

Crisis Control Newsletter

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

May 2013
Volume U0513 Issue 1

FSIS—Targeted Verification for Allergens

From 2008-2012, there has been a sustained increase in the number of recalls of FSIS-regulated products that contained undeclared allergens.

An analysis of the recalls connected to undeclared allergens in 2011 and 2012 revealed that many occurred because of:

1. Changes in ingredient suppliers;
2. Products in the wrong package; or
3. Changes to product or ingredient formulation.

Proper labeling of a product, especially correctly declaring all allergenic proteins, is directly related to food safety. Specifically, the consumption of products containing undeclared "big 8" allergens, may result in adverse health reactions. Because of the increase in recalls associated with the failure of establishments to properly address labeling, FSIS is now explicitly directing inspection program personnel to conduct new labeling verification activities to determine whether establishment labels accurately reflect ingredients for products containing allergens. The new verification task will include record review and observation of the production process.

The "big 8" allergens account for approximately 90 percent of all food allergy reactions. The "big 8" allergens are:

1. Wheat;
2. Crustacean shellfish (e.g. crab, lobster, shrimp);
3. Eggs;
4. Fish;
5. Peanuts;
6. Milk;
7. Tree nuts (e.g. almonds, pecans, walnuts); and
8. Soybeans.

When "big 8" allergens or other ingredients of public health concern are not properly declared, then a recall may be warranted.

When an establishment releases product into commerce with an undeclared allergen, a failure in the establishment's food safety system has occurred. The establishment has either failed to address the chemical (allergen) food safety hazard in its hazard analysis, failed to support the decisions made in the hazard analysis, or failed to effectively implement the controls to support the decisions made in the hazard analysis. It is important that establishments have preventive measures or controls in place in order to address allergens.

Inspection program personnel may request or recommend a food safety audit if the establishment is unable to demonstrate that it has put adequate controls in place to ensure allergenic ingredients are properly used and declared, or if lack of adequate controls raises concerns about the adequacy of the establishment's HACCP system.

Sources: USDA FSIS website, FSIS notice 20-13, FAAN

Allergen Control Plan

An allergen control plan (a type of prerequisite program) is a written document that outlines how an establishment addresses allergenic foods and ingredients. Often establishments use these programs to support that the chemical food safety hazard, allergens, are not likely to occur in their processes.

FSIS recommends control measures throughout an establishment's HACCP system to prevent the potential of undeclared allergens based on three basic principles: identify, prevent and control, and declare.

These principles may also be included in an establishment's SSOP or other prerequisite program. Examples of each principle are listed below:

Identify

- Arrangements with suppliers to ensure complete and accurate ingredient labeling on all incoming product
- Inspection of incoming ingredients for allergens or allergen-containing foods
- Cross-referencing labels and product formulations with incoming ingredients
- Separation of allergenic materials in separate, designated areas

Prevent and Control

- Dedicated equipment or separation of allergenic products by time
- Sanitation including documented cleaning procedures with checklists
- Maintaining documented process flow and methods for tracking products

Declare

- Methods for tracking products through packaging and verification of labels
- Systems and checklists for labeling of final product, procedures for labeling discrepancies
- Storage of products in clearly identified and marked areas

It is important that this plan be reviewed on a regular basis and updated as necessary.

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

Product: Smoked & Pickled Herring
Incident: Possible Health Risk–*Clostridium botulinum*

A North Hollywood, CA firm is recalling both smoked and pickled herring fish because the products were found to be uneviscerated, and have the potential to be contaminated with *Clostridium botulinum*. Consumers are warned not to use the product even if it does not smell spoiled. The recalled products were sold prior to April 4, 2013 and were manufactured and distributed in the state of California. These products were sold as whole fish, packaged in vacuum sealed packaging in various weights and sizes. No illnesses have been reported to date. Products were found to be uneviscerated during an inspection by the Food and Drug Administration. The sale of uneviscerated fish is prohibited because *Clostridium botulinum* spores are more likely to be concentrated in the viscera than any other portion of the fish. Consumers who have purchased the smoked or pickled herring fish are advised not to eat it and return it for a refund.

Product: Granola
Incident: Possible Health Risk–*Undeclared Allergen*

A Lynn, MA company is voluntarily recalling 834 cases of gluten free granola with flax and fruit because they contain undeclared almonds. People who have an allergy or severe sensitivity to almonds and other tree nuts run the risk of serious or life-threatening allergic reaction if they consume this product. The product was sold in 12 oz. pouches, 6 per case and were distributed to distributors in MA, CT, NJ, PA, NC, SC, FL, MI and TX. No injuries have been reported to date. The recall was initiated after it was discovered that the label failed to reveal the presence of almonds. The company has taken action to correct the label. Consumers who have purchased this product should return them unopened to the place of purchase for a full refund. Consumers with questions should contact the company directly.

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

Product: Breaded Chicken Products
Incident: Possible Health Risk–*Undeclared Allergen*

A Russellville, AR firm is recalling approximately 127,000 lbs. of uncooked breaded chicken tenderloin fritter products because of an undeclared allergen and misbranding. The product contains soy, a known allergen not declared on the label. The recalled products were produced between March 1 and March 27, 2013, sold in 10 and 20 lb. packages and shipped to food service companies nationwide for further distribution to restaurants and institutions. The problem was discovered by the company and occurred as a result of a label change after reformulation of the product. A marinade ingredient that included an incorrect sub-ingredient (concentrated soy protein) was not declared on the label. The FSIS and the company have not received any reports of adverse reactions due to the consumption of these products. Consumers with questions about the recall should contact the company directly.

Product: Roast Beef Deli Meat
Incident: Possible Health Risk–*Listeria Monocytogenes*

A Baker, LA establishment is recalling approximately 20,166 pounds of cooked roast beef deli meat due to possible contamination with *Listeria monocytogenes*. Various weights of the roast beef products may have been sliced at retail deli's and may not bear any packaging information. The products were packed on February 27, 2013 and shipped for further distribution and to retail deli stores in LA, TX, FL, AL, MS, OK, IL and TN. FSIS was alerted to the problem by the Tennessee Department of Agriculture who took an intact sample of cooked roast beef at a retail establishment on April 5, 2013, which later confirmed positive for *Listeria monocytogenes*. So far there have been no reports of illnesses associated with the consumption of these products. Media and consumers with questions about this recall should contact the company directly for more information.

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

Product: Chest Freezers
Incident: Possible Risk-*Fire Hazard*

A New York, NY importer along with the U.S. CPSC is recalling approximately 41,000 chest freezers which were manufactured in China and sold at regional and local retailers nationwide and online from September 2009 through March 2013. The recall involves several models of 7.0 and 5.3 cubic foot capacity chest freezers. A capacitor in the freezer's circuitry can overheat, posing a fire hazard. In addition to the 18 incidents reported in a November 2010 recall, which included four reports of fires with minor property damage, the company and the CPSC have received 27 additional incident reports. This includes three fires that cause substantial property damage. There have been no reports of injuries. Consumers should immediately unplug their freezer and contact the company to schedule an appointment for a free repair to the freezer.

Product: Handgun Security Vaults
Incident: Possible Risk-*Lock Malfunction*

A Columbia, MO importer in conjunction with the U.S. CPSC and Health Canada are recalling approximately 3,900 units (100 units in Canada) of combination lock models of compact and large handgun security vaults. The recalled vaults were manufactured in China and sold at small sporting goods and specialty stores nationwide and at online retailers from May 2012 to March 2013. The vaults are black, steel cases used to store handguns or other valuables at home, in the car or when traveling. The vaults are lined with foam padding in the top and bottom and are secured by a three-digit combination lock. The lock can fail and allow unintended access to the contents of the vault. Consumers should immediately stop using the recalled handgun vaults and contact the company to return the vault for a full refund. So far no incidents or injuries have been reported. Please contact the company for more information.

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

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