



# **30 Years of the Rapid Alert System: Stakeholder Expectations**

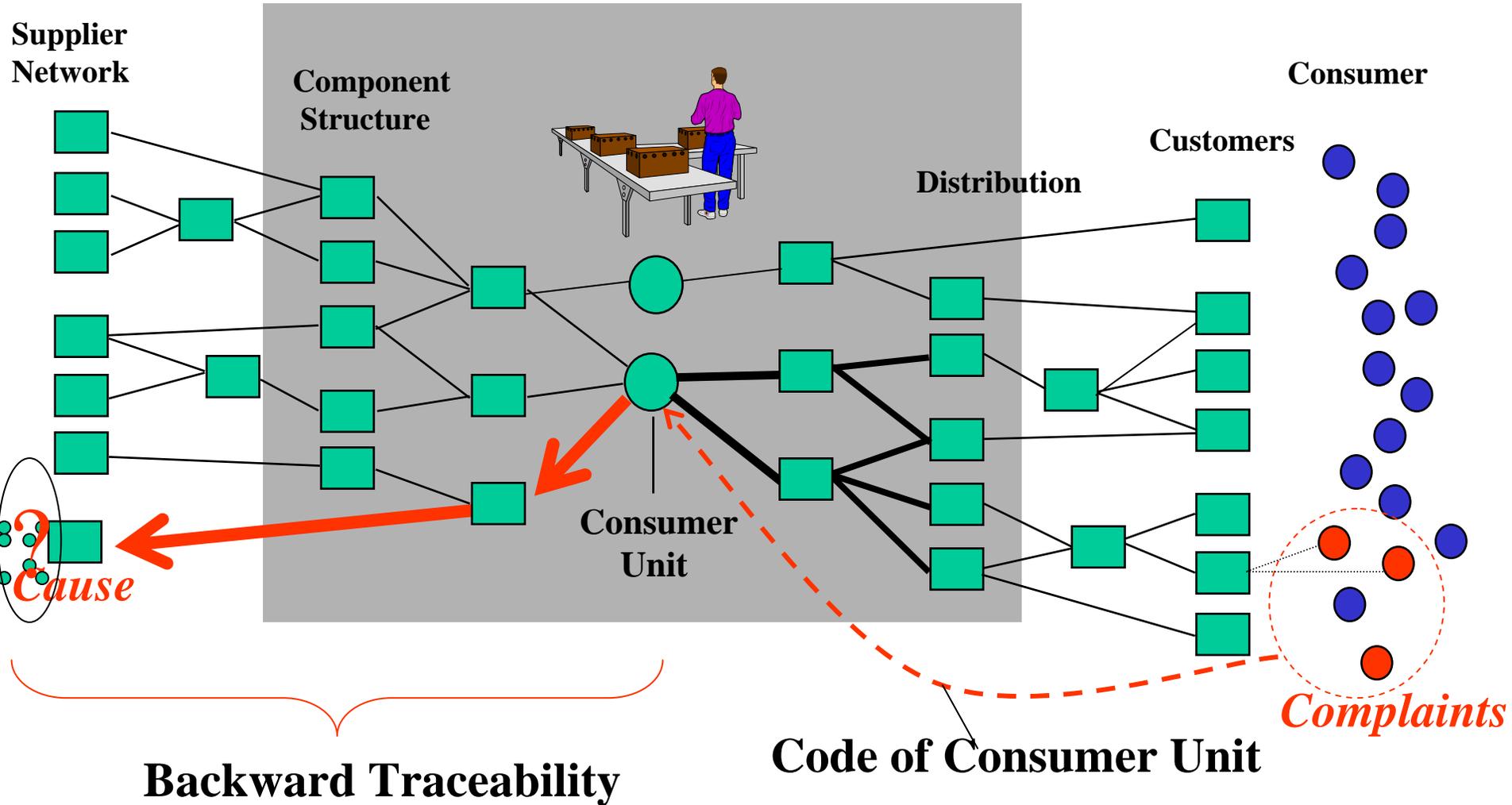


# Obligations of Food and Feed Business Operators

- ✓ Safety - Unsafe food shall not be placed on the market
- ✓ Responsibility
- ✓ Traceability
- ✓ Transparency
- ✓ Emergency
- ✓ Prevention
- ✓ Co-operation

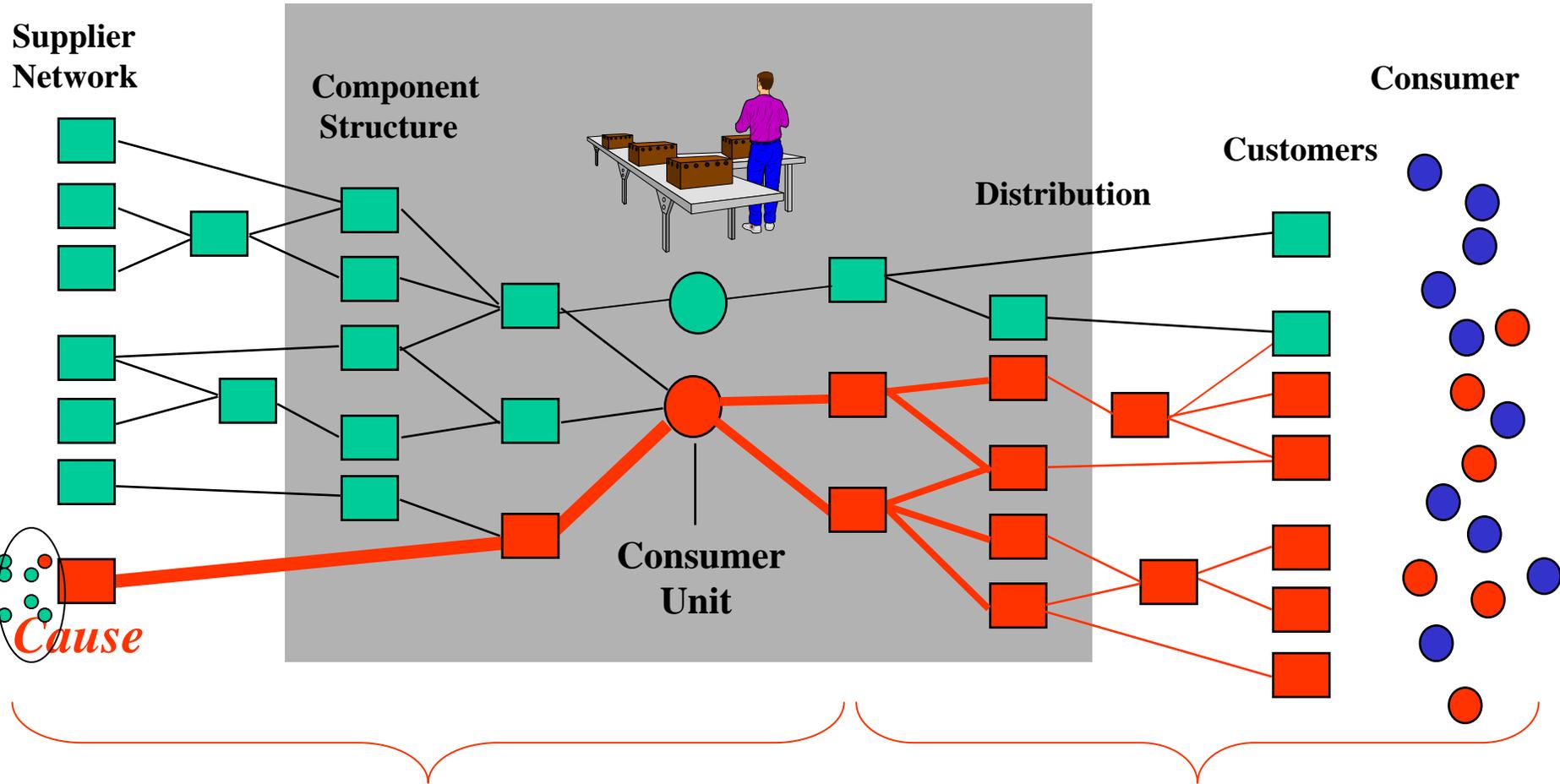


# Traceability: Search for Cause





# Product Tracing

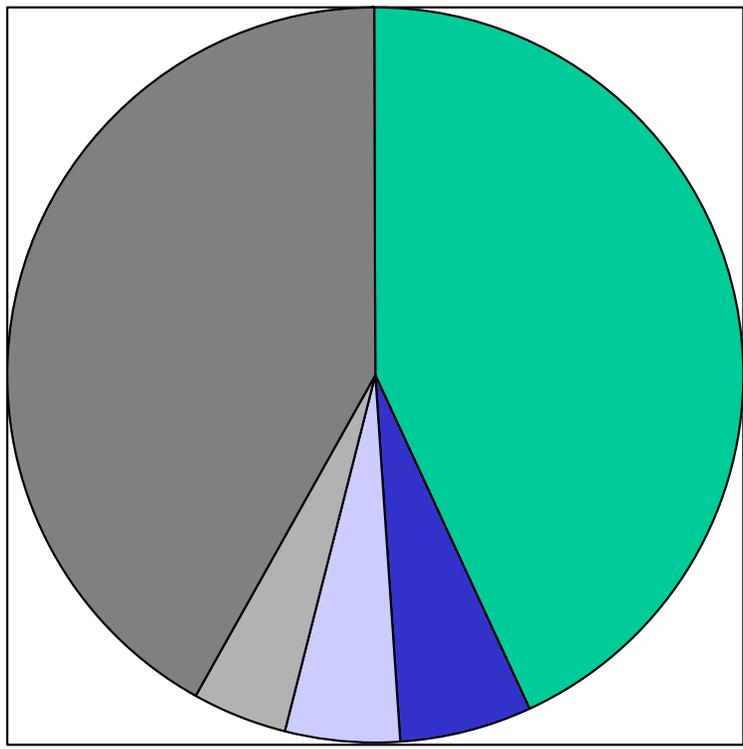


**Backward Traceability**

**Forward Traceability**



# Rapid Alert System for Food and Feed – Annual Report 2007



- Market controls
- Border controls - screening samples
- Company own checks
- Consumer complaints
- Border controls - imports rejected

**2976 notifications**



# The Functioning of the RASFF System

- ✓ The RASFF is first and foremost designed for National Control Authorities;
- ✓ Weekly reports have been published on the DG SANCO website since February 2002;
- ✓ It is indisputable that Food Business Operators themselves are affected by certain elements of the functioning of the RASFF or the measures triggered by it.



# Observations About the Functioning of the System (1)

- ✓ Food Business Operators have not been given any role, although they have key information (eg. processing conditions, etc) which is needed to make a substantiated decision on the relevance of a given alert.
- ✓ Insufficient rigour is applied when checking the accuracy of information prior to issuing an alert.
  - Accuracy of information is fundamentally important in order to facilitate rapid and appropriate risk management actions and to strengthen consumer confidence in the longer term.
- ✓ With the exception of the information published in the weekly overview, the information provided to the RASFF is deemed to be commercially confidential and is therefore only available to Member States.
  - However, some of this information would help companies with their supply chain checks and could be made available to the concerned Food Business Operator in certain circumstances, which in return could help to better identify the real issue.



## Observations About the Functioning of the System (2)

- ✓ Although an explanation is provided on the dedicated website, there is a lack of clarity regarding the application of the specific criteria for “alert notifications” and “information notifications;
- ✓ A number of different wordings i.e. “immediate serious health consequence”; or “temporary adverse health implications”; or “unlikely to have serious health consequences” are used to explain when the system is to be applied;
- ✓ An analysis shows that different criteria are used by Member States when deciding whether or not to submit information to the RASFF system.



# Recommendations to improve the Current System (1)

- ✓ The RASFF should function as a European-wide system;
- ✓ Clarification is needed as to the circumstances when a rapid alert has been put into the system due to a lack of harmonised European legislation and therefore reference has been made to national legislation;
- ✓ It is important to extend the information system to other partners, such as the US, China, India, etc, given the increasingly global nature of the food supply.



# Recommendations to Improve the Current System (2)

- ✓ CIAA acknowledges that the RASFF requires quick action. However, before issuing notifications to the System, the Commission should be able to evaluate their validity, accuracy and necessity;
- ✓ The Operator concerned should be informed as part of the procedure as early as possible, and should have the right to provide further information, such as test results, in order to add quality to the evaluation.
  - Operators could play an effective role with regard to the provision of information on emerging risks and should therefore be allowed to be involved at the earliest possible stage.



# Recommendations to Improve the Current System (3)

- ✓ Clear implementation rules are necessary to prevent diverging interpretations of Rapid Alert Systems for Food and Feed (RASFF) at Member State level to the detriment of the food industry;
- ✓ Responsible Rapid Alerts should be issued, as the aim of the RASFF should be to prevent further incidents.
  - Therefore, an evaluation of the impact of the event should be conducted before issuing a rapid alert.
- ✓ Industry should be a partner both in the debate and in the evaluation of the impact;
- ✓ Industry would like to share observations with Governmental experts in order to improve the functioning of the System and to prevent diverging interpretations.



# Recommendations to Improve the Current System (4)

- ✓ CIAA considers it important to:
  - Communicate that an Alert has been closed;
  - Provide an evaluation of the process;
  - Provide a conclusion which may be applied in similar cases.



# Case Study: Migrating Substances from Packaging

- ✓ ITX in a liquid food package triggered a Rapid Alert to all Member States in Week 37, 2005;
- ✓ The Commission's Standing Committee on the Food Chain and Animal Health (Toxicology Section) met on 30<sup>th</sup> November 2005 to assess the situation;
- ✓ On 9<sup>th</sup> December, well ahead of schedule, EFSA issued a final Opinion on ITX, which stated:
- ✓ *“The presence of ITX (2-Isopropylthioxanthone) in food, whilst undesirable, does not raise health concerns at the levels reported. ITX is a substance which has been found in minute quantities in liquid baby milk and other products packaged in cartons.”*
- ✓ The packaging industry concerned committed itself to phasing out the use of this substance in packaging for milk, fatty liquids and juices by the end of January 2006.



# CIAA Initiatives

- ✓ At the initiative of CIAA, a Joint Industry Working Group comprising the F&D, packaging and ink industries, and led by the packaging industry, was launched in January 2006;
- ✓ CIAA created an internal Incident Management System which is able to respond to emerging issues, either communicated via the RASFF system or by CIAA members, within 48 hours, but which does not replace the responsibilities of individual companies.



# Conclusion

## Enhance European Incident Management System

- ✓ *Strengthen and further improve coordination with all the relevant stakeholders in order to better anticipate new and emerging risks;*
- ✓ *Adopt harmonised Guidance for a higher level of coordination among enforcement actors to achieve an even more efficient and proportionate implementation of the Rapid Alert System for Food and Feed (RASFF).*

Quote: Recommendation no.9 Roadmap HLG



# Where to find more information about CIAA

**CIAA Public Website**  
**<http://www.ciaa.eu>**