

Crisis Control Newsletter

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

July 2012
Volume U0712 Issue 1

Recall Communications

A critical element to any product recall strategy is a well developed communications plan that answers the questions who, what when, where and how. The question of why is always to protect the health and safety of the consumer and protect the business and its brands besides regulatory obligations..

Who

Effective external communications to consumers, customers, distributors, suppliers, regulatory agencies and any other key stakeholders are essential to the success of the recall. In addition, it is important to communicate internally with all levels of the organization. The company spokesperson should also be prepared to communicate with the media.

What

The message needs to be consistent, concise, clear, and contain all pertinent information about the products involved, the reason for the recall and what to do with the product. In all communications, key product information such as the name of the recalling firm, product name, product codes, descriptions, package size, package type, code dates, and volume being recalled will be included along with the geographical area(s) affected by the recall, and any other descriptive items that help to identify the product. A picture of the products also helps consumers and customers identify the correct products implicated in the recall.

When

It is important to communicate with the regulatory agency as soon as a potential or actual recallable issue is known. This will result in a press release to the public to make them aware of the recall. Prompt communication to the public aids in mitigating potential serious consequences to the consumers and also for the business. Notification to all other stakeholders will be distributed simultaneously to ensure that unsafe product is removed from commerce.

Keep in mind that a responsible party is required to submit a report to the FDA through the Reportable Food electronic portal as soon as practicable, but in no case later than 24 hours after determining that an article of food is a reportable food. (Section 417(d)(1) of the FD&C Act).

Where

The important thing about where to communicate is to make sure that the message gets to the right audience at the right time. The press release will state the geographical areas involved. Signs posted at the stores that sell the products can also alert the public to the issue. Clearly post the information on the company website. Other possible outlets for communicating are television, radio, newspapers, and social networking sites such as Facebook, Twitter, etc.

How

Developing recall communication templates and holding statements for the media before an actual recall event will ensure that all key stakeholders get the right message in a timely manner. How you communicate whether by phone, email, letter, internet or other means will depend on the intended audience and your company's specific needs.

By: Carol Kozlowski, CPIM, Manager of Crisis Management, RQA, Inc.

Recall Communications Checklist

Effective and proactive communication is a key contributor to successful recall management. At a time of crisis, such as in the case of a product recall, it is important to have check lists to make sure that all necessary steps are covered. This includes a checklist for recall communications. Below is a checklist that covers most of the communications required, but you may have other pertinent communications that would be applicable to your specific situation. This is to be used as a guide to help you through the process, although you may have to adjust according to your particular needs or regulatory requirements.

Type of Communication	External
Agency Notification Letter	Regulatory Agency
Reportable Food Registry	FDA
Press Release Specific to the Issue: Allergen, Pathogen, Foreign Material, Oth	Regulatory Agency/ General Public
Recall Notification	Consignee/Customer
Recall Notification	Company Website
Recall Notification	Social Media
Recall Notification	Special Networks: hospitals, physicians, schools, FAAN, oth
Prepared Key Statements	Media (if necessary)
Recall Signage/Placards/Posters	Stores/ Consumers
Register Lock Out	Stores/ Consumers
Recall Return Survey Email/Postcard	Consignee/Customer
Recall Effectiveness Letter	Consignee/Customer
Recall Effectiveness Questionnaire	Consignee/Customer
Recall Status Reports	Regulatory Agency
Certificate of Destruction	Consignee/Customer
Request for Recall Termination	Regulatory Agency
Recall Termination	Consignee/Customer
What to Communicate	**Internal**
Media / External Communications Policy	Employees
Complaint Info for Investigation/ CAPA	Quality
Stop/ Hold/ Destroy Product	Production/ Operations
Stop Delivery/ Return or Destroy Product	Logistics
Credit/ Replacement/ Stop Promotions	Marketing/Sales
Track All Expenses	Finance/ Accounting
Prepared Key Statements	Consumer Affairs
Product Return and Replacement	Customer Service

Work with your internal or external communications and legal professionals when developing communications and refer to your governing agency for regulatory guidance.

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

Product: Red Pepper Onion & Garlic Cheddar
Incident: Possible Health Risk– *Listeria monocytogenes*

A Bow, WA firm in cooperation with the Washington State Dept. of Agriculture (WSDA) is voluntarily recalling red pepper onion & garlic cheddar produced on Aug. 30, 2011 because it has the potential to be contaminated with *Listeria monocytogenes*. *Listeria monocytogenes* can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. To date, no illnesses related to this recall have been reported. The recall was initiated as the result of a sample taken by the WSDA that returned a positive result. Approximately 124 pounds of the cheddar was sold from March 1 - June 7, 2012 in pre-cut random weight packages ranging in size. These products were sold at various local area farmers markets as well as independent retailers in Washington State and Oregon. Consumers who have purchased the affected products should return it to place of purchase for a refund.

Product: Ice Cream
Incident: Possible Health Risk–*Undeclared Allergen*

An Englewood Cliffs, NJ firm is voluntarily recalling pint containers of a specific brand and flavors of ice cream. These containers are missing the allergen advisory statement. The allergen advisory statement should be at the end of the ingredients list but was inadvertently omitted from the recalled product. People who have an allergy or severe sensitivity to peanuts or tree nuts run the risk of serious or life threatening allergic reactions if they consume these recalled products. So far, no illnesses or allergic reactions have been reported to date. The recall was initiated after it was discovered that the ingredient label on the pint containers did not include this information. The product was manufactured in the US and was distributed nationwide and sold in retail stores. Consumers who have purchased these products should discard any remaining product, rinse out the container, cut out and retain the UPC and call the company for a replacement coupon. Please contact the company for more details.

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

Product: Ready-to-Eat Pork Products
Incident: Possible Health Risk–*Listeria monocytogenes*

A Honolulu, HI establishment has recalled approximately 400 pounds of a ready-to-eat pork products because these products may be contaminated with *Listeria monocytogenes*. *Listeria monocytogenes* can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. So far, FSIS has not received any consumer complaints or reports of illness or adverse reactions due to the consumption of these products. The problem was identified by the firm during a follow-up testing conducted after a positive result from a FSIS routine monitoring sample. These pork products were produced between May 24-25, 2012 and were distributed to retail establishments in Hawaii. Consumers and media with questions should contact the company directly.

Product: Raw Stuffed Chicken Product
Incident: Possible Health Risk–*Undeclared Allergen*

A South San Francisco, CA establishment has recalled approximately 3,534 pounds of raw stuffed chicken products because of misbranding and undeclared ingredients, including known allergens. The product may contain the known allergens milk and soy and may also contain monosodium glutamate (MSG), none of which are not noted on the label. The product was sold in 1-lb. trays and were packaged between June 1-11, 2012. These products were distributed to retail establishments in AZ, CA, NV, NM, OR and WA. The problem was discovered by FSIS personnel during a label review at the establishment and may have occurred as a result of a change in an ingredient used in the product. There have not been any reports of adverse reactions due to consumption of these products. Individuals concerned about an allergic reaction should contact a physician.

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

Product: Freezer Gel Packs
Incident: Hazard– *Ingestion*

A Toronto, Canada importer in cooperation with the CPSC is voluntarily recalling about 880,000 ice/hot and ice gel packs. The packs are gel-filled plastic pouches with either transparent or opaque sealed wrappers. They are used to keep food hot or cold. If the gel packs become damaged, they can leak gel that could contain diethylene glycol and ethylene glycol, which can cause illness if ingested in large amounts. The gel packs were sold separately and with a variety of lunch boxes, coolers and thermal carriers. The six gel pack styles that are being recalled were manufactured in China and sold at mass merchandise and warehouse stores, other retailers, distributors and on-line sellers nationwide from July 2007 through Dec. 2008. No injuries have been reported. Consumers should immediately stop using the recalled gel packs and properly dispose of them. Consumers are asked to contact the company for more details and a refund.

Product: Coffeemakers
Incident: Hazard-*Burn and Laceration*

A Miramar. FL distributor in cooperation with the CPSC is recalling approximately 159,000 units of coffeemakers sold nationwide from July 2008 - May 2012. The coffee/makers, manufactured in China, were sold as 12-cup coffeemakers designed to mount under a cabinet. Available in both white or black models, the coffeemakers have a digital time display and five round buttons above the water reservoir. The Coffee pots are glass with a molded handle the same color as the machine and a silver metallic bracket running around the glass near the bottom. The coffee pot handle can break, posing burn and laceration hazards. The distributor has received 1,276 reports of the handles breaking, including 68 reports of burn and/or cut injuries. Consumers should immediately stop using the recalled coffeemakers and return them for a free replacement. For more details, consumers should contact the company directly.

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

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