



## **Emergency Preparedness and Crisis Management Team**

A food safety emergency is a crisis in which an unplanned event triggers a real, perceived, or possible threat to public safety and health, and to a company's reputation and credibility. Such a crisis has the potential to significantly impact the company's operations or to pose a significant economic, reputation, or legal liability. An effective food safety emergency response policy, potentially involving a product recall, will require the cooperation of many departments in a company, typically including the company CEO as well as senior management that have responsibilities in quality assurance, R&D, marketing, sales, customer service, public affairs, operations, distribution, finance and legal.

If engaged, a crisis management team must be prepared to immediately contain any potential problem and be trained to:

- Assess crisis characteristics.
- Determine the level of crisis, and if a recall situation exists.
- Immediately and efficiently contain all suspect product and minimize risk to the public as quickly and efficiently as possible.
- Assess health hazard risks.
- Implement a recall, if necessary, notifying appropriate authorities, customers and agencies.
- Complete all tasks and documentation thoroughly.
- Effectively communicate this information to the public, such that the company establishes control over the situation and crisis-related messages are accurately and quickly transmitted, received, understood and believed.

### **How Do Recalls Happen?**

Typically, recalls are voluntary and reported by the processor. All food products are regulated by the Food and Drug Administration (FDA). Recalls may be initiated by the processor or distributor of the suspect product or at the request of USDA or FDA. If a company refuses to recall its product, then the USDA or FDA has the legal authority to detain and/or seize products in commerce when there is reason to believe they are hazardous to public health or if other consumer protection requirements are not met.

Unsafe or improperly labeled product can come to the attention of USDA or FDA in many different ways:

- The company that manufactured or distributed the food informs the agency of the situation.
- The discovery is made through test results received by the agency as part of its sampling program.
- USDA or FDA field inspectors and compliance officers, in the course of their routine duties, gather information and make observations that may lead to the discovery of unsafe or improperly labeled foods.
- USDA or FDA may learn of unsafe food from consumer complaints, epidemiological data submitted by state or local public health departments and other federal agencies such as the Department of Defense.



FDA/USDA has guidelines for companies to follow in recalling defective products that fall under the jurisdiction of these agencies. These guidelines make clear that FDA/USDA expects these firms to take full responsibility for product recalls, including follow-up checks to assure that recalls are successful. Under the guidelines, companies are expected to notify FDA/USDA when recalls are started, to make progress reports to FDA/USDA on recalls and to undertake recalls when asked to do so by either agency. The guidelines also call on manufacturers and distributors to develop contingency plans for product recalls that can be put into effect if and when needed. FDA/USDA's role under the guidelines is to monitor company recalls and assess the adequacy of a firm's action. After a recall is completed, FDA/USDA makes sure that the product is destroyed or suitably reconditioned and investigates why the product was defective.

The USDA and FDA define the term "recall" according to the level of hazard involved, as either:

**Class I:** The situation presents a reasonable probability that the use of or exposure to the product will cause serious adverse health consequences or death. Examples include contamination with *Clostridium Botulinum* toxin, *Listeria monocytogenes*, *E. coli* 0157:H7, and possibly *Salmonella*, or the undeclared presence of potent allergens such as eggs or peanuts.

**Class II:** The situation presents a reasonable probability that the use of, or exposure to, a product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote. Examples include a food with wood fragments, a food with glass or metal fragments, food contaminated with less harmful pathogens or containing less potent undeclared allergens such as almonds or FD&C Yellow No. 5.

**Class III:** The situation in which use of, or exposure to, a product is not likely to cause adverse health consequences. Examples include filth in food relating to aesthetic qualities, or non-hazardous labeling violations such as inaccurate weights.

#### **What are the Roles of the Crisis Team?**

The people selected for the company's crisis team should include individuals who are perceptive, intuitive, be able to accept additional responsibility, clear thinkers, decisive, calm under stress and capable problem solvers.

The crisis "team leader" will typically also serve as the company's crisis communications spokesperson and should be someone of sufficient authority to be accepted as speaking for the company, possess relevant technical knowledge about the crisis, be able to express technical knowledge in a way that can be understood by the media and the average person, be able to respond to sensitive questions, possess excellent communication skills and be able to work well under pressure.

In many companies, the crisis management team leader is the CEO. A mock recall must be scheduled, and the program tested, at least one to two times per year. The role of the recall coordinator, typically the individual that oversees corporate quality assurance, is to develop the recall strategy, regularly test it and act as the central point for all information about product quality, safety and compliance and coordinate all tasks associated with the isolation, retrieval, and disposition of suspect product if ever a recall situation were to occur.