

BT-17

Ver 0.3



Incident and crisis
management:
communication to OVOCOM
and to the certification body



ov@com
together for safety and quality

DOCUMENT HISTORY

Version and date of approval	Reasons for revision	Revision scope	Ultimate date of application
0.0 22/10/2015	Introduction of a new document	Entire document	01/01/2016
0.1 15/09/2016	Addition of example in the definition of incident	Point 1	15/09/2016
	Modification of the decision tree	Point 3	
	Clarifications as to who should notify	Point 5	
0.2 21/10/2016	New lay-out	Entire document	21/10/2016
0.3 15/12/2017	Addition of 2 schemes for which OVOCOM has an interchangeability agreement including information exchange on incidents	Annex 1	1/01/2018
0.4 99/99/9999			99/99/9999



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BT-17 : Incident and crisis management: communication to OVOCOM and to the certification body

1. Objectives

Via Rapid reactions and communication throughout the entire 'feed' chain, adverse consequences may be limited or avoided for the entire feed chain. The communication to OVOCOM and to the certification body of incidents, described in this document, can help to achieve this.

Indeed, a fast, structured and univocal response helps to ensure the reliability as well as the credibility of the FCA Standard.

Certain requirements relating to communication and transmission of information by FCA certified companies to OVOCOM and to the certification body, are described in this document.

The responsibility of being prepared and to react appropriately to an incident lies primarily with the company itself.

Definitions

Incident: an event that may possibly have a negative influence on the safety of animal feed. Failure to control/manage such event shall lead to a hazard/risk for the health of humans, animals or plants. In this document, by incident we mean e.g.:

- Defects or irregularities relating to food and feed safety, over which a company does not (no longer) have control, and/or which may have implications for other companies;
- Exceeding of a standard / an action level set out in FCA-standard or in applicable legislation;
- Involvement in recall.

2. Scope

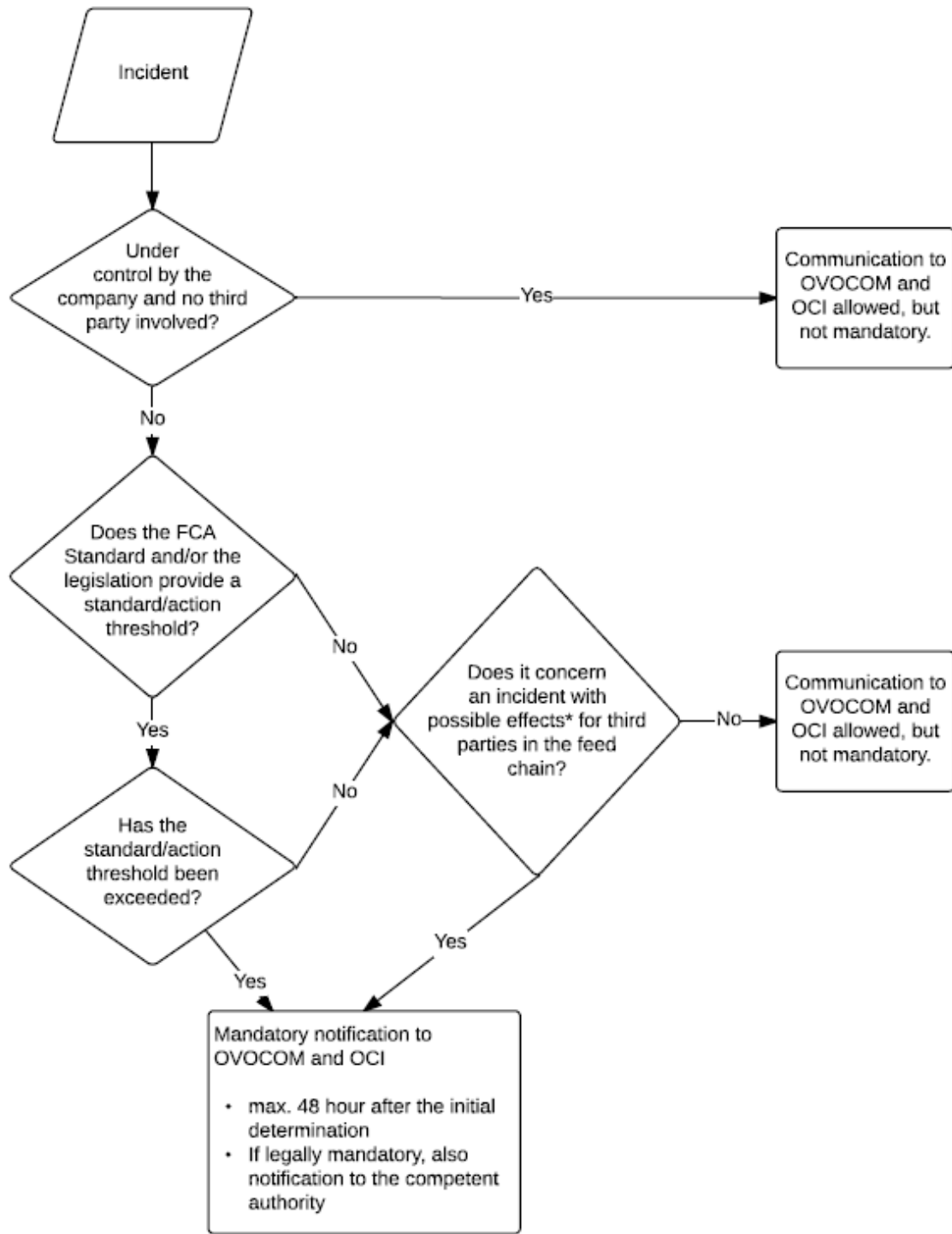
The requirements described in this document are applicable to all FCA certified companies.

3. Evaluation of an incident

The following decision tree must be applied in order to determine whether an incident is obliged to be reported to OVOCOM and to the certification body.

Each communicated incident will be assessed by OVOCOM and, only when necessary, discussed with experts. If necessary, OVOCOM shall then contact the company for further follow-up.

OVOCOM always deals with information in a confidential manner and takes into account the legal obligations of all parties concerned (see point 8).



* eg. quarantine, recall, fraude suspicion, new danger or emerging danger etc

Please note! No mandatory communication to OVOCOM and OCI does not mean that no internal measures should be taken with respect to a specific incident.

In case of doubt as to whether or not a certain situation should be reported, the company may always contact OVOCOM.

4. When to notify OVOCOM and OCI

In the case of an obligation to notify (e.g. exceeding of a standard or a crisis), OVOCOM must be informed as soon as possible, and no later than 48 hours after the initial determination. When a mandatory notification with regard to the competent authority takes place (Regulation (EC) No 178/2002 – art.20), then the notification to OVOCOM and OCI must take place at the same time.

5. Who must notify OVOCOM AND OCI

The requirements included in this document are applicable to every participant in the FCA Standard. The obligation to provide the requested information applies therefore to each participant.

However, if a company can demonstrate that another upstream link, certified FCA has already executed the mandatory notification to OVOCOM (written confirmation from the notifying FCA company), then this company is not required to inform OVOCOM again. This rule does not apply when the product in question had been further distributed within the feed chain by the company. In case of doubt the communication to OVOCOM and OCI should be performed.

6. How to notify OVOCOM and the OCI

The requested information must always be communicated, in writing, to OVOCOM and to the Certification body.

OVOCOM coordinates:

OVOCOM asbl
Rue de l'Hôpital 29, 1000 Bruxelles – BE
Mail: info@ovocom.be
T: +32 (0)2 514 01 86

7. Which kind of information should be communicated to OVOCOM

In case of mandatory communication to OVOCOM, the following information must be communicated (if applicable or known):

1. General information on the notifying company:

- a. Name;
- b. Address;
- c. Telephone;
- d. Email;
- e. Coordinates of contact person and of the operator responsible for the FCA company.

2. Product details:

- a. Type of animal feed or 'by-products for reprocessing';
- b. Name (if applicable: catalogue code of feed material or number of additive);
- c. Batch number;
- d. Date of production and/or delivery;
- e. Quantity involved;
- f. Product status (blocked, quarantined, with the buyer, etc.).

3. Data relating to the origin of the product:

- a. Company details (name, address, Email, certification, contact person) of producer / Supplier / import operator / distributor of the product;
- b. Company details of transport operator;
- c. Country of origin.

4. Location of the product:

- a. Country where the product is located;
- b. If other companies are involved: information as regards their 'feed' certification (e.g. FCA, GMP+ FSA, FAMI-QS).

5. Nature of the problem:

- a. Type of detected hazard;
- b. Reason and cause of the incident.

6. Analysis Data:

- a. Date of sampling;
- b. Laboratory having performed the analysis and the applicable analysis method;
- c. Result of analysis (while taking into account the uncertainty) and applicable standard.

7. Measures taken:

- a. Contacted companies and institutions;
- b. Measures already taken and those yet to be taken;
- c. Release by the competent national authority.

Companies may use their own form or may use an existing official form.

Attention, do not forget (if applicable):

- To inform the supplier(s)/buyer(s) of the product. This must be done in writing ;
- To report the incident to the instructing party in writing;
- To block the goods and to proceed with a hazard analysis and traceability.

After the initial notification, communication must of course be continued as regards the further follow up: decision by the competent national authority and/or the supplier, corrective measure taken, unblocking of the goods, destination of batch, etc.

OVOCOM may directly contact an FCA certified company in order to request additional information (both, for their own notification as well as for the notification of another FCA certified company). The company shall provide the requested (additional) information, and shall always keep the related certification body informed.

8. Confidentiality of information

Unless otherwise stated in this document, OVOCOM shall not disclose any confidential information regarding a company (or certification body) to third parties, without written consent from the company (or certification body) in question. Communication with respect to an incident will only take place between the parties concerned. OVOCOM will not use this obtained information outside the context of its own crisis management system.

When companies, covered by a quality system other than the FCA Standard, are involved in an incident, and OVOCOM has an interchangeability agreement with those quality systems (see list in Annex 1), then information regarding the incident will be communicated to the systems concerned. When the notifying company is a service provider (transport, storage and transshipment company), and therefore not the legal owner of the feed or 'by-product for reprocessing', the information shall not be passed on to the schemes included in Annex 1 which could possibly be involved. The responsibility for notification to these schemes, is left to the legal owner of the feed or 'by-product for reprocessing'.

Under no circumstances, shall OVOCOM, instead of the company, perform a notification. The company remains responsible for its legal obligations in terms of notification and risk management.

Annex I: Schemes for which OVOCOM has an interchangeability agreement including the exchange of information on incidents.

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Organisation	Standard
AIC	UFAS, FEMAS, TASCC
Coceral	GTPCode
Coop de France Métiers du grain – FNA - Synacomex	CSA/GTP
EFISC	EFISC
Fami-QS	Fami-QS
GAFTA	GTAS
GMP+ International	GMP+ FSA
Oqualim	RCNA International
QS Qualität und Sicherheit	QS
Qualimat	Qualimat-Transport