

Crisis Control Newsletter

Crisis Control Newsletter from RQA, Inc.—A Catlin Preferred Provider to Foodservice, Food Processing and Consumer Products Industries

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Importance of Complaint Surveys

Your consumer affairs/customer service line receives a call from a consumer complaining of a foreign object found in one of your products that caused injury to the consumer or consuming one of your products made the consumer ill. Now what do you do? Every company should have a consumer complaint system or protocols established to handle these types of incidents.

When a consumer calls to complain that they became ill after consuming one of your products, a foodborne illness survey should be completed. Many times, consumers believe that when they become ill immediately or shortly after consuming a product, it was that product that made them ill. For example, someone who claims to become immediately ill after eating last night's meatloaf would not be sick from *E.coli* O157:H7. Pathogens in food take time to incubate, and times vary depending on the pathogen. Also, duration of symptoms vary depending on the pathogen. In addition, pathogens cannot be tasted, smelled or seen by the naked eye. So saying a product had an off flavor or smelled funny would not indicate the presence of a pathogen.

Likewise, when a consumer claims to have found a foreign object in your product that caused an injury or illness, it is important to understand the type of foreign object and how the consumer discovered it.

Completing a foodborne illness survey or a foreign object report will capture important data to determine the validity of the claim. While actual incidents such as these do happen from time to time, companies need to be aware that, unfortunately, some consumers make false or unsupportable claims hoping for a settlement from a company. Having a reliable system in place to either substantiate or discredit a claim is important in settling these matters.

If the consumer still has some of the product including any claimed foreign material and packaging object, it is important to get the product back. Remember to follow strict chain of custody protocols when retrieving and transferring samples and ensure that the manner in which the product is transferred does not degrade the sample.

Sending the sample/packaging to a third party lab for testing will provide the impartial scientific data necessary to help determine the appropriate course of action in settling or disregarding the claim. Results of the tests also give management important data to determine if a potential or actual larger issue may exist so that expedient and appropriate action can be taken to ensure the health and safety of other consumers.

Data captured on the foodborne illness survey or foreign material report will also help to determine the probable cause or discredit the claim. What other possible reasons can explain the incident? Is there malicious product tampering? Was the product properly stored, prepared, heated, refrigerated, handled, etc.? Did the recipe call for other ingredients that may have contributed to the alleged incident? There are many questions that need to answered in order to determine the truth and actual cause of the incident. Complaint surveys capture the necessary data to help understand the whole story which is essential in minimizing liability and risk.

Importance of Complaint Surveys (cont.)

When a consumer complains of a foodborne illness, at minimum, the foodborne illness survey should include:

- Date/time of the survey
- Consumer completing survey and contact data
- When was the suspect item consumed
- How was the suspect item:
  - Handled
  - Prepared
  - Served
  - Stored
- What else was consumed with the suspect item
- Did any others consume the same
- Did they display any symptoms
- What symptoms did the consumer suffer
- When did each symptom start
- How long did each symptom last
- Did the consumer seek medical treatment
- Is there a doctor's report
- What else was consumed that day
- What else was consumed within the prior 48-72 hours.

For a consumer complaint of discovering a foreign object that has or could have caused injury, it is helpful to obtain at least the following data:

- Date/time of the survey
- Consumer completing survey and contact data
- When was the suspect item consumed
- Time and location of incident
- How was foreign material discovered
- What happened/how did it happen
- Was there anything unusual about the product and/or packaging
- How was product handled/prepared/stored
- Did the consumer seek medical treatment
- Is there a doctor's report

Determine if it is necessary to get the sample to a lab for testing. Check production and maintenance or other internal records if material could have come from the manufacturing facility. If appropriate, check for signs of malicious product tampering by an external or even internal source.

Consumer complaints are a wealth of information about the products consumers use. Gathering comprehensive data about complaints allows a company the opportunity to serve customers better, improve products and operations and develop new products—all that can add to the bottom line. Most importantly though is the ability to protect the health and safety of consumers.

Food and Drug Administration Recalls (www.fda.gov)

Product: Black Bean Burgers
Incident: Possible Health Risk–Undeclared Allergen

A Battle Creek, MI firm is recalling certain code dates of black bean burgers because they may contain undeclared peanut. People who have an allergy or severe sensitivity to peanuts run the risk of serious or life-threatening allergic reaction if they consume this product. The firm was notified by a third party supplier that one of the spice ingredients used in black bean burgers may inadvertently contain peanut, an allergen that is not declared on the products ingredient statements. So far no illnesses or customer complaints have been reported to date. These recalled products were distributed nationwide in the U.S. at both retail stores and through foodservice channels. People who are allergic to peanuts should not consume this product and should either destroy or return it to the place of purchase. Consumers with questions should contact the company's Consumer Response Center.

Product: Smoked Salmon
Incident: Possible Health Risk– *Listeria monocytogenes*

A Santa Barbara, CA firm is recalling specific brands and batches of cold smoked salmon produced and packed between December 17-24, 2014 because they have the potential to be contaminated with *Listeria monocytogenes*. The potential for contamination was noted after routine testing by the company revealed the presence of *Listeria monocytogenes* on food contact surfaces. The production of the product has been voluntarily suspended while CDPH and the company continue to investigate the source of the incident. So far no illnesses have been reported to date in connection with this incident. Consumers should return products to the place of purchase for a full refund and contact the company with any questions.

United States Department of Agriculture Recalls (www.usda.gov)

Product: Boneless Beef Products
Incident: Possible Health Risk–Non-Inspection

A Torrance, CA establishment is recalling approximately 359 pounds of frozen boneless beef products produced in Japan that were not presented at the U.S. point of entry for inspection. Without the benefit of full inspection, a possibility of adverse health consequences exist. The various size beef products were produced in Japan on August 6, 2014 and imported in September of 2014. The importer cut, repackaged and sold the products at a retail store in Torrance, CA. The problem was discovered when FSIS import staff reviewed records and discovered that the importer did not present the products for USDA inspection at the U.S. point of entry. FSIS and the company has not received any reports of illness due to consumption of these products. Media and consumers with questions in regard to the recall should contact the company's Merchandising Purchasing Manager or Department Director.

Product: Ground Beef Products
Incident: Possible Health Risk–Foreign Material

A Sutton, MA establishment is recalling approximately 33,948 pounds of ground beef products that may be contaminated with plastic materials. The ground beef products were produced on December 23, 2014 and sold in 1-lb. vacuum sealed packages and also in a 3-pack containing three 1-lb. packages. The problem was discovered after the firm received consumer complaints through retail establishments that the product contained small malleable plastic pieces. FSIS and the company have not received any reports of illness associate with consumption of these products. Anyone concerned about an injury or illness should contact a healthcare provider. Media and consumers with questions in regard to the recall should contact the company's Quality Assurance Manager or the company's President.

Consumer Product Safety Commission Recalls (www.cpsc.gov)

Product: Cleaner & Degreaser Products
Incident: Possible Risk-Chemical Hazard

A West Chester, OH manufacturer is recalling approximately 83,800 units of cleaning products because the products are labeled "Does not contain Ammonia" when in fact the products may contain ammonia. The mislabeling of the bottles can pose a chemical hazard to consumers. If ammonia is mixed with bleach or other household chemicals, irritating or toxic gases could be produced. The recalled cleaning products come in white plastic spray bottles and white or green plastic containers. The company has not received any reports of injuries related to the use of these products. The cleaning products were manufactured in the USA and sold at retailers nationwide from August 2014 to November 2014. Consumers should stop using the recalled cleaning products and return them to the retailer for a replacement. Consumers with questions should contact the company directly or visit their website for more information.

Product: Crib Mattresses
Incident: Possible Risk-Entrapment Hazard

A Conshohocken, PA importer is recalling approximately 169,000 units of crib mattresses because they can create a gap between the mattress and crib ends larger than allowed by federal regulations, posing an entrapment hazard to infants. The recall involves five models of crib mattresses manufactured in Mexico on May 4, 2014 or earlier. A gap between the mattress and crib ends larger than two finger width is an indication of the defective mattress. The firm has received two reports of infants becoming entrapped between the mattress and an end of the crib. The children were removed from the gap without injury. The mattresses were sold at a retailer nationwide and online from August 2010 through May 2014. Consumers should immediately stop using the recalled mattress and return it for an exchange or refund. Consumers with questions should contact the company directly for more information.

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