Food Safety and Food Authenticity Strategy

2018-2020

An Roinn Talmhaíochta, Bia agus Mara
Department of Agriculture, Food and the Marine
Minister Introduction

I am pleased to introduce this Food Safety and Food Authenticity Strategy of the Department. It sets out the vision and objectives that this Department will action to ensure the continued safety and authenticity of food as the industry continues to implement the Food Wise 2025 Strategy. Our work in this area has always been of high value, illustrative of the expertise and dedication of Department staff. This new initiative is another step forward for this Department as it seeks to serve the citizens of Ireland and the agri-sector.

The Strategy has been prepared by this Department in consultation with our regulatory partners and stakeholders. I am confident that it prepares us as a Department to meet the many challenges and opportunities which we will face over the coming years.

There are 5 goals identified as central to this strategy:

1. Governance - As a Department we need to ensure that DAFM has an open, transparent and robust framework for the organisation of all activities including official controls on food safety and food authenticity.

2. Communication - The value of good communication has been identified as critical to creating greater awareness and collaboration on food safety and food authenticity within DAFM, and with stakeholders and the wider public.

3. Risk - Enhancing and harmonising risk systems based on the best and most up-to-date methodologies and scientific evidence available will enable DAFM to achieve its strategic objective to safeguard public health, food safety and food authenticity.

4. Data, Information and Knowledge – As a Department we need to maximise the quality, accessibility and applicability of food safety and food authenticity data, information and knowledge by both internal and external users.

5. Policy and Regulatory Framework – The development and implementation of a cohesive policy and regulatory framework will safeguard the consumer and promote compliance within the food industry.

While fully recognising our regulatory responsibilities to protect public health, an integral component of this Strategy is the growth of a culture of compliance across the agri-food sector that will maximise the potential for collaboration across government and industry to work together to ensure the safety of consumers, not only at home here in Ireland but also across the span of our global consumer base.

I look forward to supporting the work of this strategy over the coming years.
Secretary General Foreword

I welcome this 3 year Food Safety and Food Authenticity Strategy, which sets out a pathway to underpin the most important platform for the growth of the agri-food sector: our assurances on the safety, provenance and integrity of the food we produce. The strategy will support the implementation of the high level strategic objective of Food Wise 2025 which has set out a blueprint for the further development of the industry.

Multi-disciplinary teams within the Department have examined how best we can deliver improved assurances to our consumers in the face of the challenges and risks facing the sector. This review has led to the identification of the high level goals that will now be implemented over the course of the 3 year strategy. This Strategy, dealing with the harmonisation and co-ordination of all Departmental activities across food safety and food authenticity related control activities, including contingency planning, will serve to give confidence to consumers at home and abroad that we are aiming for the highest standards of policy and implementation within DAFM. Our governance of official controls, allied to improved communications with the agri-sector will yield benefits for the consumer as we forge a way forward to deal with the risks across the food chain. The analysis of food based data will turn our information into knowledge that will support evidence based policy, and an improved and focussed official control system.

The agri-food sector is an essential component of our national economy and society, and will be key to success in the future. DAFM’s work with our regulatory partners at home and abroad will be critical to this ongoing progress. This Department has clear understanding of its regulatory role in enforcement of food legislation, but also recognises the high levels of compliance achieved by the agri-sector. An important component of our Strategy is to seek to identify best compliance practice, identify the triggers for compliant behaviour and to be an enabler of such behaviour.

This Department looks forward to working with our regulatory partners and the industry in achieving our goals.

“The agri-food sector is an essential component of our national economy and society”
Background

As consumers we expect that the food we and our families choose to eat is safe and authentic\(^1\) and that the information we use to make our food choices is accurate. Under the General Food Law, Food Business Operators (FBO) have primary responsibility for food safety and food authenticity. The Department of Agriculture, Food and the Marine (DAFM) and its agencies play a leading role in ensuring food safety and food authenticity through its system of inspection, analysis and audit from production to consumption (Figure 1). This is done in partnership with the Food Safety Authority of Ireland (FSAI) and other organisations.

With over 600 staff directly, and many more indirectly involved in food safety and food authenticity activities, DAFM’s commitment to this crucial area is clear. Safeguarding public health, consumer confidence, and protecting Ireland as a producer of safe and authentic food are the most important activities which DAFM undertakes. Our commitment in turn supports a €26bn agri-food industry, which exports to 175 countries across the globe, and provides employment for over 163,000 people.

DAFM’s Mission Statement encapsulates this commitment, ‘Serving the Government and the people of Ireland by leading, developing and regulating the agri-food sector, protecting public health and optimising social, economic and environmental benefits’. The development and promotion of the agri-food sector and the ambitious targets set by the Foodwise 2025 agri-food strategy depends absolutely on our record and reputation for food safety and food authenticity.

The challenges facing us in this area are diverse and ever-changing. Examples include the increasingly complex food chain with novel processes and technologies, evolving consumer demands, globalisation, climate change and environmental sustainability. While food safety is well established from a legislative perspective, food authenticity has had an increasing focus over the last 5 years in Europe, arising from a proliferation of fraudulent findings in relation to food, and the increased activity of the European Union and Commission in this area.

More recently, the official controls on food and feed (Regulation (EU) 882/2004) have been rationalised with the new Regulation (EU) 2017/625 which has a broader scope and introduces the establishment of an EU reference centre on food authenticity and integrity. The implementation of this Regulation creates an added imperative for DAFM to examine and improve its performance to meet the challenge of these new rules and requirements.

As the challenges are wide ranging and continually evolving, DAFM recognises that it must build on the skills, expertise and knowledge of its own personnel. It also recognises that this should not be done in isolation, but in partnership with other agencies and the agri-food industry.

\(^1\)References to food authenticity include food standards, food composition, consumer interests and labelling compliance. Deficits to food authenticity include food fraud, a term used to encompass the deliberate and intentional substitution, addition, tampering, or misrepresentation of food, food ingredients, or food packaging; or false or misleading statements made about a product, for economic gain.
The Process

DAFM’s Management Board established a Food Safety and Authenticity Working Group in 2016 with the objective of ensuring that DAFM has an effective, efficient, harmonised and co-ordinated framework for the organisation of all activities, including official controls, on food safety and food authenticity.

One of the first actions of the Working Group was to organise a Forum for DAFM staff involved in food safety and food authenticity, which provided an opportunity to examine issues pertaining to food safety and food authenticity and which gave rise to a number of themes that the Working Group needed to consider.

One of the outcomes of the Forum was to highlight the range of activities, expertise, resources, interactions and cross-cutting issues which constitute DAFM’s food safety and food authenticity control system. Consequently, the first stage in achieving the objective of the Working Group, was the decision to bring together, into a single strategy document, a set of goals, objectives and recommendations, with an initial 3-year implementation phase.

The Working Group engaged in wide ranging consultations with staff and stakeholders in order to identify challenges and opportunities that could lead to an enhanced harmonised and efficient control system.

These included:

- Targeted surveys in which internal and external stakeholders were invited to submit their views on food safety and food authenticity issues, thus enabling the development of this strategy. The themes, identified at the Forum formed the basis of these surveys.

- Internal and external stakeholder focus groups which assisted in the development of key recommendations to support the main areas of activity identified in the Strategy.

It was agreed that the scope of the strategy would include an examination of DAFM food safety and food authenticity activities with reference to the themes identified at the Forum, in so far as they directly affect food safety and food authenticity, while taking account of the feedback from both internal and external consultations. It is recognised that in relation to the safety and hygiene of fish and fishery products that DAFM retains a policy development role, for which this strategy is relevant. However the Sea-Fisheries Protection Authority (SFPA) is independent in the exercise of its functions and provides advice in relation to effective implementation, collects and reports data and assists in the representation of the State when requested on these matters, and it works in accordance with its own statement of strategy.
The Strategy

Consultations and discussions with internal and external stakeholders have been key elements in the development of this strategy. In addition, it is recognised that there are other complementary strategies of DAFM, its agencies and other organisations, with which there will be synergies (Appendix 1, Page 14). It is intended that the DAFM Food Safety and Food Authenticity Strategy will be complementary to these other strategies.

DAFM recognises the significant contribution made by a broad range of stakeholders in safeguarding public health, public confidence, food safety and food authenticity. Their input, which will continue to be of value when developing the implementation phase of this Strategy, has ensured that the full breadth of issues pertaining to food safety and food authenticity have been identified. This consultation has allowed further refinement of the common themes which now form the goals of this Strategy.

These goals, reflecting the key areas underpinning the delivery of the objective of the Food Safety and Authenticity Working Group, are set out in this strategy statement together with clear objectives, outcomes and recommendations.
1 - Governance

Good governance demands that DAFM has robust, open, transparent and accountable processes and procedures for managing food safety and food authenticity. Such an approach will build confidence on the part of the public in DAFM as a guardian of the safety and authenticity of food. It will also help clarify the responsibilities and obligations attaching to the various stakeholders who play a role in ensuring the safety and authenticity of food.

Goal 1

Ensure that DAFM has an open, transparent and robust framework for the organisation of all activities including official controls on food safety and food authenticity.

Objective

DAFM to actively strengthen its leadership role in safeguarding food safety and food authenticity.
To deliver a high level of guarantee in relation to consumer expectations of food authenticity.

Outcome

Building on existing practice, DAFM will have structures, systems and procedures that are harmonised and co-ordinated in relation to horizontal aspects of food safety and food authenticity.
DAFM programme of activity to be reflective of the strengths, weaknesses, opportunities and threats facing food safety and food authenticity.
Enhanced capability and capacity of the organisation and personnel to have robust controls in relation to food authenticity.

Recommendation

Design and implement a programme of actions for the organisation of all activities that will provide consistency of approach in relation to the delivery of official controls.
DAFM to have open and transparent processes of engagement with all stakeholders, allowing for their views to be taken into account.
### 2 - Communication

In order to ensure that there is confidence in Irish food and the benefits of the control system that underpin it, there is a responsibility for DAFM to engage, inform, educate and listen at all stages of the food chain from producer to consumer. In addition, DAFM needs to ensure effective communication with its own staff so that they are fully aware of the strategic importance of the work they do. Communication is a two-way process, and innovative mechanisms will need to be put in place to allow DAFM to benefit from the vast store of knowledge, experience and ideas which its own staff possess.

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<th>Goal 2</th>
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<td><strong>Enhance COMMUNICATION</strong> leading to greater awareness and collaboration on food safety and food authenticity within DAFM, with stakeholders and the wider public.</td>
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<th>Objective</th>
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<td>To promote clear and consistent communication on food safety and food authenticity with our own staff, stakeholders and the wider public.</td>
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<td>Foster and promote linkages and collaboration with other agencies, stakeholders and research bodies to inform the development and implementation of our work on food safety and food authenticity.</td>
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<th>Outcome</th>
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<td>Consumer, industry and market trust in DAFM's effectiveness and professionalism in safeguarding food safety and food authenticity.</td>
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<td>More effective and harmonised implementation of regulatory controls across the food sector.</td>
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<td>DAFM and industry working in partnership towards achieving the goals of food safety and food authenticity.</td>
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<td>Review communication within DAFM and externally, with a view to encouraging a positive and structured engagement with staff, stakeholders and the wider public.</td>
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<td>Align and co-ordinate DAFM food safety and food authenticity activities with relevant cross-agency expert groups.</td>
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<td>Examine means by which the DAFM website and a digital footprint may support its objectives in relation to food safety and food authenticity.</td>
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<td>Identify means of promoting the tangible benefits of compliance across the spectrum of stakeholders.</td>
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<td>Deliver additional relevant and appropriate training to personnel to ensure that they have enhanced knowledge and expertise to deal with food authenticity issues.</td>
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3 - Risk

The identification and categorisation of risk and its subsequent mitigation is essential to DAFMs mission of protecting public health. It also allows DAFM to focus its attention on the matters of most threat, deploying staff and resources accordingly. However the identification of risk needs to be a dynamic process, utilising up to date information and findings, and it demands a significant resource to effectively use the data to enhance food safety and food authenticity.

Goal 3

To enhance and harmonise RISK systems based on the best and most up-to-date methodologies and scientific evidence available, enabling DAFM to achieve its strategic objective to safeguard public health, food safety and food authenticity.

Objective

To have an enhanced proactive capacity to identify risk in the food chain with a view to its mitigation.

Foster and promote linkages and communication on risk within DAFM and with stakeholders and other official agencies involved in the area of food regulation.

Recognising the risks to the food chain and the threat to the authenticity of food, to ensure that the activities of DAFM are to the forefront in ensuring food authenticity.

Outcome

An integrated risk analysis system that utilises the most up to date data, expertise, science and technology to detect new and emerging risks and control known risks.

Evidence based policy, strategy and decision making to support safe and authentic food.

Enhanced preparedness for food safety and food authenticity issues that might arise.

Increased focus on the identification, reduction or mitigation of risk in relation to food authenticity.

Recommendation

Undertake an assessment of current approaches to the identification, reduction or mitigation of risk with a view to developing an integrated and harmonised risk analysis system.

Review the best international practice in the area of risk analysis to oversee the development of an early warning system.

Establish and simulate procedures and contingency planning for responding to major risk incidents.

Assess the means by which vulnerability assessments can be undertaken across the main food sectors with a view to risk identification and mitigation.
4 - Data, Information and Knowledge

The vast amounts of data now being produced has the capacity to transform how DAFM conducts its activities not least in the area of food safety and food authenticity. In this rapidly evolving environment, innovative approaches for capturing, managing and using data need to be developed. By encouraging new uses for data, DAFM also needs to ensure that the benefits that accrue from data resources can be used in the most efficient way possible for the benefit of the consumer and the agri-food industry.

Goal 4
Maximise the quality, accessibility and applicability of food safety and food authenticity DATA, INFORMATION and KNOWLEDGE by both internal and external users

Objective

To enhance our data capture, storage, extraction, and transmission using the most appropriate IT systems and solutions.
Generate relevant and accurate data, including latest research and technologies such as genomic data and other novel data sources having regard to data protection legislation.
Maximise linkages between data repositories to facilitate the access and sharing of data in keeping with the Open Data Initiative.
Better exploitation of available data using new analytic approaches and models to support DAFM and industry in their respective roles.

Outcome

Comprehensive and harmonised work programmes, reports and metrics across business areas.
Evidence based policy, strategy and decision making, based on outcomes of data collation and analysis.
Enablement of horizon scanning and trends identification.
Demonstration of work outputs to stakeholders.
Greater ability to contribute fact based findings to other national and international priorities and discussions.

Recommendation

Review the current data capture and analysis systems used across the divisions involved in food safety and food authenticity activities and identify gaps and needs.
Leverage and enhance existing IT systems in conjunction with DAFM Information Management and Technology Division (IMT).
In consultation with IMT, engage in data analysis with a focus on enhancing DAFM capability to mitigate risk and identify opportunities for the protection of public health and consumer interest.
Ensure availability of relevant data for the Government Open Data Initiative.
5 - Policy and Regulatory Framework

DAFM plays a key role in the development of policies and regulation that help ensure food is safe and that the claims that are made in relation to it are accurate. The tools available to DAFM include the funding of research, and the fostering of a culture of compliance through education and the intelligent design of policy. These measures, aimed at maximising voluntary compliance, are supported by those of a compulsory nature, including effective and proportionate rules and regulations. This cohesive approach to protecting public health and public confidence in the food chain is essential to enhancing Ireland’s reputation as a trusted provider of safe and authentic food.

Goal 5
To ensure that DAFM develops and implements a cohesive POLICY AND REGULATORY FRAMEWORK that safeguards the consumer and promotes compliance within the food industry.

Objective
The provision of a robust and harmonised policy and regulatory framework that is informed by, and serves, the consumers’ interests.
The various stakeholders in the food chain understand their roles and responsibilities in safeguarding the food chain.

Outcome
A regulatory and policy framework which fosters a culture of compliance within the agri-food sector.
Robust and adequate/appropriate legislation to provide an optimum regulatory framework to underpin DAFM controls.
Enforcement which is proportionate, effective and dissuasive.

Recommendation
Review the tools used to develop policy and legislation in the area of food safety and food authenticity.
Establish appropriate indices that measure food safety and food authenticity compliance with a view to communicating this to industry and consumers.
Harmonise DAFM activities in horizontal areas, e.g. training for regulatory duties and enforcement.
Evaluate the benefit of developing a mechanism for centrally based co-ordination of policy analysis.
Appendix 1: Other Relevant Strategies...

DAFM Statement of Strategy 2016-2019
DAFM’s statement of strategy sets out the vision, mission and objectives of the Department for the period 2016-2019. The strategy identifies the key strategic objective of safeguarding public health, food safety and food authenticity.

FOODWISE 2025
This strategy sets out ambitious growth targets for the Irish agri-food sector. It identifies several main focus areas; developing human capital, a greater role for consumer insights, productivity improvements driven by innovation and technology and value addition to the sustainable production of primary materials.

DAFM Laboratory Review 2016
This long term strategy for the Department’s Laboratory Service builds on existing capability and expertise in animal health, food safety and plant sciences, which allows DAFM to deal more effectively with new and emerging risks and provide valued services and advisory support to the farming community, the food industry and wider society.

DAFM National Farmed Animal Health Strategy 2017-2022
This strategy sets out a series of collective actions by stakeholders in order to ensure the health of farmed animals. It recognises the central role of food safety as a driver for animal health controls and makes recommendations especially in the areas of traceability and surveillance and data management of particular relevance to relevant to food safety and public health.
iNAP – Ireland’s National Action Plan on Antimicrobial Resistance

Ireland’s National Action Plan on Antimicrobial Resistance 2017-2020 recognises the urgent and growing problem of antimicrobial resistance for human health worldwide. It aims to implement policies and actions to prevent, monitor and combat AMR across the health, agricultural and environmental sectors.

SFPA Strategy Statement 2015-2017

This strategy provides a high-level framework for the sea-fisheries sector, outlining the approach to continuously improving, growing and innovating the sector, in support of stakeholders and the public interest.

FSAI Statement of Strategy 2016-2018

This sets out the Food Safety Authority of Ireland (FSAI) core vision of safe and trustworthy food for everyone and its mission of protecting consumers by leading a collaborative food safety community to continuously raise food standards and create a culture of excellence.

The Open Data Strategy 2017-2022

This is a whole of Government initiative which provides a framework for data to be used to ensure that public services are delivered in a more effective and efficient manner and in a transparent and accountable way.