

Review into the Integrity and Assurance of Food Supply Networks

Note of meeting with Which?

Date: 16 January 2014

Attendees:

Sue Davies – Chief Policy Officer – Which?

Darren Shirley – Campaign Manager – Which?

Professor Chris Elliott (CE) – Review into the Integrity and Assurance of Food Supply Networks

Sarah Appleby – Review into the Integrity and Assurance of Food Supply Networks

Nick Hughes - Review into the Integrity and Assurance of Food Supply Networks

1. Reflections on Elliott Review interim report

Which? said it was generally pleased with the content of the interim report and that many of the recommendations were in line with the conclusions drawn in its recent Food Enforcement briefing. More specifically, it was noted that the recommendation for better intelligence gathering was of fundamental importance to prevention of food fraud and the establishment of a safe haven had the potential to enable a better flow of information from the food industry. The challenge was ensuring that this could be provided in sufficient detail to be useful and in a timely enough way. The establishment of an economic intelligence hub was also welcomed as it was suggested there was a need to generate more meaningful data. Which? also highlighted the need for the actions aimed at the food industry to recognise that smaller businesses will need more direction and therefore there is an important role for the FSA in providing guidance on the appropriate levels of controls that need to be put in place.

Which? suggested that it would be useful for the final report to include a little more detail on how the FSA linked up with other agencies in Europe and overseas such as in China and the US, as well as other Member States. It also asked whether there was an opportunity to create a transatlantic rapid alert system to exchange information on food fraud as part of the Transatlantic Trade Investment Partnership discussions. CE noted that DG Sanco was working on setting up a similar unit within the EU and had seconded someone from the FSA into the unit; however he suggested that a food fraud unit was a means to an end rather than an end in itself and there was still difficulty in knowing how to effectively use the information that was collected and collated.

CE said that responses to his interim report had been broadly positive particularly among the food industry. He noted that a lot of work had already been done to improve traceability in the red meat supply chain but that all food supply chains were at risk of fraud and the integrity of non-meat products must not be overlooked. He made the point that retailers

that claimed they had been victims of fraud were not taking a tenable position and that it was up to individual businesses to carry out due diligence on their supply chains and discuss any concerns at board level. He suggested that if rogues were able to operate in your supply chain then your control systems were not sufficiently robust.

2. Which? feedback on specific recommendations

Which? said it was supportive of most of the recommendations relating to labelling and standards. It strongly supported the need to return food labelling and standards policy responsibility to the FSA, however, it felt that responsibility for country or origin (COO) labelling policy should also return to the FSA as this was an issue of consumer protection rather than marketing. CE noted that industry sees COO as a source of competitive advantage adding that he planned to hold further discussions on the issue of authenticity work returning to the FSA. He also suggested that the two pillars of safety and authenticity should not be separated.

On the subject of the FSA, Which? noted that the 2010 machinery of government changes had come as a big shock and had significantly weakened the Agency. It was suggested that it was important to strike the right balance between the FSA maintaining its independence and consumer focus and integrating the Agency into government-wide discussions on food policy. The FSA must maintain its clear remit to put consumer interests first and to speak out if necessary. CE agreed that the FSA had become isolated and said he had looked at many different models for governance arrangements and would continue to do so. He also believed it was strange that no high level meetings took place between ministers/senior officials at FSA, Defra and DH and, indeed, other government departments with a stake in food policy. Which? pointed out that there had previously been a cabinet sub-committee on food which was disbanded in 2010 (the Ministerial Committee on Domestic Affairs Sub-Committee on Food (DAF)). It agreed with CE that there was a need for a cross-government group to meet regularly to discuss wider food issues, but that a wider mechanism was also needed (eg. sustainability and obesity issues, as well as safety and standards).

Which? said its recent report on Food Enforcement had found huge variation in the way that food enforcement was carried out around the country by local authorities (LAs). It believed that LAs had to find smarter ways to work in a resource-scarce environment, for instance by combining environmental health and trading standards services as had been the case in Worcestershire. Which? said it believed the FSA should assume a bigger strategic role in food enforcement and work together with LAs to achieve desired outcomes. This included being less passive and taking an active lead in working with LAs to identify the areas in which to focus their resources. It was also noted that all the mechanisms that used to be in place to allow LAs and the FSA to work together had gone, other than informal meetings, and there was a need to reinstate some of these mechanisms.

CE raised the subject of the cost to the consumer of food fraud prevention, suggesting that the extra cost of supply chain controls, such as testing and information gathering, would work its way up the chain to consumers. He asked whether that was something Which? could monitor? Which? said it had an interest in looking at costs being passed on to the consumer but said this could be difficult to measure.

3. Next steps

CE talked Which? through the timeline for the next stage of his Review. He noted that over the next 4-6 weeks, he would be discussing implementation of his recommendations with stakeholders and aimed to have a clear timetable for publication of the final report by the end of this period. Much of his work in the coming months would be to carry out impact assessments on his recommendations and look for learnings from other countries and business sectors. He noted that as far as possible he planned to ensure there was a minimal cost burden on industry or government from implementation of his recommendations. Which? stressed that the wider cost to the economy of low consumer confidence should not be underestimated when considering the costs of action versus inaction.

Which? said it planned to carry out more work on food fraud including a programme of product testing of its own.

ACTION: CE agreed to work with Which? to develop a programme of testing for food integrity.

ACTION: Which? agreed to provide further written comment in response to the interim report.

15 January 2014