



9 WAYS
Food Plants Can Prevent Costly
Recalls and Lawsuits



Food recalls are your greatest fear. Full stop. And they affect everyone—from corporate management to the production line to customers.

It's all up to you and your team: consumer safety, your company's reputation and its ability to do business. Why?

- **Consumer safety** is priority one. One injury or illness is one too many.
- Your company's **reputation is perishable**. Once lost, consumer trust is difficult, perhaps even impossible, to regain. It can take years. Social media amplifies and accelerates bad news.
- The average direct costs of a product recall can exceed **\$10 million**. That's an expense you can't afford to take on.

A recall or lawsuit puts everything on the line. FlexXray offers 9 steps to help you protect your customers and your company.

1. **Prioritize Infrastructure and Fight for Improvements**
2. **Insist on Detection Methods You Can Trust**
3. **Commit to Traceability and Comprehensive Reporting**
4. **Validate Through Self-Audits**
5. **Eliminate 'Run-to-Failure' from Your Maintenance Program**
6. **Emphasize Food Safety Training for All Employees**
7. **Monitor Allergen Program, Internally and Externally**
8. **Continually Improve Processes**
9. **If Necessary, Recall Rather Than Face a Lawsuit**

You have a lot on your plate, and we're here to help, whether you're concerned about **microbiological, chemical or foreign material contamination from your suppliers or internal processes**. Be sure to take a look at our 9-step checklist you can use in your department and with your peers.



1

Prioritize Infrastructure and Fight for Improvements

Be the hero. Continuous improvement is a priority, as is the need for infrastructure upgrades. Inform the decision-makers and fight for them. In addition to the expense of a recall (can top direct costs of \$10 million), you'll also face damage to your brand—an expense that's incalculable.

You know proper plant infrastructure **mitigates environmental risks**. When you see the need for improvements to your infrastructure, go for it.

- Antiquated cast drains and FRP walls will be hazardous to your production space until they're replaced.
- Investing in a proper CIP system or floor coating now can save you the cost of a recall later.

What infrastructure improvements are top of mind for you today?



Dollar for dollar, preventative spending on infrastructure will always be more cost-effective than recalls.

2

Insist on Detection Methods You Can Trust

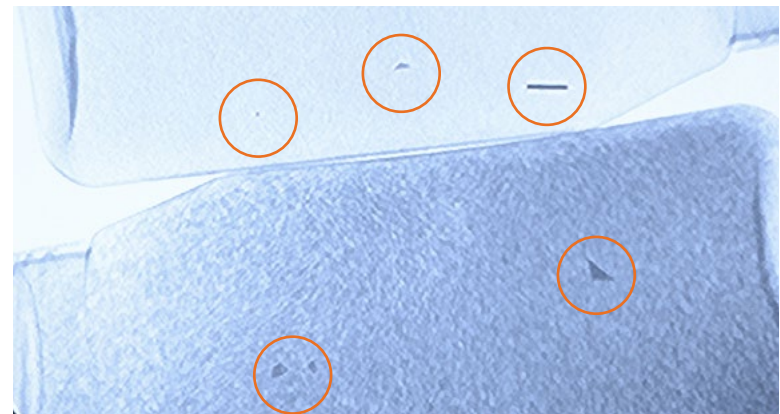
What keeps you up at night? The fear of foreign material contamination (rework!) in your products.

Finding and extracting a contaminant—whether through self-audit or a third-party inspection service—helps you identify areas that might need improvement to keep your product safe.

- This is **significantly** more cost-effective than scrapping a batch of product.
- It's **exponentially** more cost-effective than a recall.

What level of detection can your in-plant system provide? Is it sufficient? Do you need more?

When you find a machine part is damaged or missing, you don't want to guess whether it fell into your product---you want to know.



3

Commit to Traceability and Comprehensive Reporting

If there's a contamination problem, you know you'll be called on for the whole story. You need a way to determine, based on accurate records, when the contamination happened and where it is in your production chain **right away**.

No matter your size, traceability is key to preventing a recall.

- Keep **accurate records** with only pertinent information.
- **Real-time data** recording to allows you to catch an error and mitigate risk.

Is your traceability protocol sufficient? Are your records in good order? Is your staff committed? Do you drill on this?



If record-keeping becomes just a to-do list item for employees, they will get complacent. Traceability and records are at the heart of recall prevention.

4

Validate Through Self-Audits

Do you catch yourself wondering, “How do I know it’s working?”, when you think about your contaminant detection system? Process validation is part of your HACCP plan for a reason. When you can identify **weaknesses** in your system, you can **make adjustments** before they create problems.

Another excellent way to stay in front of recalls is to put your detection system to the test. Be sure your system will catch potential contaminants:

- **Test** your own detection methods.
- Have a **third party validate** your process.

What do your internal audit results say about your plant and your plan?

How you engage, complete and follow-through with your monthly internal audit says a lot about your culture and engagement levels within your facility.



5

Eliminate 'Run-to-Failure' from Your Maintenance Program

Do you worry that your procedures or protocols could inadvertently cause foreign material contamination? Instead of waiting to catch the problem, **eliminate 'run-to-failure'** from your maintenance program. Worn-down equipment accounts for many of the foreign contaminant cases you'll encounter.

Proper equipment maintenance is an easy preventative step that is entirely within your control.

- Ensure your plant is **investing** its capital wisely.
- **Update** your maintenance inspection and replacement schedules.

Do your maintenance protocols give you the confidence that you're mitigating this critical risk?



If you have a machine that's old and in need of repairs, it's more likely that a bolt will fall out or a piece will break. Then, you've got a piece of metal or plastic somewhere in your product.

6

Emphasize Food Safety Training for All Employees

You believe that food safety is everyone's responsibility. Do you **know** that safety imperatives are included in training for **every** employee?

New employee orientations are a great place to emphasize the importance of food safety, but it has to go beyond a list of tasks. It must include the **rationale** for your program.

- Engage staff with your company's food safety culture.
- Ensure they understand the "why" behind the tasks they do.

If you ask an employee about their safety responsibilities and why they are important, could they tell you?

When production employees feel a sense of ownership over the product they create, they're more likely to take a concept like food safety personally.



Photo: Courtesy of Global Food Safety Initiative

7

Monitor Allergen Programs, Internally and Externally

What's one of your most dreaded words? Allergens.

An allergen-related recall is a clear sign your operation lacks organization and attention to detail.

- Use color-coding, labeling, cleaning and segregation as part of your **allergen management**.
- **Audit your suppliers**, beyond a checklist. Insist on full chemical and biological analyses for each lot of product—don't let a single supplier put your business at risk.

Are your allergen protocols simple to execute and difficult to deviate from?



There are two main reasons so many food recalls involve allergens: either because they are unintentionally present or the food was mislabeled.

8

Continually Improve Your Processes

You believe in continuous improvement, and you know that the day-to-day work doesn't always allow enough time for robust consideration. Make time to look for ways to **improve your processes** through preventative maintenance, training, documentation and detection.

You've got a HACCP plan and GMPs in place. You know practical considerations arise during production flow, and that you can't rely solely on theory. It's easy to overlook workflow:

- Are you placing more **stress** on your equipment than it can handle?
- Do employees have enough time to **thoroughly clean** equipment between line changes?

Ongoing improvement helps you mitigate risk, avoid foreign material contamination and minimize rework.

Don't let the discovery of a contaminant be the reason you improve your safety practices. Make this a team effort among the quality, safety, and operations departments.



9

If Necessary, Recall Rather Than Face a Lawsuit

One of your toughest decisions—one you never want to have to make—is issuing a recall. However, you have a **responsibility** to the people who consume your product, as well as to your company's financial well-being and reputation.

- This will be a group decision that requires careful thought and involves many departments, including yours.
- A recall is better than a lawsuit.

Are you ready to consider the need for a recall? To alert the proper people and departments? To follow company protocols to ensure a successful recall?



Food should never harm the people who consume it. If you can prevent harm, you must.



FlexXray's 9-Point Checklist to Prevent Costly Recalls and Lawsuits

FlexXray, your partner in food safety, offers this 9-point checklist to help you mitigate risk and avoid foreign material contamination. Use it with your team to ensure you're keeping consumer safety and your company's reputation top of mind.

1 What are your top three **infrastructure** improvement priorities?

1. _____
2. _____
3. _____

2 What level of **detection** can your in-plant system provide? Is it sufficient? Do you need more?

3 Is your **traceability** protocol sufficient? Are your **records** in good order? Is staff committed? Do you drill on this?

4 What do your **internal audit results** say about your plant? What action do you need to take?

5 How should you adjust your maintenance program to avoid "run-to-failure" and assure the best chance that your protocols won't be the cause of your own problem?



6 Does your food safety **training** include all employees, and does it cover the “how” and the “why?” What enhancements do you need?

7 Does your **allergen prevention** process include internal protocols that are hard to deviate from and external processes that include robust supplier audits?

8 Do you regularly take time to look for ways to **improve** your processes through preventative maintenance, training, documentation and detection?

9 In the event a **recall** becomes necessary, are you ready to act?

FlexXray is North America’s leading foreign material inspection company and your partner in food safety. Based in Arlington, Texas, we serve the largest food companies across the United States and Canada. We offer inspection solutions at our USDA-registered and temperature-controlled facilities or at your facility.



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FlexXray is North America's leading foreign material inspection company and your partner in food safety. Our custom-built direct X-ray technology detects issues before products go to market, saving companies like yours millions of dollars each year. We inspect for contaminants and foreign materials, including: metal, plastic, rubber, gasket and bone.

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