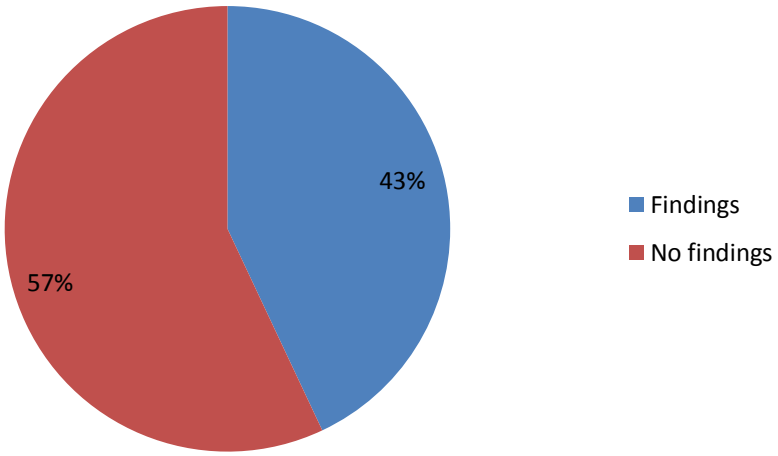
4.4. Overall compliance with legislative requirements

4.4.1. Store-level compliance

The purpose of this audit was to assess how multiple retailers manage the recall and withdrawal of food products from the market when a non-compliance with food safety legislation is identified; this was achieved by visiting the stores and head offices of seven multiple retailers operating in the Irish market. Regulation (EC) No 178/2002 sets out the legislative requirements for FBOs in such instances.

At store level, six (43%) of the 14 stores visited were found to have deficiencies in their procedures to withdraw or recall food from their customers, with 20 findings requiring corrective action identified by the audit team.

Figure 4: Store-level compliance

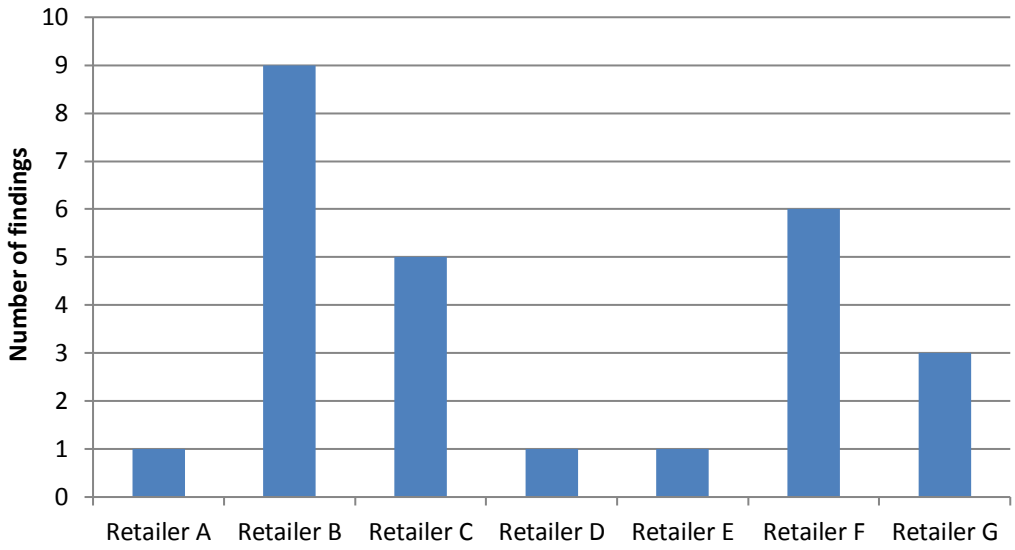


4.4.2. Head office-level compliance

In summary, at head office level, all of the multiple retailers had findings that required corrective action. Three head offices (43%) only had one finding requiring corrective action, with the remaining four head offices having between three and nine findings. One multiple retailer head office had nine findings that required corrective action. These findings were in relation to non-compliances to meet the HACCP requirements of Regulation (EC) No 852/2004, the responsibilities of FBOs, and the risk assessment and risk management requirements as set out in Regulation (EC) No 178/2002.

The two head offices with the greatest number of findings requiring corrective action had significant deficiencies in how the use of local suppliers to their stores was incorporated into procedures to effectively manage the recall and withdrawal of food from customers when an issue was identified with the product.

Figure 5: Head office-level compliance



5. POSITIVE PRACTICES OBSERVED DURING THE AUDIT

A number of positive practices were observed by the audit team during the course of this audit.

- Stores had designated quarantine areas in which stock that was the subject of a recall/withdrawal was isolated from other stock, so that it could be collected by the supplier. In one multiple retailer, the area manager was responsible for visiting all stores in their area within 24 hours of a notification to physically verify the stock count in this location, prior to its collection/disposal.
- One multiple retailer had a system in stores where three bells rang out in the store to alert store management that a product recall/withdrawal notification required action.
- The head office staff involved in dealing with product recalls/withdrawals and in the decision-making process of risk assessing and risk managing such incidents were all found to be very proactive in pursuing their suppliers for information when an issue was identified to them, so as to ensure that the issue identified was fully understood and that the information available allowed an informed risk management decision to be made,

6. CONCLUSIONS

In summary, at store level, six of the 14 (43%) stores from three FBOs visited had 20 findings between them that required corrective action to address issues identified during the audit. Eight stores (57%) had no findings and were found to be compliant with the requirements of Regulation (EC) No 178/2002.

Significantly, four of these six stores with findings had no procedures in place to effectively deal with the withdrawal or recall of a “locally” supplied food. Two of these six stores had no procedures in place to inform the competent authorities of a recall of a locally supplied product, and one store was not aware of its legal requirement

regarding informing consumers of the recall of product (for example, by displaying a POS notice informing consumers of a product recall and the reason for it).

A second store indicated that POS notices are generally only displayed for between two and three days and a third store had delayed displaying a POS notice to inform consumers of a recall of a food for five days, as the communication from its head office had gone unnoticed by store management.

All head offices visited had findings that required corrective action; three had only one finding to address. The remaining four had a number of significant findings that needed to be addressed in order to ensure that their stores would be compliant with the requirements of Regulation (EC) No 178/2002. The main issues identified were:

- Commercial contracts not specifying to suppliers their responsibilities when they identify a non-compliance with food safety legislation, and lack of clarity as to who is responsible for the risk assessment of hazards identified.
- Lack of oversight and verification by head office that stores have received and actioned withdrawal or recall notifications; lack of reconciliation of stock returned at the CDC level.
- No procedures in place at head office level or provided to stores as to requirements for stores when a local supplier identifies an issue/non-compliance with its food and needs to withdraw/recall the product from the market; no procedures to inform the competent authority of such local supplier withdrawals or recalls.
- Undue delays in displaying POS notices in stores; instructions as to where POS notices should be displayed do not facilitate consumers being informed.

Following audits in which non-compliances with legal requirements were identified, the FBO was informed of these non-compliances and was required to implement corrective actions which were reviewed for close-out by the supervising official agency.

7. RECOMMENDATIONS

1. Stores should put in place corrective action to address the findings that require corrective action; they should do this in conjunction with the Health Service Executive (HSE) Environmental Health Service.

2. The head offices of the multiple retailers audited should ensure that ‘local’ suppliers of foods to their store network are included in their recall and withdrawal procedures, and they should recognise that this supply route requires additional follow-up by them with their stores when an issue arises.

3. Procedures for the undertaking of risk assessment and risk management should be updated by the head offices of the multiple retailers to include ‘local’ suppliers, and to reflect the decision-making process in the business. Retailers B and F need to immediately put in place procedures, outlining the risk assessment and risk management process within the food business operator’s business.

4. The outcomes of risk assessment and risk management discussions should be documented by the FBOs to ensure that this information can be used to inform future decisions.

5. The location where POS notices are displayed in stores should be reviewed by the head offices of the multiple retailers, particularly in cases where notices are displayed at the Customer Service Desk, which may be located some distance away from customer traffic areas in the store, and particularly where the notice may be displayed some distance away from the food or product concerned.

6. The head offices of the multiple retailers should ensure that they have oversight and verification that stores have undertaken the actions requested of them when a product is recalled or withdrawn from sale, and when POS notices are to be displayed.

7. Where third party audits of stores are undertaken on behalf of the multiple retailers, head office staff should ensure that any findings are closed out in a timely manner.

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