Executive summary

The COVID-19 pandemic has revealed vulnerabilities in safety in both the food chain and food supplies

The pandemic highlighted how developing nations play a crucial role in ensuring food chain safety and how rules and sanctions alone cannot achieve desired safety goals. Food plays an intricate role amongst human beings, and also reflects a society's socio-economic and environmental condition. A wet market in China, where the novel corona virus is thought to have originated, raises the interesting debate of "supermarketisation" – a phenomenon where the private sector (super/hyper markets) contributes significantly to strengthening food value chains – and the rise of the elite. "Supermarketisation" is a situation where, influenced by the process of urbanization and income growth, traditional retail outlets and wet markets are increasingly replaced by modern retail outlets such as supermarkets. While wet markets are known to be a constant threat of zoonotic diseases, simply bringing in regulations to curb the spread of diseases from wet markets may not be effective. This is because wet markets are more than just a source of food for millions of poor people. They are invariably informal in their organisation and fundamental to the socio-economic functioning of the local communities within which they operate. Supermarkets are thought to disrupt this harmony. Therefore, first, the design of regulations needs to factor in these local contexts, for a food safety regulation may have unintended impacts in other areas. Second, achieving food safety requires a robust implementation infrastructure. Food safety regulatory delivery should rely as much as possible on "enabling and engaging" action that helps businesses focus on the "good" rather than just prevent the "bad".

Changing behaviour through cultural shifts can go a long way towards achieving and ensuring food safety

Organisational behaviour, especially among managers and workers, has taken on greater importance in the debate on making regulations more responsive to human behaviour. Despite several regulatory controls in place, the threat of foodborne diseases always exists. This could be because businesses often forego safety precautions for profit or sometimes simply because employees underestimate the risks or do not have a clear understanding of the rules. To combat this, creating a culture of hygiene across businesses can go a long way in controlling the spread of infectious diseases. Top-down approaches in corporate structures hinder creativity and, in turn, reduce initiatives by workers. It is important to increase workers' understanding of why they do what they do. This can ensure a better application of rules from theory to practice. Success stories show that companies that have a stronger food safety culture do a better job at implementing new standards or responding to new threats. Regulators should, however, be mindful of the characteristics of the business in question. Safety culture requirements must take into account the nature and size of the business. A prior assessment of the prevailing culture and the culture maturity matrix can also help regulators frame better policies. The benefits of a strong food safety culture are known; the challenge lies in implementing food safety cultures using evaluation tools for control agencies as well as businesses.

Digital tools and flexibility can ensure seamless regulatory delivery in times of crisis

The COVID crisis required governments across the world to take swift action and adjust their regulatory delivery – or the way their regulatory agencies operate to achieve the intended outcomes of regulation. This adjustment had to be balanced with the need to ensure the smooth functioning of the food supply chain. The pandemic, briefly, also saw changes in consumer trends. For instance, more food was supplied to supermarkets because restaurants were closed. Consumers also shifted to online shopping as a convenient and safer way of obtaining groceries. This added additional burdens on authorities who now had to monitor the sale of food supplies online. Difficulties in carrying out physical inspections, a lack of protective equipment, the reshuffling of inspectorates to respond to the pandemic all resulted in an easing of regulatory measures through temporary legislation. This was done in multiple ways – deferred inspections, e-certifications, lenient approaches to labelling, third-party involvement in audit and certification processes, etc. Regulators across the world see an increased potential in using digital tools such as machine learning and big data to improve regulatory capacity. Using these tools, inspectors can sift through volumes of data and perform risk-based assessments. While these tools were certainly useful during the pandemic, the future scope and use of them raise questions. For example, it has been found that remote inspections are not always possible. In some cases, remote inspections and audits were not found to be helpful, for instance for the initial assessment of food hygiene in a new operator, or in high-risk food businesses (where there is a higher public health risk associated with failing to identify food hazards) and it was found more appropriate to continue relying on "on site" controls instead. In order to move forward and to foster economic recovery, regulators will have to consider regulatory impact assessments of temporary measures, hybrid approaches, greater risk-based prioritisation and, most importantly, improving co-ordination in inspection functions.

Economic recovery will need optimising of regulatory systems

While the pandemic has created its own set of challenges and put into question existing regulatory delivery performance, it has also opened new opportunities for regulators to rethink and reprioritise their approach to regulatory delivery. One way forward is to have a risk-based and flexible regulatory system. Risk-based regulatory systems have been performing risk analysis of materials and processes that need to be changed and updating their systems to accommodate the results of their risk analysis. Regulators must be flexible and agile to come up with temporary solutions, whether risk-based or not. Inefficiencies related to fragmentation and duplication of regulatory responses also have to be addressed. Finally, lessons learnt in times of crisis should be applied in normal times. Planning and prioritisation of controls is important, and mock drills during normal times can prove useful in assessing human as well as infrastructure capacities.