

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

October 2015
Volume U1015 Issue 1

Food Recalls for Undeclared Allergens Rising

As we begin the final quarter of 2015, it's appropriate to look back at the first half of the year and assess the food industry's recall performance, both for trends and lessons learned.

In the U.S. there were 121 FDA food recalls in Q1 2015, an increase of 15 percent from the prior quarter. The number of affected companies also increased, with 114 manufacturers experiencing at least one recall in Q1. The trend continued in the first three months, as the number of units rose by 40 percent to 19.4 million units recalled. 96 percent of recalled units in Q1 2015 were Class I, due to the rise in undeclared allergen recalls, which presented a significant safety concern for allergic individuals. Implications from several supplier related product recalls dominated the food industry, showing how one product recall event can have a multiplier effect throughout the supply chain.

There were 178 FDA food recalls in Q2 2015, an increase of 47 percent from the prior quarter. Sixty-two percent of the affected units were due to bacteria contamination, with salmonella and listeria as the most common contaminants. The top category behind FDA food recalls was vegetables, which contributed to 61 percent of the quarter's activity.

According to USDA reports, there were 52 recalls of meat, poultry or processed egg products in Q1 2015, up 68 percent from Q4 2014. This equates to the same number of events in the last two quarters combined. However, the amount of recalled pounds dropped by 50 percent in Q1 to just barely over 1 million pounds. Fifty-one companies were impacted by a recall in Q1 – the highest number tracked since 2013.

Recall activity increased dramatically in USDA regulated industries relative to recall volume in Q2 2015. There were 10.7 million pounds recalled throughout the quarter—approximately ten times the volume of pounds recalled in the prior quarter. The leading cause of these recalls was undeclared allergens at almost 90 percent of the affected units in Q2.

The Canadian Food Inspection Authority reported 56 food recalls in the first half of 2015, with the 26 recalls in Q2 representing a 13 percent decrease from Q1. Recalls for undeclared allergens, however, rose from 30 percent of recalls in Q1 to 42 percent in Q2. Allergen related recalls accounted for one half of the Class I recalls through June.

(1) Allergy Facts and Figures | www.aafa.org

(2) Facts and Statistics | www.foodallergy.org

Preventive Controls

In the U.S., the Food Allergen Labeling and Consumer Protection Act (FALCPA), which took effect January 1, 2006, mandates that the labels of foods containing major food allergens (milk, eggs, fish, crustacean shellfish, peanuts, tree nuts, wheat and soy) declare the allergen in plain language so as to protect consumers.

Now, the Preventive Controls final rule elevates allergen management in the manufacturing environment to a regulatory requirement vs. a best practice food safety and quality management system practice.

The FD&C Act as amended by the FSMA now identifies food allergens as a food safety hazard that must be evaluated and controlled in section 418(b) of the FD&C Act. In particular, section 418(c)(3) requires preventive controls to assure that food is not adulterated under section 402 or misbranded under section 403(w).

FDA included provisions to prohibit unintended "cross-contact" between food not intended to contain allergens and food allergens throughout the original Part 117 proposal for CGMPs. FDA changed the term "cross-contact" to "food allergen cross-contact" in the supplemental Part 117 proposal to clarify its intent.

The Preventive Controls provisions of the FDA Part 117 proposal require a hazard analysis of known or reasonably foreseeable hazards to human food, including food allergens. The manufacturers, processors, packers, & holders of human food that must comply with Part 117 are then required to comply with the other preventive controls provisions for the identified food hazards, including food allergens.

The CFIA enforces Canada's labeling laws and works with associations, distributors, food manufacturers and importers to ensure complete and appropriate labeling of all foods. The CFIA recommends that food companies establish effective allergen controls to minimize the potential for allergic reactions. Enhanced labeling requirements for food allergen, gluten sources and sulphites came into force on August 4, 2012.

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

Product: Cucumbers
Incident: Possible Health Risk–*Salmonella*

A San Diego, CA firm is voluntarily recalling all cucumbers sold under their label during the period from August 1, 2015 through September 3, 2015 because they may be contaminated with *Salmonella*. The firm is working with health authorities to determine if this product is the source of an outbreak of *Salmonella* with 285 illnesses cases being reported in 27 states. The firm is taking all necessary actions to prevent further consumption of potentially affected products. The recalled cucumbers were produced in Baja, CA and distributed in AK, AR, AZ, CA, CO, FL, ID, IL, KS, KY, LA, MS, MN, MT, NJ, NM, NV, IK, IR, SC, TX and UT through retail, food service, wholesalers and brokers. Consumers who have purchased these items are urged not to consume them and to return them to the place of purchase for a full refund or dispose of them. Consumers with questions should contact the company or visit their website for more information.

Product: Sliced Apples
Incident: Possible Health Risk– *Listeria monocytogenes*

A Dauberville, PA firm is voluntarily recalling a limited number of consumer packages of fresh sliced apples due to possible contamination with *Listeria monocytogenes*. The recalled product was shipped to retail distribution centers, wholesalers and foodservice customers in the states of FL, MA, NY and PA between August 31 and September 2, 2015. The recall is being initiated after the company was informed that an environmental sample taken in the production facility as part of a routine sampling program tested positive for the bacteria. None of the final product tested positive and subsequent test results from the facility have been negative. To date health authorities have not linked any illnesses to this recall. 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 or visit their website for more information.

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

Product: Beef Product
Incident: Possible Health Risk–Non-O157 *E. Coli*

A Romulus, NY establishment is recalling approximately 20 pounds of ground beef product that may be contaminated with non-O157 Shiga toxin-product *E. coli.* The ground beef product was produced on September 2, 2015 and sold in 1 -lb. packages at the firm's retail store in Seneca County, NY. The problem was discovered during routine establishment testing, however this establishment released product into commerce prematurely. FSIS and the company have not received any reports of illness or adverse reactions due to consumption of these products. Consumers who have purchased these products are urged not to consume them. These products should be thrown away or returned to the place of purchase. Consumers and media with questions about the recall should contact the firm directly for more information.

Product: Pork Sausage Products
Incident: Possible Health Risk–Foreign Material

A Kenosha, WI establishment is recalling approximately 89,235 pounds of pork sausage patty products that may be contaminated with extraneous materials. The frozen, pork sausage patties were produced on May 13, 2015 and sold in 24-oz. cartons and 13.5-lb. cases containing nine, 24 –oz. cartons of the product to retail locations in AR, IN, KS, MI, MN, MO, OH, IL, IA, TX and WI. The problem was discovered after the firm began receiving consumer complaints that small pieces of metal were being found in the products. FSIS and the company have not received any reports of oral injury or illness associated with the consumption of these products. Consumers who have purchased these products are urged not to consume them. These products should be thrown away or returned to the place of purchase. Media and consumers with questions in regard to the recall should contact the company directly for more information.

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

Product: Downlights
Incident: Possible Risk-Electrical Shock Hazard

An Aurora, OH importer is recalling approximately 24,400 units of LED downlights for recessed cans manufactured in China (6,200 units in Canada). The recall involves 5-inch and 6-inch LED downlight retrofits for recessed cans which are white in color and produce soft white or bright white color temperature. The internal wiring in the LED downlights can contact the downlight's metal trim, posing a shock hazard to consumers. So far, there have not been any reports of incidents or injuries related to the use of this product. The product was sold at a hardware retailer and distributors nationwide and online from June 2014 through June 2015. Consumers should not touch the lamp while it is powered and should contact the company to receive a free replacement lamp with installation instructions. Consumers with questions should contact the company directly or visit their website for more information.

Product: Blenders
Incident: Possible Risk-Laceration Hazard

An Upper Saddle River, NJ importer is recalling approximately 150 units of blenders manufactured in China (860 units in Canada). The recalled blender has a glass jar and handle and a black plastic lid. It sits on a grey power unit with a motor and user control panel. The lower blade of the blender can break during use, posing a laceration hazard. No injuries have been reported related to the use of these blenders. The recalled blenders were sold at retailers nationwide from August 2014 through July 2015. Consumers should immediately stop using the recalled blenders and contact the firm to arranged for a free replacement blade assembly kit to be mailed to their homes. 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. & XL Catlin.

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