External Stakeholder Research Group Meeting - 15 June 2017

Feedback from the Consumer Groups

Areas of clarity for the Kantar research report:

- Were there different consumer views across different groups – e.g. do we have any differences in findings for example in allergy groups versus those without allergies? The consumer groups thought it would be useful if this could be drawn out of the research.
- Large versus small business – what were the criteria for these definitions. Would be useful to draw this out in the research. Also more broadly the group thought we should be careful not to be too simplistic with the language and not to draw too many inference from small versus large. There might be other factors at play – were businesses a brand owner versus private label/ were there any third party verification/members of assurance schemes etc.
- Care with language as 'customer' can mean the end consumer to some, but for others can mean a business to business trade customer.
- The group were very keen that the report was clear on how the 200 businesses in phase 2 were selected. Was this done in a random way/how? Or were they all contacted through a trade association (and if so could this skew results?)

General points of discussion from the Consumer group and on areas for improvement

- Consumer engagement – would be useful to know more on techniques that could be used and what the barriers might be for why they aren't used e.g. data from loyalty card users/online shoppers direct email etc. Other than placing a point of sale notice in store, what can business do to actively contact consumers.
- Consumer groups commented that from their experience, when some companies used them to disseminate information, the companies view was that they didn't need to go any further/actively promote the message themselves.
- One view was that the research highlighted gaps in consistency of approach. Overall view form the group was that there should be **clear guidelines** set down including;
    - who gets notified and how (including the consumer groups at an early stage);
    - The process needs more standardisation;

    - Clarification on when products must be legally withdrawn over when business might chose to voluntarily withdraw;
    - The role of FSA and LAs needs to be clarified;
    - The guidelines need to be clear on timeframes.
    - They should include best practice on traceability (down to batch codes into specific stores – is this feasible?);
    - Should also include guidance on best practice on communicating with consumers (reference to using personal data from store cards etc.);
    - Strong guidelines need to come from FSA – providing more clarity/direction and that are robust and consistent.
- In all of this FSA needs to mitigate the impact of leaving the EU. If we rely on systems that allows the process to work, how will this impact on the processes after EU exit?
- **Feedback and learning** was important - Gluten free industry association was presented as an example of industry coming together to share learning to prevent the number of recalls and alerts in this area. Also discussed data being shared among industry in an anonymised way. Useful to share results of root cause analysis.
- The consumer group felt in all of this there was a need for independent oversight of the process and agreed there were links from findings of this work to the regulating our future programme.
- The allergy groups raised the issue of setting thresholds. They get requests from industry asking them for threshold levels for different allergenic ingredients before a product needs to be withdrawn. They feel industry generally could have a greater understanding in this area.