FAO/WHO framework for developing national food safety emergency response plans

World Health Organization

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Acronyms

CIFOR	United States Council to Improve Foodborne Outbreak Response
EFSA	European Food Safety Authority
EMPRES	Food Safety Emergency Prevention System for Food Safety
FAO	Food and Agriculture Organization of the United Nations
FDA	United States Food and Drug Administration
FSA	United Kingdom Food Standards Agency
FSAI	Food Safety Authority of Ireland
IHR	International Health Regulations
INFOSAN	International Food Safety Authorities Network
MACG	Multiagency coordination group
NASDA	United States National Association of State Departments of Agriculture
SPS	Sanitary and Phytosanitary
WHO	World Health Organization

1. Introduction

1.1 Background

Many member states have requested that FAO and WHO provide technical assistance in the development of food safety emergency response plans. Reinforcing preparedness, and recognizing and responding rapidly to food safety emergencies are key elements of the food safety emergency-related programmes of FAO and WHO, namely the Emergency Prevention System for Food Safety (EMPRES Food Safety) and the International Food Safety Authorities Network (INFOSAN).

Several countries, most with well developed food control systems, have prepared response plans to document their actions during an emergency. However, there is currently no guidance that documents the best practices to use during the process of developing such plans, or what the plans should contain. The management of food safety emergencies is rarely the responsibility of a single national authority, and timely and coordinated collaboration among all partners is required to ensure an effective response.

1.2 Purpose of the document

This document was developed to assist countries in the formulation and implementation of national food safety emergency response plans that are consistent with the Risk Analysis concept[1].

1.3 Target audience

The target audience includes national authorities with responsibility for responding to food safety emergencies. While it was developed mainly for government agencies, this

[1] Risk analysis is a process that consists of three components: risk assessment, risk management and risk communication (FAO/WHO. 2005. Codex Alimentarius Commission. Procedural Manual, 15th Edition).
For more information, see: FAO/WHO. 2006. *Food safety risk analysis: A guide for national food safety authorities*. (ftp://ftp.fao.org/docrep/fao/009/a0822e/a0822e00.pdf).

document may also be useful for organizations that are engaged in activities in the area of food safety. In recognition of the importance of relying on effective national food control systems to build food safety emergency response plans, the document also addresses the specific needs of countries that are in the process of developing their national food control systems.

1.4 Scope of the document

The document outlines the process and principles of developing an integrated national food safety emergency response plan. The document also provides advice to national authorities on the steps to be taken in order to develop a plan.

Owing to the diversity of national food control systems[2] at different levels of development and the wide range of food safety hazards, the provision of standardized templates is unlikely to be useful; hence the present document provides general guidance to be used in the development of country-specific plans.

The document addresses the importance of adopting multiagency and multidisciplinary approaches, because an effective response can be achieved only through coordination and proper preparation of the various agencies that should be involved in the response process, given the complex nature of many food safety emergencies.

1.5 How to use the document

There are five sections in this document. After the first (introductory) section, the second section introduces the Codex definition of "food safety emergency" and describes factors to consider when defining a "food safety emergency" in national contexts. The third section, "Preliminary steps", outlines the necessary steps before initiating development of national food safety emergency plans. The fourth section, "Key considerations", is divided into two topics (general considerations and country-specific considerations) and illustrates important issues that should be considered and understood by all planning partners when drafting the plan. The last section, "Key elements of an emergency response plan", is the core section of the document and provides guidance on essential topics to be included in the plan.

[2] For information, see: FAO. 2006. *Strengthening national food control systems: Guidelines to assess capacity building needs* (ftp://ftp.fao.org/docrep/fao/009/a0601e/a0601e00.pdf).

2. Defining 'food safety emergency'

For the purpose of this document the Codex Alimentarius definition[3] is used, which defines a "food safety emergency" as:

> *a situation, whether accidental or intentional, that is identified by a competent authority as constituting a serious and as yet uncontrolled foodborne risk to public health that requires urgent action.*

The Codex definition provides a general description of a food safety emergency that will apply to a broad range of situations.

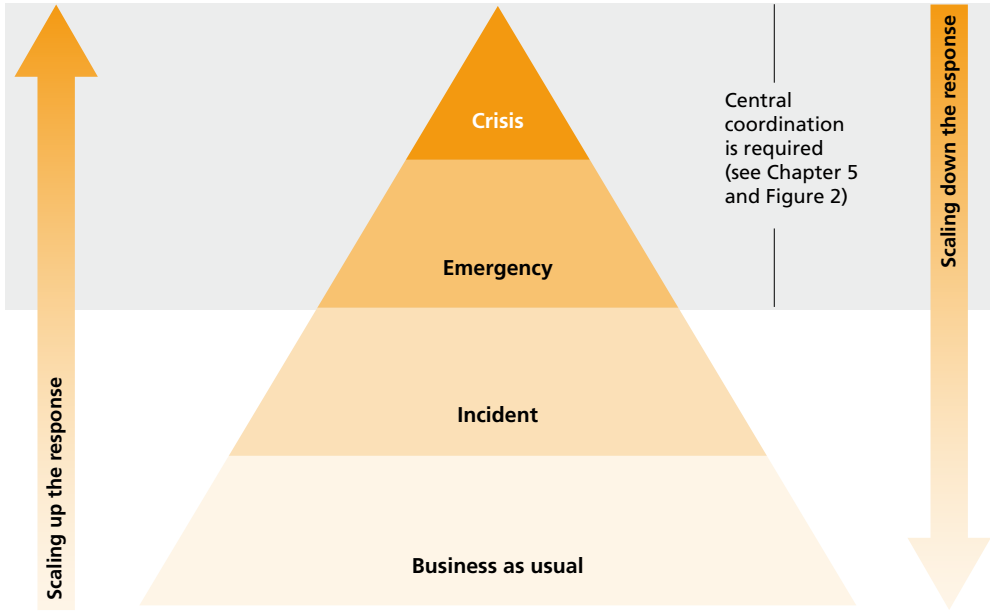
It is recognized that food safety events that require intervention to protect the health of consumers will range from minor incidents to major crises. A situation can change quickly or evolve over time to require varying amounts of resources, coordination and management in the response. Several factors will influence how an event is approached, including the number of people ill, the severity of the illness, the distribution and volumes of food, whether the contaminant is known or unknown, and the international and trade implications. In addition, the structures in place in a country to respond to such an event will play a critical role in the level of coordination and resources required. What might be handled as a routine incident in one country may be considered a crisis in another. These variations can lead to difficulties in determining what constitutes a food safety emergency. A variety of terms have been used for defining similar situations[4].

Countries will need to describe an emergency in terms of their own food control system. As a result, the definition of an emergency may vary from country to country, and the threshold of response will differ. While different terms may be used to describe the severity of an event, Figure 1 illustrates how the more severe (and less

[3] Under *Codex principles and guidelines for the exchange of information in food safety emergency situations* (CAC/GL 19-1995, Rev.1-2004).

[4] See 'Resources' on page 23.

Figure 1. Scalability of responses to food safety events



frequent) events have escalating needs for resources, centralized coordination and decision-making at a senior level. Response plans should reflect the need to adapt the response either up or down to meet the needs of the event.

3. Preliminary steps

Step 1. Obtain high-level support

Before embarking on the development of a food safety emergency response plan, appropriate government support and mandate are required.

In countries that have well developed food safety control programmes and in which a single food safety authority has been established through legislation, the mandate to develop and implement a food safety emergency response plan already exists. In countries without a single agency or specific legislation such a mandate needs to be sought at a high level of government.

The task of initiating a process to develop a food safety emergency response plan usually falls to an individual or agency[5] within the government. Given that multiagency collaboration will be required to develop this plan, other government agencies that will need to be involved should be identified during the process of seeking high-level support. This reflects the fact that the responsibility for food safety is often spread across a number of government agencies, all of which need to be involved in order to develop and implement an effective food safety emergency plan successfully.

Step 2. Identify key partners

Owing to the fact that the food safety hazards may originate from multiple sectors (plant, animal, feed, processing, etc.), the key to a successful response is to involve all those government agencies that have some responsibility for food safety in the development of the plan. This helps to ensure cooperation and collaboration by all interested parties and facilitates the sharing of information among responsible agencies. In developing a food safety emergency plan, the key partners will come from government agencies such as health, agriculture, fisheries, trade, and regional and local

[8] Given that the terminology used to describe political structures varies between countries, the term "government agencies" is used throughout this document to represent all such bodies, including ministries.

governments. The key disciplines and sectors to involve or consult may include the following:

- food inspection services;
- veterinary services;
- public health and epidemiology services;
- laboratory services[6];
- agriculture;
- emergency response services/specialists;
- customs and quarantine;
- legal services;
- law enforcement;
- food science and technology (government);
- me dia and communications;
- other relevant sectors.[7]

Step 3. Establish a planning group

A planning group needs to be established to lead the process of developing the food safety emergency response plan. This group should be multidisciplinary and have representatives from all of the key government agencies. Members of the group should be senior staff members with decision-making responsibilities and a good awareness of national and international policy.

The functions of this group will be to determine the scope of the food safety emergency response plan, to oversee the preparation of the plan, to ensure appropriate review and consultation with the key partners listed above, and to seek approval. The planning group should also ensure that a mechanism is in place for updating the plan as appropriate and conducting simulation exercises to test its effectiveness (see Chapter 4).

There will also be a need for the planning group to collect and review all relevant legal texts and to ensure the integration of the food safety emergency response plan with other national response plans, as appropriate. This group must also identify financial and human resources for the development of the plan and its implementation.

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[6] This also includes laboratories that may not be directly related to food analysis, for example clinical and environmental laboratories.

[7] The plan should be inclusive of all possible partners, for example tourism, environmental agencies, national security departments, etc.

4. Key considerations

4.1 General considerations

An incident may develop over time, becoming more serious and complex, and requiring greater resources to manage it. In some circumstances the incident will span various jurisdictions and may involve international trade. It may be useful to consider incidents as requiring a "tiered" response, moving from the ability to manage them locally to requiring coordination at national level.[8]

It will be important to develop criteria to distinguish between routine, easy to manage incidents and larger emergencies. In determining criteria for initiating the food safety emergency response, consideration will need to be given not only to the seriousness of the incident but also to the geographical area implicated, and other factors such as international trade and national policy.

It is important to recognize that emergencies will happen and there will be a need to respond. A plan will assist in providing a coordinated, efficient and consistent approach to dealing with incidents in order to minimize their impact on public health.

While a food safety emergency response plan would normally be built on an effective food control system, the absence of a well developed system should not prevent the development of a plan.

As stated above, the planning process should also include arrangements for the maintenance and periodic review of the plan and for ensuring that the information contained within it is up to date. Once a plan has been written, exercises should be arranged to ensure that the persons involved are familiar with the plan and that it can be implemented rapidly and effectively. The execution of simulation exercises may

[8] Government organization is often complicated and clear roles and responsibilities and communication channel among national, regional and local authorities should be detailed in the plan to ensure a consistent and coordinated approach is implemented.

identify shortcomings[9] or areas for review that can be addressed before an emergency occurs. Exercises can be simple scenario-driven tabletop exercises that involve few resources but are still useful in this process.

Timely communication and information sharing are important components in gathering and disseminating detailed information about the situation, and they assist in the decision-making process. The planning process should identify the existing channels of communication and identify how information about an incident can be disseminated.

Once the plan has been developed, it should be communicated to all relevant national agencies. In addition, stakeholders such as food industry and consumer groups should
be informed about the plan.

4.2 Country-specific considerations

Countries should review their experiences of food-related incidents and develop a profile of the system that already exists to address food safety emergencies, identify gaps and limitations, and consider how these should be addressed. The types of system to be considered include food inspection and food-borne disease surveillance, laboratory capacity, and access to medical countermeasures and specific treatments relevant to food-borne diseases.

Where resources are limited, implementation of the plan may be difficult. Therefore alternative arrangements may be needed to manage a food safety emergency. These solutions may be found within the country through partner agencies who may not be involved normally in food control. In addition, regional or international cooperation and contingency planning should be considered to address these needs. The international organizations that work in the area of food safety, such as FAO and WHO, should be considered as resources to provide support during emergencies as well as sources of information.

The development and implementation of a food safety emergency response plan is in line with best international practices and demonstrates compliance with international obligations such as those of the Sanitary and Phytosanitary (SPS) Agreement and International Health Regulations (IHR).

[9] Such shortcomings may indicate the need for further training, or limited financial and/or human resources, etc.

5. Key elements of an emergency response plan

5.1 Essential background information

The emergency response plan should include some introductory remarks on the overall purpose and objectives of the plan. In broad terms, the purpose of a food safety emergency response plan is to set out a framework for the response to emergencies when they occur. It provides guidance for those who have a role in food incident prevention or response. The objective is to have a coordinated approach across all government agencies to reduce risks to consumers, minimize public health impact, and to remove implicated products from the market.

The food safety emergency response plan should refer to relevant regulations or national legislation that provides the legal basis for its implementation. In addition, where other national and international emergency plans exist, for instance those relating to the control of food-borne disease outbreaks or outbreaks of animal diseases, the response plan should be linked to these to ensure an integrated response.

The roles and responsibilities of different national agencies involved in the food safety emergency response should also be described in the plan and may include the following:

- health sector;
- agriculture and fisheries;
- food/feed safety sectors;
- local authorities;
- national reference laboratories;[10]
- sectors that liaise with industry, trade and academia.

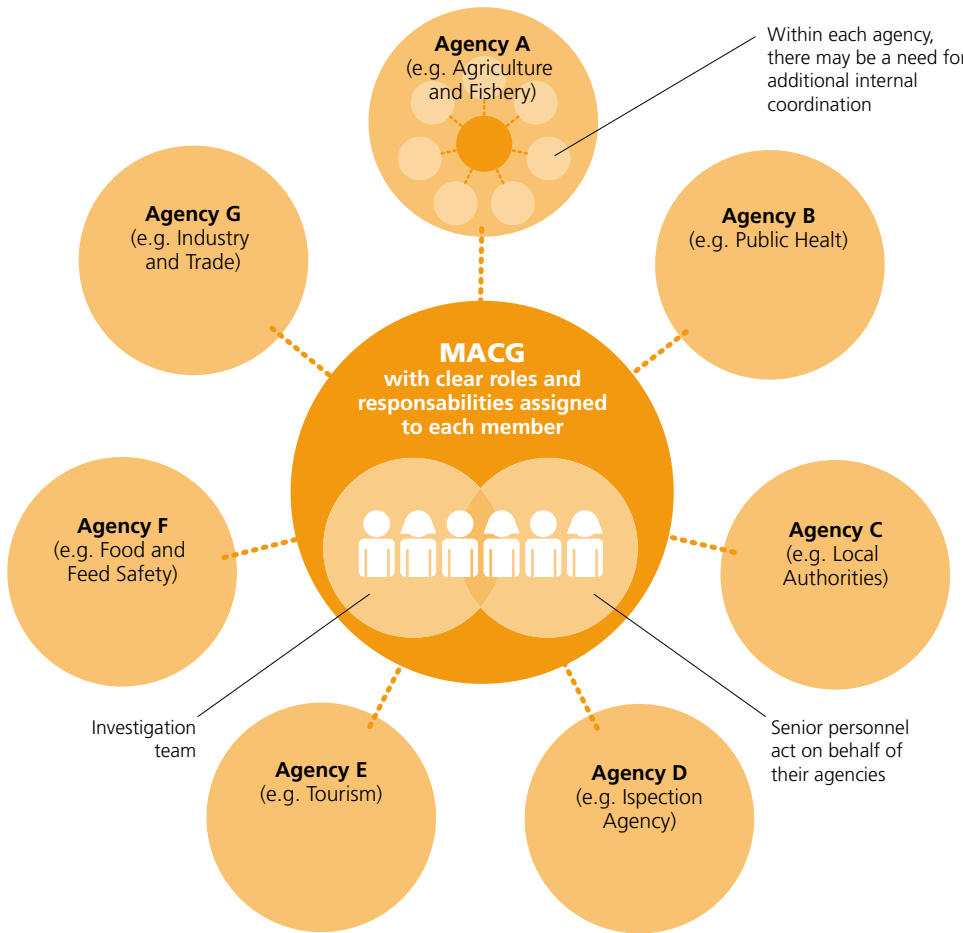
To ensure a coordinated approach, it is recommended that the plan considers the need for a multiagency coordination group (MACG), involving relevant government

[10] In countries where there is no national reference laboratory, the planning team may consider other options, such as regional or international laboratories.

Box 1. Ideas for items related to the MACG to be included in the emergency response plan

- General structure and composition of the MACG;
- Terms of reference (roles and responsibilities) of the MACG;
- Communication strategy among participating agencies;
- Operational and logistical arrangements;
- Evaluation and monitoring mechanisms.

Figure 2. Multiagency coordination group (MACG)



agencies, to coordinate the national response (see Figure 2). Depending on the country situation, such a coordination mechanism may already exist or can be built on other existing coordination groups. Multiagency coordination occurs across different disciplines, jurisdictions and government agencies. All partners in the MACG need to be identified and their roles and responsibilities described in relation to the control of the food safety emergency[11]. Typical members of the MACG will be senior personnel in the agencies of public health and agriculture, food inspection agencies and local authorities who are delegated to act on behalf of their agencies. The composition of the MACG will change depending on the nature of the event being managed; it should be an ad hoc group that is set up for each particular event.

It is acknowledged that within each agency there may be a need for additional coordination activities to manage the event, which may involve extra resources. This will probably have occurred before the MACG is established.

5.2 Incident identification

Food safety incidents are usually identified by a variety of information sources, such as the food industry, trading partners, laboratory reports, public health surveillance, hospital admission reports, consumer complaints, environmental monitoring, national food safety monitoring and surveillance programmes, international notification, and media monitoring.

Monitoring systems are usually under the mandate of different government agencies engaged in food safety and public health. If reports from the various systems are evaluated collectively, incidents are more likely to be identified. Mechanisms for sharing such information should be developed, ideally by a central management team. However, in the absence of such a central team it is necessary to establish regular communication between the partners for sharing and assessing data. The public health sector would normally share data on individual cases or outbreaks of food-borne diseases. Reference laboratories share data on the detailed analysis of samples. Government agencies in charge of the agriculture and fisheries sectors share information on contaminated food that is likely to be on the market. Similar information may come from the food sector. It is crucial that a mechanism is in place to share information routinely among all relevant partners, and this mechanism should be documented in the emergency response plan.

When an unusual event is identified, the information needs to be validated in order to assess the situation fully and decide on the subsequent action. To this end,

[11] Sometimes it is necessary to identify a leading agency.

more information related to the event should be sought rapidly and assessed by the MACG using a risk-based framework. The plan should outline this process and how the situation will be reassessed as new information becomes available.

The criteria for activating the food safety emergency response plan should be developed and agreed by all partners. These criteria will be related to the nature of the hazards, the risks associated with these hazards, the complexity and magnitude of the emergency, the distribution and quantity of food implicated, the severity of the health effect, the population at risk and the resources available to deal with the emergency.

The plan must describe the process that will ensure that all information and documents relating to the incident are recorded centrally. These records should include those of meetings convened, and the decisions taken.

5.3 Incident management

From the outset, incident management relies on establishing control, direction and coordination for dealing with an incident. The overall control of an incident needs to be managed centrally by the MACG. During the management of an incident, the investigating agencies will need to take direction from the MACG to ensure effective coordination. The food safety emergency response plan needs to describe all aspects of this coordination, including how the MACG communicates and receives information associated with the incident.

The information should flow from the key response implementation partners involved in the investigation to the MACG, who coordinate and review the information in order to determine the appropriate risk management actions. Information should also flow from the MACG to those involved in dealing with the incident to provide updates on the situation. This can be done in the form of daily situation reports that are issued to all involved and also reported up to the political hierarchy.

The primary information relating to the incident should normally include sufficient information to allow the identification of the population at risk.

Depending on the nature of the incident, it may be necessary to involve other agencies and to request additional resources and staff to deal with the incident. In anticipation of the need for surge capacity, staff who could be reassigned to assist in the response to an event should be identified and trained in advance. A duty roster that allows for appropriate rest time for those responding is also essential because many food safety events carry on for weeks. Therefore, the plan should include a process for recruiting surge capacity, rotating staff as needed and ensuring their needs are met when working extended hours.

As part of the investigation, it will often be necessary to increase sampling (from food and from human cases), and the existing laboratory capacity (public or private) may not be sufficient to cope with the number and type of samples required. Where there is insufficient capacity, arrangements should be made to access capacity elsewhere, such as in neighbouring countries.

As the incident develops it will usually be necessary to initiate interventions to protect public health by containing and controlling the distribution of affected food products. Prevention of the distribution of contaminated food products, withdrawal and recall of food, and closure of food businesses should be considered to be appropriate measures and undertaken when necessary. Ideally there will be established procedures for tracing the food, withdrawal, recall, and temporary closure of food businesses. These should be referred to in the response plan.

Procedures must be documented for adequate disposal of food products that have been removed from the food chain, to neutralize any active contaminants and to prevent further possibility of the food or the contaminant entering the food chain.

At some stage of the incident it will be necessary to scale down the investigation to normal routine activities. This will be decided by the MACG, when there is no longer a risk to public health and all implicated food products have been controlled, according to criteria laid down in the response plan. All those involved in the investigation will need to be informed that the incident has been scaled down.

5.4 Post-incident review and evaluation

At the conclusion of an incident, it is often useful to conduct a review of how the incident was managed, to identify strengths and areas that could be improved to make the management of future incidents more effective. This process should be outlined clearly as part of the response plan.

Consideration should be given to reviewing the response activities that were undertaken to protect public health, the different means of communication, the regulatory procedures available to inspectors for taking action to prevent the production and distribution of implicated food products, the capacity and reporting of laboratory and inspection services and the effectiveness of any product withdrawal/recall. Gaps in laboratory testing capability may also be identified that may require future consideration of capacity building.

Following the "lessons learned" analysis of the incident it may be necessary for the planning team to revise the plan. It may also be appropriate to make recommendations for corrective actions to improve the national food control

programme, for example additional training for inspection staff, strengthened laboratory capacity or improved regulatory procedures.

The information gained during the course of an investigation may identify processes or practices that require action to ensure that similar incidents are avoided. Such corrective actions should be shared with the trade sector and policy-makers.

5.5 Communication

The national food safety emergency response plan should document strategies for communication and information exchange with: 1) partners, 2) stakeholders, including healthcare providers, media and the general public, and 3) international organizations. Effective communication is essential and requires preparation in advance of an emergency situation, and this should include exchange of information with all stakeholders. The objective of a communications strategy is to provide accurate, timely information on the hazard and to ensure a common understanding of the problem.

The plan needs to reflect the overall approach to communication with all partners and with the public. Processes must be considered to address a variety of information needs, such as emergency alerts, interagency communication, other government authorities (local, state/province, tribal nations), foreign governments and international organizations, public messaging and communications to industry.

An essential component of any plan is a list of the contact details of all key partners and stakeholders, including the media; this list needs to be readily available and updated regularly.

Procedures should be in place (Standard Operating Procedures, Codes of Practice) to manage the information and communications generated during the management of an incident. Regular updates need to be prepared on the emergency as it unfolds and disseminated to those involved in managing the incident. Some of the information gathered will need to remain confidential and the plan should address this.

The communications strategy may include the use of model press releases, templates for notification of incidents, recall/withdrawal notices, prepared questions and answers, and fact sheets on familiar topics. The means of disseminating information can include dedicated Web sites, printed materials[12], and public notices in national and local press. It is important to ensure that the information provided is accessible to the general population. It may be necessary to translate the message into

[12] The planning team should pay attention to country-specific situations for effective communication strategies, for example, the use of graphics, posters, etc.

other languages and to provide coverage via television and radio. It is necessary to ensure that those in rural areas without access to mass media also receive the information through other means.

Communications to the public should be simple to understand, open and factual about the risk and the products affected, and should provide advice to the public. Information should be provided on what has been and what is being done to contain the problem. Advice should also be given to consumers on what to do if they have obtained affected products and what to do if they have consumed affected products.[13]

The plan should describe the establishment of a telephone information line with trained staff that concerned individuals can call for factual information on the food safety emergency. This should be able to adapt to cope with large numbers of calls over short time periods.

It is beneficial to have a single nominated spokesperson to present information to the media via press briefings. This person will be prepared and trained in advance on how to communicate effectively in such circumstances and should be a person who can be recognized as having some authority on the topic. Regular press briefings may need to be held. A process for monitoring information needs and advising on subsequent communications should be in place.

In considering outreach to the international community, existing systems for information exchange may be in place and should be used. The International Food Safety Authorities Network (INFOSAN) is an FAO/WHO network for the dissemination of important information about food safety issues globally. INFOSAN maintains a network of focal points and emergency contact points in member countries. During food safety incidents, INFOSAN liaises with relevant national authorities to collect, validate and if required share factual information at the international level. Information reported to INFOSAN is subject to validation with the relevant countries. Alerts that result from these discussions are developed and agreed with the countries involved, and shared through a secure Web site. INFOSAN should be considered a key information resource for support during emergencies. Many food safety emergencies have international implications and may be reportable to WHO under the International Health Regulations (IHR). This will require close collaboration between the authorities that are directly involved in the food safety emergency and the National IHR Focal Point.

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13 See 'Resources' on page 23.

14 For more information, see: http://whqlibdoc.who.int/publications/2008/9789241580410_eng.pdf

UK: Food Standards Agency

- *Principles for preventing and responding to food incidents – A guidance document produced by the Food Standards Agency's taskforce on incidents* (April 2008). http://www.food.gov.uk/multimedia/pdfs/incidentsprinciples.pdf
- *Incident response protocol* (revised February 2009). http://www.food.gov.uk/multimedia/pdfs/incidentresponserotocol.pdf

Ireland: Food Safety Authority of Ireland

- *Food incidents and food alerts*. The aim of this Code of Practice is to set out the arrangements for responsibility of managing food incidents at local and national level involving food hazards as identified by food businesses, official agencies or other Member States. http://www.fsai.ie/assets/0/86/204/f63ada65-0dcd-47b7-9225-f70ff3458ce4.pdf
- *Product recall and traceability*. This guidance aims to clarify and standardize procedures for the identification and removal of unsafe food from the food chain. Traceability and recall systems are fundamental components of the food safety management system of a food business. http://www.fsai.ie/assets/0/86/204/9c05bc98-cc20-4a62-aa29-cea71730df30.pdf

USA

- FDA - *Emergency response plan* (August 2010). http://www.fda.gov/downloads/EmergencyPreparedness/EmergencyPreparedness/UCM230973.pdf
- NASDA - *Emergency response plan*. Food emergency template version 1.0 (February 2006). http://www.nasda.org/File.aspx?id=11167

- CIFOR – *Guidelines for foodborne disease outbreak response* (2009). [This is a very broad document but may have some useful components that are widely applicable.] http://www.cifor.us/documents/CIFORGuidelinesforFoodborneDiseaseOutbreakResponse-updated.pdf

Australia: Department of Health and Ageing

- *National food incident response protocol*. A guide for the coordination of Australian government agencies responsible for food safety and food issues in the event of a national food incident (May 2007). http://www.health.gov.au/internet/main/publishing.nsf/Content/CDA339ACBEE60CF8CA25709600193198/$File/response.pdf

Canada: Health Canada

- *Foodborne illness outbreak response protocol to guide a multi-jurisdictional response* (July 2006). http://www.hc-sc.gc.ca/hc-ps/alt_formats/pacrb-dgapcr/pdf/respond/fiorp-priti-eng.pdf

France

- Practical guide for food alerts management (July 2009). http://agriculture.gouv.fr/sections/thematiques/alimentation/securite-sanitaire/surveillance-controles-alertes/surveillance-des-denrees-alimentaires-controle-et-gestion-des-alertes-sanitaires/downloadFile/FichierAttache_8_f0/Guide_Gestion_Alerte_Revision_02_juillet_2009_VDef.pdf?nocache=1246975079.59

WHO

- Manual for the public health management of chemical incidents. http://whqlibdoc.who.int/publications/2009/9789241598149_eng.pdf

FAO

- Food safety guidance in emergency situations. ftp://ftp.fao.org/es/esn/food/emergency.pdf

Many member states have requested that FAO and WHO provide technical assistance in the development of food safety emergency response plans. Reinforcing preparedness, and recognizing and responding rapidly to food safety emergencies are key elements of the food safety emergency-related programmes of FAO and WHO, namely the Emergency Prevention System for Food Safety (EMPRES Food Safety) and the International Food Safety Authorities Network (INFOSAN).

Several countries, most with well developed food control systems, have prepared response plans to document their actions during an emergency. However, there is currently no guidance that documents the best practices to use during the process of developing such plans, or what the plans should contain. The management of food safety emergencies is rarely the responsibility of a single national authority, and timely and coordinated collaboration among all partners is required to ensure an effective response.

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