

Incident and crisis management: Explanations for the feed sector

The purpose of this supporting document is to assist QS scheme participants in the case of an incident or a crisis, and to provide guidance on how to proceed, what information must be given to whom and what measures must be taken.

1 Course of action in the case of incidents/crisis

As soon as the company becomes aware of an incident/crisis, you have to initiate certain steps. We have listed the essential steps here. They will be further explained in the following chapters.

Necessary steps if an incident/crisis event is known in the company:

- **Inform** the affected **employees** in the company (e.g. crisis manager, crisis team)
- **Blocking** of the affected product at the premises or sites of the company
- Start **traceability** (information must be gathered in < 4 hours)
- **Inform** affected **customers**
- **Inform** the **standard owner** (Paper of incident), relevant **authority** and, if applicable, (liability) insurance company
- **Inform supplier(s)** (if relevant)
- Case **delimitation** (possible further products affected)
- **Research** about **causes**
- Take (further) **samples**/ carry out **analysis** (raw materials, subsequent lots/batches, retained samples)
- **Check process** (e.g. production, drying, storage)
- **Initiate measures** and **control** their **effectiveness**

2 Marketability and release of the goods

According to *Regulation (EC) No 178/2002*, feed should not be placed on the market (nor fed), if it is likely to compromise human or animal health or to have adverse effects on animal production.

If, as a feed business operator, you have reason to believe that a **feed** produced (or imported, traded, stored, transported) by you **is not safe**, the first step must be the **immediate blocking of the goods**. If the goods have already been distributed, the supplied **customers** must be immediately **informed**, so that the goods are no longer sold or fed. The competent supervisory authority must then be informed.

Under certain circumstances, the **goods** can be **released again later**. It always depends on the **individual case**. Which feed is affected? Which contaminant was identified? The final decision on the marketability and release of the goods is taken by the responsible authority (when there are legally defined limit values, e.g. heavy metals). In the cases where there is no legal limit value, but only a QS guideline value, the goods can be released for the QS scheme by QS (e.g. contamination with PAH).

With the release of the goods after prior blocking, the feed business operator must ensure that the feed supplied complies with the statutory provisions. According to § 24 LFGB (food and feed code of law) in connection with Article 4 paragraph 2 subparagraph 1 letter a of Regulation (EC) No. 767/2009, the seller of a feedstuff guarantees that the feedstuff is of merchantable quality and sound.

Note: *Generalised "safety certificates" are not recommended in any case, they do not provide the required security for buyers or suppliers and are neither technically nor legally meaningful.*

Examples in which, after consideration, a subsequent release of the goods can be made possible are listed in Chapter 7 (Annex).

The literature also describes procedures for the decontamination of undesirable substances. It is therefore possible to use decontamination procedures for certain types of feed and undesirable substances. However, this remains a case-by-case approach and requires the approval of QS (in the case of limit values set by QS) or the relevant competent authority.

3 Information steps

All affected **employees** in the own company must be informed about the incident:

- Senior management / company manager / quality manager
- Crisis manager, crisis team
- Employees, e.g. incoming raw materials, loading (quick reaction required when goods are blocked)

Afterwards, all the directly affected **customers** must be informed:

- In order to reach the customers quickly and make sure that the right contact person is informed, it is recommended to call the customer
- The information can also be additionally provided by e-mail/fax
- Information about blocking the affected (still available) goods, until further information is available; the customer can then inform his own customers (if the goods have already been resold)
- If necessary, directly agree on the collection of the goods and delivery of new (marketable/non-contaminated) products.

Along with the information to the customer, or immediately thereafter, the company must inform **QS as standard owner** about the case:

- For this purpose, the QS Paper of incident or another notification form should be used which contains at least the same information; the paper of incident should be available in the company or downloaded from the QS website www.q-s.de and should preferably be prefilled in order to save time (e.g. company master data, information on the responsible feed monitoring authority). Alternatively, the online form on the QS website www.q-s.de (scheme participants, incident and crisis management, documents) can be used.
- The list of affected customers (customer list) and suppliers (supplier list) is particularly important → use excel sheet (*Supporting document incidents and crisis management (information on clients and suppliers)*)
- If not all the information is available at the time of the notification, it is possible to submit the missing information later, as soon as it is available.

If the cause of the contamination is traced back to a **supplier** or there is a strong suspicion, then it is necessary to inform the supplier as well:

- In order to reach the supplier quickly and make sure that the right contact person is informed, it is recommended to call the supplier
- The information can also be additionally provided by e-mail/fax
- If the delivered goods belong to a larger batch, it is possible that other customers of the supplier may also be affected. The supplier must act in this respect (information to customers, standard owners, etc.).

Furthermore, as a feed business operator, you have an **official obligation to report the incident to your competent supervisory authority** - even if it is initially only a suspicious case. In the end, it is the responsibility of the authority to decide whether to market or block and release the products (see above).

Besides QS, it may be necessary to inform **other standard owners** about the incident. If you are certified according to another standard or you are eligible to deliver in the QS scheme on the basis of mutual recognition with another quality assurance system, the other standard owner needs to be informed about the incident in question.

4 Delimitation of the case

In the best-case scenario, the **extent of contamination can be quickly delimited**, and the affected customers immediately informed. This is usually a punctual entry with no serious impact on the downstream supply chain (agriculture, slaughtering/deboning/processing, food retail).

In other cases, however, **the extent is greater**, for instance, if the customers are traders who in turn sell the goods to other traders. It may pass some time until the end customer (farmer) is informed about the contamination or the suspected case. Here, it is required that every individual company along the supply chain reacts very quickly; the traceability information should also be collected and transmitted to QS as soon as possible.

There are also cases where the **extent seems at first to be under control**. After the first notification and measures taken, it becomes clear that the level of dissemination is higher than expected.

Some examples of how to delimit cases are presented in Chapter 7 (Annex).

It is **important** that a case is **delimited as far as possible** and the **extent estimated as accurately as possible**. If **new findings** are available, they must be **immediately communicated to QS**.

5 Research about causes

The causes of contamination can be manifold. They can, for example, occur in the manufacturing process (e.g. increased concentrations of PAH or dioxin when drying with direct firing), by cross-contamination in the warehouse or during transport (preceding product) or be incorporated from the environment (heavy metal contamination in the soil).

A clear cause cannot always be located. Nevertheless, when a contamination becomes known, the cause must always be researched, and all possible sources of contamination must be examined.

6 Measures

Once initial measures (such as blocking the goods) have been taken, further action is needed to prevent the spread or the recurrence of the contamination. These measures are closely linked to the detection of the cause.

If the cause is found in a step of the process, it must be improved there (e.g. accumulation/caking of feed in a dead space, measure: removal of caking and structural measure at this point in the process).

Finally, it must be checked if measures taken are successful (e.g. sampling directly at the point in the process where improvements were made).

If the cause cannot be clearly determined, preventive measures should be taken as far as possible.

Example: Contamination of protein-containing feed with Salmonella: addition of acid or heat treatment of the product (pelletizing), cleaning and disinfection.

Both the identification of causes and the successful implementation of measures depend on the respective situation (feed, contaminants/parameters, process, etc.). There will always be a case-by-case assessment. If you are affected by an incident/crisis and need support, please do not hesitate to contact us.

7 Annex

Example cases in which, after consideration, a subsequent release of the goods could be possible:

(see also Supporting document feed sector Incident and Crisis Management (information on contaminants))

- Contamination of rapeseed extraction meal with Salmonella

→ You should ask yourself the following questions:

- Is the product pelletised? Has the product been treated with heat in any other way?
- Was the product treated with acid? How high was the acid concentration?
- In any case, the goods must be examined again for salmonella after the respective treatment (if possible, with a 5-fold or 10-fold preparation).

→ If a heat or acid treatment has been carried out and the subsequent examination was negative for Salmonella, the goods could be released.

- Contamination of a supplementary feed with dioxin

→ You should ask yourself the following questions:

- Were the raw materials used in the supplementary feed analysed for dioxin and is a raw material responsible for the increased dioxin content?

- *If so, were other compound feeds produced with the same raw material? How high is the (maximum) proportion of contaminated raw material in the other feed produced (mixing rate)? What is the calculated dioxin content of the respective feeds?*

→ *Depending on the level of contamination (e.g. calculated value) in the compound feed, the product could be released for marketing/feeding.*

- *Contamination of a dairy feed with aflatoxin B1:*

→ *You should ask yourself the following questions:*

- *How high is the measured value? Is it above the QM-Milk maximum level of 2,5 µg/kg?*

→ *If the QM-Milk maximum level is exceeded, but the aflatoxin B1 content is below the legal limit value (5 µg/kg), it is possible that the product is released for feeding to dairy cattle after consultation with QS (e.g. delivery not to QM-Milk dairy farms). However, we recommend in any case, to make a clear reference to the customer with regards to the determined content of aflatoxin B1.*

Examples about case delimitation:

- *Example for limitation of a case:*

An increased dioxin content is detected in a compound feed. One of the components used is a mineral feed (single feed material) extracted from a mine. There is suspicion that this is a geogenic input of dioxin, i.e. a natural content in the rock. The mineral component is analysed, and the result is also an increased dioxin content. Since an entry of dioxin via the other components is very unlikely, the mineral feed is regard-ed as the cause. The mineral feed was only used in a (special) mixture delivered to a farmer. The farmer only received the goods the day before and did not feed any of them. The goods can be completely re-called and disposed of.

- *Example for propagation of a case:*

In an oil mill, a sample is taken during truck loading and (after 3 days) a positive salmonella result is detected by the laboratory. The samplings of the previous truckloads had a negative result. The customer who received the affected truck shipment was informed. The case was reported to QS. Two days later, the oil mill again received analysis reports with positive results from subsequent truck shipments. Now some other customers are also affected. The oil mill checks the process flow in the factory and finds a problem with a filter.