

Crisis Control Newsletter

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

May 2015
Volume U0515 Issue 1

Food—Safety, Defense, Security, Fraud

Hot topics in today's food industry evolve around food safety, food defense, food security and food fraud...but what is the difference among these? Terminology can be confusing and interpreted in different ways by different people. Below are some definitions to help us all speak the same language.

A medical encyclopedia defines food safety as "the conditions and practices that preserve the quality of food to prevent contamination and foodborne illness". As defined by the USDA, food safety is "the protection of food products from **unintentional contamination** by agents reasonably likely to occur in the food supply." This would include such instances as the presence of a pathogen such as *Salmonella, E.coli or Listeria, etc*. Foreign materials found in food that could cause a health hazard or injury would also be considered a food safety hazard.

Conversely, the USDA defines food defense as "the protection of food products from **intentional contamination** by biological, chemical, physical, or radiological agents that are **not** reasonably likely to occur in the food supply." Intentional contamination are acts of malicious product tampering with varying motives/reasons—terrorism, extortion, sabotage against a company, mental instability, or a number of other reasons. These acts are also a criminal offense. Nevertheless, food defense issues can pose a serious health risk or even death.

While many use the terms food defense and food security interchangeably, the terms have difference meanings. The USDA defines food security as "the reliable availability of a **sufficient quantity** and quality of nutritious food for a population." Similarly, Oxford Dictionary defines food security as "the state of having reliable access to a sufficient quantity of affordable, nutritious food".

The U.S. Pharmacopeial Convention, a nonprofit that sets standards used by the FDA, describes food fraud as the "**deliberate (and intentional**) substitution, addition, tampering or misrepresentation of food, food ingredients or food packaging, or false or misleading statements made about a product **for economic gain**." Instead of food fraud, another term used by several regulatory agencies is EMA—Economically Motivated Adulteration. Examples include melamine added to milk to boost the apparent protein content, horsemeat in ground beef, honey substituted with sugar or other sweeteners, ground cinnamon containing sawdust, and substituting less costly species of fish which may be toxic or cause allergic reactions and misrepresenting them as more expensive species. Other examples include selling known contaminated products or cargo theft reintroduced into commerce. Food fraud ultimately pose health risks and diminishes consumer confidence in products.

It is important that we understand these differences and how to mitigate, prepare and react to an incident involving these type of food issues.

Safeguarding the Food Supply

Now that we've defined the differences among food security, defense, safety and fraud, we can audit and assess our operations to safeguard the food supply.

From a food safety standpoint, it is important that protocols are in place to prevent foodborne illness, prevent foreign materials from entering food, ensure accurate and correct labeling, follow regulatory requirements, just to name a few. An implemented robust quality management program is key in producing food safe for consumption.

Prerequisite programs should be reviewed on a regular basis or anytime there is a change in people, process or systems to ensure they are up-to-date and valid. A few of these prerequisite programs include a valid HACCP plan, supplier management program, recall plan, traceability program and procedures, sanitation program, etc. With these programs in place, the chance of contamination is greatly reduced.

Food facilities should have a written food defense plan that addresses significant vulnerabilities in its food production process to protect against intentional contamination. Facilities need to identify and implement strategies to address the vulnerabilities, establish monitoring procedures and corrective actions, verify the system is working, ensure personnel assigned to the vulnerable areas receive appropriate training, and maintain certain records. The benefits of these actions are a reduction in the possibility of illness, death and economic disruption resulting from the intentional adulteration of food.

There are several approaches to mitigate or prevent food fraud. Inspections and testing of products on a regular schedule can detect a potential or actual incident of economically motivated adulteration and may pinpoint the problem before it becomes a crisis. Conducting regular internal and supplier audits can also help to prevent food fraud. Companies should also conduct a risk assessment to determine what are their vulnerabilities where food fraud may occur. What is the economic climate of the geographic location or companies that source materials or products to your organization? Are there other factors that play a part in the potential for food fraud? These are just a few questions to ask.

Preventative measures and processes are essential in safeguarding the food supply. The time to plan for a crisis is before and not at the time of or after it happens. After all it's true, "an ounce of prevention is worth a pound of cure".

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

Product: Ice Cream
Incident: Possible Health Risk–*Listeria monocytogenes*

A Brenham, TX firm is expanding its recall of ice cream products that were produced in the Broken Arrow, OK plant which tested positive for *Listeria monocytogenes*. The products being recalled were distributed to retail outlets, including food service accounts, convenience stores and supermarkets in AL, AZ, AR, CO, FL, GA, IL, IN, KS, KY, LA, MS, MO, NV, NM, NC, OH, OK, SC, TN, TX, VA and WY. No illnesses have been confirmed to date. The firm voluntarily suspended operations at the Broken Arrow, OK plant to thoroughly inspect the facility due to a 3 oz. cup that tested positive for *Listeria monocytogenes.* The firm later announced it is recalling all products produced from the Broken Arrow, OK plant on Feb. 12, 2015-March 27, 2015. Consumers who have purchased these items are urged to return them to the place of purchase for a full refund. Consumers with questions should contact the company.

Product: Hummus
Incident: Possible Health Risk– *Listeria monocytogenes*

A Colonial Heights, VA firm announced it is recalling approximately 30,000 cases of hummus due to possible contamination with *Listeria monocytogenes*. The recall is limited to five SKUs of hummus sold nationwide. To date, there have been no reports indicating that these products have caused any illness. The recalled products were distributed to retail outlets, including food service accounts and supermarkets in the U.S. The potential for contamination was discovered when a routine, random sample collected at a retail location tested positive for *Listeria monocytogenes*. Consumers who have purchased any of these products are urged to dispose of or return them to the place of purchase for a full refund. Consumers with questions should contact the company directly for more information.

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

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

A Rockville, MD establishment is recalling approximately 1,108 pounds of canned corned beef products not presented at the U.S. point of entry for inspection. Without the benefit of full inspection, a possibility of adverse health consequences exists. 123 cases plus 3-340 g. individual cans of corned beef were imported from Brazil on March 15, 2015 and were shipped to retail locations in Maryland and Virginia and are currently on route to a distributor in California. The problem was discovered during routine review of product tracking records by FSIS employees. FSIS and the company have not received any reports of illness due to consumption of these products. Consumers and media with questions about the recall should contact the firm directly for more information.

Product: Baby Food
Incident: Possible Health Risk–Foreign Material

An Amsterdam, NY establishment is recalling approximately 1,920 pounds of baby food products that may be contaminated with small pieces of glass. The baby food product was produced on December 12, 2014, sold in 4-oz. glass jars and shipped to retail locations nationwide. The problem was discovered after the firm received a complaint from a consumer who found a small piece of glass in the product. The company has received a report of an oral injury associated with the consumption of these products. FSIS has received no additional reports of injury or illness from consumption of these products. Media and consumers with questions in regard to the recall should contact the company's consumer hotline.

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

Product: Electric Blower Vacuum
Incident: Possible Risk-Fire and Burn Hazards

An Anderson, SC importer is recalling approximately 823,000 units of electric blower vacuums (41,000 units in Canada). The recall involves specific models of 12 amp red and black electric blower vacuums manufactured in China. The blower vacuums can overheat, spark and catch on fire posing fire and burn hazards. The company has received 1,369 reports of blower vacuums sparking, arcing, smoking or burning, including one report of a minor injury. The product was sold at a hardware retailer and factory outlet stores nationwide and online from January 2010 through March 2015. Consumers should immediately stop using the recalled blower vacuum and return them to the store for a full refund. Consumers with questions should contact the company directly or visit their website for more information.

Product: Vertical Bike Hooks
Incident: Possible Risk-Injury Hazard

A Waterloo, IA distributor is recalling approximately 105,000 units of vertical bike hooks (15,000 units in Canada) manufactured in China. The recall involves vertical bike hooks that are used in conjunction with a trackwall garage storage system. The black metal plate is mounted to the grooves in the trackwall and the bike's tire is attached to a hook protruding from the plate. The mounted bike hooks can unexpectedly detach, allowing the bike to fall, posing a risk of injury to bystanders. The firm has received 22 reports of the bike hooks falling from the mounted trackwall, including 12 reports of property damage. No injuries have been reported. The bike hooks were sold at a hardware retailer nationwide from April 2011 to March 2015. Consumers should immediately stop using the recalled hooks and return them to the store for a full refund. Consumers with questions should contact the company directly for additional information.

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

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

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

RQA-Inc.com

London, UK:

Ian Bailey: ian.bailey@xlcatlin.com
John Naughton: john.naughton@xlcatlin.com
Andrew Kyle: andrew.kyle@xlcatlin.com

Email: CrisisManagement@catlin.com

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