Incident Management

FSKN 11

GFSI Basic Level

- The organisation shall have an effective product withdrawal and recall procedure for all products, which shall include the provision of information to the customer

Criteria

- Legal requirements

- Incident management

- Product recall and product withdrawal

- In house systems

Legal Requirements

EU Food and Feed General Food Law – Regulation (EC) 178/2002

- Article 19
  - If a food business operator considers or has reason to believe that a food which it has imported, produced, processed, manufactured or distributed is not in compliance with the food safety requirements, it shall **immediately initiate procedures to withdraw the food in question from the market**.

Definitions

Incident

- an event where based on the information available there are concerns about the actual or suspected threats to the safety or quality of a product that could require intervention to protect consumers' interests

Definitions

Product recall

- the process by which a product is removed from the market, where the product has reached consumers and they are advised to return or destroy products supplied to them

Definitions

Product withdrawal

- the process by which a product is removed from the market, up to and including the retail stage and including action by producers, manufacturers, packers, distributors, wholesalers and retailers, as appropriate, but where consumers are not asked to return or destroy the product

Factors Affecting Product Withdrawal and Recall

- Legislation and involvement with competent authorities

- Media activity (24 hour news reporting/ local media)

- Labelling compliance (Allergens)

- Sophisticated complaint handling software

- Level of enforcement and communication cross border

- Levels of detection of contaminates

Effective Incident Management

- The safety of the consumer is of paramount importance

- Your company's and your customer's reputation and future is at risk if incidents are not effectively managed

- Incidents happen nearly every day in factories

- Serious incidents will happen even with robust product safety controls are in place

- Effective incident management is achieved through careful planning

Incident Management

- Incident Management Framework
  - identify when a significant incident has occurred
  - the accurate assessment of risk
  - systems to support the quick and effective isolation and quarantining of product in the supply chain

Key Requirements

- Identification and understanding of an incident

- A risk assessment procedure

- An Incident Management Team

- Quarantine, traceability and documentation

- Communication processes

- Operational procedures (product recall plan)

Sources of Information

- Customers and customer complaint review

- Consumers

- In house testing

- In house reporting

- Government Authorities

- Suppliers

- Media

Risk Assessment

- **Hazard**
  - is a biological, chemical or physical agent with the potential to cause adverse effects

- **Risk**
  - as the probability or likelihood of an adverse health effect, and the severity of that effect as a consequence of exposure to a biological, chemical or physical agent (a hazard)

- **Risk Assessment**
  - is the scientific-based evaluation of known or potential adverse health effects resulting from exposure to hazards

Risk Assessment

Four steps

1. Hazard identification- identification of hazard

2. Hazard characterisation- identification of the nature of the hazards effects

3. Exposure assessment- assessment of the exposure to the consumer

4. Risk characterisation- comparison of exposure assessment against known data sources

Communication

- Without communication the whole incident management process is not effective

- There must be a defined communication interface

- Communication must be accurate

- Communication must be fast and effective

Product Recall and Product Withdrawal

- Consumer safety is paramount

- Communicate accurately and as fast as possible with your customers

- Quarantine product effectively

- Work in co-operation with all parties

- Listen and take guidance from customers

The Product Recall Plan

- Specifies **how**

- Should be highly detailed

- Is well documented but easily understood

- Regularly reviewed

- Regularly tested

A Highly Developed Product Recall Plan

- list of incident management team members and contacts

- responsibilities and tasks of incident management team

- internal contact list

- customer contact list

- supplier contact list

- enforcement agency contact list

- service provider contact list

- operational procedures for specific tasks

- incident status register/log

- checklist for tasks

- key document samples or templates

- training procedures

- testing procedures

- plan review procedures

Communication Processes

- Contact data maintenance

- Internal, external, governmental, service providers contact details must be held but several numbers must be in place

- Use electronic communication

- Be aware of key contacts

Communication Processes

- Prioritisation of communication

- Clear, concise, truthful and unambiguous

- Identify key communicators within your organisation

- Do not 'get your wires crossed'!
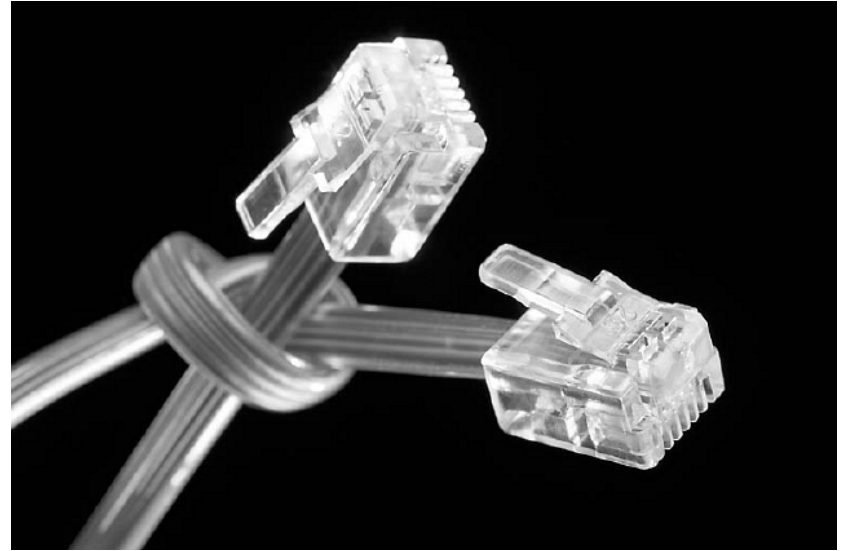
In House Systems Requirements

- Customer complaint records

- Quarantine systems

- Traceability records

- Customer contact details

- Logistics records

- Process control records

QUESTIONS?

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