

Crisis Control Newsletter

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

March 2015
Volume U0315 Issue 1

Is It Time for a Tune Up?

A business develops a recall plan. Great—there is now a plan in place occupying a space on a shelf. When was the last time the recall plan was assessed or tested? Spring is right around the corner and it's a good time to clean up or tune up the recall plan.

A recall plan should be reviewed at least annually to determine if there are any changes that should made to the plan. What should be changed? Maybe nothing, but then again, maybe some important elements need to be updated. Version control should be included to know who reviewed the plan and when the review was completed. It is also helpful to track what revisions were made within this review period.

Within the past year, have there been any changes in your people, processes or systems that would affect the effectiveness or correctness of your recall plan?

Does your plan include the most up-to-date roster of all recall team members and alternates including 24 hour contact information? What about a matrix of other internal and external resources and subject matter experts? Are you sure that all contact information is current and valid?

With federal agency regulatory updates, are there any elements in your plan that need to be updated in order to comply with new regulations or proposed rulings? What is your review process for ensuring that regulatory changes affecting your recall plan will be included as part of the plan?

Have there been any significant process changes or additions that could affect the recall plan? Have processes been clearly defined before, during and after a recall action?

Have there been changes to systems that would affect the plan or have there been advances or updates to technology that would change the way you do things? Are these included in your recall plan?

Have communications templates been reviewed for adequacy and completeness?

Has there been training for all recall team members and alternates on an annual basis. Are training records maintained?

Are traceability exercises completed at regular intervals and have recall simulations been conducted at least annually? Is the requirement in your recall plan?

Once the plan has been updated, it is helpful to have a third party assess the completeness of your plan by conducting a desk top review to ensure that all important elements are included and understood and that the plan will serve as valuable guidance document should the need to recall or withdraw product becomes necessary. Maybe it IS time for a tune up!

Benefits of a Recall Simulation

A Recall Simulation includes all aspects of a "real" recall situation, by testing your company's people, processes and systems. One of the most important parts of a Recall Simulation is it puts the team in a situation which allows it to proactively practice its recall process and see how well it follows the recall plan. These are just a few benefits of conducting at least annual recall simulations:

- A Recall Simulation tests a company's entire recall process and plan. Any gaps become evident, and areas for improvement and corrective action are identified. Incorporating these changes into the recall plan will make it a more robust guidance document should the need for an actual recall/withdrawal become necessary.
- The entire team assesses how well it performed and is able to collaboratively identify needed corrective actions. It also allows the team to determine their strengths and reinforce proactive and effective behavior and actions.
- Based on the Simulation's outcome, contingency plans can be made to reduce unforeseen surprises in the event of a real recall.
- A Simulation is a great refresher for seasoned team members and an excellent training tool for new team members and alternates.
- There is an opportunity to establish "best in class", consistent processes and training programs across multiple plants and/or business units.
- All team members have increased awareness of their individual responsibilities and other team members' responsibilities.
- All team members have increased awareness of the need for prompt, clear and factual internal and external communications in order to protect consumer health and safety, as well as protect the company, its reputation and brand names.
- A Recall Simulation helps prepare the recall team and reduces the anxiety associated with a real recall by being prepared and confident in decisions and actions.

Conduct a Recall Simulation at least once per year with different products and different triggers. Truly test your team and plan by increasing the difficulty or complexity of the scenarios presented. Practice makes perfect!

Being prepared for a recall saves the company time, reputation, and money. The time to prepare for such a crisis is not when it happens!

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

Product: Bagels
Incident: Possible Health Risk–Undeclared Allergen

A Horsham, PA firm is recalling a variety of flavors of bagels because they may contain undeclared peanuts and almonds. People who have an allergy or severe sensitivity to peanuts and almonds run the risk of serious or life-threatening allergic reaction if they consume this product. The recalled product was distributed in IA, IL , IN, KS, KY, MN, MO, ND, NE, OH, SD and WI at various retail grocery stores. So far no illnesses or customer complaints have been reported to date. The recall was initiated after the bakery that produced the product discovered that peanuts and almonds were present in an ingredient used for the bagels. People who are allergic to peanuts and almonds should not consume this product and should return it to the place of purchase for a full refund. Consumers with questions should contact the company at any time 24 hours a day.

Product: Dog Food
Incident: Possible Health Risk– *Salmonella*

A Perham, MN firm is voluntarily recalling specific lots of 4-lb. bags of dry dog food because they have the potential to be contaminated with *Salmonella*. *Salmonella* can affect animals eating the products and there is also a risk to humans handling the contaminated pet products. Infected but otherwise healthy pets can be carriers and infect other animals or humans. So far, there have been no *Salmonella* related illnesses in people or animals associated with this recalled product. The recalled dog food was distributed nationwide to distributors, brokers, retail stores and internet retailers. The recall was initiated after a routine sampling program by the Ohio Department of Agriculture revealed the presence of *Salmonella* in one 4-lb. bag of product. Consumers should stop using the recalled pet food product, discard it in a safe manner and should contact the company for further information.

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

Product: Poultry Products
Incident: Possible Health Risk–Non-Inspection

An Alberta, Canada establishment is recalling approximately 2,705 pounds of various cases of poultry products that were not presented at the U.S. point of entry for inspection. Without the benefit of full import inspection, a possibility of adverse health consequences exist. The poultry items were produced on February 2, 2015 and were shipped to a retail location in Washington. The problem was discovered when the import facility reported to FSIS that product with an estimated date of arrival of February 4, 2015 had not been received at that location. FSIS and the company have not received any reports of adverse reactions due to consumption of these products. Media and consumers with questions in regard to the recall should contact the company.

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

A Torrance, CA establishment is recalling approximately 1,999 pounds of whole boneless beef products 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 weights and cuts of vacuum packed boneless beef products were imported from Japan on various dates between Oct. 9, 2014—Jan. 15, 2015, and labeled in Japanese only. The products were shipped to distributors and retail locations in AZ, CA and WA. The problem was discovered during routine review of product tracking records. FSIS and the company have not received any reports of illness associate with consumption of these products. Media and consumers with questions in regard to the recall should contact the company.

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

Product: Fire Extinguishers
Incident: Possible Risk-Failure to Discharge

A Mebane, NC importer is recalling approximately 4.6 million units of 31 models of disposable fire extinguishers with black plastic valves (175,000 units in Canada). The recalled extinguishers are red, white or silver and are either ABC or BC rated. The fire extinguishers were manufactured in Mexico from July 23, 2013 through Oct. 15, 2014 and sold at department, home and hardware stores nationwide and online from Aug. 2013 through Nov. 2014. A faulty valve component can cause the disposable fire extinguishers to not fully discharge when the lever is repeatedly pressed and released during a fire emergency, posing a risk of injury. The company has received 11 reports of the recalled extinguishers failing to discharge as expected. No injuries have been reported. Consumers should contact the company to receive a replacement. Consumers with questions should contact the company or visit their website for more information.

Product: Chandeliers
Incident: Possible Risk-Injury Hazard

A Skokie, IL manufacturer is recalling approximately 8,800 units of chandeliers (800 units in Canada). The recall includes seven collections of chandeliers which are metal with various finishes and two or three tiers of glass shades. The chandelier's screw collar that holds the chandeliers to the ceiling mount can break causing the chandelier to fall and injure bystanders. The light fixtures were manufactured in China and sold at retailers nationwide and online from Nov. 2006 through Aug. 2013. The company has received four reports of the chandeliers falling from the ceiling causing property damage. No injuries have been reported. Consumers should contact the dealer for free replacement hardware to repair the chandelier or replace chandeliers that have fallen. Consumers with questions should contact the company directly or visit their website for additional information.

Crisis Control is a newsletter jointly published by RQA, Inc. & Catlin Group.

For more information about these topics and more, please contact:

Carol Kozlowski, CPIM
Manager of Crisis Management, RQA, Inc.
Phone: 708-364-7060 x129
Email: c.kozlowski@rqa-inc.com

RQA-Inc.com

London, UK:
David Burke: david.burke@catlin.com
Ian Bailey: ian.bailey@catlin.com
John Naughton: john.naughton@catlin.com
Andrew Kyle: andrew.kyle@catlin.com

Email: CrisisManagement@catlin.com

Catlin.com