Food Safety Incident Management

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Outline

• What is a food safety incident?
• What is incident management?
• Why develop a system?
• Features of an incident management system

Food Safety Incidents

• Usually involve a number of government agencies
• Can occur at any time
• Can range from fairly simple, localised problems to complex, multi-jurisdictional (national and international)
• Are managed under an agreed set of structures, processes and protocols

Food safety incidents

• No single definition
• Common characteristics
  – Risk (actual or potential) to human health
  – Involves a physical, chemical or microbiological hazard
  – Can occur at any stage of the food supply chain
  – Requires some form of action
• Incidents will happen!

Food Safety Incidents – what we know

• Public health and safety risks
• Consumer concerns…
  • Usually do not have all of the information at the start
  • Scientific uncertainties
  • Involve more than one agency/organisation
  • Inconsistent responses
  • Impact at a number of government levels
  • Disruption to domestic and international trade
  • May last for weeks, or months!

‘Pre-washed’ salads in bags aren’t as clean as you may think
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Impact

Consumers responded to the Food and Drug Administration’s September 2006 warnings to avoid eating spinach because of possible contamination with E. coli O157:H7.

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Is this a food incident?

• Non-compliance with food standards.
• Perception of a risk to public health and safety.
• Specific level of risk to public health and safety.
• ‘Routine’ food recalls (e.g. voluntary recalls initiated by industry)
• Differences in enforcement activities across different jurisdictions.
• An incident in only one or two jurisdictions
• Terrorism and food tampering.

Challenges for Responding to incidents

• New and emerging hazards
• Uncertainties in science
• Perceptions
• Legal liabilities
• Political sensitivity

Response should be...

• Scientifically based
• Effective
• Consistent
• Legally sound
• Balanced – public health, social impacts, cost-benefit
• Well communicated
What is incident management?

- Measures to manage the risk to consumers from unsafe/unsuitable food
- A management framework that is:
  - Comprehensive and can address all hazards
  - Integrated at all levels of government and with industry
  - Contains prevention, preparation, response and recovery elements

Why develop a system?

- Frequency and complexity of incidents have increased worldwide
- Impacts to governments, industry and consumers can be significant
- Several agencies may need to respond
- Need for a consistent and timely response

What is required in a system?

- Robust
- Integration of activities and resources of multiple agencies
- Operate effectively for any type of incident (imminent or actual)
- System and supporting principles can be applied broadly to food safety management

Response Protocols

- Operation, coordination and communication between agencies/jurisdictions
- Builds on existing individual organisation protocols
- Emergency management principles
- Roles and responsibilities
- Response and review phase and activities

Summary

- System need to be in place
- Networks need to be in place
- System need to be integrated
- Common command and control and coordination system
- System and roles need to be known and exercised
- Protocols need to be reviewed
An Overview of Australia’s National Food Incident Response Protocol

Why have a Protocol?
- Ensure response and communication is timely, consistent, appropriate, coordinated
- Formalise current arrangements and link Commonwealth and State/Territory protocols
- Manage incidents for widely distributed foods

Scope
- A guidance document for coordinating the response of food regulatory agencies during a food incident

“Any situation within the food supply chain where there is a risk, potential risk or perceived risk of illness or confirmed illness associated with the consumption of a food or foods.”

“A food incident that could, or is expected to, impact on multiple government jurisdictions.”

Structure of the Protocol
- Single coordination point
- Roles and responsibilities defined
- Consultative mechanisms involving government and industry
- Response actions designed to minimise disruption to industry/consumers while protecting public health and safety
- Graduated responses depending on the incident
- Integration of food incident and public health incident response processes

Roles and Responsibilities
- Notifying Agency
- Central Notification Point
- Food Incident Contact Officer
- Lead Agency
- National Food Incident Coordinator
- Agency Food Incident Controller
- Participating Agencies
- Risk assessor
- Communications controller

How Does the Protocol Work?
Three phases:
- ALERT
- ACTION
- STAND DOWN
Alert Phase

- Awareness of incident from variety of sources
- Notifying agency notifies the Central Notification Point (CNP) – early notification encouraged
- CNP circulates a Food Incident Notification, including to National Incident Room (International Health Regulation obligations)
- May be only response for many incidents

Action Phase

- If more than initial info circular is required, then response moves to Action Phase.
- Actions may be restricted to the Notifying Agency or affected jurisdiction for minor incidents
- For other incidents – agencies notified of expected activities (e.g. a teleconference)
- Allocation of roles and responsibilities
- National Food Incident Coordinator
- Agency Food Incident Controllers nominated
- Lead Agency nominated

Action Phase Response Activities

- Incident Objective established
- Risk analysed and evaluated
- Consultation with industry – early as practical
- Response action to meet Incident Objective determined (e.g. recall, communication, survey)
- Best endeavours to reach an agreed response action
- Situation Reports circulated
- Implement agreed actions
- Communication activities – developed by National Food Incident Controller
- Escalation/De-escalation – participating agencies decide depending on the changing complexity of the issue

Stand-down phase

- Participating Agencies agree that a nationally coordinated response no longer required and incident deemed to be over
- Participating Agencies should do de-brief or conduct after action review
- Outcomes considered by Incident Response Working Group, who may make recommendations to ISC on changes to the Protocol

Protocol Annexes

- Intentional interference
- Chemical contaminants
- Environmental investigation/traceback

Incidents

- 2007 – 01: Clostridium botulinum type A, nachos
- 2007 – 02: plastic contamination, chocolate bars
- 2007 – 03: wheat gluten
- 2007 – 04: apple juice contamination
- 2007 – 05: Listeria monocytogenes, meat products
- 2008 – 01: cyanogenic glycosides, vegetable crackers
- 2008 – 02: metal contamination, meat and frozen products
- 2008 – 03: Melamine contaminated baby formula from China
- 2008 – 04: Dioxin contaminated pork from Ireland
- 2009 – 01: Hepatitis A in semi-dried tomatoes
- 2010 – 01: Bonsoy milk suspected link to thyroid dysfunction
A copy of the Protocol can be accessed at:
3110318E7fNational%20Food%20Incident%20Response%20Protocol%20July%202009.pdf

Questions?

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