

Internal Incidents, Investigations & Documentation

What are internal incidents?

Internal incidents refer to deviations within the facility that may have or do directly impact product safety or quality.

Examples: a broken piece of processing equipment discovered while or after processing, personnel injury, handling error leading to potential contamination

Value to Operation:

- Documented control of deviation and implicated product
- Documented, detailed investigation of the incident, product impacted and actions taken that can be referenced if:
 - 1. A customer complaint is received
 - 2. USDA inspector or 3rd Party Food Safety Auditor investigates and has questions
- Staff confidence in understanding the process exists to control and prevent potential recall situations

Internal Incident Response Process:

- 1. Incident occurs
- STOP production line if the incident is a) active and in an area of open product or
 b) a human safety risk
- 3. Notify Manager(s) (Production Manager & Food Safety, Quality, Regulatory Manager)
- 4. Determine if the product is involved or at risk.
- 5. Isolate & place all products possibly implicated on hold
- 6. Put any affected/damaged equipment/parts on hold (lock out tag out, if applicable).
- 7. Cross functional team investigation followed up with a documented risk assessment.
- 8. Before resuming production, clean out any remaining meat, wash, and sanitize any equipment directly involved with the incident or implicated product.
- 9. Conduct a thorough investigation, and determine product disposition (if the product is affected)
- 10. Take immediate corrective action on product (dispose OR rework/recondition back to safe, quality product conditions)
- 11. Determine any preventative actions based on the investigation findings.
- 12. Document investigation, corrective & preventative actions.
- 13. Follow-up with relevant employee training (targeted to incident as well as any internal incident response refreshers needed to improve the process)

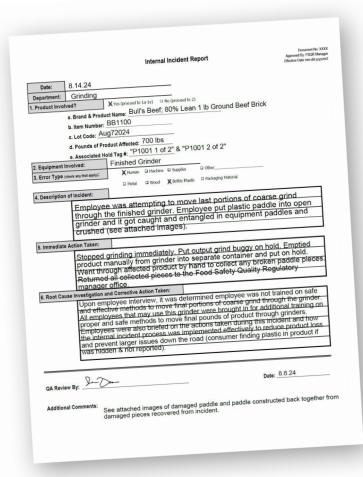






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Internal Incident & Documentation Example





Attached image of the paddle damage



Attached image of the paddle pieced together to determine if/show evidence all pieces are accounted for.

Company culture must support the empowerment of employees to speak up when errors are made, not intimidation or fear of job loss.

Leadership:

Empowerment leadership results in processes being followed and safer products. Fear-based leadership will result in internal incident "cover-ups" and subsequent potential recall scenarios.

Accountability:

If the employee was conducting their job outside of the trained process or expectations and that resulted in an internal incident, disciplinary action may be warranted and justified.

Employee Training Topics:

- 1. Review Product & Equipment Hold SOP/Process
- 2. Immediate internal incident reporting to management
- Actions to take in the event of an incident (present various scenarios)
- 4. Understand the value of their role in following the process.



