



Feed/food Safety Incident and Crisis Management

Procedure for EFISC-GTP, operators and CB's



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1. Introduction

Proper assurance of feed safety worldwide is a high priority. Because feed/food safety has been a top issue internationally, both politically and commercially, and because serious incidents in the feed/food and food sector can occur, demonstrable assurance of feed/food safety has become a sales prerequisite.

A (potential) disruption in one or more feed/food materials producing companies can have negative consequences for the whole feed and food chain. Decisive, structured and unambiguous respond and act - if necessary chain context - is desirable, both to prevent a disturbance and/ or minimize the impact of the incident. Preparing for crisis situations and responding appropriately to them is an important element of feed and food safety.

The starting point is the responsibility of the feed/food material operator, both for his business and industry as a whole. Action and communication shall be done in collaboration with other stakeholders in the feed/food chain.

For this purpose, in addition to the requirements in the EFISC-GTP Code §4.4.5 on crisis management, a *“Feed/food Safety Incident and Crisis Management Procedure”* has been initiated and is described here. The document contains the scenario for the adoption of measures and communication in the event of a feed/food safety incident.

2. Scope

This document is applicable for all EFISC-GTP certified operators (certified against the GTP Code version 1.3A or EFISC Code version 3.1 or EFISC-GTP Code version 4.0) and Certification Bodies (CBs).

In the event that the operator becomes aware or has reasons to suspect a feed/food safety incident, or in the event of a product recall in relation to such incidents, where the operator is involved, the operator shall immediately make EFISC-GTP and the Certification Body aware of the situation.

Together with the operator, the Certification Body in turn shall take appropriate steps to assess the situation and any implications for the operator's certificate (See EFISC-GTP Rules of certification §8 Incident management). The Certification Body shall inform EFISC-GTP of the result from this assessment and of its further progress. During each regular audit, the auditor shall verify whether a feed/food safety incident has occurred.

3. Key terms

Incident

Feed/food safety incident is an incident associated with the contamination of feed/food materials in manufacturing resulting in action to withdraw the feed/food from sale and/ or recall it from the customer. For the feed/food material manufactured there is a suspicion that it could be harmful to the health of humans or animals and/or non-compliant with legal provisions established by legislators in order to secure a high level of protection of humans and animals

An Incident is usually an isolated event which, while relatively insignificant in its business impact, has the potential to grow into a crisis. In general, if handled properly, low/no media attention.

Crisis - A situation involving damage or danger, whether deliberate or accidental, to at least one EFISC-GTP certified company. It could involve people, performance, reputation, product and demands immediate management decision and action.

It is worthy of public/media attention and therefore could affect the reputation of the company and the EFISC-GTP code/system. A crisis has the ability to grow from local to national or even international scale without you noticing, and can be picked up by the press. Every crisis is different and will need to be managed by different teams and using different criteria.

Special audits (based on ISO/IEC 17021:2011) - It may be necessary for the Certification Body to conduct audits of certified clients at short notice to investigate changes after a feed/food safety incident or crisis, or as a follow-up on suspended clients. In such cases:

- The Certification Body shall describe and make known in advance to the certified clients the conditions under which these short notice visits are to be conducted, and
- The Certification Body shall exercise additional care in the assignment of the audit team

because of the lack of opportunity for the client to object to audit team members.

4. Procedure

This section outlines the elements of a product recall plan and the actions to take when feed/food materials under the scope of EFISC-GTP are harmful to the health of humans and animals. When these products are non-compliant with legal provisions established by legislators in order to secure a high level of protection of humans and animals, they must be removed from the feed and/or food chain in the event of a crisis.

The first objective of this procedure is to protect public health by informing authorities and customers (when necessary) of the presence of a potentially hazardous feed/food material on the market.

The second objective is to facilitate a rapid identification, in order to stop directly usage of applicable products and to remove them from the production and distribution chain.

STEP 1 - USE THE DECISION TREE TO DECIDE WHETHER THE FEED/FOOD IS SAFE OR UNSAFE

Annex 1 provides the flowchart (STEP 1: annex 1) which should be the tool to evaluate whether the feed/food is safe or unsafe


STEP 2 - DEFINE THE STATUS OF THE UNSAFE FEED/FOOD AND WHEN TO NOTIFY THE COMPETENT AUTHORITIES, EFISC-GTP AND THE CB

The following definitions are relevant:

- a. the defined amount of the product is no longer under the control of the operator through:
- being used by a customer;
 - being transported and complete control is questionable.
- b. the defined amount of the product is still under complete control of the operator by either
- having not left the operator's premises;
 - being held at a customer and the complete batch is blocked;
 - being transported but complete control is manageable

Depending on the status of the unsafe product: a or b

Follow the steps marked with **X** in the sequence up-down. Steps marked with - do not need to be followed.



Status of the product:	a	b
Segregate existing stock	X	X
Initiate a recall procedure	X	X
Inform EFISC-GTP and the Certification body (CB) within 24 hours (filling in the notification form): see step 3	X	
Inform the competent authorities (Art. 19 and 20 of Regulation (EC) 178/2002 and/or local regulations)	X	
Inform the competent authorities (Art. 19 and 20 of Regulation (EC) 178/2002) and EFISC-GTP in case other Feed/food Business Operators could have potentially similar problems with their imported, manufactured or distributed feed/food materials or raw materials	X	X
Cooperate with the competent authorities in respect of handling the crisis, e.g. <ul style="list-style-type: none">▪ Information on names of suppliers/customers▪ Destruction or reprocess of the batch/batches, lot/lots or consignment/consignments▪ Other information needed to support the Rapid Alert System	X	
Conduct necessary corrective and preventive actions	X	X

STEP 3 - CRISIS IDENTIFICATION AND REPORTING TO EFISC-GTP

Any incident indicating “notify the competent authority, EFISC-GTP and the CB” on the decision tree (STEP 2) results in filling the notification Form (Annex 2) established by EFISC-GTP. The objective of this notification is the early reporting of irregularities in feed/food materials and the allowance of rapid response and communication throughout the feed/food production chain, with the aim of preventing or limiting the harmful consequences for humans and/ or animals.

A blank form of the Notification Form (Word version) for making a notification to EFISC-GTP is provided on the [EFISC-GTP website](#) (see annex 2). Send the form to the EFISC-GTP (contact list below) and the Certification body by e-mail. Analysis supporting your report shall be included. Notification to EFISC-GTP and the Certification body must be performed within 24 hours (the notification must be sent to both email addresses):

EFISC-GTP Manager Fulvio Pernice GSM: 0032 (0)492064406 Tel: 0032 2 7619472 Fax: 0032 2 771 38 17 Email: fulvio.pernice@efisc-gtp.eu	EFISC-GTP Secretary General Nathalie Lecocq GSM: 0032 (0)495785711 Tel: 00322 771 53 30 Fax: 00322 771 38 17 Email: nathalie.lecocq@efisc-gtp.eu, nlecocq@fediol.eu
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NOTE: A report to EFISC-GTP does not substitute a report to the local authorities. If the non-conformity is a legal breach, you will also need to report to the authorities in your country.

What to report?

Regulation (EC) 178/2002 (Art. 19 and 20) and/or additional local country rules, requires any feed/food business operator to inform immediately the competent authorities if it considers or has reason to believe that a feed/food placed on the market may not satisfy the feed/food safety requirements which encompasses:

1. risk to animal health and/or human health;
2. non-compliance with a regulatory provision implementing feed & food legislations

See EFISC-GTP Code chapter 7- Reference documents for the legislation

STEP 4 - CRISIS MANAGEMENT ASSESSMENT AND COMMUNICATION

The EFISC-GTP crisis management team will work in close collaboration with the respective sector crisis team.

The EFISC-GTP crisis management team consists out of six members:

	Organisation:	Name:	Contact information
1	EFISC-GTP Manager	<i>Fulvio Pernice</i>	<i>Fulvio.pernice@efisc-gtp.eu</i>
2	STARCH EUROPE	<i>Guglielmo Adinolfi</i>	<i>guglielmo.adinolfi@starch.eu</i>
3	FEDIOL	<i>Coen Blomsma</i>	<i>cblomsma@fediol.eu</i>
4	EBB	secretariat	secretariat@ebb-eu.org - aj@ebb-eu.org .
5	COCERAL	secretariat	secretariat@coceral.com
6	EUROMALT	<i>Kris Eyckman</i>	<i>kris.eyckmans@boortmalt.com</i>

The EFISC-GTP crisis team is obliged to handle the data in confidence:

- the provided information and report form will be available only to the EFISC-GTP crisis management team;
- The EFISC-GTP secretariat will allocate an anonymous serial number to the report so that the report may be discussed anonymously;
- all reports will be treated in confidence, no business-specific information or post-crisis review will be provided to third parties without the permission of the reporting body;
- the report form is archived on a secured system, a password is required to open the document, only EFISC-GTP staff can access those documents and the report form is archived for 5 years.

The report will be assessed by the EFISC-GTP crisis management team. After assessing the report, there are three possible outcomes:

- Alert* – The situation is urgent and not (completely) under control, an alert message will be published on the EFISC-GTP website and by email. This alerts all EFISC-GTP certified companies and recognized scheme owners (see Annex 3) and gives them a possibility to take appropriate counter measures.
- General report within the framework of EFISC-GTP* – The situation is under control, but it is useful to inform the other EFISC-GTP Members about what happened. With this information, the other EFISC-GTP Members can evaluate and take counter measures.
- No publication* – The situation is under control and there is no need to inform the EFISC-GTP certified companies or other stakeholders.

The reporting operator and the certification body will be informed about the outcome of the assessment within 48 hours. In the case of a or b, the operator will also receive a draft of the message to be approved within 24 hours.

If several EFISC-GTP feed/food material manufacturers are involved, the crisis management team shall if necessary be extended to a crisis task force, where the companies concerned and the

relevant industry associations participate.

STEP 5 - CORRECTIVE ACTIONS

Operators

In case an operator is involved in a crisis, corrective actions must be implemented.

- A progress report must be sent to the EFISC-GTP Crisis Management Team within **3 weeks**.
- Depending on the development of the crisis situation, another reporting date can be set in agreement with the EFISC-GTP staff.

Certification Bodies

After consulting the operator, the CB shall choose the tools to assess the situation (as e.g. audit documentation review, short notice audit).

The CB can perform a **short notice audit** if the circumstances make it necessary.

If a short notice audit is not necessary, the CB shall verify the implementation of the corrective actions during the next regular audit.

The CB shall also check that the operator has sent the notification and the progress report to the EFISC-GTP Team within the set timeframe. If not, a non-conformity shall be issued.

EFISC-GTP crisis management team

The EFISC-GTP crisis team will coordinate the communication and process between the operator, CB, EFISC-GTP and other scheme owners (if needed).

STEP 6 - FOLLOW-UP AND CLOSURE

To follow-up and close a case, the EFISC-GTP secretariat needs a decision on the further certification status of the operator from the CB either by email or letter.

The CB defines the criteria to suspend or withdraw a certification. The withdrawal of a certificate remains the responsibility of the CB. Once the withdrawal is confirmed, the name of the operator will be removed from the [EFISC-GTP register](#) on the website. Not notifying the EFISC-GTP team and the CB about a feed/food safety incident could be a potential reason for withdrawing the certificate.

In case a short notice audit was conducted, the EFISC-GTP secretariat needs the special audit summary report from the CB, showing that the corrective actions have been implemented and the root cause has been identified.

If no short notice audit is needed, the issue must be checked during the next regular audit and documented by the CB in the audit summary report provided to EFISC-GTP.

The EFISC-GTP crisis management team will write a post-crisis review for their archive. This post-crisis review signals the transition to normal operations and the end of the crisis. The review is an opportunity to see what was learned from the crisis and provides opportunities for updates of risk management systems and best practices.

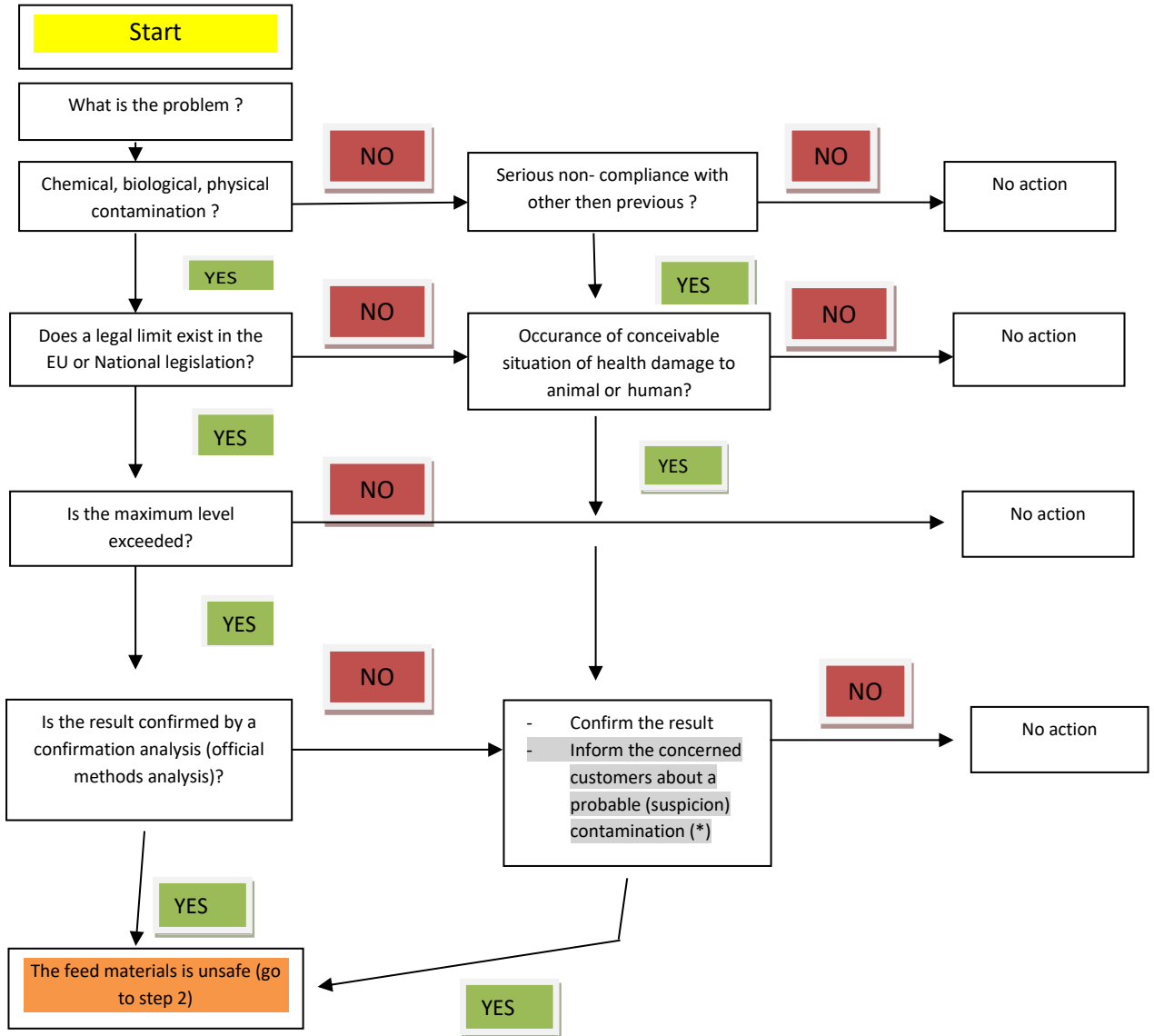
5. Confidentiality

Any exchange of information related to the purpose of this procedure will be kept strictly confidential and shall only be communicated between the parties involved (EFIS-GTP, Certification Body and Feed/food Business Operator). All information obtained from the Operator and by the Certification Body will be handled in a strictly confidential way by the EFISC-GTP staff. The EFISC-GTP team will not use it for purposes apart from those established in the frame of the crisis management procedure.

In case of a feed/food safety incident information can be shared with other National feed/food safety schemes in order to control and minimize the impact of the incident.

6. Annexes

Annex 1 – STEP 1- Decision tree safe/ unsafe feed/food material



(*) customers who have received the product (probably contaminated) have to be informed in order to keep segregated the product until the confirmation of the result.

GENERAL INFORMATION

Date and time	
<u>Company:</u> - Site (If different): - Address:	<u>Contact:</u> - Name: - Phone: - Mobile: - Fax: - Email: - Title:

PRODUCT

Product and commercial names:	
Lot/batch number of product concerned	
Quantity/volume concerned	
Date of manufacture or reception/selling period	
Product distribution known	<input type="checkbox"/> YES <input type="checkbox"/> NO
Product location known at this time	<input type="checkbox"/> YES <input type="checkbox"/> NO

NATURE OF THE PROBLEM

¹ Any exchange of information related to the purpose of this procedure will be kept strictly confidential and shall only be communicated between the parties involved (EFIS-GTP, Certification Body and Feed/food Business Operator). All information obtained from the Operator and by the Certification Body will be handled in a strictly confidential way by the EFISC-GTP staff. The EFISC-GTP team will not use it for purposes apart from those established in the frame of the crisis management procedure. In agreement with the mutual recognition contracts in place between EFISC-GTP and the other recognized schemes (see annex 3 of EFISC-GTP code 3.1, 4.0 or reference 2.1 of the GTP code v. 1.3A), information provided by the operator could be eventually shared with the concerned scheme/s (which will in turn be treated confidentially in accordance with the mutual recognition agreement with EFISC-GTP). In case of a feed/food safety incident, information can be shared with other National or International feed/food safety schemes in order to control and minimize the impact of the incident.

Nature of the hazard (anomalies, contaminants...)	
Elements leading to the accident (possible cause, confirmed or suspected)	
Which analyses performed?	
Sampling by whom? (accredited lab) / Sampling date	
Nature of risk (effect on the health of humans, animals or plants)	
What other information is available?	
Relevant legislation	

CERTIFICATION BODY INFORMATION AND MEASURES TAKEN

CB informed (name, date...)	<input type="checkbox"/> YES <input type="checkbox"/> NO	
CB decision about follow-up	<input type="checkbox"/> during next audit	<input type="checkbox"/> special audit necessary
Measures already taken	Measure 1:..... Measure 2:.....	
<u>Corrective action:</u>	<i>yes</i>	<i>in progress</i>
Risk analysis	<input type="checkbox"/>	<input type="checkbox"/>
Product recall	<input type="checkbox"/>	<input type="checkbox"/>
Laboratory analysis	<input type="checkbox"/>	<input type="checkbox"/>
Client informed	<input type="checkbox"/>	<input type="checkbox"/>
Supplier informed	<input type="checkbox"/>	<input type="checkbox"/>
Agreed follow-up action with EFISC-GTP *(Deadline for progress report)	
Has there been discussion with others? If so, with whom?	

ADVICES TO USERS

What to do with the product?	
Product recall (location)	
Conditions relating to the product recall	

LIST OF COMPANIES THAT HAVE RECEIVED THE CONTAMINATED FEED/FOOD

NAME OF THE COMPANY	LOCATION	CERTIFIED (GMP+, EFISC-GTP, FCA, Q-S, AIC (UFAS-FEMAS-TASCC)
		(*)

(*) add more lines if needed or enclose the list as separated document.

OTHER INFORMATION

Other Information	
CB decision about Certificate *	
Closing date of notification (EFISC-GTP) *	
Date: Name, function: Signature

*: grey field will be filled in by EFISC-GTP

EFISC-GTP contact details (the notification must be sent to both email addresses):

EFISC-GTP Manager Fulvio Pernice GSM: 0032 (0)492064406 Tel: 0032 2 7619472 Fax: 0032 2 771 38 17 Email: fulvio.pernice@efisc-gtp.eu	EFISC-GTP Secretary General Nathalie Lecocq GSM: 0032 (0)495785711 Tel: 00322 771 53 30 Fax: 00322 771 38 17 Email: nathalie.lecocq@efisc-gtp.eu, nlecocq@fediol.eu
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Annex 3: Communication with other certification scheme owners:

The following scheme owners will be informed and information will be exchanged in case of a public feed/food safety incident or in case an incident is affecting their constituency:

Organisation	Contact person	Email	Tel
GMP+ International	Johan den Hartog	johan.denhartog@gmpplus.org leyla.alpaca@gmpplus.org , info@gmpplus.org ews@gmpplus.org	+31(0)70.307.4124
OVOCOM	Bart Verhulst	BVerhulst@ovocom.be	+32 (0)2.514.01.86
Q-S	Claudia Brill	claudia.brill@q-s.de	+49(0)22835068211 +49 (0) 228 35068270
AIC	Simon Williams	simon.williams@agindustries.org.uk	+44(0)173.338.52.45
FAMI- QS	Laetitia Cirilli	laetitia@fami-qs.org	+32(0)2.639.66.71