

Hand-out notes from the HFF Conference, Lorne 2016

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Let's pretend you grow herbs. A routine test comes back indicating you have listeria in one of your products.

What would be your first thoughts?

- Is it safe to eat?
- Where is the contamination?
- Do I need to initiate a recall?
- What will the supermarkets do?
- The media is going to destroy our business

What if today I can help you with those decisions? To recall or not to recall? I'll tell you our story, the struggle, the despair, the stress.

My aim is to make it easier for you should the situation ever arise where you have to do a recall.

Testing Methodology

Tasman Bay Herbs was the first grower in NZ to be NZ Gap approved. That was 1998. In 2007 we initiated our own in-house food safety programme as we wanted to make sure that our products were not only healthy, but safe to eat.

Testing Regularly

We initiated weekly testing, then when certain that everything was safe, extended it to 2 weekly, then monthly and finally every three months. For the last 8 years we had all negative test results.

Why is it important to test? Our product is ready to eat; it's not washed as it is mostly grown at waist height on benches. Consumers demand, in fact I want to know that any food I put in my mouth is not going to harm me in any way. It's very important to know your product is safe to eat.

E.coli, Salmonella & Listeria the three pathogens that can kill you. Important when testing to get an enumeration count, number of CFU's - coliform forming units per gm. Indication of how bad the contamination is.

Details: Monday morning the 15th June 2015 we received by email a lab test that indicated there was listeria present in one of 5 samples we had sent the previous week. The lab did composite samples, which means they took 25 grams of 5 different herbs, mixed them all up and then tested for pathogens. Composite samples are regularly done to keep the cost of testing down. We had no way of knowing which herb was infected. We knew it was either Watercress, salad, coriander, chives or Italian parsley.

Listeria – Why worry? 1985 – **52 died**, 19 stillbirths in California from eating Cheese; 2008 - **22 died** in Canada from eating cold cuts; 2011 - **30 died**, USA from eating Rock melons; 2014 - **15 died** in Denmark from eating Bacon, pork & pate.

Summary

- We had an indication from testing that Listeria was present in our product
- We didn't know which product
- We didn't know how much was contaminated
- However we knew it could kill people.
- What were we going to do about it?

We panicked.

It's okay, you're allowed to panic. But don't do it for long. Have your little tantrum, swear at an object or however you deal with extreme situations then get yourself sorted! That's critical.

Keep Calm and Carry On.

We assembled our management team in the office and we started formulating a plan. It's called...

Corrective Actions

We phoned all the supermarkets that had received product that day and told them to take the 5 products off the shelf.

Trade Recall

This is known as a withdrawal or trade recall, where you remove product before it reaches the consumer. Our independent Food Safety Auditor arrived. We took samples of all 15 products we had in the chiller and sent those off for testing.

The first test result had indicated Listeria but not what type of Listeria. There are in fact 15 types.

Listeria. monocytogenes

The nasty one is called Listeria monocytogenes. The disease affects pregnant women, newborns, adults with weakened immune systems, and the elderly. Listeriosis is a serious disease for humans; the disease has a case-fatality rate of about 20%. The two main clinical manifestations are sepsis and meningitis.

The Food Safety Auditor strongly recommended that we do a consumer recall of all product because we couldn't safely say that we didn't have the nasty L. monocytogenes. I took her advice and did a full recall of all our products.

Consumer Recall

We phoned all the supermarkets and told them to remove all of our product and destroy it. We also made the decision to halt all production and begin a cleaning routine.

I contacted a PR consultant regarding guidance for public relations at 8pm Monday night.

Tuesday morning, we extended testing to swabbing the Packhouse. This included scissors, trays, benches and any surfaces that may have come into contact with herbs. We also took water samples for testing.

Meanwhile we were waiting on a second test result to come back from the lab. We sent out a generic email to all of our customers telling them of the precautionary recall of our product.

Media starting making enquiries. We issued a press release and an hour after that it was on all the news websites in NZ. I didn't get any sleep that night!

Wednesday was D-Day. I had my sales team manning the phones saying I was unavailable. We had print and radio journalists hounding us for comments.

And we were simply waiting – the longest wait I think I’ve ever had, for a phone call from the lab. We updated our Facebook page to let everyone know there was a contamination issue but not to worry, it was purely a precautionary measure.

The results arrived about 12.30pm. They retested 4 of the 5 product we had originally sent plus the 15 individual herbs and all were negative.

Italian parsley

But they couldn’t retest the Italian Parsley, which was a ground grown herb we were buying in from a local grower. The lab had lost the original 100g sample bag. The lab surmised that because our herbs were all clean it indicated to them that the Listeria came from the Italian Parsley. They put this in writing.

We now had the evidence to re-commence production and limit the recall to just 259 bags of Italian parsley sent out to 9 retailers.

The media weren’t going to let us off the hook that easy. I decided to front up and talk to Radio NZ, the station with the most listeners. They are the serious journalists. We were lucky in that there had been no reports of illness and that we acted so promptly. It was a precautionary recall and I believe we got a lot of respect from the public for doing that. My PR advisor had forgotten to tell me to “NOT talk to Radio NZ”. You can listen to the interview from this link:

<http://www.radionz.co.nz/audio/player/201758825>

Summary

To summarise, we didn’t hesitate, had a wee panic attack and then got on with testing to find out where the issue was and how to fix it. And we communicated the issue as soon as word was out in the public domain via Facebook. But did we do the right thing and what did we learn?

What did we learn? – Don’t panic!

Sure have a mild meltdown but don’t rush into doing things before you have the evidence. Ethically it was the right thing to do and it was a very conservative decision but in hindsight you have to weigh up the risks.

What we should have done was to tell the supermarkets to hold all product for 48 hours while we waited for the test results. By telling the stores to throw out all the product, that one sentence cost us over \$10,000 in product that didn’t need to be thrown out.

Recall or not to Recall?

We didn’t need to do a recall. There was only ever an indication of Listeria in the first test and all subsequent tests at our facility and the farm where they grew the Italian Parsley were negative. They couldn’t find Listeria present at all. Despite this a major wholesaler made the poor outdoor grower plough under a hectare of product. This was a knee-jerk reaction. Some Food Safety people in the industry questioned why we were doing a recall when we only had a preliminary test and not a final result.

Hire a PR Firm

Get a good PR firm to help you produce media statements. Keep positive communication open with the public through Facebook posts and the media via press releases.

Ask Questions

Question the scientists and lab results. There probably was no Listeria. Certainly the lab couldn't find any in subsequent tests. They pointed the finger at the Italian Parsley but they couldn't prove it as they had lost the sample bag we sent. Sometimes these things happen in laboratories. So always get a second opinion. The lab made a number of mistakes during this incident which we found out by asking questions.

By failing to prepare you are preparing to fail.

This is an old adage but a good one. We were reasonably well prepared. We knew within 5 minutes of initiating the Trade Withdrawal who we had sent all the 5 items to and phoned all the supermarkets.

How you can prepare for a Food Recall?

Make a Recall list

Who would you call and in what order if you received a positive test? Make a recall list up of the important phone numbers, their priority and call them once a year to test it.

Do a mock recall

Can you immediately tell any auditor exactly what product went where and when and how much you need to recall? It's harder than you think to do this. We use MYOB which tracks our sales and units to individual stores. It takes us about 2 minutes to produce a list at any time.

Understand all the Regulations associated with your product for the markets that you sell in to. Keep up to date, as the Regulations are changing all the time. Write down what these limits are so they can be easily accessed.

Recall Team Skills- have enough people on the team that understands the products, process and inventory systems. Have someone who is not "emotionally involved" and can gather information and challenge the decisions at each stage of the process. Some companies use their accountants for this.

Make sure you have a documented recall plan. Here is a link to the Food Standards Code recall template.

<http://www.foodstandards.gov.au/industry/foodrecalls/recalltemplates/Pages/default.aspx>

Start thinking PR

Have a generic media statement prepared. You can save valuable time, especially now that many people get their information first from Facebook. It's important that you respond quickly and positively to Facebook posts, otherwise you get people starting to comment and troll you. There are a couple of our media statements in the handouts for your reference.

Never be pressured

Sure, you are going to be stressed out but unless microbiology pathogen counts are extremely high or someone has already become ill, wait for that final result. Have all the information on results before you make the first decision to recall.

Stay calm

Don't panic – think logically and stay calm. It's your company – don't hand the reins over to someone who just waltzes in. Make the decisions, argue with anyone if you think they are wrong. Fight for your company's survival.

Don't be afraid to Recall.

You don't have to be afraid of doing a product recall. While the thought of it is frightening, it's nothing like waking up to find your product has made people ill or worse, died. I believe it is the single biggest financial risk now to any food business, especially if someone gets ill and you don't do anything about it. If a recall is handled correctly, you can come out of it okay and enhance your branding. Find out the facts – and if you think someone could get ill or has already gotten ill, DO A RECALL.

Press Releases

Tuesday 16th June 5.15pm

Tasman Bay Herbs withdraws all products in pre-emptive safety strike

Tasman Bay Herbs have conducted a voluntary recall on all its products in a pre-emptive move following tests showing a potential contamination," says Managing Director Don Grant.

Riwaka –based Tasman Bay Herbs has been growing herbs since 1996. They currently produce 40 herb and salad products, which are distributed to outlets throughout New Zealand. Tasman Bay Herbs was the first commercial grower in New Zealand to be certified Vegfed 'Approved Supplier' (latterly called NZ GAP) in 1998, and this is their first ever product recall.

"Our most recent food safety tests on Monday showed a trace of a potential contamination, so we immediately requested that our distributors withdraw our products off their shelves while we undertook further testing," Grant says. "The results of this further testing will be known tomorrow (Wednesday). Once we know if there is a contamination and precisely what it is and which products might be affected, we will immediately notify stockists and customers.

"Food safety and quality is of utmost importance to us, and ensuring our food is safe is at the core of everything we do," he says. "The important thing for now is that all the products are off the shelves while we ascertain if there is a contamination and the extent of it. We believe the risk is low, but if customers have bought any Tasman Bay Herbs products with a best before date of 27th June, or before, then we suggest it is thrown away as a precaution."

ENDS

Wednesday 18th June 2015 3.48pm

Traces of Listeria Monocytogenes found in 50 gram bags of "Tasman Bay Herbs Italian Parsley" sold to nine retail outlets

Following intensive testing, traces of Listeria Monocytogenes have been found on samples of 50g bags labelled "Tasman Bay Herbs Italian Parsley" with a best before date

of 27th June or before, so should not be eaten. The bags were sold to nine retail outlets in Auckland, Wellington, Nelson and Christchurch.

Riwaka –based Tasman Bay Herbs produces 40 herb and salad products, the majority of which are grown on their premises. The Company does however utilise product from external suppliers to meet seasonal demand. The contaminated product, which was ground grown, originated from one such supplier.

The traces of contamination were first recorded during standard food safety testing undertaken by Tasman Bay Herbs on Monday 15th June, after which the company conducted a voluntary recall on ALL products as a precaution.

Results of further testing this week shows that the 50g bags of Italian Parsley were the only product contaminated, with all other products testing negative for Listeria Monocytogenes.

Tasman Bay Herbs Managing Director Don Grant says he is extremely upset that contaminated products have been sold.

“Food safety and quality is of utmost importance to us, and ensuring our food is safe is at the core of everything we do,” Grant says. “Our standard food safety tests on Monday showed a trace of a potential contamination, so we asked distributors to immediately withdrawal all products off their shelves while we undertook further testing.

“We were pretty sure at the time that it was only one product, but needed the evidence and so we chose to withdraw all products purely as a precaution,” he says. “Distributors also contacted their customers on Monday to inform them of the potential risk.

“It is now confirmed that there was only one product that was contaminated, so we urge customers who have bought 50 gram bags of “Tasman Bay Herbs Italian Parsley” with a best before date of 27th June or before to not eat them. They can return these products to their retailer for a full refund. Any person concerned about their health should also seek medical advice.”

“We have already begun reviewing our processes in regards to produce grown by our suppliers to ensure this never happens again.”

Stores supplied the contaminated product are:

- *Auckland: New World Victoria Park, New World Warkworth*
- *Wellington: New World Thorndon, Pak ‘N’ Save Upper Hutt*
- *Nelson: Fresh Choice Richmond, Raeward Fresh Richmond*
- *Christchurch: New World Northwood, New World South City, New World St Martins*

ENDS: For Media Enquiries: Don Grant, 03 528 7275