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1. **INTRODUCTION**

FAMI-QS is a Quality and Safety System for Specialty Feed Ingredients and their Mixtures. The FAMI-QS Code of Practice in its respective current version is a recognized ‘Community Guideline’ mutually acknowledged by other European, national or local standards. For the types of feed covered by FAMI-QS, the Code addresses safety, quality and regulatory compliance.

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

Preparing for crisis situations and responding appropriately to them is an important part of feed safety. For this purpose, a “Feed Safety Incident and Crisis Management Procedure” has been initiated and is described here.

2. **SCOPE**

This document is for all FAMI-QS certified Operators/companies and Certification Bodies.

In the event that the Operator becomes aware or has reasons to suspect a feed 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 the FAMI-QS Crisis Management Team 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. The Certification Body shall inform FAMI-QS Team of the result from this assessment and of its further progress. During each regular audit, the auditor shall verify whether a feed safety incident has occurred.

3. **KEY TERMS**

   **Issue** - Usually a topic of on-going debate (e.g. in the media) which occasionally ‘peaks’ when attention is focused on it. At that stage, it can turn into an incident or a crisis.

   **Incident** - 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. **Feed safety incident** is an incident associated with imported, produced, cultivated, processed, manufactured, traded or transported product for which there is a suspicion that it could be harmful to the health of humans, animals or plants or to the environment and/or non-compliant with legal provisions established by legislators in order to secure a high level of protection of humans, animals or the environment.

   **Crisis** - A situation involving damage or danger, whether deliberate or accidental, to at least one FAMI-QS 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 FAMI-QS 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 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 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 products of the scope of FAMI-QS (Specialty Feed Ingredients and their Mixtures) are harmful to the health of humans and animals or to the environment. 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 or of the environment, 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 consumers (when necessary) of the presence of a potentially hazardous FAMI-QS certified product 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.

Here below is a flowchart (Step 1) which should be the tool to evaluate whether the feed is safe or unsafe and if the FAMI-QS Crisis Management Team and the CB must be notified.

- **Step 1 - Use the crisis tree to decide whether the feed is safe or unsafe and when to notify FAMI-QS Team** (see flowchart on following page)

- **Step 2 - Define the status of the unsafe feed and when to notify the competent authorities**

  The following definitions are relevant:

  a. the defined amount of the product is no longer under the control of the operator through:
     - being held at distributors with a view to sale;
     - being used by a customer;
     - being held at a customer with a view to use; or
     - being transported and complete control is questionable.

  b. the defined amount is still under complete control of the operator by either
     - having not left the operator’s premises;
     - being transported but complete control is manageable.
- Step 1: Use the crisis tree to decide whether the feed is safe or unsafe and when to notify FAMI-QS Team

Start

What is the problem?

Yes

Is it a practical challenge or management contamination?

No

Yes

Does it involve risk and reporting?

No

Yes

Occurrence of health concerns for human?

No

Yes

Is the food safe to provide to human?

No

Yes

Yes

Is the food unsafe to provide to human?

No

Yes

The feed is unsafe (go to step 2)

Notify FAMI-QS Team / CB (go to step 3)

No step further*
Depending on the status of the unsafe product: a or b (STEP 2).
Follow the steps marked with [X] in the sequence up-down.
Steps marked with [--] do not need to be followed.

```
<table>
<thead>
<tr>
<th>Status of the product:</th>
<th>a</th>
<th>b</th>
</tr>
</thead>
<tbody>
<tr>
<td>Segregate existing stock</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Initiate a recall process</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Inform the competent authorities (Art. 20 of Regulation (EC) 178/2002 and/or local regulations)</td>
<td>X</td>
<td>--</td>
</tr>
<tr>
<td>Inform the competent authorities (Art. 20) in case other Feed Business Operators could have potentially similar problems with their imported, produced, processed, manufactured or distributed feed.</td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Cooperate with the competent authorities in respect of handling the crisis, e.g.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• information on names of suppliers/customers</td>
<td>X</td>
<td>--</td>
</tr>
<tr>
<td>• destruction or reprocess of the batch/batches, lot/lots or consignment/consignments</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• other information needed to support the Rapid Alert System</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Conduct necessary corrective and preventive actions</td>
<td>X</td>
<td>X</td>
</tr>
</tbody>
</table>
```

**STEP 3 - CRISIS IDENTIFICATION AND REPORTING TO FAMI-QS CRISIS MANAGEMENT TEAM**

Any incident indicating “notify FAMI-QS Team” on the decision tree (STEP 1) results in filling the Notification Form established by FAMI-QS. The objective of this notification is the early reporting of irregularities in animal feeds and the allowance of rapid response and communication throughout the animal feed production chain, with the aim of preventing or limiting the harmful consequences for man, animals and the environment.

A blank form of the Notification Form (Word version) for making a notification to FAMI-QS Secretariat is provided on the FAMI-QS website (see annex 1). Send the form to the FAMI-QS Crisis Management Team by fax or by email (contact list below). If you have any analysis supporting your report, please send it too. Initial notification to FAMI-QS must be performed within 2 days.

**FAMI-QS Crisis Management Team**

Mail: notification@fami-qs.org
Phone: +32.2.639.66.69
Fax: +32.2.640.41.11

Didier Jans (Secretary General)
Emmanuel Geneiatakis (Quality Manager)
Laetitia Cirilli (Process Manager)

**NOTE:** A report to FAMI-QS Secretariat 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. 20) requires any feed business operator to inform immediately the competent authorities if it considers or has reason to believe that a feed placed on the market may not satisfy the feed safety requirements which encompasses:

- risk to animal health, human health or the environment;
- non-compliance with a regulatory provision implementing feed legislations
  - Regulation (EC) 999/2001 laying down rules for the prevention, control and eradication of certain transmissible spongiform encephalopathies.

**STEP 4 - CRISIS MANAGEMENT ASSESSMENT AND COMMUNICATION**

FAMI-QS Team is obliged to handle the data in confidence:

- the provided information and report form will be available only to the FAMI-QS Crisis Management Team;
- FAMI-QS 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 FAMI-QS staff can access those documents and the report form is archived for 10 years.

The report will be assessed by the FAMI-QS Crisis Management Team.

After assessing the report, there are three possible outcomes:

a. **Alert** – The situation is urgent and not (completely) under control, an alert message will be published on the FAMI-QS website or by email. This alerts all FAMI-QS certified companies and gives them a possibility to take appropriate counter measures.

b. **General report within the framework of FAMI-QS** – The situation is under control, but it is useful to inform the other FAMI-QS Members about what happened. With this information, the other FAMI-QS Members can evaluate and take counter measures.

c. **No publication** – The situation is under control and there is no need to inform the FAMI-QS certified companies.

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

**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 FAMI-QS Crisis Management Team within 3 weeks. Depending on the development of the crisis situation, another reporting date can be set in agreement with FAMI-QS Staff.

- **Certification Bodies**
  - After consulting the operator, the CB shall choose the tools to assess the situation (as e.g. audit documentation review, special audits).
- CBs can perform a **special audit** if circumstances make it necessary, by implementing section 7 of the rules for CBs.
  - If a special audit is not necessary, CBs shall verify the implementation of the corrective actions during the next regular audit. CBs shall also check that the operator has sent the initial notification and the progress report to FAMI-QS Team within the set timeframe. If not, a minor non-conformity shall be issued.

### Step 6 - Follow-up and Closure

To follow-up and close a case, FAMI-QS Secretariat needs a decision on the further certification status 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 FAMI-QS register on the website ([http://www.fami-qs/certifiedcompanies.htm](http://www.fami-qs/certifiedcompanies.htm)). Valid certificates can be found on the FAMI-QS website. Not notifying FAMI-QS Team and the CB about a feed safety incident could be a potential reason for withdrawing the certificate.

In case a **special audit** was conducted, FAMI-QS 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 special audit is needed, the issue must be checked during the next regular audit and documented by the CB in the audit summary report.

FAMI-QS 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 (FAMI-QS, Certification Body and Feed Business Operator). All information obtained from the Operator and by the Certification Body will be handled in a strictly confidential way by FAMI-QS Staff. FAMI-QS Team will not use it for purposes apart from those established in the frame of the crisis management procedure.

### 6. Annex

- **NOTIFICATION FORM D-CM-001.**