

How to Survive Your Worst Food-Safety Nightmare

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A food safety emergency can be stressful, but it's crucial to respond immediately.
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Bad news travels faster than a [Salmonella](#) outbreak on the 4th of July. That's why when a food safety crisis hits, or any situation that challenges the safety or quality of your product, it's essential to **respond immediately**. And that response should emphasize both what you're *doing* about it and how you will *communicate* what you're doing.

Imagine the following scenario from the viewpoint of a food safety professional: It's 3 p.m. on the Friday of a long holiday weekend. The manager of your food facility is on the road, and you're on the phone with the local health department. They've just informed you that your nationally distributed product has been linked to a *Salmonella* outbreak—and the Department of Health wants to know what you've already done about it.

What else can go wrong? Lots. A few real-life examples:

- The suspect ingredient, which is obtained from multiple sources, was identified—but there's no way to match the supplier with the batch/lot.
- The product is manufactured by another company that doesn't agree with your decision to recall everything. It wants to limit the recall to the known problem lots but cannot say for sure why there is a problem in the first place; it can't even assure that there won't be more lots with more problems next week, or next year. And, they plan to sue for payment on the lots made—even those for which you refused delivery.
- You are forced to recall the same product for the third time for the same problem: a resident population of a pathogen that you can't seem to eliminate. The FDA has asked to stop all manufacturing, sign a consent decree of permanent injunction, and resume only when the agency says you can.

What Do You Do?

The same question applies in all these cases: What do you do now? The below tips can help.

Follow your recall plan. Unless you can unequivocally rule out your product as the problem, assess the information linking your product to the reported problem and initiate a recall. While the FDA and other food safety authorities could be wrong, they very rarely are.

Do not hesitate. If the problem is defined by FDA as Class 1, with the likelihood of injury or death, speed is crucial. You might literally be saving lives by moving quickly to remove suspect product.

Make it official. File a Reportable Food Registry report on FDA's website within 24 hours of learning of the problem associated with the product. You probably won't have complete information, but the regulation does not allow you to delay reporting until you have everything. The file updates as more information is available.

Advise legal, don't wait for legal advice. Inform those in the company who need to know, including the legal representative. Do not ask the attorney if the product needs to be recalled; that is a decision management must make. The FDA will hold management responsible, as will third-party attorneys who are representing injured consumers.

Communicate early and often. It's important to acknowledge the issue publicly and to state what the company is doing to research and resolve the issue. Take an empathetic tone and resist the urge to become defensive. Many crises are inflamed by leaders taking issue with media reports.

Strike the right chords. Companies should always be honest and forthcoming and speak with compassion when discussing the crisis publicly. Websites and microsites should be updated in real time to keep employees, key stakeholders, and consumers informed. If possible, post a short video featuring a relatable spokesperson within hours of the issue going public.

Draft a detailed action plan. A good plan will make a recall smoother and faster. The plan should exceed the very basic FDA requirements to assign responsibilities—it should match product ingredients and their sources with bills of lading. If product recipients can't be determined, the recall will grow exponentially larger, more expensive, and harder to manage.

Establish recall limits. Knowing when a problem started and when the cause was corrected will tell you what must be recalled. Belief is not enough; certainty is key. Establish the last documented evidence before the problem arose, the time the problem became known, and documentation that it was controlled.

If the product presents a microbiological hazard, it's helpful to determine whether and when there was a resident or transient population of a pathogen in the facility. That knowledge will help determine how far back to extend the recall, and when to determine the product safety as well.

Prevention Tips

Now that the worst is behind you, what measures will you take to avoid a reoccurrence—and repair the company's reputation? Here are some suggestions.

Perform a root cause analysis. A **root cause analysis** must be performed to determine why the problem occurred. Avoid the temptation to accept the most apparent cause. The FDA expects a thorough analysis that not only pinpoints the failure or failures that led to the problem, but also rules out other possible causes.

Root cause analyses can be painful. If the immediate cause is a worker who made an error, then **worker training** may appear to have been at fault. But that's not really the root cause because management is responsible for assuring that worker training is robust enough to prevent problems. If you tell the FDA it was the fault of an employee, they may hear that management failed to assure proper training.

Once the root cause is identified, decide what will be done to prevent it from happening again. Superficial step-changes or quick fixes won't prevent a repeated failure and they won't protect the company's reputation. Prevention means addressing the root causes from a system perspective, and that might mean re-examining quality control, safety, and reporting processes.

Instill a culture of food safety. Food safety training cannot be a one-time event. Use modern communication tools like an employee engagement smartphone app to keep food safety news top-of-mind and cultivate a sense of pride in a job well done.

Be a good corporate citizen. A well-received public response—and the return of the company's reputation—depends on how well your audiences know and trust you and how willing they are to give you the benefit of the doubt.

Revive the company's reputation and regain trust more quickly by visibly engaging in corporate good works, demonstrating commitment to social responsibility, responsible sourcing, nutrition, health and wellness, and sustainability. Express meaningful commitments publicly—online and offline—and share positive actions in a caring and credible way.

Plan for the worst. Ask yourself: What could go wrong? Develop thoughtful plans for the top three scenarios. Be sure to socialize the plan by conducting practice exercises and drills with both company leadership and frontline employees. And don't forget to conduct on-camera media training with the official company spokespeople.

Develop relationships with outside experts. Invite scientific and academic experts to tour your facilities. Make an effort to visit their institutions and update them regularly on company events and milestones. This will provide allies who are prepared to vouch for your safety efforts in the future.

No food business is immune from risk. But by investing in your facility's operations and in communications planning, you'll rebound more quickly after an incident and regain your rightful place in the market—with the respect of your friends, followers, and customers intact.

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