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Global Food Safety as a Complex Adaptive System: Key Concepts and Future Prospects

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30 **Global Food Safety as a Complex Adaptive System: Key Concepts and Future**
31 **Prospects**

32

33 **Abstract**

34 *Background*

35 Over the last few decades the food production, distribution and consumption chains
36 have become complex as a result of globalisation and food travelling over large
37 distances. The food supply chain is a multi-layered structure with multiple interactions
38 across and within the hierarchical levels across the entire food system. As unwanted
39 factors and food safety behaviours could lead to global food poisoning catastrophes,
40 it is important to adopt a systems approach to gain a whole-system perspective of the
41 global food system.

42 *Scope and Approach*

43 In this review the importance of adopting a complex systems approach towards the
44 global food system and a possible systems analysis method that would help capture
45 this perspective are described. This study emphasizes the importance of adopting a
46 proactive approach, starting with identifying the similarities between the characteristics
47 of complex systems and the food system and the importance and benefits of adopting
48 a whole system approach in the global food system.

49 *Key Findings and Conclusions*

50 Adopting a complex systems approach to the global food system is of paramount
51 relevance as this would help further understand the interconnectivity of food systems
52 and how multifaceted factors across systemic levels play a major role in achieving
53 food safety. Using a systems analysis model such as the Systems-Theoretic Accident
54 Models and Processes (STAMP) model provides the ability to tackle the limitations of
55 event chain models and analyse the complex interactions among various components
56 in the complex food system. It is the need of the hour to study food systems at micro
57 and macro-levels and develop a model that would have the ability to identify food
58 safety related issues across the global food system.

59 **Key words:** Complex systems; Globalisation; Food safety; Food safety system;
60 Systems approach; Human Factors

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65 **1. Introduction**

66 Globalisation has led to a world-wide demand for a variety of food products and as a
67 direct consequence, food production, distribution and consumption chains have
68 become distributed, intricate and complex. A combination of population explosion and
69 food scarcity where more than 800 million people remain food insecure (FAO, WFP,
70 & IFAD, 2012), is another reason for the widespread export and import of food across
71 the world. By 2050-2052, it is projected that the global population will reach 8-9 billion
72 people, and at such a point, the dynamics between population, climate and diet would
73 have a more direct effect on the global food systems than what it is today (Lee, 2014;
74 Randers, 2012). A population's diet is determined by a complex interplay of social,
75 economic and technological forces (Schlosser, 2001; Johnston *et al.*, 2014). The food
76 supply chain, from subsistence farmers to multinational food companies, can be
77 viewed as a multifaceted structure with multiple interactions across and within factors
78 distributed across hierarchical levels in the entire system. These intricate levels of
79 interactions are a result of globalization of the agri-food system (Busch, 2004; Inglis,
80 2016).

81 Products that were once only locally available are now easily available all over the
82 world (Busch, 1997). This has brought together large populations who lived within
83 defined boundaries by introducing complex governance to deliver sufficient quantities
84 and quality of food (Hueston & McLeod, 2012). Food safety policies help to orient local,
85 regional, national and global food systems. These policies are formed as a result of
86 interactions between a set of stakeholders, some, if not all of who might seek to defend
87 either theirs or their allies' interests (Maetz, 2013a). The degree of influence of each
88 stakeholder depends on their capacity to have an impact on the institutional framework
89 at the regional, national and global levels within which the policies are being
90 formulated. Governments at various levels often tend to make policies in favour of the
91 vast majority of the population that elected them and the private companies that invest
92 in their party (Maetz, 2013b; Pennington, 2003). The other relevant stakeholders are
93 multinational firms whose main objective is to maximise profit. These firms often have
94 a global impact as they operate in several countries at a time. Therefore, they provide
95 fiscal and social benefits to multiple governments and countries (Maetz, 2013b).

96 Food regulations such as Regulation (EC) No 2073/2005 in the UK (Food Standards
97 Agency, 2005) and the Food Safety Modernization Act (FSMA) in the US (Food and
98 Drug Administration, 2015) make it mandatory for all food businesses to complete
99 microbial testing of their premises as well as of high-risk food products. As a result,
100 there is a tendency to rely solely on microbial analyses (Griffith *et al.*, 2017). Although
101 such reactive preventative methods produce a safe food supply system in the short-
102 run, it is limited in its scope over the medium to long-term. Food poisoning outbreaks
103 are still a global issue; every year, millions of people get ill, thousands require
104 hospitalization and hundreds die from food-related illnesses (Walczak & Reuter, 2002).
105 It was estimated by the World Health Organisation's Foodborne Disease Burden
106 Epidemiology Reference Group that in 2010, there were 582 million reported cases
107 and 251,000 reported deaths associated with 22 different foodborne enteric diseases
108 (WHO FERG group, 2015). The reason for this is the narrow microbiological base on
109 which preventative efforts are based. Processes such as time and temperature control,
110 safe food handling procedures, employee hygiene, cleaning and sanitizing techniques
111 and a Hazard Analysis and Critical Control Point (HACCP) plan or a HACCP-based
112 plan are proven to be effective (Walczak & Reuter, 2002). Despite the existence of
113 reactive approaches, the issue still remains – how to minimize population exposure to
114 foodborne pathogens? Concepts relevant to adopting proactive techniques such as
115 understanding the food system and stakeholders' behaviours and interactions can be
116 helpful in understanding how and why food safety violations occur.

117 Food systems are quite fragile. Events such as the 1996 *E.coli* O157 outbreak in
118 Scotland (Pennington, 1997), 2009 Godstone Farm *E.coli* O157 outbreak in England
119 (Griffin, 2010), 2011 sprouted foods *E.coli* outbreak in Germany (World Health
120 Organization, 2011) and the 2018 *E.coli* outbreak in the United States of America
121 (Adam Bros. Farming, 2018; Centers for Disease Control and Prevention, 2019)
122 highlight the consequences of such fragility. With food traveling over larger distances
123 in the modern world, food safety related concerns are often raised. This has also led
124 to an increase in the number of factors in the food system that have responsibilities
125 and accountabilities. Due to globalisation of the food industry, it is essential to look at
126 the food system from a global perspective and to identify and address all the flawed
127 factors associated with the food system. Although stricter and more detailed
128 regulations have been established since the above mentioned food poisoning

129 incidents under the assumption that there will be strict compliance, there is a general
130 lack of understanding of compliance and performance variability (Hollnagel, 2009)
131 within the food system.

132 1.1. Aims and objectives

133 The overall aim of this paper is to outline the complex systemic properties of the global
134 food system. The specific objectives of the paper are threefold:

135 1. To outline the properties of a complex system and demonstrate its relevance to the
136 global food system and food safety.

137 2. To outline the possible effects of globalisation of the food system on food safety
138 behaviours.

139 3. To illustrate the value of using systems analysis methods to understand interactions
140 between and the functioning of the components of the food system.

141 In what follows, we first detail the history of globalisation of the food industry followed
142 by a timeline indicating the development of food safety. The primary intention of the
143 timeline is to indicate major developments related to food safety. The timeline also
144 indicates a shift in consumption pattern from immediate consumption to storage and
145 preservation for extending the shelf-life in order to help prevent food poisoning related
146 illnesses and to carry out trade, i.e., export food locally, regionally, nationally and
147 globally. In the later sections of the paper, the properties of a complex system and the
148 relevance of these properties in the current global food system are discussed in great
149 detail. Finally, we discuss a systems and control theory based model, STAMP
150 (System-Theoretic Accident Model and Processes), its properties, general application
151 and its possible applicability to understand the interactions between stakeholders
152 within the food system.

153

154 **2. Globalisation and the food industry**

155 There have been cascades of changes on a global scale since the latter decades of
156 the twentieth century (Gunderson & Holling, 2002). The factors that played a role in
157 the globalisation of the food industry such as transition from local to global markets

158 and shipping of food products over long distances also played a major role in the
159 development of the concept of food safety by reasons mentioned below (Busch, 1997;
160 Hueston & McLeod, 2012). Globalisation can also have a negative impact on the food
161 industry – e.g., after the 1964 *Salmonella typhi* outbreak in Aberdeen caused by the
162 consumption of canned sliced beef imported from Argentina, not only did tourism in
163 Aberdeen drop, but there was also a reduction in the amount of corned beef consumed
164 in the UK. This led to cattle raisers in countries specialized in exporting beef, such as
165 Paraguay, Kenya and Tanganyika, suffering an economic loss (Pennington, 2003).

166 Food safety has evolved as a result of various practices carried out by people who
167 interact with food in various forms in various stages of development and operations
168 across the world. All these people have deemed the food they have handled as safe.
169 Hence, food safety is dependent on the more or less predictable behaviour of chemical
170 and biological entities as well as the behaviour of human beings who perform more or
171 less predictable activities to achieve a certain level of food safety that is deemed
172 acceptable by local and global standards. Thus, food safety is a socio-natural process
173 (Busch, 2004).

174 2.1. Transition from local/regional to global markets

175 In today's world, food purchased at a store is mostly never entirely locally produced
176 and consumed. Consumers have no idea about how or where the food gets produced
177 and how it is transported from one place to another. Due to the lengthened networks,
178 there is an absence of personal ties between consumers and producers and
179 processors (Busch, 1997). Multinational producers, processors and retailers have
180 deliberately discouraged the social dimensions of exchange. This has forced
181 consumers to pick from the wealth of goods supplied. According to a report by
182 Vasquez-Nicholson in 2015, one of the leading supermarkets in the UK stocks 40,000
183 product lines, of which 25,000 are food and beverage. Another leading supermarket
184 store in the UK carries about 21,000 food and beverage items (Vasquez-Nicholson,
185 2015). In a supermarket, the process of retrieving goods involves locating them,
186 placing them in carts, bringing them to checkout counters, placing them on conveyor
187 belts and putting the purchased products in bags (Busch, 1997). This process has not
188 changed much over the last 20 years, the only changes being certain advances in
189 technology such as self-checkout counters and portable scanning machines. Face-to-

190 face relationships exist higher up the food chain, for example, wholesalers always
191 know who their suppliers and customers are. However, when it comes to the extreme
192 ends of the process, relations become impersonal (Busch, 1997). It is also important
193 to acknowledge that locally produced food has become the foci of food self-sufficiency
194 among some consumers (Fang *et al.*, 2018), therefore, it is important to understand
195 local food systems to establish the dynamics of interactions between the various
196 stakeholders of these food systems.

197 2.2. Industrialization of the food industry and the scale of production

198 Advances in technology and the aim to improve social organisations have helped
199 increase scale of production (Busch, 1997). The first carload of fruits and vegetables
200 was shipped eastward in 1869 and it was only a decade later that rail service permitted
201 wider marketing areas (Busch, 1997; Levenstein, 1988). This led to the relocation of
202 larger units away from metropolitan areas. Mechanization occurred in four areas in the
203 food system; (1) mechanization of agriculture; (2) mechanization of organic
204 substances; (3) mechanization of meat; and (4) mechanization of growth (e.g., artificial
205 egg fertilization) (Giedion, 1948).

206 In the late 1800s, the Parris abattoirs of La Villette had an individual stall for each
207 animal where each animal was slaughtered individually, whereas the abattoirs in
208 Chicago were fully automated (Busch, 1997; Giedion, 1948). The scale of production
209 has increased all over the world. Tomatoes were once a garden crop, but are now
210 grown in large hectares of lands in the Netherlands and in the US (United States
211 Department of Agriculture Economic Research Service, 2016). Kiwis which were
212 grown in China as lowly berries are now grown on farms in New Zealand, Italy and
213 the United States of America (Busch, 1997).

214 2.3. Modernisation of production practices and processing technologies

215 A rise in population has led to an increase in the demand for food (Hueston & McLeod,
216 2012; Kireziova *et al.*, 2015; Reiher, 2012; WWF, 2016). Chickens that were once
217 raised as pin money by American farm women are now bred everywhere with
218 thousands of birds squeezed into small cages. This is also the case with cows and
219 hogs (Busch, 1997). In order to feed these animals and birds, feed containing exotic
220 nutrients were imported from all over the world in order to maximise growth and feed

221 efficiency while trying to minimise cost. Addition of exotic nutrients could lead to new
222 disease vectors. This is the cause of Bovine Spongiform Encephalopathy (Busch,
223 1997) which led to a large crisis between 1986 and 1996 despite the best efforts of
224 regulators (Cassano-Piche *et al.*, 2006).

225 Along with the modernisation of farm practices, there has also been a development in
226 the processing industry. Food processing is a post-harvest activity that adds value to
227 the agricultural product (Wilkinson, 2004). The sudden boom of the food processing
228 industry in the 1990s was caused by foreign direct investment (FDI) and this led to an
229 increased revenue and employment generation and development of new knowledge
230 and technology (Wilkinson, 2004). Canning was one of the first 'developments' in the
231 food processing industry. This enabled the mobility of a wide range of foods to different
232 parts of the world. New forms of food were also created because of this development
233 (e.g., the invention of condensed soups by Campbell's Soup Company) (Busch, 1997;
234 Levenstein, 1988). According to a report from the United States Department of
235 Agriculture Economic Research Service (2016), 59% of the tomato consumption in the
236 US was canned.

237 2.4. Shipping of a variety of products over long distances

238 There are two issues with shipping food over long distances: (1) the distance and (2)
239 the food product shipped. If a ship does not have the required conditions, it is easy for
240 the food product to spoil. For example, during the 1880s in the US, beef was shipped
241 from stockyards in Chicago to slaughterhouses in New York and by the time the
242 journey was completed, most animals would lose weight or die (Busch, 1997). During
243 this period, butchers were aware of diseases related to cattle. Once refrigerated cars
244 were invented and regulations were amended such that trained food inspectors
245 inspected cattle, these butchers began getting lesser information.

246 2.5. Shift from supply-driven to demand-driven economies

247 Until the 20th century, countries had supply-driven economies where they followed a
248 model of food self-sufficiency to ensure adequate domestic supplies of basic feedstuffs.
249 This model permitted an increased supply, thereby reducing the costs of food.
250 Countries that produced in excess used export markets and food aid programs
251 (Hueston & McLeod, 2012). However, since the 20th century, there has been a rise in

252 consumer demand for food. A rise in demand for chicken led to the development of
253 the broiler industry. Certain parts of the world consume only white meat where chicken
254 feet is regarded as a waste product whereas in other parts of the world, chicken feet
255 and dark meat are considered a delicacy. Global food trade has provided suppliers the
256 opportunity to supply all parts of the animals they breed whether or not there is any
257 domestic demand. The world enjoys relatively inexpensive food as commodities and
258 specialized products can be marketed worldwide (Hueston & McLeod, 2012).

259

260 **3. Impact of globalization on food safety**

261 As mentioned in Section 2, factors that played a role in globalization also helped in
262 strengthening the conceptual framework required for food safety. Since food could not
263 be shipped over long distances or stored for large periods of time, investment was
264 made in the food preservation sector. The initial methods of food preservation involved
265 drying. This was a method known even in the ancient times. Fermentation and
266 pasteurization were the next developments in food preservation. The latter was
267 applied to wine in China (Hueston & McLeod, 2012).

268 Canning and freezing helped revolutionize preservation techniques as they helped
269 store and transport food in an almost fresh state. Since Napoleon's army had bouts of
270 food poisoning during their conquests, he offered a reward for devising a method to
271 help preserve food for a longer duration (Busch, 1997; Jay, 1992). In 1809, Appert
272 succeeded in preserving meats in glass bottles that had been kept in boiling water for
273 varying amounts of time. Thus began the technique of canning which still plays an
274 important role in food storage today. The concept of freezing developed from storage
275 in the Northern parts of the world where ice from frozen lakes was stored for use later
276 in the year (Hueston & McLeod, 2012). Initially, slow freezing was carried out and this
277 changed the texture and taste of food. Flash freezing was then discovered and this
278 helped store food without changing its texture, colour or taste (Busch, 1997). The first
279 refrigerated ship was the SS Dunedin in 1882 and it revolutionized the meat and dairy
280 industries in Australia and New Zealand (Hueston & McLeod, 2012). Advances were
281 also made in plant and animal disease control; pigs were moved indoors to decrease
282 disease exposure and to enhance efficiency.

283 Food safety embraces all the steps in the food production process (processing,
284 preparation and handling of food) and ensures that it is safe to eat. Poor understanding
285 of the importance of food safety and hygiene has in the past contributed to a number
286 of food poisoning outbreaks and at times, deaths (e.g. 2005 *E.coli* O157 Outbreak in
287 Wales). Reports and studies carried out on these outbreaks identified a wide range of
288 factors contributing to these accidents. Chief amongst these were the relaxed attitudes
289 towards food safety, lack of adequate training provision and many other such human
290 factors related errors (Pennington, 2003). The 2008 Maple Leaf Foods *Listeria*
291 outbreak in Canada and the 2011 *E.coli* O104:H4 outbreak in Europe for example, are
292 often seen as indicative of poor regard for hygiene and safety standards amongst food
293 business operators (European Food Safety Authority, 2011; Jespersen & Huffman,
294 2014; Manning, 2017). The 2009 Godstone Farm *E.coli* O157 outbreak is seen as a
295 substantial failure of health protection and the flaws of a complex regulatory structure
296 were identified as a major contributing factor (Griffith *et al.*, 2010). This outbreak
297 resulted in 93 cases, most of which were children. The food safety chain is only as
298 strong as its weakest link and the responsibility lies not only with the producers and
299 processors of food but also the governments and consumers (Griffith, 2006). Table 1
300 highlights the development of the food law in the UK – the purpose of this table is to
301 highlight that regulations alone are not sufficient to ensure food safety and hygiene. It
302 is important for all the stakeholders involved in the food system to work together to
303 ensure food safety and hygiene.

304

305

Table 1 about here

306

307 **4. Complex systems: key concepts**

308 One of the most apt definitions for complex systems with regards to the food system
309 is “A system comprised of a (usually large) number of (usually strongly) interacting
310 entities, processes, or agents, the understanding of which requires the development,
311 or the use of, new scientific tools, nonlinear models, out of equilibrium descriptions
312 and computer simulations” (Rocha, 1999). A complex system contains large number
313 of elements (Cilliers, 1998) and is one in which there are more possibilities than can

314 be actualised (Luhmann, 1985). A complex system might appear to be pseudo-simple
315 (e.g., a leaf) and a simple system might appear to be pseudo-complex (e.g., a
316 combustion engine); “complexity is not located at a specific, identifiable site in a
317 system” (Cilliers, 1998, p. 2). In his book “When Food Kills: BSE *E.coli* and Disaster
318 Science” (2003), Pennington argues for the need to adopt a systems approach (with
319 systems thinking) to ensure food safety - he uses the concept of a systems based
320 approach to compare food poisoning outbreaks to the Chernobyl, Piper Alpha and
321 railway accidents in Ireland and Britain (Nayak & Waterson, 2016).

322 4.1. Systems thinking

323 Systems thinking is a way of seeing and talking about reality as it helps us in
324 understanding systems better. It is hence a perspective that uses unique vocabulary
325 for describing systemic behaviour by using tools that help in visually capturing and
326 communicating about systems (Kim, 1999). Systems thinking differs from the
327 traditional reductionist, analytic view as it does not look for “root causes” (Salmon *et*
328 *al*, 2016). A systemic perspective is an important complement to analytics thinking as
329 it explains how a system works, the role humans play in these systems and it lets us
330 function more effectively and proactively (Kim, 1999).

331 4.1.1. System of systems approach (SoS)

332 Most complex systems focus on performance optimization, robustness and reliability
333 among an emerging group of heterogeneous systems to achieve their goals. Complex
334 systems have a number of concurrent and distributed constituents/actors in a
335 hierarchical order which on their own, are also complex. There needs to be a
336 synergistic effect between the independent systems to achieve the desired overall
337 system goal (Jamshidi, 2009; Kotov, 1997). System of systems can be defined as a
338 “supersystem comprised of other elements” (Jamshidi, 2009) which work in a
339 cooperative manner and interact with each other to achieve a common goal. This
340 approach focuses on the total-system performance even when there is a change in
341 only one or a few of its parts as certain systemic properties can only be treated
342 adequately from a holistic point of view. A system of systems approach helps to
343 effectively implement and analyse large, complex, independent and heterogeneous
344 systems which either work in or are made to work in a cooperative manner (Ackoff,
345 1971; Jamshidi, 2009).

346 There is a possibility of the total system not achieving its intended goals even if every
347 part of an imperfectly organised system performs as well as possible relative to its
348 individual objectives (Ackoff, 1971). For example, in the food system, although front-
349 line employees might meet their targets (production of a certain amount of food per
350 day) and management might meet their targets (generating a certain amount of profit),
351 the food system might not achieve all its intended goals (e.g., providing safe and an
352 adequate amount of food to a diverse range of people across the country/globe). It is
353 important to note that the collective goal of the system and all its components is always
354 the same; however, the components might also have additional targets/goals which
355 would eventually lead to the system achieving its end target. Only if subsystems work
356 coherently, will the system function effectively (Ackoff, 1971). The SoS concept
357 already plays a major role in military and engineering applications, however, it is new
358 to the sociotechnical systems world. The emergence of this concept indicates an
359 increase in the complexity of the sociotechnical environment and foreshadows a major
360 evolutionary shift.

361 4.2. Characteristics of complex systems

362 Since the food system is tightly interwoven globally and the pace is increasing
363 continuously, it is important to be system-wise. All complex systems share several
364 defining characteristics. Figure 1 illustrates a framework of the functioning of the food
365 system using a human factors approach. Human factors emphasizes interactions
366 between people and their environment contributing to the performance, safety (food
367 and employee in this framework), quality of work life, and the goods and services
368 produced (P. Carayon et al., 2006). This framework has been developed to
369 characterize the many interactions between people and their environment in a concise
370 and coherent manner, and illustrate their influence on performance variability of the
371 various stakeholders of the food system. In the work system framework, *people* (shop-
372 floor employees, line managers, engineers, organisational management, or
373 consumers) perform a range of *tasks* using a variety of *tools and technology*. All these
374 tasks are carried out within a certain *physical environment* and under specific
375 *organisational conditions* (policies, guidelines, and standard operating procedures).
376 All the five components of this work system interact and influence each other. These
377 interactions produce different outcomes such as: (a) variable performance by
378 employees; (b) variable quality of food products; and (c) variable quality of work life.

379 These outcomes are achieved through the occurrences of multiple processes either
380 carried out by: (a) individual shop-floor employees; (b) production lines/teams; (c)
381 consumers while and after purchasing food products. Since this is a descriptive
382 framework, there is no specific guidance as to the critical elements. Further, there is
383 no detailed discussion of processes, guidance for system redesign and improvement
384 of food safety. This framework is an adaptation of the SEIPS framework from the
385 healthcare industry (P. Carayon et al., 2006).

386

387 Figure 1 about here

388

389 4.2.1. Purpose

390 All complex systems have a purpose. It is this purpose that defines the system as a
391 discrete entity and provides it with integrity to hold it together. It is a property of the
392 entire system and not of its parts (Kim, 1999). For example, the purpose of the food
393 supply system is to provide consumers with food that is safe to consume. This 'purpose'
394 is the property of the entire food supply system and not just of its parts such as the
395 farmers or retailers. In line with the purpose of the system, all complex systems have
396 a history that leads to its constant evolution as well as its present behaviours (Cilliers,
397 1998).

398 4.2.2. Efficient functioning and presence of all parts of the system for the purpose to 399 be achieved

400 A large number of elements are required for a system to be complex, else, even grains
401 of sand on a beach would constitute a complex system. However, the number of
402 elements alone does not determine whether a system is a complex one or not.
403 Complex systems are interwoven globally and have complex interactions (Cilliers,
404 1998; Kirlik, 2011; Vicente & Christoffersen, 2006). It is not possible to have a few of
405 its components missing. Elements within a system interact dynamically and these
406 interactions could either be physical or involve exchange of information (Cilliers, 1998).

407 There is a critical difference between a collection and a system. A system has complex
408 interactions across various systemic levels whereas a collection has no interactions

409 (Kim, 1999). Hence, taking a part out of a collection would not affect the nature of the
410 collection, but taking a part out of a system or if a part does not function efficiently
411 enough, it could adversely affect the entire system (Rasmussen, 1997). Since
412 sociotechnical systems are dynamic in nature, an accident would develop over time
413 due to normal efforts of individuals in a system and a normal variation in somebody's
414 behaviour. Such variation could lead to accidents (Rasmussen, 1997). Interactions
415 within a complex system are usually of a fairly short range. Although possible, long
416 range interaction is not practical due to constraints. As the interactions are rich in
417 nature (Cilliers, 1998), they still have a wide-ranging influence on the system and can
418 be covered in a few steps. Therefore, these influences can be enhanced, suppressed
419 and altered in a number of ways. Elements in a systemic level are therefore ignorant
420 of the behaviour of the entire complex system and only respond to information that is
421 available locally. If every element was aware of the behaviour of the entire system, it
422 would no more be a complex system, but a complex element (Bar-Yam, 2012a).

423 4.2.3. Order of arrangement

424 Complex systems operate under non-equilibrium conditions and hence require
425 constant flow of energy and information to maintain the organisation of the system in
426 order to ensure its survival. Elements in a complex system interact with each other
427 and thus, have the ability to influence to each other as well as the system (Cilliers,
428 1998). If the parts/elements of a collection can be arranged in any order, then they are
429 only a part of a collection (Kim, 1999; Ottino, 2004a). The order in which the parts of
430 a complex system are arranged affects the performance of the system. From
431 Rasmussen's framework, it can be noted that a complex system often has multiple
432 systemic levels - government, regulatory bodies, local area government, technical and
433 operational management, physical processes and equipment and surroundings
434 (Svedung & Rasmussen, 2002) and the same applies to the food system as seen in
435 Figures 2 and 3 in the study conducted by Nayak and Waterson (2016). If the factors
436 that make up a food system were to be rearranged, the links between them would be
437 broken and hence would lead to a chaos. Interactions are primarily but not exclusively
438 between neighbouring systemic levels or elements within the same systemic level
439 (Cilliers, 1998).

440 4.2.4. Communication

441 Communication, which is the exchange of information and the transmission of
442 meaning, forms the basis of a social system. It permits the input of human energy. The
443 set tasks can only be completed if there is effective communication between people
444 within and between subsystems. Exertion of influence, cooperation, social imitation
445 and leadership are some of the social interactions that are often subsumed under
446 communication (Katz & Kahn, 1978a). Systems that have a full and free flow of
447 information are considered to be healthy. The power of communication is such that it
448 has the ability to reveal as well as eliminate problems. However, miscommunication
449 can also lead to obscuring and confusing existing problems. Effective communication
450 only occurs when it is a two-way process (Nayak & Waterson, 2017), i.e., the orator
451 as well as the receiver have performed their function. Complications of effective
452 communication are best seen at play in large organisations where there is lesser
453 opportunity than in small groups to get signals from those down the line as interactions
454 in complex systems occur over smaller ranges (Cilliers, 1998). A similar problem also
455 occurs in bottom-up communication. In global systems, communication is an even
456 bigger problem due to language barriers (e.g., messages often meant to be orders are
457 communicated merely as information).

458 4.2.4.1. Direction of communication flow

459 In any system, it is quite important to be aware of the direction of information flow, i.e.,
460 top-down, horizontal and bottom-up. It is important to have a good combination of all
461 these types of communication as it helps keep the entire system connected (Gilmore,
462 2007). For example, in an organisation, the department chief knows about all the
463 division heads and their respective divisions, whereas, each department chief only
464 knows about his or her own division (Katz & Kahn, 1978a). Similarly, the department
465 chief will not be aware of the problems and the real-world problems that arise in the
466 lower levels of the hierarchical chain.

467 4.2.4.1.1. Top-down communication

468 The direction of this type of communication is from superior to subordinate and is the
469 primary interpersonal relationship within an organisation. This type of communication
470 is so important that it has the ability to determine how individuals identify with the
471 organisation, the individual's job satisfaction and commitment (Long & Vaughan, 2007).
472 There are 5 types of top-down communication (Katz & Kahn, 1978a):

473 1. Job instructions - Specific task directives:

474 This type of communication is given priority in industrial, healthcare and military
475 organisations. Direct orders are communicated from superiors in the form of training
476 session, training manuals and written directives.

477 2. Job rationale - Information produced to help better understand the task at hand and
478 its relation to other tasks:

479 This type of communication is designed to provide employees with a full understanding
480 of the job and its possible links to other jobs within the same subsystem.

481 3. Details on organisational procedures and practices

482 In addition to the job description, employees also have obligations and privileges as a
483 member of the system (e.g., benefits, vacations, sick leave, rewards and sanctions).
484 These details complete the descriptions of the role requirements of the organisational
485 member.

486 4. Feedback – Providing subordinates with performance feedback

487 Top-down feedback though often neglected, is an important aspect of healthy systems.
488 Providing such feedback is a form of motivation for employees. It is also important to
489 note that providing feedback to employees is not the only solution to the breakdown
490 of a complex system. It is often quite tedious to provide individual employees a
491 performance report.

492 5. Indoctrination of system and organisational goals – Inculcating a sense of mission
493 by providing information of an ideological character

494 It is important for an organisation to instil its culture and goals in its employees.
495 Similarly, it is also important for a system to have its own goals and to instil these in
496 all its actors across the subsystems. For example, an employee working on the shop-
497 floor at a food manufacturing plant who knows why he/she is following certain
498 protocols is more certain to follow those protocols (e.g., hand-washing) and thus, it is
499 much easier for him/her to develop an ideological commitment to the food system. The
500 advantages of giving people fuller information on job understanding are twofold: (1)
501 higher possibility of them carrying out their tasks more efficiently and (2) having an

502 understanding of their job and its relation to the subsystem would increase their ability
503 to identify with organisational goals.

504 4.2.4.1.2. Horizontal communication

505 This form of communication entails passing of information between people within the
506 same hierarchical level and is one of the most difficult forms of communication.
507 Employees receive instruction from the person immediately above them in the
508 hierarchical order and would hence communicate with associates only for task
509 coordination that are specified by rules. It is important to have the right amount of
510 horizontal communication as too much of it could lead to detracting from maximum
511 efficiency (Katz & Kahn, 1978a).

512 4.2.4.1.3. Stability through feedback mechanisms

513 Feedback is the transmission and return of information. This type of communication
514 is usually from subordinates to their superiors and typically focuses on information
515 about the subordinates themselves, their colleagues and either work-related or
516 personal problems. Feedback can also include information about tasks to accomplish
517 or organisational policies and practices (Long & Vaughan, 2007). This can either be
518 positive (enhancing/stimulating) or negative (detracting/inhibiting). Both of these types
519 of feedback are necessary (Cilliers, 1998; Johnson, 2001b) to help in the continuous
520 development of the system. The importance of feedback is that it informs the system
521 about how it is performing relative to the desired state (Johnson, 2001b; Kim, 1999).
522 Three factors need to be addressed to ensure that a complex system has a proactive
523 closed feedback loop: (1) identification of the decision-makers and actors involved in
524 the control of productive processes; (2) definition of the work-space under their control;
525 and (3) defined structure of the distributed control system (Rasmussen & Svedung,
526 2000).

527 4.2.5. Holism

528 An organisation is a subsystem of one or more larger systems (Katz & Kahn, 1978b).
529 The concept of holism involves putting the whole before its parts. Therefore, it does
530 not involve breaking an organisation into parts and addressing local issues, but
531 involves looking at the bigger picture, i.e., the entire system/organisation. In the
532 modern world, food business operators and employees face increasing complexity,

533 change and diversity (Bertalanffy, 1995; Jackson, 2006). Personnel higher up the
534 hierarchical level are expected to manage and provide solutions to problems and
535 issues that might arise in the level(s) whose functioning they overlook. Sometimes, the
536 solutions that they offer and the support provided to them rarely seem to work. Often,
537 these solutions that are offered are termed as 'simple solutions' (Jackson, 2006). The
538 error in this approach lies in the desire to search for simple solutions that address the
539 specific problem and not the other linked factors that either led to that particular
540 problem or to new problems that could arise from this issue. This is often the result of
541 either ignoring or not being aware of interacting factors. Therefore, holism and a
542 practical approach are required to help personnel address complex problem situations'
543 (Jackson, 2006).

544 Although a system consists of multiple subordinate systems, summing up the
545 behaviour of the whole from the isolated parts is not a reliable method. Interactions
546 between the various subordinated systems and the systems which are super-
547 ordinated to them need to be taken into account to understand the behaviour of the
548 parts (Bertalanffy, 1995). While studying a system, it is important to investigate the
549 position of the various subsystems in the community and in the system as a whole
550 prior. Adopting a holistic approach would help all businesses address broad, strategic
551 and systemic issues as well as narrow, technical ones (Katz & Kahn, 1978b).

552 4.2.6. Emergence

553 "Emergence refers to the relationship between the details and the larger view" (Bar-
554 Yam, 2012, p. 4). All natural systems are complex adaptive systems (Gunderson &
555 Holling, 2002). Interactions in complex systems occur in randomised directions (Bar-
556 Yam, 2004; Morowitz, 2002), i.e., they are not specifically either top-down, horizontal
557 or bottom-up (Katz & Kahn, 1978a). From these interactions, patterns emerge and
558 these patterns define the behaviour of the components/agents within the system and
559 the behaviour of the whole system. Emergent behaviour relies on the concept of actors
560 in the lower-level of the sociotechnical system leading to higher-level sophistication.
561 Systems are not considered to be emergent if local interactions do not lead to any
562 discernible behaviour higher up the hierarchical chain (Johnson, 2001a). The
563 emergent property of complex systems makes them self-organizing and adaptive

564 (Ottino, 2004b). This property also enables a system to possess social organisation
565 without the need for constant direction from actors higher up the hierarchical chain.

566 4.2.7. Interdependence

567 Interdependence is defined as “the existence of relationships between the behaviour
568 of parts of a system” (Bar-Yam, 2012, p. 2). Complex systems are open systems
569 whose parts are related to its whole and to its environment. This nature of complex
570 systems is called interdependence as all the subsystems affect and are affected by
571 each other. The ‘interdependence’ property of a complex system has a link with the
572 ‘communication’ property as the latter leads to the former. The impact of
573 interdependence is such that it has a bearing on the entire organisation (Bar-Yam,
574 2012; Goldhaber, 1990). For example, a line manager of a biscuit manufacturing plant
575 taking a decision that work can continue despite there being a broken oven, resulting
576 in under-baked biscuits, could have ramifications throughout the organisation such as
577 significant economic impacts, unhappy superiors and subordinates losing faith in their
578 superiors or loss of jobs. However, if used wisely, this property could also bear fruit.
579 For example, effective and regular communication throughout the food system would
580 not only keep the actors at the top of the hierarchical chain well informed, but would
581 also keep the subordinates satisfied and happy, leading to a positive food safety
582 culture and a reduction in the number of food poisoning related outbreaks.

583 4.2.8. The law of requisite variety

584 For a system to achieve maximum stability, the number of states of its control
585 mechanism must be greater than or equal to the number of states in the system that
586 is being controlled. A complex system with good stability only has the ability to adapt
587 to a certain number of stimuli (Ottino, 2004b) – Ashby’s law of requisite variety states
588 that ‘only variety can destroy variety’ (Ashby, 1999, p. 207). A system would only be
589 able to survive as long as the range of responses it marshals (while adapting to the
590 tensions imposed on it) successfully matches the range of situations (threats and
591 opportunities) confronting it. When living systems are involved in such complex
592 systems, behavioural responses are also included. Therefore, responses in complex
593 systems are dependent on the type of stimuli provided and are a combination of
594 behaviour and cognition. Responses of complex systems also vary based on their
595 environments (Boisot & McKelvey, 2011a).

596 Most complex systems respond to representations of their environment and not to the
597 actual environment (Boisot & McKelvey, 2011b). These representations of
598 environments are complex schemas (Gell-Mann, 2002), i.e., they are structured
599 descriptions of an objective external world that neither have too few or too many
600 degrees of freedom. It is important that a system builds schemas in ways that
601 distinguish meaningful information from meaningless stimuli. What constitutes
602 information or noise is defined by the system's expectations and judgements about
603 what is important (Boisot & McKelvey, 2011b; Gell-Mann, 2002). The characteristics
604 of a complex system are summarized in Table 2.

605

606 Table 2 about here

607

608 **5. Applying a complex systems perspective to food safety**

609 In order to understand food systems and their food safety cultures better, they need
610 to be analysed from two perspectives: (1) 'micro-perspective' and (2) 'macro-
611 perspective'. Factors within the micro-perspective influence the functioning and
612 behaviours of national level food systems. Whereas, factors within the macro-
613 perspective influence the functioning and behaviours of the global food system. The
614 food system is a complex sociotechnical system from both the perspectives (macro
615 and micro) – and hence, needs to be analysed and understood in detail to address
616 negative food safety cultures.

617 5.1. Micro (national) perspective

618 The micro-perspective helps to understand the food system within a country. When
619 seen from this perspective, a range of factors and stakeholders play a key role in
620 providing food safe for consumption (Pennington, 2003), which is the one of the
621 purposes of the food system at the micro-level. As a system of system, the food system
622 encompasses a wide range of processes - from manufacturing of raw materials to
623 consumption of the finished food product by consumers. All these processes have
624 food safety cultures of their own and being a complex system, influence the quality of
625 food available for consumers and food safety. Thus, the complexity of the food system

626 influences the food safety. At the micro-level, food system globally consists of the
627 following systemic levels: (1) national government and regulatory bodies; (2)
628 organisational management (upper-middle-lower); and (3) front-line actors (shop floor
629 staff and the physical work place). Apart from this, there is also an additional level that
630 plays an active role in national food safety culture – the ‘external level’; this consists
631 of societal factors such as market forces, media and societal values and priorities,
632 historic events and global politics (Nayak & Waterson, 2016; Rasmussen, 1997). Table
633 3 highlights the components of the food system across various systemic levels in the
634 UK and the US, and the roles they currently play. It also highlights similarities in the
635 structures of food systems at the national level across two major economic
636 superpowers. Finally, Table 3 brings to light all the activities and resources that go into
637 production, distribution and consumption; the drivers and outcomes of these
638 processes; and the complex extensive relationships between the system participants
639 and components (Neff & Lawrence, 2014).

640

641

Table 3 about here

642

643 Every country has a mix of large-scale food businesses as well as medium, small and
644 micro-scale food businesses. Although disregard for hygiene practices is usually
645 attributed to individuals, it is often related to the prevailing organisational culture
646 (Clayton & Griffith, 2008; Griffith *et. al.*, 2010). A high level of trust within as well as
647 between organisational levels as well as systemic levels is important to have a positive
648 food safety culture. One of the factors that leads to development of trust and
649 understanding in the food system at the micro-level is open and free flow of information
650 across the system (Pennington, 2003), without which, there is an increased risk of
651 food poisoning outbreaks (Nayak & Waterson, 2016; Pennington, 2009; Pennington,
652 1997). Behaviours at the lower-levels of the sociotechnical system lead to emergence
653 in higher level sophistication. This is also true vice-versa as this is one of the factors
654 that define employees’ job satisfaction. A negligent safety culture affects the
655 behaviours of people across every systemic level in a complex system (Stanwell-Smith,
656 2013).

657 5.2. Macro (global) perspective

658 The best example to highlight the complexity of the current food supply chain is that
659 of a cheeseburger. Researchers at the University of Minnesota mapped the global
660 food supply chain of cheeseburgers produced at a large fast food chain. A
661 cheeseburger contains more than 50 ingredients imported from countries in every
662 continent except the Arctic (Hueston & McLeod, 2012). Food supplies move all over
663 the world and as a result food-processing supplies move globally. These include
664 processing equipment, packaging and chemicals such as disinfectants and
665 preservatives. Agricultural inputs such as feed, fertilizer, vaccines, pharmaceuticals,
666 harvesting and planting equipment also move worldwide (Hueston & McLeod, 2012).

667 A single food component (e.g., bread) contains ingredients that have travelled from all
668 parts of the world, and multiple food components make up a food product (e.g., bread,
669 cheese, meat, lettuce, ketchup together make a cheeseburger). Thus, it is imperative
670 to understand and analyse the scale of stakeholders involved and the complexity of
671 the relationships between the system components of the global food system in order
672 to achieve food safety. The food miles (Pirog & Benjamin, 2003) described above also
673 highlight the need for smooth, efficient and open top-down, bottom-up and horizontal
674 communications for the food system at the macro-level to progress without major
675 glitches.

676 At the macro-level too, the food system is a system of systems - government regulatory
677 systems, private sector initiatives, educational efforts and consumer actions are a part
678 of the food system. Food systems are linked to food safety and contamination can
679 occur at any point in this complex system. There are an increasing number of food
680 safety related controversies at a transnational level (Lien, 2004) due to the scale and
681 complexities of food systems in the modern world (Ercsey-Ravasz *et al.*, 2012). Hence,
682 it is important to have adequate and adaptive prevention and control strategies in place.
683 Global consumers are vulnerable to changes in regulations, shifts in practices and
684 routines that occur in any part of the world (Lien, 2004). The more complex a system
685 gets, higher are the chances for things to go wrong, and the larger the scale of the
686 operation, the more people are likely to get affected. The food system is a particularly
687 high risk industry as consumers range from new born babies to the elderly, and a host
688 of other immunocompromised population (Food Standards Agency, 2012; Jespersen

689 *et al.*, 2016; Powell *et al.*, 2011; Whaetherill, 2009). Thus, the stakes are high in the
690 event of a food poisoning outbreak.

691 The food industry comprises of various systemic levels (e.g., Board of Directors; upper,
692 middle and lower management; and front-line employees). The structure of the
693 national food system, much like many other systems, adheres to Rasmussen's socio-
694 technical systems framework (Nayak & Waterson, 2016). These systemic levels have
695 been referred to as subsystems by authors such as Hueston and McLeod (2012). Due
696 to the short-range complex interactions across and between various systemic levels
697 as highlighted in Nayak and Waterson (2016) and the holistic and interdependent
698 nature of the food system, it is not possible to predict the properties if each systemic
699 level when looked at in isolation. However, if systemic behaviour is understood, it is
700 possible to anticipate behaviour and work with systems rather than being controlled
701 by them (Kim, 1999). Behaviours at the lower levels of the sociotechnical systems also
702 lead to emergent behaviours higher up the hierarchical chain.

703 Hueston and McLeod (2012) state that food systems can be called as adaptive
704 systems as they have no boundaries, i.e., faulty individual actions can affect the entire
705 food system and thus affect food production as well as consumption. However, it is
706 imperative to keep in mind that every system has a boundary of acceptable behaviour
707 (see Figure 2) to which behaviour will migrate to under the presence of strong
708 gradients (Ashby, 1999; Rasmussen, 1997). It is also important to note that complex
709 systems also have a memory (Hueston & McLeod, 2012; Nayak & Waterson, 2017)
710 where present behaviour is affected by prior behaviour – hence, past successes as
711 well as failures influence organisational behaviour.

712

713 Figure 2 about here

714

715 However, it is not possible to predict the overall behaviour of the food system based
716 on the behaviour of individual elements (Cilliers, 1998). An example of this is the 2005
717 *E.coli* O157 Outbreak in South Wales. Faulty auditing by food inspectors (Government
718 Level) led to lack of regard for hygiene practices at the Organisational level, which in-
719 turn led to there being no protocol for cleaning leading to inadequate cleaning of

720 equipment which led to cross-contamination (Nayak & Waterson, 2016). Another
721 example is the 2012 *E.coli* O157 Outbreak in Canada where the inadequate provision
722 of food safety training by the management led to the absence of product recall
723 protocols. This in turn led to widespread confusion and panic when the first few
724 incidents occurred leading to delays and widespread consequences on public health
725 as well as the organisation (Jespersen *et al.*, 2017). These examples highlight the fact
726 that the food system is non-linear, and a small perturbation may or may not have a
727 large effect. However, being a high-risk industry, it would be risky and possibly
728 catastrophic to take this chance, especially on a global scale.

729 Since food systems are dynamic and interdependent, it is not possible to have one
730 system that meets all needs. However, as food systems are complex systems, even
731 a small positive change would positively alter the entire system of systems. A relevant
732 model that illustrates the various factors influencing performance and an effective
733 complex system design is the 'onion model' by Wilson and Sharples (2015). This
734 model applies a holistic approach to understand complex interacting systems and
735 subsystems that involve people. It is important to apply the right approach instead of
736 applying the right type of knowledge (Waterson & Catchpole, 2015). Table 4 highlights
737 similarities in the gaps across various national food safety systems citing examples
738 from the UK, the US and the European Union (EU). It is necessary to develop a model
739 that would help identify the links between these factors in order to address issues
740 related to global food safety.

741

742 Table 4 about here

743

744 **6. Systems analysis of the global food systems using the STAMP methodology**

745 The STAMP (System-Theoretic Accident Model and Processes) accident analysis
746 methodology is underpinned by systems and control theory (Salmon *et al.*, 2016)
747 rather than the traditional reliability theory (Leveson, 2015). Systems theory is an
748 effective method to analyse accidents, particularly system accidents (Leveson, 2004;
749 Rasmussen, 1997). According to Leveson (2004), accidents are either a result of
750 inadequate control or inadequate enforcement of safety-related constraints on the

751 development, design and operation of the system. "... accidents occur when external
752 disturbances, component failures or dysfunctional interactions among system
753 components are not adequately handled by the control system ..." (Leveson, 2004, p.
754 250). In the food safety context for example, the model might suggest that one of the
755 factors that could lead food poisoning outbreaks is when controls such as mandatory
756 internal Hazard Analysis and Critical Control Points (HACCP) audits are not carried
757 out diligently, thus failing to identify faults, rectify and report them.

758 STAMP views safety as a manageable control related incident if a well-designed
759 control structure is in place. The goal of this control structure must be to enforce
760 constraints on actors within the system. The STAMP method helps analysts identify
761 the existing types of controls in a system/complex system and their failure points
762 (Leveson, 2004; Salmon *et al.*, 2016). A generic structure of a STAMP model is
763 presented in Figure 3 (Leveson, 2004). Most accident and system analysis models
764 define safety management in terms of preventing component failure events; however,
765 STAMP defines safety management as a "continuous control task to impose the
766 constraints necessary to limit system behaviour to safe changes and adaptations"
767 (Leveson, 2004, p. 251). According to this model, accidents are to be understood by
768 identifying controls and analysing the reasons behind these controls not being
769 effective or adequate enough to prevent or detect maladaptive changes and enforce
770 the safety constraints in place. Hence, violated safety constraints also need to be
771 identified. Constraints, control loops, process models and levels of control are the
772 basic concepts in STAMP (Leveson, 2004).

773

774 Figure 3 about here

775

776 6.1. Basic concepts of STAMP

777 6.1.1. Role of constraints

778 Mariam-Webster dictionary (2017) defines constraints as a limitation or a restriction of
779 performance of a specific action. Control is always associated with constraints,
780 especially in systems theory. Instead of viewing accidents as the end result of a series

781 of events, in the STAMP model, it is viewed as the result of a lack of constraints
782 imposed on the system design and on operations across the various socio-technical
783 levels. In systems theory, safety is viewed as an emergent property that arises when
784 the components of a system interact effectively within an environment. These
785 emergent properties are controlled and enforced by a set of constraints (control laws).
786 Accidents occur due to a lack of appropriate constraints on the interactions (Leveson,
787 2004).

788 As an example, one of the unsafe behaviours in the 2011 listeriosis in Colorado, USA
789 was the failure to use the correct equipment. The farm management team was legally
790 obliged to audit employee work practices and provide them with regular training. The
791 farm was also obliged to comply with regulations enforced by the US Food and Drug
792 Administration (U.S. Food and Drug Administration, 2011). However, poorly designed
793 food safety regulations and a significant delay in implementing the Food Safety
794 Modernization Act led to an inadequate enforcement of constraints such as regular
795 food safety inspections and facility design requirements. Similarly, several questions
796 need to be answered to further establish why the employees used incorrect equipment
797 - why was there a delay in implementing the new Act?; did the government not
798 consider the implications of delaying the “implementation” phase of the new Act?; was
799 the farm management not knowledgeable enough to understand the risks (health as
800 well as financial) associated with disregard for hygiene and cleanliness in a food
801 business, and not providing adequate information and guidance to employees? Such
802 an approach allows one to reconsider the complexity of the food system such as the
803 politicizing food safety regulations, the working structure of food safety regulatory
804 bodies and the impact each they have on national/transnational food safety and food
805 business policies and practices. It is important to identify all the constraints prior to
806 designing the safety process in the system; these constraints also include social and
807 organisational aspects of the system.

808 6.1.2. Control loops and process models

809 In systems theory, open systems are defined as interrelated components that are kept
810 in a state of dynamic equilibrium through feedback loops of information and control.
811 Complex systems are constituted by intricate sets of non-linear relationships and
812 feedback loops which lead to whole system analysis becoming extremely complicated

813 (Cilliers, 1998; Leveson, 2004; Ottino, 2004b) unless there is a suitable model to do
814 so. Only if a system's overall performance is controlled will it be able to produce the
815 desired outcome while satisfying safety and quality constraints (Leveson, 2004). To
816 possess control over a system, four conditions need to be met (Ashby, 1999): (1) the
817 controller must have goals and objectives; (2) the controller must be able to affect the
818 state of the system; (3) the controller must be or contain a model of the system; and
819 (4) the controller must be able to ascertain the state of the system.

820 Controllers working within the system must have a mental model of the level of the
821 hierarchical system of which they are a part and the relationships among system
822 variables, the current state of the system variables and ways in which the process can
823 change state. This helps controllers determine the control actions required and these
824 are communicated back in the form of feedback. Accidents can occur if controllers
825 form inaccuracies in the mental model (Leveson, 2004). In the 1996 *E.coli* O157
826 outbreak in Scotland employees working at the organisational level had no idea about
827 who to report to in the event of disturbances in the food processing process. Also, as
828 there were no documented systems in place, they were unaware of the current
829 condition of the system variables. Most of the employees were not trained to handle
830 food and hence they had no idea about how the process could change state (Nayak
831 & Waterson, 2016). These were few of the major factors that led to the outbreak. If the
832 entire food system is looked at, there are multiple human as well as automated
833 controllers; however, the number of human controllers is greater in the food system.

834 6.1.3. Socio-technical levels of control

835 In systems theory, systems are viewed as hierarchical structures with systemic levels
836 where each of these levels impose constraints on the activity in the level beneath it
837 (Checkland, 1981; Leveson, 2004). There is also a possibility of there being
838 constraints across one systemic level and this needs to be further investigated,
839 especially in the food system. Constraints are required on the relationships between
840 the values of system variables; such constraints are known as control laws. Safety-
841 related control laws specify those relationships between system variables that would
842 lead to non-hazardous system states (Leveson, 2004), for example, while handling
843 raw meat, employees on the factory floor must wear a different set of uniform. Safe

844 changes and adaptations in a complex system will only be assured if control processes
845 enforce such constraints.

846 It is quite important that constraints on behaviour are reflected in the company policy
847 and standards. There has been a change in the style of management from
848 management by oversight to management by insight (Leveson, 2004). This has been
849 a positive change as there are now greater levels of feedback control exerted over the
850 lower levels and a change from prescriptive management control to management by
851 objectives. The objectives are interpreted and satisfied according to the local context
852 (Leveson, 2004; Rasmussen, 1997). Management are now delegating decisions to
853 various employees across the lower levels of hierarchy. This requires an explicit
854 formulation of the value criteria to be used and effectively communicating the values
855 down the systemic levels. Although generic instructions and guidance are required
856 from the level above in order to avoid accidents, execution of the guidance can be left
857 to lower levels (Leveson, 2004).

858 6.2. Understanding flaws in the control structures that lead to outbreaks

859 Section 6 mentioned that accidents were caused by inadequate control where the
860 control loop creates dysfunctional interactions in the process. Hence, by
861 understanding the flaws in the control structures (development and operations), the
862 process that leads to accidents can be understood (Leveson, 2004). These flaws have
863 been classified by Leveson (2004) to make it easier to identify the factors involved in
864 an accident during accident analysis or while designing models to prevent accidents.

865 There are multiple control loops within a complex system and each control loop can
866 contribute to inadequate control. At any point in a control loop where humans or
867 organisations are involved, the context in which decision are made may vary and
868 hence need to be evaluated in order to analyse the behaviour shaping mechanisms.
869 This helps in understanding how and why unsafe decisions were made (Leveson,
870 2004). Accidents may also occur due to basic component failures such as inadequate
871 constraints on the process; inadequate and faulty designs; lack of feedback and
872 correspondence between individual component capacity (including humans) and task
873 requirements; environmental disturbances; inadequate maintenance; and physical
874 degradation (of machines or the entire system) over time (Leveson, 2004). In order to
875 avoid component failure, it is important to make the components resistant to internal

876 and external influences that are detrimental to the system dynamics. Although
877 management by insight is a better approach, there must be safety margins within
878 which a system should operate. Another method to avoid component failure is by
879 having operational controls in order to ensure that the component operates within its
880 designed environment and through periodic, effective and thorough inspections. The
881 STAMP model helps identify the reasons behind component failures (Leveson, 2004)
882 and this could be very helpful as it would help prevent future whole system failures.

883 Figure 4 illustrates an example of a STAMP model of the UK food system. This model
884 was developed based on information gathered from various sources such as
885 government documents (e.g., Miller, 2014), stakeholder websites (e.g., Food
886 Standards Agency and the UK government websites) and academic literature (Nayak
887 & Waterson, 2016; Pennington, 2003). One of the researchers constructed a draft
888 version of the UK food system as seen in Table 3 in Section 5.1. Following this, a
889 STAMP model was constructed to fit the UK food system. Actors who resided at each
890 of the control structure levels were identified and the control and feedback loops
891 existing between different control structure levels were mapped. The model was
892 reviewed by the other researcher who is experienced in constructing STAMP models.

893 Using system theory to model complex organisations involves dividing the entire
894 complex system into various hierarchical systemic levels (Leveson, 2004; Rasmussen,
895 1997). Figure 2 (in this article), as well as multiple Accimap analyses of global food
896 poisoning outbreaks (Nayak, 2018) highlight that food systems across the world have
897 multiple hierarchical complex socio-technical systemic levels. As seen from Figure 6,
898 the STAMP model can also be applied to a food system. The advantage of this model
899 over the model designed by Rasmussen and Svedung in 2000 (Rasmussen &
900 Svedung, 2000) is that the former divides the development and operations stages,
901 therefore giving a more detailed analysis. As seen in Figure 4, there are two
902 hierarchical control structures: (1) system development on the left and (2) system
903 operation on the right with interactions between them. A food manufacturer, for
904 example, would only have development under its immediate control, however, safety
905 involves development (growing, manufacturing, processing, packaging and
906 inspections and regulations related to these) as well as operations (import, export,
907 transport and inspections and regulations related to these) of food manufacturing.

908 Figure 4 establishes that although the links between various systemic levels can be
909 established using existing documents, further studies need to be carried out to further
910 elaborate on and analyse the control and feedback structures of the food system
911 across the world. The outcomes of such a study would help identify and address
912 potential and existing flaws in the control and feedback structures of food systems at
913 a global scale, learn from well-designed and well-structured food systems and develop
914 proactive and systemic-level interventions to improve global food safety.

915

916 Figure 4 about here

917

918 **7. Conclusions, limitations and future work**

919 Global interconnected food systems play a major role in the modern society to harness
920 a multiplicity of complex supply chains. Globalisation of food networks has introduced
921 an unprecedented level of complexity to the global food system; this has not only
922 brought significant benefits, but also systemic risks. Due to the interconnectivity across
923 systemic levels, disruptions at one point in the system would lead to reverberations in
924 the form of economic, social and political impacts throughout the entire system
925 (Maynard, 2015). Hence, understanding the entire food system is the need of the hour
926 to enhance global resilience to systemic food system failures. Globalisation of the food
927 system initiated a change in the food safety domain. New techniques were and are
928 still being developed to further the reach of the food system globally.

929 As seen in above sections, the characteristics of the global food system resonate with
930 the characteristics of complex systems. Therefore, it is necessary to use systems
931 analysis methods to understand the interactions between the components of the food
932 system. With the use of STAMP, leading indicators can be identified (Leveson, 2015)
933 and this would help identify the potential for a food poisoning outbreak before it occurs.
934 STAMP can be used to identify food system specific leading indicators which would
935 then help in designing appropriate and specific models. Similar to accidents in other
936 high-risk industries, food poisoning outbreaks also have warning signs before they
937 occur. Before an outbreak occurs, 'weak signals' are only viewed as noise (Leveson,
938 2015).

939 Systems analysis models such as STAMP have the ability to tackle limitations of event
940 chain models. It not only has the ability to address single component failures but also
941 can analyse interactions among various components in the complex food system
942 (Leveson, 2004). Such models also adopt a whole system approach where they
943 consider the entire safety control structure to determine reasons behind inefficiencies
944 of existing constraints on safe behaviour. It is quite difficult to analyse the performance
945 of complex systems, especially when looking at the 'whole system' (Cilliers, 1998;
946 Leveson, 2004). Currently, individual components are analysed and any inadequacies
947 are addressed accordingly. Safety metrics could be identified by the use of system
948 accident models and basic concepts of safety constraints. Determining adequacy of
949 control over constraints, evaluating potential design errors, assessing the
950 organisational structure and human behaviour leading to hazards, detecting errors in
951 the developmental and operational environments and identifying maladaptive changes
952 over time (Leveson, 2004) could be few of the causal factors that could be identified
953 and analysed using this model.

954 One of the limitations of STAMP is that it does not specify an accident investigation
955 process. Since variations exist among investigation reports, if food outbreaks alone
956 are used to develop a control process model, the model might be biased towards the
957 report used to analyse accidents and outbreaks (Stoop & Benner, 2015). Identifying
958 all stakeholders relevant to the food system and conducting interviews and focus
959 group discussions with them, in addition to analysing outbreak reports, would help
960 tackle this limitation. This would permit gathering all the possible perspectives and
961 factors that play a role in providing food safe for consumption at the micro and macro-
962 levels in the food system. It is important to note that it is not possible to use a single
963 systems analysis method in isolation to help identify key insights for interventions, and
964 hence, there is a need to develop new methods or further adapt existing methods to
965 understand dynamic adaptive systems (Thatcher *et al.*, 2019).

966 Figure 4 illustrates the influence of external factors (macro-environment) on the micro-
967 environment of food businesses. Regulatory bodies, national policies and politics
968 impact the performance of the food industry as the former play a critical role in drafting
969 and enforcing all food-related regulations (such as safety, production, import and
970 export). Any anticipated change in regulations leads to confusion and panic among
971 stakeholders – such uncertainty often sets the food system up to fail. An example of

972 the influence of uncertainty on food businesses and food safety due to external factors
973 has been highlighted in Section 6.1.1. The delay in implementing the new regulations
974 in the US led to confusion and panic, eventually leading to a food poisoning outbreak.

975 This past event should serve as an important learning point as there exists a risk of a
976 similar such occurrence during and after Brexit – at the time of writing this article, it is
977 a well-known fact that the UK is struggling to reach a deal with the European Union
978 (EU) regarding trade policies after the UK leaves the EU in 2019. This uncertainty has
979 already led to the media speculating possible food safety risks and the dangers to
980 consumer and stakeholder safety should the UK government not be successful in
981 reaching a favourable trade agreement with the EU (Rees-Mogg, 2018; Rayner, 2017,
982 2018). Hence, it is the need of the hour to further investigate methods of reducing
983 negative external influences on the food system.

984 While every country across the world has its own prescribed food safety system, a
985 vast majority of them engage extensively in the export and import of food products.
986 This results in food systems being composed of interrelated subsystems, each with its
987 own hierarchical structure, all of which lead to the lowest level within an elementary
988 subsystem (Simon, 1962; Thatcher *et al.*, 2019). Further evidence across multiple
989 disciplines characterise these multiple interacting systems in the form of nested
990 hierarchies with smaller, less complex systems embedded within larger, more complex
991 systems (Carayon *et al.*, 2015; Clegg *et al.*, 2017; Gunderson & Holling, 2002;
992 Thatcher *et al.*, 2019; Thatcher & Yeow, 2016). Larger systems provide the broader
993 framework which helps understand smaller systems, while smaller systems provide
994 the functional elements that enable larger systems achieve stability and function in a
995 specific manner.

996 As food travels long distances in the modern world, a global model is required to help
997 identify factors that occur at any point in the global food system. Conducting the above-
998 mentioned process at a global scale would help develop a “prototypical food system”
999 model – this would provide a global benchmark and a backbone structure upon which
1000 country-specific food systems could be designed. Being able to look at the whole
1001 picture, identify emerging control/constraint failures and learn from high performing
1002 food system models would not only benefit all the stakeholders of the global food
1003 industry, but also protect consumers from food poisoning related ill health and deaths.

1004 Therefore, it is the need of the hour to adopt a proactive approach and study food
1005 systems at micro and macro-levels globally and the interactions between various
1006 factors within and between food systems. This would help in the development of a truly
1007 global model that would have the ability to identify food safety related issues across
1008 the food system.

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Table 1: Development of the food safety law in the UK

Regulation/Act/Development	Year of enactment	Domain	Purpose	Drawback(s)	Primary target population protection
Assisa Panis et Cervisiae (Assize of Bread and Ale)	1266	Food adulteration	Medieval English Law to regulate the price, weight and quality of manufactured beer and bread.	Did not regulate the quality of bread and beer.	Consumers
Regulation of quality standards conducted by guilds (corporations of craftsmen).	Middle Ages	Food adulteration	Market protection from adulteration.	As guilds were only present in towns and cities, adulteration outside these areas was unregulated. Consumer protection (if any) was pure coincidental.	Market/Internal stakeholders
		Food adulteration			
The Treatise on Adulterations of Food and Culinary Poisons	1820	Food adulteration	Book containing list of all the possible food adulterants and adulterers.		Consumers
The Adulteration of Food and Drugs Act	1860 (revised in 1872)	Food adulteration	Provision for the appointment of public analysts and regulations against food adulteration		Consumers
Sale of Food and Drugs Act	1875	Food adulteration	Regulation of sale of food and drugs.		Consumers
Society of Public Analysts	1874	Food adulteration	Official society consisting of public analysts		
The Milk and Dairies Act	1914	Food safety	Production and sale of clean and safe milk for human consumption		Consumers

Regulation/Act/Development	Year of enactment	Domain	Purpose	Drawback(s)	Primary target population protection
Food and Drugs (Adulterations) Act	1928	Food adulteration	Consolidation of the Sale of Food and Drugs Act.		Consumers
Food and Drugs Act	1938	Falsifying information	Introduction of penalties for false or misleading labels and advertising.	Greater focus on falsifying information and not enough focus on food safety and food adulteration.	Consumers
Defence (Sale of Food) Regulations	1943	Food safety and food adulteration	Crisis plan to ensure efficient use of available food. Detailed information regarding the minimum requirements for labelling.	No mention about the need to provide quantities of ingredients.	Consumers
Medicines Act	1968	Food and medicine safety and adulteration	Legalisation related to food and control of medicines for human and veterinary use.		Consumers
Trade Descriptions Act	1968	Falsifying information	Prohibition of false and misleading advertisement and product claims, false indication of the price of goods and the false use of royal awards.	Focus only on prevention of falsifying information	Consumers
Food Act	1984	Intention to cover food safety, food adulteration and falsifying information	Consolidated previous food safety provisions	Failed to impose satisfactory standards within the food industry and was not thorough enough. Hazard and	Consumers

Regulation/Act/Development	Year of enactment	Domain	Purpose	Drawback(s)	Primary target population protection
				safety were not a part of this Act.	
Food Safety Act	1990	Food safety, food quality and trading standards	Provides the framework within which all modern food legislation is written.		Consumers
General Food Law Regulation (Regulation (EC) No 178/2002)	2002	New laws on safety, traceability, withdrawal and recall requirements			
General Food Regulation	2004	Further modified the definition of food as originally in the Food Safety Act 1990			
EU Hygiene Regulations No 852/2004, 853/2004, 854/2004, 2073/2005 and 2075/2005, 834/2007	2006	Food safety for different foods and hazard prevention within the food industry	Implementation of the Hazard Analysis and Critical Control Points (HACCP) system by the European Union		Internal and external stakeholders
Official Feed and Food Controls (England) Regulations 2009	2009	Food safety, agricultural policy, veterinary and phytosanitary measures	Protection of public health and measures relating to feed produced for or fed to food producing animals		Internal and external stakeholders
Regulation (EU) No 1169/2011, 1924/2006, 609/2013, 1829/2003, 1830/2003, 1308/2013	2003-2013	Food labelling and food information, health and identification marks	EU food law to harmonize labelling of labelling of food placed on the EU market.	Changes would need to be made once the UK withdraws from the European Union	Consumers
Food Safety and Hygiene (England) Regulations 2013	2013	Certain provisions of Regulation 178/2002	Food safety, food hygiene, bulk transport by sea of		Internal stakeholders

Regulation/Act/Development	Year of enactment	Domain	Purpose	Drawback(s)	Primary target population protection
Regulation (EU) 2015/2283	2018	Novel foods	liquid oils, fats and raw sugar Import and manufacture of new and innovative foods in the EU market		Internal stakeholders and consumers

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Table 2: Summary of the characteristics of a complex system

Characteristics of complex systems	
Purpose	<p>Defines the system and provides it with integrity to hold it together</p> <p>Property of the entire system</p> <p>History of a complex system leads to the constant evolution of the purpose of the system and its behaviours</p>
Efficiency	<p>Complex systems have efficient, short-range and dynamic interactions between elements</p> <p>It is essential that all the interacting elements are present for efficient functioning of a complex system</p>
Order of arrangement	<p>The order in which in which the parts of a complex system are arranged affects the performance of the system</p> <p>Rearranging elements would break the links between interacting elements leading to chaos</p>
Communication	<p>Forms the basis of a social system</p> <p>There are 3 directions of communication flow:</p> <p>Top-down</p> <p>Direction of communication is from the superior to subordinates</p> <p>Determines how individuals identify with the organisation</p> <p>Horizontal</p> <p>Involves passing of information between people at the same hierarchical level</p> <p>One of the most difficult forms of communication and requires the right amount of information to be passed to avoid inadequate or over-communication</p> <p>(Bottom-up) Feedback</p> <p>Feedback helps inform a system about its performance and behaviour</p> <p>Feedback can be of two types – positive and negative. Both are necessary to help in the continuous development of the system.</p>
Holism	<p>Holism is about looking at the bigger picture and not just addressing the local issues in the subsystem</p>

Characteristics of complex systems

Emergence

This approach does not just look for simple solutions that address a specific problem, but looks at other linked factors and problems that could arise in the future

Interactions in a complex system leads to the emergence of patterns that define the behaviour of the components/agents within the system and the behaviour of the entire system

Interdependence

Open systems have parts that are related to its whole and to its environment – this is known as interdependence

Law of requisite variety

A change in any part of the system will affect the entire system

Too much variety in a complex system can destroy the entire system

A system would only be able to survive as long as the range of responses it marshals successfully matches the range of situations confronting it

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1341 **Table 3: Components of the food system across various systemic levels in the UK and the USA**

1342 Adapted from Nayak and Waterson (2016); and Keenan *et al.*, (2015).

Systemic level	Component		Role played in the food system
	United Kingdom	United States of America	
External	Media, Market forces, Societal values and priorities, Historic events and Global politics		Conveying new regulations and budget allocations to consumers as well as manufacturers; publicizing wrong-doings and breaches of regulation. Media are essentially the link between consumers and manufacturers, as well as consumers and the government.
Government	European commission, Council of Ministers and European Parliament	United States Congress	Initiation and approval of new laws.
	UK Parliament		Implementation of regulations in the national food law; making decisions over how to implement directives into the country's food regulations; deciding on budget allocation.
	Food Standards Agency	Food and Drug Administration (FDA) and the Food Safety Inspection Service (FSIS)	Protection of public health in relation to food; helping local councils understand food regulations; making decisions on how to split the allocated budget.
	Local councils	State and local agencies (health and agriculture departments)	Ensuring that the regulations are actually implemented; inspecting food businesses; helping food businesses establish and better themselves.
Organisational/Workplace	Management		Conveying information from food inspectors to the shop-floor employees; ensuring that food manufactured is safe for consumption; ensuring that food safety and hygiene regulations are complied with; administration work; bringing in orders for the food business; hiring contractors (cleaning, temporary employees, full-time employees, transportation); ensuring that employees have the required training.
	Shop-floor employees		Working on the shop floor; following training provided diligently; ensuring that they follow protocols; making sure that they know what they are doing; production of food safe for

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Systemic level	Component	Role played in the food system
	<i>United Kingdom</i> <i>United States of America</i>	consumption; efficient cleaning of shop-floor; transporting food; storing and organizing food in stores .

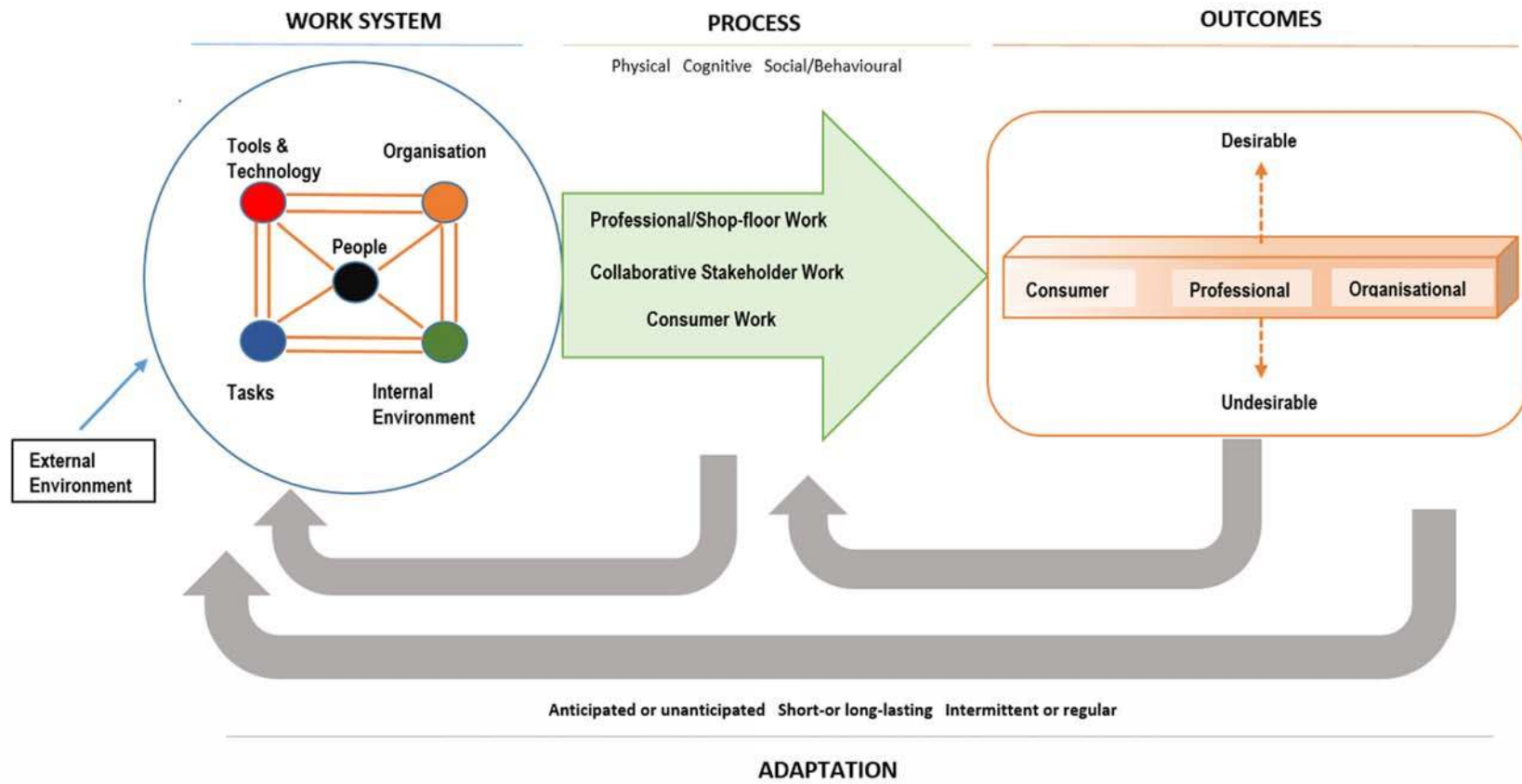
1344 **Table 4: Common gaps across food safety systems in the UK, US and Europe**

System level (based on the Onion model)	Example issues within the food safety domain	Current focus	Gaps in knowledge and the underexploited aspects
Wider physical and virtual work environment	Food poisoning outbreaks investigations, food safety related issues	Root cause analysis, audits and inspections by food safety inspectors	Adopting proactive measures such as understanding the food business' work environment and using these to support wider organisational learning. Using methods of incident investigation (e.g., FRAM) that are commonly used in other industries and take into account interactions between a range of systemic factors that lead to food poisoning outbreaks.
Personal physical and virtual workspace	Safety culture	Survey instruments, benchmarking, microbial testing, rapid testing techniques	Qualitative methods provide richer assessments of the safety culture of food businesses; multiple methods should be used to assess the safety culture (e.g., interviews with staff, questionnaires, workshops)
Tasks	Demands, decision making, workload, situational awareness	Focus on mistakes and blame culture	Use of cognitive work analysis to get deeper insights into how complex tasks and team work are accomplished. Understanding antecedents (early warning, near misses) that lead to negative behaviours.
People	Team work, temporary agency workers	Team training and making every employee understand company protocols and the health and safety protocols	Understanding staff better to help them achieve job satisfaction, ensuring that the workload is no too much and making sure that the team is able to achieve everything together (socio-cultural aspects of team work – trust and organisational commitment).
Technology	Temperature control thermometers, rapid hygiene testing devices	Usability, reliability and validity	Understanding the impact of technology on working practice

System level (based on the Onion model)	Example issues within the food safety domain	Current focus	Gaps in knowledge and the underexploited aspects
Tools	Hazard Analysis and Critical Control Points (HACCP) used globally; Safer Food Better Business (SFBB) and Food Hygiene Rating Scheme (FHRS) in the UK; the FDA-iRisk® and Virtual Deli in the US; the Rapid Alert System for Food and Feed (RASFF) used in the European Union.	Compliance, standardisation	Involving stakeholders while designing the implementation process in order to provide appropriate local solutions. Understanding that tools are complex interventions that depend on other system attributes (e.g., communication, culture)

1346 **Figure 1: Socio-Technical Framework of the Functioning of the Food System**

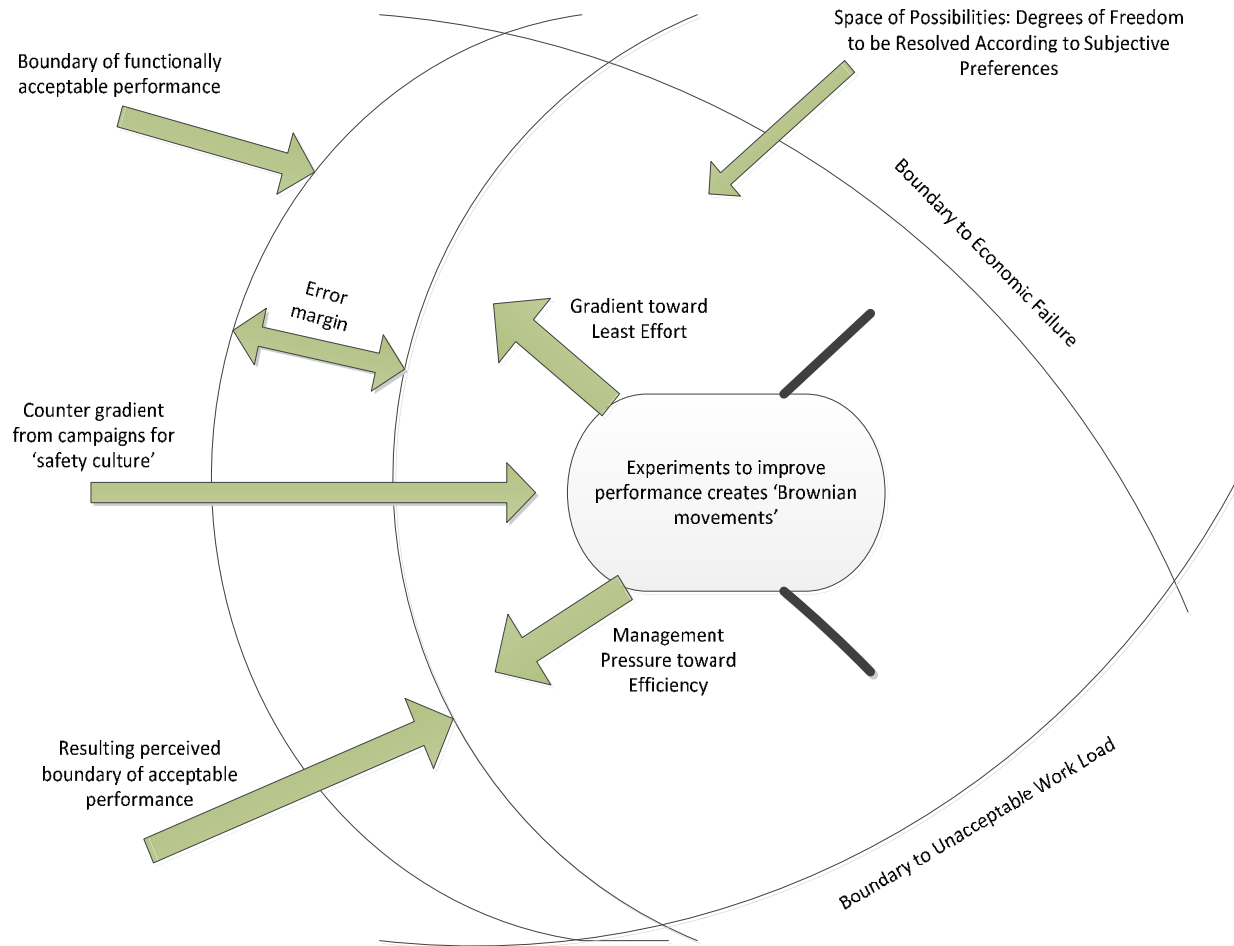
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1349 **Figure 2: Boundaries of acceptable behaviour**

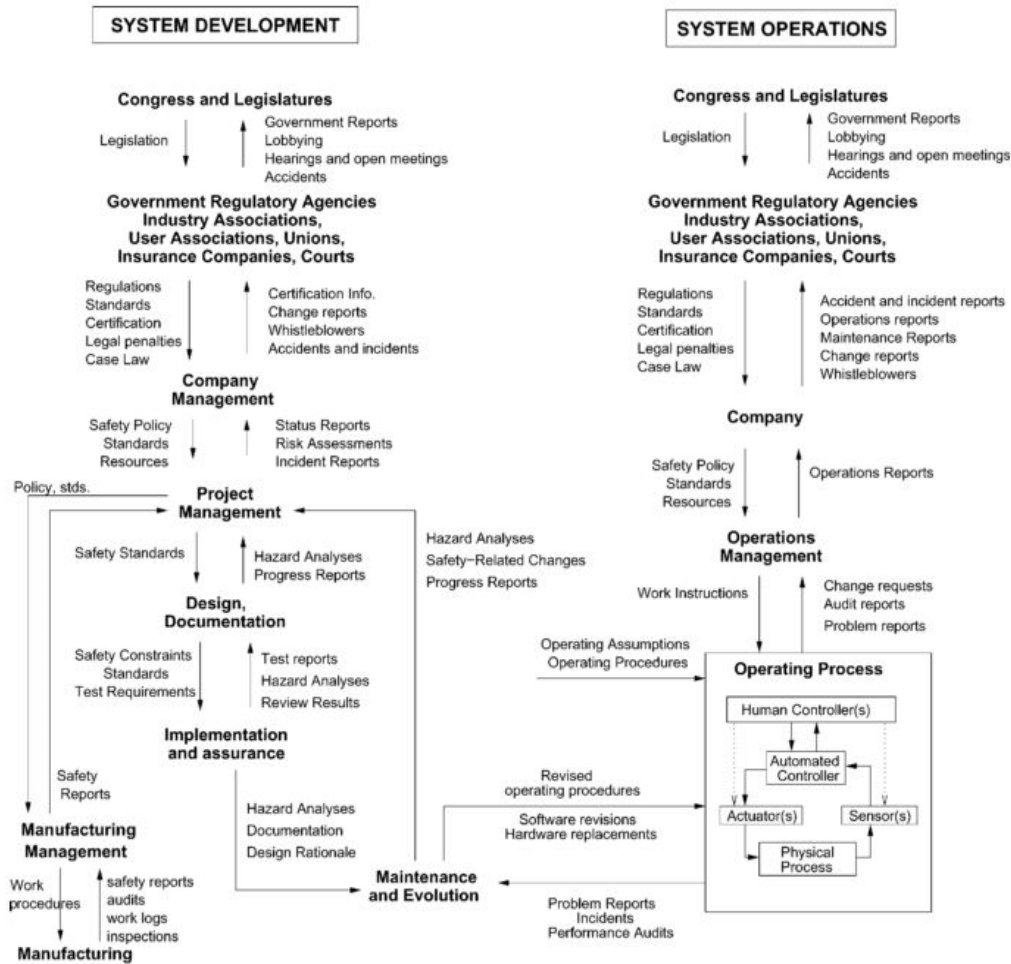
1350 Adapted from Rasmussen (1997)



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1352 **Figure 3: General form of a STAMP model**

1353 Adapted from Leveson (2004) p. 257.



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