

June 2019

Strawberry tampering incident

Debrief May 1 2019

Follow-up report to government

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Executive summary

In September 2018 there was a food tampering incident involving the intentional tampering of strawberries with sewing needles. This incident had significant financial, reputational and resourcing impacts on the strawberry industry as well as the wider fresh produce industry, on the international reputation of Australia's safe and secure food supply, and on the police and food regulatory agencies involved in the investigation who redirected significant resources to tackle this incident.

Australia has a reputation, domestically and internationally, as a safe, clean, reliable and sustainable producer of high quality food, with food exports being an important part of the Australian economy. Australia's export trends have shown a recent increase in the export of horticulture products, with high-risk horticulture (ready-to-eat, minimally processed fruits and vegetables; fresh leafy green vegetables; melons; berries; and sprouts) contributing to this increase. The competitiveness of Australian produce has been improved by tariff reductions, reduced shipping times, and favourable exchange rates. This demonstrates a large ongoing economic opportunity for Australia in our horticulture export markets which are forecast to continue to increase, particularly to Asian markets¹.

Risks, such as the intentional tampering of strawberries, as well as a number of other recent incidents affecting horticulture produce (including the listeriosis outbreak associated with rockmelons, the Hepatitis A outbreak associated with imported frozen pomegranate arils, and a large recall affecting multiple brands of imported frozen vegetable, potentially contaminated with *Listeria*), may impede the full realisation of this export opportunity. These incidents collectively raised the profile of food safety risks posed from horticulture produce and have tested Australia's incident response systems, highlighting potential areas for enhancement including in communications and traceability. Incidents of this nature have the potential to jeopardise this reputation and cause extensive and on-going losses, both direct and opportunity losses, to the Australian economy. Preparedness and effective response to food incidents are an important component to protecting this reputation.

Australian Government Departments have commenced a review to examine the interaction between Australia's food regulation system and the growing demand for Australian food exports². Specifically, the need to enhance our traceability systems across the food supply chain³. This review is to ensure we, as a nation, are prepared for any future changes in off-shore requirements, and to provide our Australian exporter businesses with a competitive advantage, leveraging off Australia's food production's safe, clean and green reputation.

The focus by all needs to be on 'Underpinning trust and preparing for the future', to ensure negative over-reactions by international markets, including the suspension of imports and reactive media, do not continue to occur. We need to work on increasing customer confidence in the entire food system. The strawberry incident demonstrated the complex and inconsistent nature of supply chains in this sector, highlighting potential gaps and vulnerabilities which increase the risk posed by intentional tampering. Future traceability initiatives, flagged in the national traceability project, include looking to ensure greater digital

¹ Agricultural commodities: September quarter 2018 <http://www.agriculture.gov.au/abares/research-topics/agricultural-commodities/sept-2018/horticulture>

² Food export review: <http://www.agriculture.gov.au/ag-farm-food/food/regulation-safety/food-export-review>

³ National Traceability Project: <http://www.agriculture.gov.au/market-access-trade/traceability-project>

supply chain integrity, and to capture efficiencies, in conjunction with a food system which is responsive, flexible and strategically aligned for greater efficiency and focus,

The importance of reviewing food safety management across the supply chain and enhancing traceability has also been discussed at the Australia and New Zealand Ministerial Forum on Food Regulation. To progress this work FSANZ is currently reviewing Chapters 3 and 4 of the Australia New Zealand Food Standards Code (the Code). The funding for this work was provided by the Department of Health. The work aims to broaden and hasten the review of risk management in high-risk horticulture sectors.

FSANZ is expecting this work will lead to the development of a primary production and processing (PPP) standard for high-risk horticulture products. This is likely to introduce requirements to manage food safety on-farm, including requirements for traceability. The estimated duration of this work will be around 2 years, and will include extensive consultation with stakeholders.

The review of horticulture is particularly important as there is a need to ensure that adequate measures are in place to protect consumers from foods which may pose a food safety risk. It is also important in maintaining confidence in a food supply for our export markets. With the exception of seed sprouts, there are currently no food safety requirements in the Code applying specifically to the primary production of horticultural produce. Given the sector is currently under-regulated, the overall regulatory impact on the industry is expected to increase as a result of this review. However, any regulatory measures proposed as a part of this review will be proportionate to the risks involved and will be within the Government's aim of achieving minimal effective regulation.

As forecasted in our [original report](#) to Government on this incident, Food Standards Australia New Zealand (FSANZ) convened a joint debrief on 1 May 2019 in Brisbane Queensland. The aim of the debrief was to reflect on the incident and confirm any systemic changes to investigation procedures should a similar incident happen in the future. The debrief included industry members from the strawberry supply chain, government representatives from food regulatory agencies and police from multiple jurisdictions. Feedback on this debrief is provided to Government in this report.

FSANZ also consulted with government, police and industry stakeholders through a confidential online stakeholder survey.

This report summarises the:

- debrief activities undertaken by FSANZ since the incident including:
 - discussion at the debrief meeting on 1 May 2019
 - feedback from the stakeholder survey
- issues identified by food regulatory agencies, police and industry stakeholders
- the recommendations arising from the incident

FSANZ is improving its preparedness for future national food incidents and, in conjunction with the wider food regulatory system, is aiming to be more modern, agile and responsive, to this rapidly changing globalised environment. FSANZ aims to not just meet but exceed community and market expectations. This will include working closely with government regulators and industry, as a priority, within current resources, to implement the recommendations arising from this incident, and to improve guidance to all sectors on dealing with future incidents of intentional tampering of food.

FSANZ appreciates the support of government in recognition of the importance of this work, while the recommendations in this report are actioned.

Recommendations

A report on the tampering of Australian strawberries in September 2018 was produced by Food Standards Australia New Zealand (FSANZ) in October 2018. Please refer to the report on the [FSANZ website](#) for full details and background.

The original report noted that while governments’ response to this food incident was timely in protecting public health, several key areas for improvement were identified and the following recommendations were made:

Recommendation	Status
<p>1. All jurisdictions should review their food incident response protocols - in particular ensuring that formal linkages between regulators, health departments and police are in place for incidents involving intentional contamination.</p>	<p><i>QLD has offered to provide officer support to develop a template based of their ‘intentional contamination’ protocol. Work is ongoing via the Implementation Subcommittee for Food Regulation (ISFR) Incident Response working group</i></p>
<p>2. When a food tampering incident occurs across jurisdictions, a central agency should be engaged to ensure national coordination of messaging and information associated with the incident.</p>	<p><i>FSANZ is centrally placed for coordination of incidents and under the National Food Incident Response Protocol (NFIRP) [if triggered] is the default communications controller</i></p>
<p>3. Police should be included in national food incident debriefs when intentional food tampering is involved.</p>	<p><i>Police from affected jurisdictions were invited to the strawberry debrief, this practice worked well and will continue for future intentional food tampering incidents</i></p>
<p>4. Triggers for activation and management of intentional contamination of food under the National Food Incident Response Protocol (NFIRP) should be reviewed by the food regulatory system.</p>	<p><i>Incorporated into review of the NFIRP [recommendation #2 post debrief], work is ongoing via the ISFR Incident Response working group by December 2019</i></p>
<p>5. A representative body for the horticulture industry is required to support crisis preparedness and response in the sector.</p>	<p><i>Industry have been active in improving cohesion in incident preparedness, and in focussing on the recovery from this incident. It is noted that a single body to represent all commodities in this sector may not be practical and further work on coordination and collaboration between multiple industry groups may be needed. Specific to the strawberry</i></p>

	<i>incident; industry members and government have worked together on recovery and the positive promotion of strawberries.</i>
6. Traceability measures within the horticulture sector need to be strengthened. Government and industry should work together to map the current state of play and identify options and tools for enhancing traceability.	<i>Traceability is a key focus across a number of concurrent and complementary ongoing projects, including the</i> <ul style="list-style-type: none"> • <i>National Traceability Project¹</i> • <i>Review of food safety management standards²</i> • <i>Food Export review³</i>
7. Work on traceability should include collaboration with research bodies and other stakeholders to evaluate technical and innovative solutions to improve quality assurance throughout the supply chain.	<i>Stakeholders, including, industry and research bodies, have been, and will be, consulted with during these projects.</i>
Recommendations post debrief (May 2019)	Tentative timelines
1. To develop, strengthen and test relationships and formal response management protocols, between food regulators, criminal enforcement agencies and the food industry; both across and within individual jurisdictions.	<i>Ongoing.</i>
2. Review and update the National Food Incident Response Protocol (NFIRP) about Intentional Interference/Tampering, to reflect learnings from the incident. This should include: <ul style="list-style-type: none"> a. information about when a tampering incident should trigger the protocol b. a process to determine the lead agency during a tampering incident c. a review of the intentional interference/tampering annex 	<i>To be finalised by December 2019.</i>

¹ National Traceability Project: <http://www.agriculture.gov.au/market-access-trade/traceability-project>
² FSANZ Review of food safety management standards: <http://www.foodstandards.gov.au/foodsafety/standards/review/Pages/default.aspx>
³ Food export review: <http://www.agriculture.gov.au/ag-farm-food/food/regulation-safety/food-export-review>

d. a process to appoint a liaison person or group to support the lead agency during an incident	
3. FSANZ to research existing coordinated emergency response mechanisms to determine if the food regulatory system can leverage off of what is already in place in other sectors.	<i>Ongoing, with initial research completed by December 2020.</i>
4. FSANZ to investigate options to run an intentional interference/tampering mock exercise.	<i>FSANZ to consider options for running a mock exercise by December 2019, with the aim to run the exercise in 2020.</i>
5. The food industry, in conjunction with FSANZ, should develop guidance materials for crisis/emergency management, and strengthen food defence (physical security within the supply chain, and food safety culture).	<i>In conjunction with recommendation 3, to be finalised by December 2020.</i>
6. Develop guidance for the management of media during a tampering incident. FSANZ to conduct research into the impact of social media.	<i>To be finalised by December 2020.</i>

Debriefing activities

On 1 May 2019, FSANZ held a meeting in Brisbane, Queensland, with affected stakeholders from government, police and industry representatives. There was general acknowledgement by the participants that this was an unprecedented incident. Many involved in the debrief complimented the good work and good will of many, and agreed to learn from the incident and make improvements moving forward.

Debrief meeting – 1st May 2019

The debrief meeting provided a valuable opportunity to review the incident, discuss identified supply chain vulnerabilities and the current effectiveness of national emergency response procedures.

Key areas of discussion included:

- FSANZ's recommendations from the Strawberry Tampering Incident report to government
- Key messages from FSANZ's stakeholder survey
- Lead jurisdiction (Queensland) perspective, including the chronology of events
- Police perspective of the incident
- Industry perspective of the incident
- Communications during an intentional tampering incident
- Breakout sessions – topics discussed included
 1. Communication
 2. Media, including social media
 3. Engagement between industry and government
 4. Enhancement of trusted stakeholder relationships

Summary of discussions held during joint debrief

Public health and protection was considered paramount during the incident by industry, food regulatory agencies and police. Key messages from the debrief are listed below.

Supply chain vulnerabilities and traceability

- The vulnerability of the food supply chain to tampering was a recurring theme. Needles in strawberries was viewed as a 'best case scenario' tampering incident as the tampering was evident and the product packaged. The incident highlighted the potential for serious and wide-ranging implications if chemical, biological, or other less evident forms of tampering were used.
- There were traceability difficulties identified across the supply chain during this incident, both for tracing fresh produce, as well as in tracing labour supply and workers.
- Areas for improvement were identified in food defence (physical security within the fresh produce supply chain) and food safety culture (workers knowing and speaking out when something is not right).

Communications

- The use of consistent language to describe the incident was considered an issue, for example, the use of the word tampering rather than contamination was seen as favourable.
- All agreed that strong collaboration and communication is key between food regulators in each jurisdiction, industry and police.
- It was agreed there is a need for a central lead agency/coordinator for public messaging and that FSANZ may be well-placed for this role.
- Messaging and communication needs to involve the whole industry supply chain, including retailers.

Regular meetings and joint exercises

- Government should facilitate regular mock exercises during peacetime.
- All agreed on the importance of building strong contacts / networks between the government food regulatory agencies, the police and industry.

Media and social media

- It was noted that this incident was exacerbated by the speed in which the news spread, with sometimes incorrect and conflicting information being posted online, fuelling copycat events nationwide.
- All agreed that management of social media is difficult. There needs to be plans in place to manage social media to greater collective benefit.
- It was considered that government developing guidance materials on media and social media management during a crisis may be of assistance.

Emergency response protocols

- The industry should develop crisis management plans that cover tampering incidents. However, it was noted that resources and capacity in the horticulture industry to do this may be limited.
- Food defence guidance materials (e.g. supply chain security and vulnerabilities; and food safety culture) need to be considered and developed by industry.
- It was noted that nationally coordinated and funded emergency response mechanisms are in place for other disciplines such as biosecurity, animal and plant health. These existing mechanisms should be investigated further to see how the food regulatory system can learn from them and develop similar emergency response mechanisms.
- It was agreed that review of current emergency protocols across all agencies will improve preparedness for intentional tampering.
- A central lead agency to coordinate the tampering incident is essential.
- There is a need for agreement on consistent and accurate messaging across all jurisdictions before releasing information to the public.
- Consideration should be given to engaging a suitable liaison person during an incident. This person would be external to the home jurisdiction and would be involved in multidisciplinary discussions on the incident.

Strawberry Tampering Incident stakeholder survey

Key messages from FSANZ's online survey

FSANZ conducted an online survey to collect further information to inform discussion at the debrief and to allow those who were unable to attend the debrief to provide comment. All sectors (industry, food regulators and the police) were represented in responses received. The responses were generally positive, with constructive feedback. The key themes from the survey result are summarised below.

1. Collaboration

Feedback was positive in regard to collaboration between food regulators, the police and the strawberry industry. This was particularly evident in the later stages of the incident when social media was managed well with positive messages about cutting up and eating strawberries appearing. However, initially most survey respondents heard about the incident via social media rather than through the official channels.

2. Timeliness

Respondents highlighted issues around timeliness of distribution of information. Events took place quickly, and some respondents felt that the initial response from government was slow and chaotic. Respondents indicated that as the incident progressed information sharing was more timely and communication between sectors improved. Respondents agreed that the adoption of communication protocols via the Bi-National Food Safety Network worked well. Industry respondents noted that the Food Incident Forum could have been used more effectively to disseminate information about the incident to industry members.

3. Central lead agency

The need for a central lead agency was identified by all respondents, with some suggesting the Australian Federal Police, FSANZ, or the home jurisdiction to take on this role. Respondents acknowledged that Queensland Health and Queensland Police led the incident well. A suggestion was made for a steering committee (or emergency committee) to be formed to control future food tampering incidents. It was suggested that this committee could include a panel of food safety experts. All respondents agreed that jurisdictions need to work together during an incident and be consistent with the advice of the lead agency.

4. Clear messaging

Respondents clearly identified the impact of media on this incident as both negative and positive. Respondents also agreed that all messaging released during an incident needs to be accurate and consistent.

5. Management of media

All respondents acknowledged the challenge of trying to manage social media. Initially social media impact was considered negative, but industry used social media for their benefit. A social media management plan was suggested.

6. Regular communication

Respondents indicated that, once established, the regular teleconferences and other sources of information sharing during the incident work well.

7. Sharing of accurate information

Some respondents felt isolated and that, at the beginning of the incident, they did not receive adequate information from government regulators to be able to make decisions about the product.

8. The National Food Incident Reponses Protocol (NFIRP) and the Bi National Food Safety Network (BFSN)

Respondents noted that the NFIRP and BFSN were not triggered although the protocol was followed and the BFSN was used to disseminate information as the incident progressed. A number of respondents suggested that the NFIRP should have been triggered.

9. Crisis/emergency management plans

Some respondents indicated that crisis/emergency management plans are being implemented by industry, including working on better reaction times. It was noted that learnings from the incident will help to update the plans.

10. Wasted product

Industry participants indicated that the wasted product that resulted from this incident was a concern and that plans could be put in place to better manage the product in future to avoid such waste.

11. Traceability

Several respondents mentioned the importance of traceability and that in this incident the traceability of product and of production workers was difficult. It was noted that there are several projects being undertaken to improve traceability of agricultural products in Australia.

12. Other

It was suggested that tighter laws and stronger sentences are needed for people who undertake copycats behaviour in these incidents.

Debrief recommendations

Australia has mature food incident response systems and processes. There is added complexity, however, when food tampering occurs and police are involved in a criminal investigation. Complex supply chains and the fragmented nature of the horticulture industry provided further challenges for this sector during this incident.

Consultation with affected government agencies, including the police and industry members from across the strawberry supply chain identified the following recommendations in response to this incident, in addition to those outlined in FSANZ's [original report](#) to Government.

1. To develop, strengthen and test relationships and formal response management protocols, between food regulators, criminal enforcement agencies and the food industry; both across and within individual jurisdictions.
2. Review and update the National Food Incident Response Protocol (NFIRP) about Intentional Interference/Tampering, to reflect learnings from the incident. This should include:
 - a. information about when a tampering incident should trigger the protocol
 - b. a process to determine the lead agency during a tampering incident
 - c. a review of the intentional interference/tampering annex
 - d. a process to appoint a liaison person or group to support the lead agency during an incident.
3. FSANZ to research existing coordinated emergency response mechanisms to determine if the food regulatory system can leverage off of what is already in place in other sectors.

4. FSANZ to investigate options to run an intentional interference/tampering mock exercise.
5. The food industry, in conjunction with FSANZ, should develop guidance materials for crisis/emergency management, and strengthen food defence (physical security within the supply chain, and food safety culture).
6. Develop guidance for the management of media during a tampering incident. FSANZ to conduct research into the impact of social media.

Risks and Funding implications

Risks

The risk of not actioning these recommendations may include:

- Continued risk to Australia's export market for horticultural products and to Australia's reputation for high quality, safe, agricultural produce.
- Continued risk to the health and safety of the Australian public from food tampering incidents.
- Continued risk to various food industries and individual businesses, and the associated increased insurance premiums for incident response from food tampering incidents
- The risk of inconsistent communications occurring again between regulatory agencies, industry representative bodies, and to the public during future food tampering incidents

Funding

As FSANZ has not received additional resources to undertake the recommended activities, as such, they will be actioned alongside our core work as the recommendations align with FSANZ' role as the Face of Food Safety. FSANZ plays an important role in leading Australia's strategic direction for food safety and this incident highlighted the potential and serious risks and economic consequences from food tampering.

FSANZ appreciates the government's recognition of the importance of this work and will work with the Department of Health to identify if any additional funding may become available to support this work.

Conclusion

FSANZ is improving its preparedness for future national food incidents. This includes working with government regulators and industry, to enhance overall system responsiveness and cohesion, implementing the above recommendations, and improving guidance to all sectors on dealing with incidents of intentional tampering of food.