Sharing protocols, experiences and knowledge on management and communication during food crisis

This report was elaborated under the Heads of European Food Safety Agencies (HoA) by a working group of 17 Member States, chaired and coordinated by the Spanish Agency for Consumer Affairs, Food Safety and Nutrition (AECOSAN) SPAIN.

Contents

Abreviations

AF: Advisory Forum of EFSA

BfR: Bundesinstitut für Risikobewertung

BVL: Federal Office of Consumer Protection and Food Safety

EFSA: European Food Safety Authority

EWRS: Early warning Response System

FAO: Food and Agricultural Organization of the United Nations

FBO: Food business operator.

FSA: Food Standards Agency

FSAI: Food Safety Authority of Ireland

FVO: Food Veterinary Office (DG SANCO)

HoA: Heads of European Food Safety Agencies

IEP: Information exchange Platform

INFOSAN: International Food Safety Authority Network

MS: Member State of the European Union.

RA: Risk assessment

RASFF: Rapid alert System for food and feed

SOPs: Standard Operation Procedures

WHO: World Health Organization

WGM: Working Group Member(s)

Summary

Member States have protocols to assist in the response to a food crisis. The general aims are to optimise the management of the crisis, minimise health and economical damage and provide adequate information to consumers. Given the diverse nature of Member State national food safety systems within the EU, the harmonisation of response plans for food crisis including common general guidelines would be highly beneficial.

This report is aimed at sharing experiences and perspectives of eighteen organizations from seventeen Member States regarding their management and communication protocols. In doing so, it also provides greater transparency to these protocols encourages harmonisation, uniformity of actions and will assist in improving information to consumers through more effective communications policies.

To gather the information from the Member States, the working group devised a templatequestionnaire that in a structured way includes the multiple steps of the three aspects of risk analysis aspects of a food crisis, Risk Assessment, Risk Evaluation and Risk Communication. The analysis of this information collected and the sharing of experiences and perspectives of the different member estates lead the Working to group to draw some conclusions and make recommendations for the management and communication process during a food crisis.

Introduction

A Food Crisis can have severe impacts on health. It may also cause social alarm and have a negative impact on economic operators. It is therefore vital that, before it occurs, agreed procedures are in place to ensure optimal management, guarantee minimal damage and provide adequate and clear information to consumers.

Recent events in the European Union, such as the *E. coli* outbreak in Germany and France, worldwide dioxins scandal or even the horsemeat case, clearly point to the need for protocols to be in place that can guarantee that food crises are managed following universally recognised criteria.

In practice, many of the EU Member States have documented plans for risk assessment, management or communications during food crisis episodes. However these plans or protocols are of different types may be integrated within national contingency plans, consist of national management protocols or SOPs. In some cases they may not exist.

Protocols for food crisis situations assist Member States in the implementation of procedures or national intervention plans that are in keeping with the three aspects of risk analysis during a food crisis. Since Member States have rather diverse national food safety systems, some harmonisation with common general guidelines would be highly beneficial.

Objectives

This working group was arranged for the exchange of experiences, points of view and current protocols and practices in the management of food crisis. The result of this exercise was to provide a view of good practices, useful ideas, sharing of documentation,

suggestions and recommendations to dealing better with these situations. Sharing experiences and perspectives regarding this type of protocols adds transparency, which among other aspects encourages uniformity in actions. The consumer should benefit from this transparency as it should assist in the development of more efficient and effective communication during times when there is intense focus on official control systems and the actions of competent authorities.

Terms of reference and methodology

Terms of reference

The work was performed by an analysis and gathering of knowledge regarding the assessment, management and communication protocols that Member States use during food crises and the establishment of a framework that allowed sharing perspectives on different aspects of protocols and experiences in the implementation and execution of the above-mentioned protocols.

The group considered the relevant existing legislative basis as follows:
- Regulation (EC) No 178/2002 of the European Parliament and of the Council, of 28 January 2002, laying down the general principles and requirements of food law and establishing the European Food Safety Authority (OJ L 31, 01.02.2002).
- Regulation (EC) No 882/2004 of the European Parliament and of the Council, of 29 April 2004, on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (OJ series L 191, 28.05.2004).
- Commission Decision 2004/478/EC, of 29 April 2004, concerning the adoption of a general plan for food/feed crisis management (OJ L 160, 30.04.2004).

Also, in order to conduct the analysis, internationally recognised guidelines and basic principles were used, analysing whether different aspects such as the following are taken into account:
- uniformity of action
- streamlining of decision making
- proportionality and transparency
- collaboration and coordination of all parties involved
- responsive and defined flow of information
- communication standards
- consideration of legal requirements
- use of precautionary and uncertainty management principles.

Working Group Members

Participants in the working group of crisis management **Chairing and coordination of the work: Spanish Agency for Consumer Affairs, Food Safety and Nutrition (AECOSAN). SPAIN**			
Country	Institution	Country	Institution
BELGIUM	Federal Agency for the Safety of the Food Chain (FASFC)	GREECE	Controls Directorate. Hellenic Food Authority
BULGARIA	Bulgarian Food Safety Agency	IRELAND	Food Safety Authority of Ireland (FSAI)
CROATIA	Veterinary and Food Safety Directorate. Ministry of Agriculture	ITALY	Directorate General of Food Hygiene Safety and Nutrition Ministry of Health
CYPRUS	State General Laboratory Food Safety Council. Ministry of Health	NETHER-LANDS	Food and Consumer Product Safety Authority (NVWA)
DENMARK	Danish Veterinary and Food Administration. Ministry of Food, Agriculture and Fisheries	POLAND	Chief Sanitary Inspectorate (GIS). Ministry of Health
ESTONIA	Veterinary and Food Board, Ministry of Agriculture	SPAIN	Spanish Agency for Consumer Affairs, Food Safety and Nutrition (AECOSAN)
FINLAND	Finnish Food Safety authority (EVIRA)	SWEDEN	National Food Agency
FRANCE	French Agency for Food, Environmental and Occupational Health & Safety (ANSES)	UNITED KINGDOM	Food Standards Agency (FSA)
GERMANY	(a) Federal Institute for Risk Assessment (BfR) (b) Federal Office of Consumer Protection and Food Safety(BVL		

Work Chronology

- Establishment of the working group (WG) (electronically prior to the acceptance of these Reference Terms by the different interested MS).(February 2013).
- Start-up meeting in Madrid to determine the work to be done and design of the survey methodology, timetable, deliverables, roles and responsibilities, and the format and content of the planned report. (March 12th, 2013).
- Distribution of questionnaire and information request to the MS (March 25th, 2013).
- Receipt of survey results and information (up to May 24th, 2013).
- Elaboration of the draft report and its presentation in the HoA meeting (June 21st, 2013).
- Final meeting of the Working group (October 7th 2013).
- Proposal for approval in the meeting of HoA (3rd December 2013).

Summarized questionaire information

Completed questionnaires were received from 18 organisations representing 17 Member States. The results of the questionnaires were analysed and are summarised as follows:

Protocols

What are the regulatory documents in your country/authority for assessment, management and communication in case of a food and feed crisis?

In general, with the exception of two, all MS participating in the working group have some formal document for the risk assessment, management and communication in food or feed crisis. MS. While they use different types of documents (e.g. cooperation agreement, national crisis plan, protocols, standard operating procedures, contingency plans, legislation); all have a common goal, which is to properly manage these special and complex situations.

   In addition, the territorial scope of the documents can differ depending on the organizational structure of food safety controls of the MS; therefore the scope can be national, regional or local.

Do you have separate organizations for risk assessment and management?

Five MS have, within the same institution, two aspects of the risk analysis – assessment and management. In ten MS there are different institutions in charge of evaluating and managing risks. (See BfR EU Food Safety Almanac[1] for further information).

   In many of the cases, where assessment and management belong to the same organization, the possibility of additional support and further consultations on risk assessment by other organizations is mentioned.

[1]http://www.bfr.bund.de/cm/364/eu-food-safety-almanac.pdf

What is your opinion on the Commission Decision 2004/478/EC?

Ten of the seventeen MS responses agree that the Decision sets out the general principles for managing food and feed crisis and is a very useful tool for MS in helping them to develop their own plans for crisis management. One MS actually uses the Decision as the only protocol during crisis situations without major modifications. Another one contended that there is a need to clarify when the Decision has to be activated during the crisis. It is thought that the Decision addresses the European level without emphasizing or taking into account the complexity of different food safety organizational structures at national level.

Six MS point out that the Commission has never declared a crisis or used the rules outlined in the Decision during a crisis situation. Moreover, due to the fact that there is a lack of experience within the EU of using the guidelines of the Decision, some MS stated that it is too generic, such as the definition of "crisis", and difficult to know if further modifications or improvements will be necessary.

Do you differentiate between crisis management protocols and contingency plans? Which one do you have?

According to the responses, most of MS do not differentiate between these two concepts. Ten MS do not establish specific differences between the two types of documents, six WGM make differences and two WGM mention that a contingency plan is included within their protocols.

Pre-crisis incident

Do you have a classification of pre-crisis incidents? If yes, please describe it further.

Three of seventeen MS have a classification of a pre-crisis incident. One of these describes four types in its national manuals: notification, incident, serious incident and crisis. The second classifies incidents in three increasing level of seriousness. The third includes an incident definition agreed with different stakeholders and classifies its incidents as low, medium or high including a definition of these terms.

Another MS defines preliminary activities and criteria for the activation of its crisis management plan. These preliminary activities include gathering information for the purpose of determining: natural hazards; time and place of the incident; population that might be exposed; scope and complexity of the risks; potential for greater implications; data on the quantity, distribution and availability of food or feed consumers).

Definition of food crisis

What do you consider key factors for triggering or defining a crisis?

There is not a clear definition or concept of the nature or concept of a food crisis. Only one MS defines crisis according to the definition in 2004/478/EC. One MS (FSA) has a very elaborate matrix for the classification of incidents, with an added feature of "Triggers" in order to identify the potential of the incident to become a crisis. The principal key factors include in the definition of food crisis are listed below.

   Two MS do not differentiate a crisis from an alert and only mention the presence on the market of food that poses a serious risk to the population as a difference.

Figure 1. Food Crisis Triggers
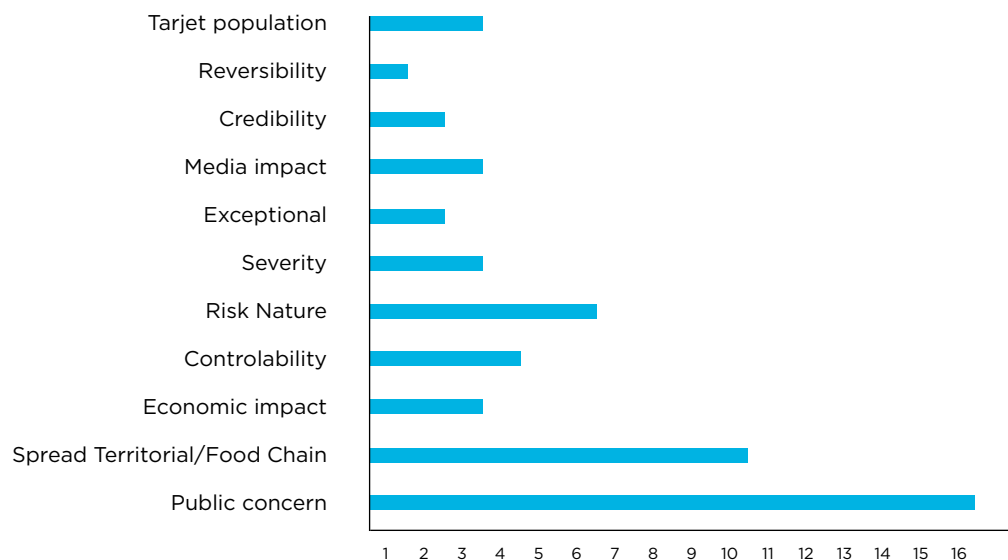
In general all MS agree that a Food Crisis implies a situation that causes strong public concern, also the territorial and food chain spread of the risk is widely mentioned, followed by economic impact, emerging risk, controllability, nature of the risk, severity....
Some other factors are mentioned as: the fact that creates uncertainty, political impact or threat to important goals.

Do you include public perception as a Key factor?

All MS agree that public perception could trigger a crisis situation and it should therefore be included as a key factor.

Do you take fraud into consideration as a key factor?

Six MS take fraud into consideration as a key factor, with no further considerations. However nine MS state that in order to take it into consideration, a link with food safety should be proven. Two MS consider that this should be a case by case decision.

Should fraud issues be included within the RASFF?

Most of the MS (14) agree with the inclusion of fraud issues within the RASFF. However: Three MS make some conditions, for example the spread to other Member states, or just, in case of no other suitable alternative.

One MS strongly disagrees, while two members of the MS consider inclusion only when food safety could be or is expected to be compromised.

The reasons for the inclusion are mainly RASFF's best points as speed, efficiency and efficacy of the system, also the possibility of having a link with food safety and finally also the fact that no other tools are available at the moment.

Crisis declaration: national/european level and crisis information channels

How do you incorporate risk assessment to crisis consideration?

All Member States value the need of risk assessment in order to consider an incident as a crisis; some incorporate it in their protocols, although the way they do it in nine MS is not well defined. Two MS have Risk Assessment independent bodies and rely on them when considering a crisis situation, four MS include their scientific committee within the protocol of crisis management and two MS will contact "ad hoc" specific experts.

Do you consider asking EFSA for help during the initial risk assessment?

All MS consider the value of using EFSA's risk assessment tools and networks. Using EFSA directly is not mentioned except by one MS that recognizes that EFSA was used during a recent food crisis (FSAI). EFSA IEP, networks, AF and even EFSA scientific support within the scope of RASFF are mentioned as ways of using EFSA for the initial RA. France and Germany, both with independent Risk Assessment bodies, do not acknowledge EFSA help for this task and they rely on their own initial risk assessment, they will not use EFSA within this scope, due to time constraints.1 MS (Sweden) considers asking EFSA for help during a crisis.

What information channels (RASFF or others) do you take into consideration? Do you consider media as a channel?

There is a large variety of information channels that are taken into consideration; the most mentioned are listed below. RASFF and INFOSAN are the most frequent information channels that MS consider.

Figure 2. Information Channels
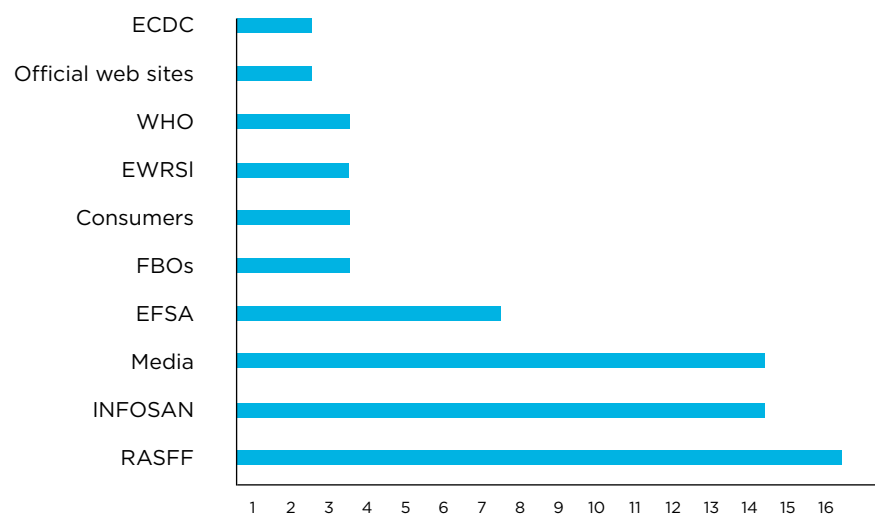
 A wide array of channels are mentioned at least by one MS: ECDC, FVO, OIE, RAPEX, SCOFCAH, SIENA, Law Enforcement Bodies, and third country competent authorities,
   There is a broad consensus for considering media as a channel for information: fourteen MS use this source of information that they consider valuable, noting that it is often *"the fastest and the most important channel"*. Nine MS mention the need of having this information verified by official sources and three organizations do not mention any need of verification. Three MS do not trust media as a reliable source of information.

Do you have a single competent authority for declaring the crisis?

With two exceptions, all of the MS represented by the WGM have a single competent body which can declare a food crisis. This body varies according to the MS and its organizational structure. In addition, all countries recognize the need to coordinate their response with other authorities. In cases when the crisis becomes of a very serious nature, some other organizations may take over the declaration. Also in some MS food and feed have different competent organizations and as such the declaration of crisis (see BfR EU Food Safety Almanac)[2].

Protocol activation

How do you manage several competent bodies for protocol activation?

Although a single competent authority for declaring a crisis is usually established, most of the MS describe several ways of collaboration for protocol activation. This is due to the fact that in the majority of the cases the handling of crisis involves different bodies or territorial authorities (regional) and they could also be or appear to be of different nature or origin. This collaboration relies on: working procedures, crisis management documents, inter-agencies protocols, cooperation agreements, national crisis headquarters or incident response protocols. When written collaboration protocols are not in place, MS will rely on efficient two-way communication, communications networks, agreements, and coordination with federal or regional authorities.

At what moment/stage or in what circumstances would you like or have asked to the Commission to intervene?

There is a general agreement on this. All MS state that they would like the Commission to intervene as stated in Decision 2004/478/EC- section 3 and points 2.1 or 2.2:

"*Serious risk: the situation involves a serious direct or indirect risk to human health and/or is perceived or publicized as such or can be perceived and/or publicized as such the risk is spread or could be spread by a large part of the food chain it is highly likely that the risk will spread to several Member States and/or non-Community countries.*

Potential risk: the risk is potential but could evolve into a serious risk which is unlikely to be prevented, eliminated or reduced by existing provisions."

The principal reason mentioned to ask Commission intervention is the spread of the incident to other MS and also in cases of unethical conduct between MS.

Most of MS would like the Commission to take a role in the harmonization of the responses, information and coordination. Two MS mention that the Commission should also intervene in the management of the crisis however; another MS states the opposite that no direct management should be done by the Commission, as this is the remit of individual MS.

Do you think crisis and communication protocols should be further harmonized at European level?

All MS with the exception of two believe that further harmonization at European level is advisable. Although there is a general agreement on this point, the different competent authority structures in place across MS in relation to food and feed law may complicate the issue. Two MS suggests that some degree of harmonization could be of value. Some alternatives are provided as:
  • Setting of common minimum elements;
  • Design of guidelines following Decision 2004/478/EC;

- Food crisis exercises;
- Establishment of common terminology and definitions, such as "crisis situations" in opposition to an "emergency situation" or some other incidents;
- Sharing best practices and definitions would be of interest in particular for the documentation of the management decisions;
- Sharing of knowledge of lessons learned during past food and feed crisis.

All MS should ensure they have established protocols on place.

Also MS suggest that a common platform for sharing experiences, discussions, intelligence and information should be facilitated at European level.

Crisis management

Do you have different protocols according to different type of crisis?

Most MS with established protocols (14) acknowledge having one single protocol. Three MS mention having separated protocols for food and feed.

Within the same basic protocol, some MS mention different operational approaches according to the crisis; a unique horizontal contingency plan that contemplates different specific case based protocols is mentioned too. One MS describes having different protocol to deal with crisis of animal origin as stakeholders can be different. Also in terms of the severity of the crisis some MS differentiate slightly and have different protocols activated either by emergencies or by crisis.

One MS (FSA) has a very clear and protocol based on and differentiated by the severity and complexity of the incident.

Another MS (FSAI), has a single protocol, which describes very detailed interagency arrangements for the management of food crisis that ensures involvement and coordination of different agencies.

Do you have a single competent body for the management of the crisis?

Although the declaration of the crisis is, with one exception, the competence of a single body, four MS declare not having a single competent body for the crisis management itself. Eleven MS declare having a single crisis management body, although some aspects could be managed at local level (2 MS) or by a leading agency (Ireland).

In the case of Germany, Italy and Spain, three MS with a decentralized political organization (Landers, Regions or Autonomous Communities), the management of the crisis will take place at those levels. However when the crisis involves more than one region, the central competent authority will coordinate the management.

How do you manage several competent bodies for crisis management?

In general, the responses are similar to those given for question 5.1 (Protocol activation), although for crisis management, this task could be shared with other competent bodies more frequently (at least four MS have more than one).

In the case of shared management, several ways are described: emergency and contingency plans, cooperation, coordination and a clear distinction of remits and tasks, establishment of national and regional crisis headquarters.

Some pointed out the need to establish more coordination between other organizations in the case of food crisis related to other sources such as bioterrorism, natural disasters, and food fraud (e.g. horsemeat incident).

How do you manage coordination between activated interfaces (EWRS, RASFF, Consumer bodies etc.)

Most of the WGM do not acknowledge the need of any additional coordination between RASFF and INFOSAN, in many cases because the national contact points for these systems are located in the same organization.

In addition to these comments, 40 % of the MS mention other ways of collaboration and coordination based on agreements, written protocols, crisis management team, regulations and coordination meetings "as needed", and also RASFF as a coordination tool with the regions. However none of these coordination tools are specifically designed for communication.

Most of MS express the need of further coordination between the health (EWRS) and food safety authorities.

Do you think it is necessary to create a crisis management committee/unit? If yes, describe composition

It is generally agreed that a crisis management committee or unit is necessary and this is resolved in different ways by the MS. In seven MS (this committee is created "ad hoc" either in their protocol, by signing an agreement or because it is included in the SOP´s. In the case of four MS, the need to create the committee is not mentioned as it is already integrated in the structure of the organization. One MS describes that the role of the management committee is assumed by the risk assessment and management organization and three MS do not define the way to create this committee.

Do you consider constituting supporting units to the crisis committee?

All MS, with the exception of one, utilise some supporting units/task forces to the crisis committee. These units or experts (as for instance scientific committees) could already be present in the organizations, in which case no need for making special arrangements

is recognized, or they can be expressly created in a crisis situation in accordance to the crisis protocols and plans at hand. The type of supporting units may differ (e.g. public health experts, risk assessors, legal expertise, chemists, administrative, communications or analytical support), but the most common is scientific support.

Do you consider a risk assessment/scientific support unit?

See the reply above, all MS at some degree consider the need of scientific support, either external or internal, "fit for purpose" or already existent within the MS.

Do you consider laboratory support?

All MS, with the exception of two, consider laboratory support to assist the crisis committee. This laboratory support could be facilitated by the network of official control laboratories or National/European reference laboratories. In two MS, National Reference Laboratories take an active part in the multi-annual control programs and also in the monitoring/surveillance programs on risk basis and/or precautionary principles. The scientific support to a crisis management committee can have an added value for a holistic approach (e.g. analytical method used, range of uncertainty and specificity of method, the analysis of more samples from other sources, supportive traceability methods). One MS has the National Reference laboratory activities at the same organization and Laboratory department gives support during crises.

Do you have a protocol for coordination with EURL, NRL, official control laboratories?

Eight MS have protocols for coordination between different laboratories (EUR, NRL, official control labs,). One MS has a protocol of cooperation between the laboratory and the competent authorities; in this protocol the specific objectives of testing are described. Eight MS lack this kind of protocol, one of which refers to the need for maintaining close cooperation as defined in the relevant EU legislation. One MS considers that there is a general routine for this matter in its crisis plan.

How do you assess the efficacy of the management measures taken (health area, other competent authorities....)? Can you describe the indicators used to monitoring the crisis?

There is no general agreement on this issue; two MS mention having monitoring and assessment included in their crisis protocols without giving further details. Two MS mention the need of using third parties or enforcement bodies.
  In terms of indicators used to assess the efficacy of the crisis management, five MS have not defined these parameters, one MS has no criteria and the rest of the MS define different parameters depending on the nature of the incident and its trigger. The principal

parameters taken into account are the following: number of cases of human illness (the majority of the MS), detection of the cause, identification of the food hazard on the market and performed controls. The fact of having EU harmonised criteria for assessing efficacy is also mentioned

Two MS remark on the relevance of the interaction with the media, the industry and the consumers. They mention the following indicators: adequate responses to media and consumers queries, communications to consumers and politicians. In addition, reputation and credibility are seen as good management indicators. One MS mentions that it carefully follows the epidemiological investigations, together with the public health authorities.

Do you have an established mechanism for closing the crisis? On what basis? Do you specifically communicate the closing of the crisis to the media?

Almost all MS (sixteen) have mechanism in place (or are in the process of including it) in their national protocols for closing the crisis. Of these, eleven MS communicate the closing of the crisis to the media and four MS will communicate this aspect depending on the type of the incident. One MS mentions not to have a specific procedure for closing the crisis.

Lesson learned

Once the crisis is closed, do you review the management? If yes, is it an internal, external or independent review?

Almost all MS (fifteen acknowledge the importance of assessing the management of the crisis and in some cases this review is included in their protocols. Two MS mention that a review is not always carried out post the event. Two MS do not have this kind of practices, and one of them suggests it would useful to have a harmonized standard to perform the review.

Ten MS consider the use of an internal review; an eventual external evaluation is taken into consideration case by case.

Do you include observers through management of the crisis?

The majority of MS do not include observers. Only one mentions the possibility of using them in the case of high level incidents

Do you consider making follow up recommendations after the crisis?

All WGM consider that it is necessary to make follow up recommendations.

Do you consider writing and communicating the report of the internal review and follow up recommendations?

Twelve MS agree with the need of a written report and also with its communication. The rest are not in favour of it, or have the decision depend on the risk or on the existence of a request.

Do you assess the impact of your communication policy?

Eleven MS do not consider doing any assessment of the impact of the communication policy. The MS find it important to specify that such an assessment can be performed through social media and consumer research.

Communication

Do you have a specific protocol for crisis communication?

Ten MS have some kind of protocol, guidelines or documents related to crisis communication. They can be included in their crisis protocols or contingency plans. The rest of the MS rely on EFSA guidelines, get the assistance of external communication experts, describe the basic elements of crisis communication in their management plan or do not consider that this is needed.

What is the communication channel you consider more valuable (TV, press, web page, social media....)?

The most favoured communication channel is internet pages followed by social media, TV, print press. Radio is the least favoured.

Table 1. Communication Channels

	The best	Very good	Good	Acceptable	Not efficient?
TV	4	5	0	3	2
Press	4	6	3	3	0
Radio	2	4	5	3	0
Web page	8	1	1	1	3
Social Networks	7	3	0	4	0

Figure 3. Classification of the value of the communication channels
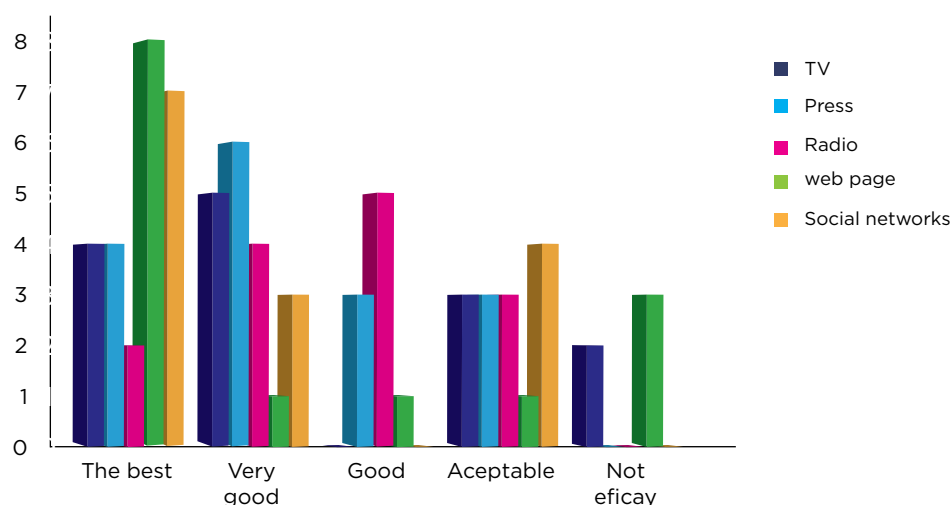
Do you use social media (Facebook or Twitter)? If so, describe further your experience.

Eleven MS declare not using these media. The rest acknowledges using social media to some extent, mainly for following up public opinion on how the crisis is managed. The MS that use social media assign their effectiveness to their "real time" capacity of evaluation and their close connection to the consumer.

Do you use one or several designed spokesperson for crisis communication?

If several, describe them. Do you use communication professionals?

All MS recognize the importance of having designated spokespersons during the crisis, but only eight MS use a single spokesperson.

MS use different designated spokesperson: Directors of Agencies, Ministers, Experts, technical staff or heads of Communication Units. Only 33% of them are communication professionals.

Have you used or intend to use EFSA communication guidelines?

Although all MS acknowledge the usefulness of EFSA communication guidelines for general communications skills, the majority do not consider them suitable for communications during crisis situations. However, eight MS incorporate at least some of the principles of EFSA communication guidelines within their communication guidelines/protocols for crisis situations.

When do you think the consumers should be informed during the crisis?

All MS agree that within a crisis situation the communication to consumers should be done as soon as possible and where necessary at all stages of the crisis. According to some MS, this communication should be transparent through the whole process and pro-active before serious incidents become crisis.

Key considerations during management

How do you handle uncertainties during crisis situations?

No specific management tools are provided, with the exception of the precautionary principle pointed up by four MS. France and Germany, through their Risk Assessment Bodies, indicate that uncertainties in crisis situations should be taken into consideration in the same way as in peacetime and Germany consequently refers to risk assessment guidelines. One MS considers that it is important to inform about crisis and make an evaluation through the journalist, to show them the uncertainties and try to be open and respectful about them.

Could you provide us with your experience or thoughts on the use of the precautionary principle?

In general the precautionary principle is seen by MS as a necessary aspect during crisis situations. In most cases no recent experiences were pointed out and five MS declared that they have never use it or did not specify. Three MS specifically mention that recall or other measures should only be done when there is a risk.

Two MS indicate that the precautionary principle was recently used and temporary recommendations were made based on the initial results. In the 2011 EHEC crisis, taking into account the precautionary principle, the German authorities issued a temporary recommendation based on the first results of a study and subsequently specified certain vegetables (cucumbers and other) as possible risky. The recommendation was drawn back when it became clear that fenugreek seeds caused the disease and fatalities.

Italy mentions that immediately after the Fukushima nuclear incident and before the EU specific programme was arranged, it was decided to test 100% of food and feed consignments coming from Japan for radioactivity.

What do you think is the role of EFSA in a crisis situation?

All MS recognize the value of EFSA during crisis. However, some point out that EFSA's role should only be supporting MS with the risk assessment and not getting involved in the risk management. MS add some possible other roles for EFSA in crisis as: harmonization of risk evaluation in crisis in order to facilitate management responses from the Commission; rapid risk assessment, provide specific experts if MS require it, direct support to a single

MS if this is required, coherent/coordinated assessment at national and European level, and the work of EFSA staff in a task force during crisis.

Other suggestions include putting in place more rapid and easier consultation procedures with MS.

Additional questions

Fourteen MS answered the additional questions

- Have your organization experience in the management of a food crisis situation in the last 10 years?
  Twelve MS recognize having experience and only two acknowledge the lack of it.
- Have your organization activated a crisis management protocol in the last 10 years?
  Twelve MS replay also affirmatively.
- Do you consider at this point revision of your current protocol?
  80% of the fourteen respondents consider revision of their current protocols.
- Classify the need of improving the following different crisis stages
  All MS consider at some point to review some of the different crisis protocol stages.

Figure 4. Need of improving crisis stages
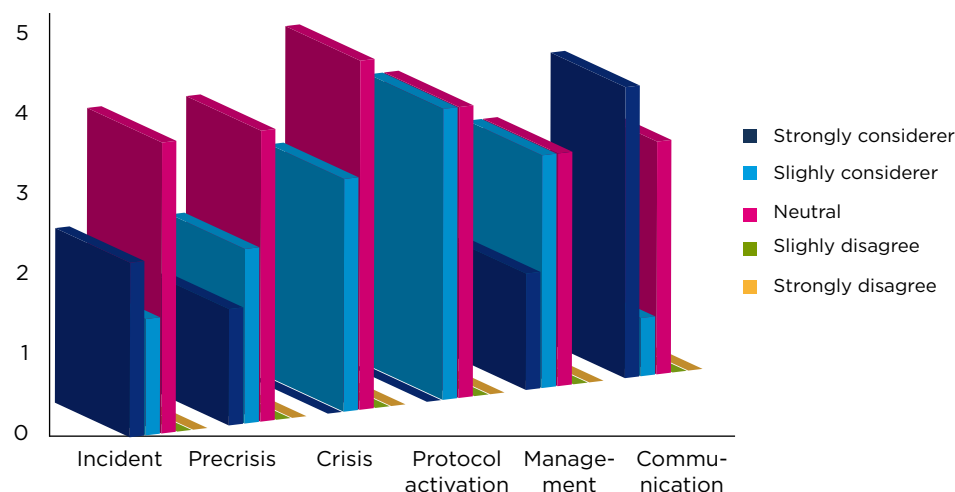
No MS considers the need for a major revision of their protocols; half of the MS do not have an opinion. Some MS slightly or strongly consider for revision of communication (6), management (4), pre-crisis (3) and incident (4) stages.

Conclusions and recommendations

Protocols

The majority of the MS have a document to manage crisis, being an agreement, a protocol or a contingency plan. The MS agree that Commission Decision 2004/478/EC is a valuable tool to design their national management and communication protocols for food crisis, but the fact that it has never been activated raises doubts about its practical use or effectiveness. The need for more practical exercises on food crisis protocol activation is mentioned, examples are the Aristaeus exercise and the EFSA rapid risk assessment exercises.

In general, there is no clear differentiation between contingency plan and protocol and therefore MS use these indistinctly.

Most of the MS mention experience in food crisis situation and the activation of crisis protocols, however not many of these crises have taken place at EU level. This confirms the need of better definition of the crisis triggers.

Although most of the MS consider revision of their crisis protocols, this revision is not a priority and no specific stages are pointed out.

Precrisis incidents

The fact that a food related incident may or not become a crisis depends on several factors. Three MS classify the incidents according to their seriousness, sometimes in agreement with stakeholders. Another MS has set up preliminary activities in order to assess the importance of the incident.

Recommendations
- To classify triggers in order to help defining border line situations between incidents and crisis.
- To share existing classifications systems of MS.

Definition of food crisis

Point 2.1 of Decision (EC) 2004/478 describes in which situations and using what critical factors the Commission should adopt emergency measures as described in articles 53 and 54 of Regulation (UE) 178/2002. However this has never applied in practice.

In general all MS agree that a food crisis implies a situation where there is strong public concern and/or a wide spatial or food chain spread of the risk, followed by economic impact, controllability, nature of the risk, severity....

Public perception is considered unanimously as a trigger for crisis situation and therefore all MS agree that it should be taken into account as one of the principal key factors. There is no general agreement to consider fraud as a key factor, although a majority will take it

into account when a link with food safety exists and most of the MS agree that fraud issues can be included within the RASFF.

Recommendations
- To work on further defining incidents and triggers that will help assess borderline situations between incidents and crisis.
- To work on public perception (e.g. outrage and anxiety) as this could trigger a crisis without any public health risk present.
- To work on the management of fraud and food crisis, especially regarding the identification of suitable management tools.

Crisis declaration: national/european level and crisis information channels

The need of risk assessment when wanting to declare a crisis is generally recognized by MS. However, the way they incorporate risk assessment is for half of them not well defined. EFSA risk assessment tools are valued but not direct use of EFSA regarding the initial risk assessment is considered due to concerns of time constraints. Official rapid alert systems, RASFF and INFOSAN are considered as the most trusted information channels. There is also a broad consensus for considering media as a valuable channel for information. Declaration of the crisis is done mostly by a single competent body.

Recommendations
- To work in the area of communications between national agencies and the media to provide accurate and timely information as it is considered as a major channel of information.
- To consider media training for the nominated spokespersons in the MS.
- To improve the risk assessment at national and European level (EFSA) to help re-solve uncertainties.

Protocol activation

A single competent authority that declares a crisis is usually established in the MS, but when several authorities could be involved, most of the MS describe ways of collaboration for the protocol activation. Interestingly, all MS agree that the Commission should intervene more actively, taking a role in the harmonization of the responses, information and coordination as stated in Decision 2004/478/EC. This is also considered in cases of unethical conduct between MS.

It is a general thought that further harmonization in protocols of crisis and communication should be established at European level. Proposed alternatives are: the setting of common minimum elements or the design of guidelines following Decision 2004/478/

EC, establishment of a common terminology and common definitions, such as "crisis situations" in opposition to an "emergency situation" or some other incidents.

Recommendations:
- To incite the Commission to take a greater role in terms of co-ordination of the European response to a crisis.
- To further harmonise crisis and communication protocols across Member states and at European level.
- To establish a common terminology and definitions.

Crisis management

Most MS acknowledge having one single protocol for crisis management at national level. However, due to the organizational structure of each MS, for every other competent authority involved a special protocol may be advisable in the special remit of the authority. Within the same basic protocol, some MS mention different operational approaches according to the severity or type of crisis.

Management of the crisis requires more coordination between bodies and competent authorities than the crisis declaration. In cases of shared management several ways are described: emergency and contingency plans, cooperation, coordination and a clear distinction of remits and tasks.

Most of the MS feels that there is no need of additional coordination with RASFF; however more coordination between Health and Food Safety authorities is desirable.

Laboratory confirmation is crucial in the establishment of the source of the crisis. Therefore, all MS consider laboratory support and half of the MS have protocols for coordination between different laboratories (EURL, NRL, official control labs…,).

In general MS do not have established protocols for the monitoring and assessment of the management of crisis. No common tools or indicators exist to assess the efficacy of the management measures taken. Some WGM feel that some harmonization of indicators is advisable.

Recommendations
- To work on a system of "ad hoc" specialised classification of protocols that may be more appropriate than the "all or nothing" approach, where it is not clear when activate the protocol.
- To work towards more coordination between national organizations and regional competent authorities.
- In relation to laboratory support, to delineate strategies for increasing capability, access to labs, availability of methodology and access to established channels for laboratory support.
- To encourage the establishment of a protocol and common indicators for assessing the crisis management.

Lessons learned

All MS recognize the importance of learning from crisis by assessing the crisis management performance and in some cases these lessons are included in protocols. However, in general no written report is elaborated. Most MS will consider internal but not external reviews, also observers are usually not considered.

Recommendations
- To work on standardizing the crisis assessment reports/reviews.
- To promote transparency by the use of external observers, and also by publication of best practice, developmental issues and recommendations of the reviews.

Communication

The majority of the MS have some kind of protocols, guidelines or documents related to crisis communication. EFSA guidelines for risk communication are of value but MS feel that are not suitable for communications during crisis situations. Although the use of social media is valued, its use is not extensive.

All MS recognise the importance of having designated spokespersons during the crisis, but only half of them use a single spokesperson. The use of communication professionals is not extended nor valued.

All MS agree communicating to consumers as soon as possible and at all stages of the crisis if this is necessary.

Recommendation
- To work on the harmonization and sharing of experiences on communication protocols for crisis situations at European levels, as well as individual Member states.
- To engage EFSA with MS in a more specific approach for risk assessment communication during crisis.
- To draw up general guidelines for the coordination of the communication policies during crisis (Head of Agencies).
- To explore limitations, vocabulary and specialized formats for the use of social media.

Key considerations during management

Managing uncertainty is a key aspect affecting all stages of the management of crisis. However, no specific tools or handling skills are mentioned, with the exception of the precautionary principle, for which in most of the cases no recent experiences were pointed out. Two risk assessment bodies believe that uncertainties in crisis situations should be

treated as in peace time. It is also suggested to work on communicating uncertainties.

The value of EFSA during crisis is recognized by all MS, but with the recommendation that EFSA should avoid getting involved in risk management.

Recommendation
- To promote the organization of exercises using risks assessment and the precautionary principle including EFSA, RASFF, EWRS, the Commission and some other bodies.
- To analyse the convenience of setting up standard procedures for specific risk, as scenario planning
- To develop workshops/common sharing sites in order to exchange documents and experiences of value for crisis situations as FAO guidelines, Regulatory documents, interagency coordination protocols, MS´s crisis protocols and related documents.

Annexes

Annex I: Comprehensive questionnaire on food and feed crises.
QUESTIONNAIRE ABOUT CRISIS MANAGEMENT AND COMMUNICATION PROTOCOLS V5 25 03 13.pdf

References

EFSA procedures for responding to urgent advice needs (3.05.12).
http://www.efsa.europa.eu/en/efsajournal/doc/279e.pdf

EU Food safety almanac
http://www.bfr.bund.de/cm/364/eu-food-safety-almanac.pdf

Member states protocols
- Food Standards Agency Incident Response Protocol
  http://www.food.gov.uk/multimedia/pdfs/incident-response-protocol.pdf

- AESAN: Management and communication protocols
  Spanish crisis management procedure.pdf
  Spanish risk communicating procedure.pdf

FAO Guidelines
- FAO Guideline for developing and improving national recall systems:
  http://www.fao.org/docrep/017/i3006e/i3006e.pdf

- FAO Guideline of risk analysis principles and procedures during food safety emergencies:
  http://whqlibdoc.who.int/publications/2011/9789241502474_eng.pdf

• FAO Guidelines for developing national food safety emergency response plans

http://www.who.int/foodsafety/publications/fs_management/ERb1_E_L_101012.pdf

Crisis management

• Acting in times of crisis and crisis prevention:

http://www.bfr.bund.de/cm/364/acting-in-times-of-crisis-and-crisis-prevention.pdf

• Crisis Management Flep

Crisis management flep.pdf

Legislation

Regulation 2004/882/CE

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2004R0882:20120101:EN:PDF

Regulation 178/2002

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2002R0178:20090807:EN:PDF

Decision 2004/478/CE:

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:212:0060:0068:EN:PDF