

Crisis Management in the Food and Drinks Industry

A practical approach

Second Edition

Colin Doeg



Springer

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Series editor's forward

The first edition of this book was the second in our series of *Practical Approaches*, and deals with a subject which had received relatively little attention in the technical literature, despite the potentially horrendous consequences that can occur as a result of a crisis situation not being handled as professionally as it might.

Clearly, those who were then involved in a crisis might not particularly have wished to be reminded of it from the commercial angle, nor would they have wished to reveal their defenses so far as their technology was concerned.

That was in 1994, and things have certainly changed in the intervening decade, although most of the principles of competent technical and business management had already been written down, even if not unduly publicized.

However, as was previously said, experience is invaluable, and the author and editor therefore set out to give the reader the atmosphere of and background to reported crises, to provide guidance on developing a procedure for handling a crisis in one's own business, and to give appropriate points of reference to professional help and support.

It may appear that the emphasis has been given to terrorism outside of direct interest to the food and drink industry. However, not only are there lessons to be learned from observing such activities elsewhere, but also they may have direct effects—such as disruption of water or energy supplies. They may also have indirect effects as a result of the direct effects they could have on suppliers of raw materials, both ingredients and packaging materials.

What does need to be emphasized is the way in which various crises have arisen over the subsequent period, the divergent motivations and circumstances from which they might arise, and the on-going need to ensure, in dealing with any specific situation, that those involved recognize each other's disciplines and work effectively as a team. Those in such a team must have confidence in the capability and reliability of one another.

To the food technologist or scientist, the book may be unusual in that it is written by someone who is fundamentally a media/PR person rather than an academic or technocrat. The literary style is far from classical technology textbook, but rather encaptures that with which one could be expected to be confronted, and may well need to use in a real-life crisis.

As editor, I should say that I have had the privilege of working with the author for at least thirty years. We have not always seen eye to eye, he wanting to simplify the most complex of technical issues to the popular media 'one-liner' or 'sound-bite', while I have wanted to qualify or reference everything severely. That has not stopped us and our colleagues from developing some very effective and sensible relationships and approaches.

After newspaper experience, Colin Doeg went into public relations, working for several 'blue chip' companies in different industries as well as a trade association.

During his years in public relations, he had seen crisis management develop into a specialized skill in its own right, especially in the food industry. He has also been involved in employee communications and the introduction of cultural change to an organization as well as launching, editing or working on a number of award-winning employee publications.

Perhaps, I ought not to say that Colin is an enthusiastic underwater photographer, and remains a very keen cyclist.

In this publication, we have tried to pack in as much as possible from real-life situations. To some extent, although filled with urgency at the time that a crisis arises, management of such situations has had a repetitive element in the temporal scenario. We have tried to continue to build up for the reader a 'feel' for potential crisis situations that historically have only been born out of experience or very explicit training. Hence, we have tried to provide examples from some of the recorded experiences via the written word wherever possible.

As a food technologist myself, and despite having worked with the author over a number of years, many of the revelations about the media and its speed of response and deadlines continue to amaze me. For example, before we produced the first edition, I had never realized that the early editions of Sunday newspapers in the United Kingdom go to print on Saturday afternoons, had not fully appreciated the expansion of satellite communications, or that the inspired and well-informed comments of commentators at events like the Olympic Games flow from the screens of an elaborate network of laptop computers.

There is little doubt that those concerned for their businesses who read this book will reap benefit. The precise extent of that benefit will depend upon the size and nature of the business, the actual degree of risk of a crisis arising, and the extent to which that organization may already have crisis management systems in place.

I suspect that there will be much of value in the book for everyone and a very great deal for those who have not previously had the need or inclination to address such potential problem areas.

The contact points and references to sources of help and information alone should justify attention. On HACCP (Hazard Analysis and Critical Control Point system), we do not manage within a static environment, and feedback from readers on scope, content, omissions and potential inclusions will be welcomed.

This publication has fitted comfortably within the *Practical Approaches*, as we had envisaged, and provides a useful extension to the database that we want to provide and its potential interface with adjacent disciplines.

Professor Keith Anderson
January 2005

Acknowledgements

By the very nature of the issues involved, the specialists who thrive on the challenges and pressures of crisis management are reticent about much of the information and knowledge they possess. In the wrong hands that could be a threat to the very organizations it is meant to protect. Therefore, inevitably, much of the world of crisis management is concealed behind a veil of 'commercial security'.

However, if you survive a baptism of fire by product recall or tampering and become an accepted member of that network, you can have access to a wealth of mutual help and support. A serious problem can temporarily unite companies that are traditionally fierce rivals in the market place. The public relations managers and food technologists of businesses normally opposed to each other will band together to offer their experience and skills in dealing with many problems, even to the extent of warning each other of pitfalls they experienced when faced with a similar difficulty.

One of the pleasures of writing the first edition of this book was the opportunity to meet many more members of that community and to enjoy their enthusiasm and interest in such a specialized subject. They, more than anyone, would have appreciated the fact that, while I gratefully acknowledged their generous help, I mentioned very few by name!

Much of the contact in the preparation of the second edition has been via the Internet but now that crisis management has become a much greater global issue, it is not possible to meet as many people face to face. Sadly, a keyboard and an ISP have had to take the place of personal contact but that, in itself, is a measure of the changing world in which we live and operate. In that respect, I thank those who responded to my e-mails and also to the governments and other organizations that have created such useful web sites.

As ever, one of the over-riding concerns Keith Anderson and I have always had in connection with a book dealing with this subject, is that it might contain too much information, and so help some very undesirable members of the community.

For that reason, for example, reference is made to foreign bodies or objects but seldom to the specific items involved to discourage 'copy-cat' incidents.

However, pointers are given as to how genuine businesses can become better informed about such things.

As ever, it has been a delight to work once more with Keith Anderson, who has always been such a sound and delightful colleague, especially when dealing with matters many other people would be too frightened to touch.

I have been particularly appreciative of the help provided by Dr Ray Gibson and Dr Graham Pettipher of Reading Scientific Services Limited, Tony Hines, MBE of Leatherhead Food International Research Association, Professor Tom Toomey of Ventress Technical Limited and Steve Dunlop of Dunlop Media. Susan Safran, the commissioning editor at Springer Science + Business Media, has been particularly helpful and a pleasure to work with.

Finally, my everlasting thanks go to my wife Mary, whose support and encouragement have made so many things possible, including the production of the second edition of this book.

Colin Doeg,
London, January 2005.

Preface

Today the world is torn by crises on a scale never envisaged when the first edition of this book was written a decade ago. At that point, no one could have conceived the horror of the bombing of the twin trade towers in New York or the other 'spectaculars' which have followed. Few could even conceive the possibility of gun-crazed pupils running amok in their schools and universities, indiscriminately killing teachers and fellow pupils.

Few could have anticipated such an inexorable expansion of the Internet or the development of communications, especially the facilities used by the world's media and pressure groups.

It is a far cry from the 1970s, when Brooke Bond Group, then the world's largest tea company, was being pilloried by an investigative television program over conditions of employment on its estates in India. Then it usually took a week to get an answer to a simple question.

Typically, a Telex message had to be sent from the Group's head office in London, England, to the head office of the Indian operation in Calcutta. From there, a new message had to be typed and sent on the internal Telex network to another office in the south of the sub-continent from where it was re-transmitted to an office even further south. From here a 'runner'—in fact an executive in a car—took it to the head office of that particular group of estates. If one was lucky, the message did not get mutilated along the way by someone who perhaps did not speak English and, therefore, had to tap it out one character at a time on a cumbersome Telex machine!

The following morning, another executive would get in his car and drive to the concerned tea estate, usually a long and tiring journey into a remote area with poor roads. That done, he would enjoy a well-earned night's sleep before beginning to seek the answer the following morning.

By now it was the third day. The executive would obtain the necessary information and spend a second night at the estate before setting off back to his office, usually arriving at dusk. As traveling by night was best avoided, the reply would not begin its tortuous journey back to the group's London offices until the following morning. Five days later!

Today, even allowing for temperamental telephone connections in remote parts of the world, thanks to the development of the Internet, it is even possible

to have 'conversations' on-line so that questions could be answered immediately by using the instant messaging facility. Even without instant messaging, it can only take a few hours to obtain an answer. In some areas, of course, it would also be possible to use a laptop computer with an appropriate phone card or data card to replace the conventional telephone link. On some airlines, it is becoming commonplace to plug your laptop computer into an Internet connection and continue working and surfing during the flight.

Satellite phones are also useful in some circumstances as is video conferencing, if the facilities are available and circumstances justify its use. Indeed, the manner in which many military operations during Operation Iraqi Freedom in 2003 were controlled thousands of miles away by 'armchair generals' in a centre in mainland America is an extraordinary example of the capabilities of modern methods of communications, when cost is not a consideration.

The world of the media continues to see dramatic advances. Thanks to satellite links and increasingly smaller and more portable equipment, it has become quicker and easier to transmit reports from virtually anywhere in the world, from the flanks of Mount Everest to the depths of the sea. Where it is difficult for camera crews to operate, reporters can now speak 'live' into video phones and file their reports that way.

Such is the march of technology that a news program being transmitted to millions of viewers can be anchored in one part of the world—even from a windy street corner—yet be seamlessly linked to studios and other centers thousands of miles from each other. The main presenter can hold discussions with colleagues and experts in distant studios or on location as well as introduce local news and weather forecasts, all as if everyone was in the same studio.

The downside is that pressures are even greater on journalists and there is increasingly less time for them to ensure the accuracy of their reports. Equally, it is even more crucial that anyone involved in the communications aspects of crisis management appreciates the equal need for speed and accuracy in ensuring they provide reporters with the necessary information.

Now we are being faced with a new phenomenon. Anyone with access to the Internet can be a journalist and publish their own information and reports on any subject that takes their fancy. They can also sidestep any official restrictions and expose issues that concern them, like the abuse of Iraqi prisoners by United States troops in Baghdad's Abu Ghraib jail in 2004. There was a world scoop if ever there was one.

Corporate security is threatened by the proliferation of portable storage devices like jumpdrives, memory sticks, music players and even digital cameras. Small and unobtrusive, they can be plugged easily into computers so that vital information can be downloaded within a few moments.

Recent incidents involving anthrax and ricin have raised concerns that findings from life science research could be used to engineer deadly viruses that could be unleashed in the world.

Each year, according to the World Health Organization¹ (WHO), unsafe food is responsible for illness in at least two billion people worldwide and can result in deaths. Announcing the second global forum of food safety regulators in Bangkok, Thailand, in October 2004, the WHO pointed out that, while large foodborne outbreaks often received the most media attention, the majority were single cases occurring in all countries in the world. As an example, the Organization cited the fact that some 700 000 people die every year in Asia alone due to individual cases of food- and water-borne disease that usually do not hit press headlines. Many more suffered long-term debilitation.

The three-day meeting, the largest-ever of its kind, brought together regulators from health, agriculture and trade to develop a common understanding of how to strengthen food safety systems to better address the increasingly complex foodborne threats to public health and safe food supplies.

These complex threats were highlighted by America in a special paper submitted to the forum. It pointed out: "The environment has traditionally been thought of as the origin of many chemical food hazards, such as heavy metals and persistent organic pollutants. However, it is becoming increasingly apparent that new pathogenic micro-organisms are emerging due to environmental stressors from food production practices."

"Increased risk of pathogenic micro-organisms may also be attributed to contamination of the agricultural water supply caused by human and animal waste, use of manure as fertilizer, health and hygienic practices of agricultural works, and global movement of foods."

"As fresh produce is exported from farms all over the world to the tables of importing countries, the responsibility of domestic public health agencies is changing to adapt to our global market. There is increasing demand from developing countries for technical assistance on new farm production and management practices, good manufacturing and processing technologies. Developed country members of the World Trade Organization have been asked to deliver more sanitary/phytosanitary training as food safety has become critical to successful trade."

The document said an example of an emerging risk of foodborne disease was associated with consumption of fresh produce. "Produce is an important component of a healthy diet and can play a vital role in weight management, which is a high priority for public health. Because most produce is grown in the natural environment, it is vulnerable to contamination with pathogens. Moreover, produce is often consumed raw without any type of intervention to control or eliminate pathogens."

The US's Food and Drug Administration (FDA) had proposed an action plan to minimize illness associated with eating fresh produce. The objectives were to prevent such contamination in the first place, to minimize the health impact when such contamination occurs, to improve communication with producers, preparers and consumers and to facilitate relevant research.

¹ <http://www.who.int/mediacentre/news/releases/2004/pr71>

In conclusion, the paper made the point that reducing such illnesses required a collaborative effort by federal public health regulators such as the FDA and federal food safety partners such as the centers for disease control within the United States as well as counterparts in other countries, states and cities, the food industry, academia and consumers.

Even in 2002, the WHO was warning about these new challenges. In a *Global Strategy for Food Safety: safer food for better health*², it pointed out that food grown in one country could now be transported and consumed halfway across the world. Institutionalizing children in schools and childcare facilities and a growing number of elderly persons in hospitals and nursing homes meant that food for many was prepared by a few and could, therefore, be the source of major foodborne disease outbreaks.

Food and feed were distributed over far greater distances than before, creating the conditions for widespread outbreaks of foodborne illnesses. As an example, the document referred to the fact that over 1 500 farms in Europe had received dioxin-contaminated feed from a single source over a two-week period. Food produced from animals given this contaminated fodder had found its way onto every continent within weeks and the effects of exposure to dioxin from this source on public health might become known only after years of investigation. The international spread of meat and bonemeal prepared from cattle affected by bovine spongiform encephalitis (BSE) was another example.

Increasing urbanization led to greater requirements for the transport, storage and preparation of food and increasing wealth, an urban lifestyle and sometimes lack of facilities meant that people ate much of their food away from home. In some countries, food was often prepared by street vendors.

Though significant progress had been made in many countries to make food safer, thousands of millions of people still became ill each year from eating contaminated food. The emergence of increased antimicrobial resistance in bacteria causing disease was aggravating the picture and the public was increasingly aware of the risk posed by pathogenic micro-organisms and chemical substances in the food supply. Furthermore, the introduction of new technologies, including genetic engineering and irradiation, were posing a special challenge in the light of the climate of concern about food safety.

The document made the point: "Some new technologies will increase agricultural production and make food safer, but their usefulness and safety must be demonstrated if they are to be accepted by consumers. Furthermore, the evaluation must be participatory, transparent and conducted using internationally agreed methods

"Until recently, most systems for regulating food safety were based on legal definitions of unsafe food, enforcement programs for the removal of unsafe food from the market and sanctions for the responsible parties. These traditional systems cannot respond to the existing and emerging challenges to food safety because they do not provide or stimulate a preventive approach. During the past decade, there was a transition to risk analysis based on better scientific

² <http://www.who.int/fsf>

knowledge of foodborne illness and its causes. This provides a preventive basis for regulatory measures for food safety at both national and international levels. The risk-based approach must be backed by information on the most appropriate and effective means to control foodborne hazards."

In Europe, which was rocked by a variety of food scares in the 1990s, there has been a major overhaul of regulations concerning the safety of food and animal feed not only produced within the European Union (EU) but also imported into any of its countries.

Today 'crisis management' is an all-encompassing buzzword. It includes not only communications with the general public and other audiences, but also business recovery, reputation protection, financial protection and many more areas including information technology.

Search the Internet for 'crisis + management' and you will be presented with thousands of matches. Experts offer their services. Schools and universities publish their crisis management plans, presumably in an attempt to reassure parents and future pupils. A television channel in the UK even ran a program in which a studio panel was judged on its ability to cope with a horrendous series of scenarios based on a massive series of explosions at a mainline railway terminus. Ironically, a few weeks later, nearly 200 people were killed and more than 1 400 injured in a series of terrible blasts on commuter trains during the morning rush hour in Madrid, the capital of Spain.

Most food crises pale into insignificance in the face of such events but they are still serious and their financial consequences can be dire. Thousands of tourists shunned the UK when the world's TV screens were filled with images of the funeral pyres on which were being burned the bodies of hundreds of cattle slaughtered during outbreaks of bovine spongiform encephalopathy (BSE or 'mad cow disease') and foot and mouth disease. Asia's poultry industry was devastated by a serious outbreak of avian flu that also claimed lives.

Food poisoning outbreaks have swept through cruise liners as people were enjoying life at sea and caused hotels to be struck off holiday companies' lists after guests were laid low with similar bugs or serious flaws were exposed in general standards of hygiene. The holidaymakers involved filmed the conditions with their video cameras or took ordinary photographs of the conditions they had to endure before going to the media with this convincing photographic material. They also demanded compensation and started legal actions against the companies involved.

Perhaps even more alarming, governments have become concerned about terrorist and bio-terrorist attacks. It is all too easy deliberately to contaminate food, drinks and water supplies with live microflora or toxins and poisons.

In a world that threatens to become more bizarre by the day, people now can place bets on web-based sites that a particular event will happen within a given timeframe, even a terrorist attack. Bets are anonymous but security experts believe that the more money is placed on a particular happening the more likely it is that the betting is being influenced by people with advance knowledge of what is proposed! By monitoring the site, it is hoped that the terrorist attacks and outrages can be thwarted.

This is the world in which we live today. And this is the backdrop against which all those in the food industry who are involved in crisis management have to operate.

Threat of foodborne illnesses

Foodborne illnesses caused by micro-organisms is a large and growing public health problem with significant increases over the past few decades in diseases caused by pathogens such as *Salmonella*, *Campylobacter jejuni* and enterohemorrhagic *Escherichia coli* and parasites such as *cryptosporidium*, *cryptospora* or trematodes.

In 1998, approximately 1.8 million children in developing countries (excluding China) died from diarrhoeal disease caused by microbiological agents, mostly originating from food and water.

Every year, one person in three in industrialized countries may be affected by foodborne illness.

In the United States, some 76 million cases of such illness, resulting in 325 000 hospitalizations and 5 000 deaths are estimated to occur annually.

Studies in the US in 1995 estimated that the annual cost of the 3.3–12 million cases of foodborne illness caused by seven pathogens was \$6.5–35 billion. The medical costs and the value of lives lost during just five foodborne outbreaks in England and Wales in 1996 were estimated at £300–700 million. The cost of the estimated 11 500 daily cases of food poisoning in Australia was calculated at AU\$2.6 billion annually.

Source: World Health Organization Global Strategy for Food Safety: safer food for better health.

Colin Doeg,
London, United Kingdom,
January 2005.

The anatomy of a crisis

In the Chinese language, the pictogram used to express crisis contains two words: danger and opportunity. The same words could be used to describe the essential elements of any crisis.

The situation can be a danger for:

- The brand
- A particular product, production line or factory
- An individual
- People such as consumers
- The company or organization concerned, as well as its investors, shareholders and insurers; or
- The entire industry.

On the other hand, if the crisis is handled well, or if the problem affects a rival concern, the situation can be an opportunity. A 'crisis' can even be created or exploited for the benefit of a product or used by a body such as a pressure group to publicize itself, promote a campaign or attract new members.

Also, a crisis can prove to be an opportunity for a company to reinforce its commitment to its consumers. Equally, it can be an opportunity for consumers to reinforce their loyalty to that particular company or product. Mistakes do happen. What marks out one company or brand from another can be the way in which the problem is resolved and whether the solution shows clearly that the company puts its consumers first.

A crisis can cost a business enormous sums of money. Actual details are usually difficult to obtain though the cost of national and international disasters, such as the foot and mouth epidemic that affected the United Kingdom and the outbreak of avian flu that ravaged the Far East, are available in the first instance as media estimates and then as figures officially quoted by the government or governments concerned. However, an indication of the financial cost and widespread implications of one particular food crisis can be obtained from details of an *E. coli* outbreak that occurred in Scotland some years ago.



A growing problem for some companies is the activities of animal rights extremists.

One clinic carried out batches of tests on some 969 people with diarrhoea. That was in addition to those who only visited their family doctor. A total of 127 people were admitted to hospital. Thirteen had to be transferred to a larger hospital for dialysis. Twenty-seven were diagnosed as having a condition

known as thrombotic micro-angiopathy. Eighteen deaths were associated with the outbreak. One can only guess at the hidden costs.

More statistics are available about a typhoid scare many years earlier in the same part of the United Kingdom. The outbreak was caused by one 6 lb can of catering corned beef from Argentina. Over 500 people each spent an average of 24 days in hospital. Eighty-six had relapses and were re-admitted for a further average of 21 days. In all, this amounted to 14 000 patient/days in hospital.

They were prescribed some 17 kg of medication; laboratory examinations were carried out on 72 000 clinical specimens, 450 sewer swabs and 196 food samples.

A number of people died. The corned beef market suffered a severe setback. Importers lost huge sums of money and other producing countries like Paraguay, Kenya and Tanganyika (now Tanzania) suffered large financial losses even though their canneries were not implicated (Tables 1.1 and 1.2).

Those figures, of course, pale into insignificance compared with the cost of some car industry recalls and oil spills but food related crises could—and do—bring down a company.

So what is a crisis like? The scene is all too familiar to those who specialize in crisis management or those who have found themselves drawn into such a situation. Some aspects remain unchanged; others alter dramatically because every crisis is different.

It is Friday night. Somehow, it is always Friday night. Most members of the company have long since gone home except the switchboard operators and a number of key executives. They are busy tackling a problem. Well, it was a problem, just a routine matter but somehow it found its way to the media and so it has become a crisis.

Now there are two scenarios.

In the first, the directors are closeted in the boardroom. They are looking at each other in dismay. Totally bewildered, they are at a loss to know what to do. It is etched in their faces. They are struggling to comprehend what is happening. They feel powerless and overwhelmed. A succession of rapidly changing events is sweeping them along though, thank goodness, they have been able to keep the problem from their staff. Well, at least most of the people they employ because they have managed to avoid or ignore them all day. Even to the extent of appearing to be unaware of the clusters of people round the drinks vending machines or talking in whispers in their offices. But, somehow, the matter will not go away and now it is threatening to ruin the weekend.

The switchboard is jammed with calls. A harassed operator is saying “No comment” and “The managing director is not available, he cannot be contacted” in a robotic voice and wishing above all else she could go home and escape the turmoil.

The board is continuing to agonize over how to get out of the situation. They have been doing so all day. Six people had complained of finding glass in one of the company's products. Some contacted the company. One had gone back to the store from which she bought the jar and even contacted her

Table 1.1 Implications of major food incidents

Year	Country	Food	Contaminant	Cause	Effect	Cost	References
1982	UK/Italy	Chocolate bars	<i>Salmonella napoli</i>	Cross-contamination	245 ill	£500K	Shapton (1989)
1985	USA	Mexican-style cheese	<i>Listeria monocytogenes</i>	Addition of raw milk	142 ill, 47 deaths	Imprisonment \$ millions	Shapton (1989)
1985	UK	Dried baby milk	<i>Salmonella ealing</i>	Cross-contamination	76 ill, 1 death	£ millions	Shapton (1989)
1996/1997	Scotland	Cooked meats implicated (as yet unproven)	<i>E. coli</i> 0157:H7	Cross-contamination or inadequate heat process suspected	20 deaths, 501 affected	Unknown	The Pennington Group (1997)
1998	UK	Shell eggs	<i>Salmonella enteritidis</i>	Statement by government minister on presence of salmonella in some eggs—but would be destroyed by adequate cooking	Public perceived eggs as unsafe	Immediate 60% reduction in sales. Overall cost >£3 millions	North and Gorman (1998)
1994	USA	Ice-cream	<i>Salmonella enteritidis</i>	Cross-contamination from raw liquid egg transported in same tank as pasteurized ice-cream mix	227 000 ill	Unreported	Hennessy et al.(1996)
1994	UK	Egg sandwiches	<i>Salmonella enteritidis</i>	Under-cooking	2 ill	Damages awarded £185 500 plus costs	Rogers (1994)
1989	UK	Hazelnut yoghurt	Botulinum toxin	Thermal process insufficient for reduced sugar hazelnut purée recipe	27 ill, 1 death	£ millions. Whole yoghurt market depressed	Shapton (1989)

1993	World-wide	Various	Peanut allergen	Unknown consumption of product containing peanut	6 deaths	Unknown	Hourihane et al.(1995)
1996	Spain	Olive oil	Aniline dye	Denatured industrial rape-seed oil sold as edible olive oil	600 deaths, 25 000 disabled Public confidence reduced; major crisis management program involved	Unknown	WHO (1992)
1993	USA	Diet Pepsi-Cola	Syringes	Malicious contamination	Public confidence reduced; major crisis management program involved	\$40 million lost sales in one week	Pepsi-Cola Public Affairs 1993
1991	UK	Glass jar baby food	Glass/razor blades	Malicious contamination	Public confidence	1988 £58 million, 1989 £45 million/US \$4 million	<i>The Grocer</i> (1991)
1990	France	Mineral water	Benzene	Filter not checked in 18 months	World-wide recall, 160 million bottles destroyed	\$79 million	Reuter (1990)
1997	USA	Ground beef	<i>E. coli</i> 0157:H7	Raw ground beef is recognized as a potential source of this organism	25 million lb of meat recalled after health department investigation into outbreak	Unknown	Janofsky (1997)
1993	Germany	Potato crisps	<i>Salmonella</i> (90 serotypes isolated)	Spice mix contaminated	1000 cases (mainly children)	Unknown	Lehmacher et al. (1995)

Source: HACCP—A Practical Approach (second edition) by S. Mortimore and C. Wallace, ISBN 0-412-75440-1.

Table 1.2 Factors contributing to 1479 outbreaks of microbiological food poisoning in England and Wales, 1970–1982

Contributing factors	Number of outbreaks in which factors recorded (%)					Total
	<i>Salmonella</i>	<i>C. perfringens</i>	<i>Staph. Aureus</i>	<i>B. cereus</i>	Other	
Preparation too far in advance	240 (42)	464 (88)	80 (48)	54 (86)	6 (4)	844 (57)
Storage at ambient temperature	172 (30)	276 (53)	75 (45)	39 (62)	4 (3)	566 (38)
Inadequate cooling	125 (22)	313 (60)	12 (7)	17 (27)	1 (<1)	468 (30)
Inadequate reheating	76 (13)	275 (52)	5 (3)	33 (52)	2 (1)	391 (26)
Contaminated processed food	100 (19)	19 (4)	27 (16)	4 (6)	88 (54)	246 (17)
Under-cooking	139 (25)	74 (14)	2 (1)	1 (2)	7 (4)	223 (15)
Contaminated canned food	2 (<1)	4 (<1)	42 (25)	1 (2)	55 (35)	104 (7)
Inadequate thawing	61 (11)	34 (6)				95 (6)
Cross-contamination	84 (15)	8 (2)	2 (1)			94 (6)
Raw food consumed	84 (15)		1 (<1)		8 (5)	93 (6)
Improper warm holding	15 (3)	52 (10)		8 (13)	2 (1)	77 (5)
Infected food handlers	13 (2)		50 (30)		2 (1)	65 (4)
Use of leftovers	25 (4)	25 (5)	11 (7)	1 (2)		62 (4)
Extra large quantities prepared	29 (5)	17 (3)	2 (1)			48 (3)
Total	566	525	166	63	159	1479

Source: Adapted from Hobbs and Roberts (1993). Reproduced from *HACCP—A Practical Approach* (second edition).

local environmental health offices as well—but then some people can be quite unreasonable. Worst of all, two had phoned the local TV station and a camera crew is camped outside the building and demanding an interview.

The directors continue to be bewildered by all the fuss. After all, there is no telling whether the incidents are linked. There is no way of knowing when the jars were packed. To try to link them is ridiculous. They could have been produced days or even weeks apart. There is no way of telling.

Then there was the telephone call from the local food enforcement authority. Five people, not just one as the company thought, had gone to them and the authority considered such a level of complaints to be unacceptable.

The enforcement officers were insisting that a national recall was necessary under the requirements of the relevant national legislation because of the threat to the health and well-being of consumers! The directors shuddered at the thought. The enforcement authority had said they would make the press announcement and required appropriate advertisements to be placed in media which would be specified when company executives met officials later that evening... a Friday evening at that! And, apart from anything else, how on earth did they expect the company to be able to get in touch with their advertising agency before Monday morning?

The officials also required a detailed list of the trade customers to whom the product had been delivered and a copy of the business's product recall procedures. What list? What procedures?

The directors continued to look at each other in dismay. Why should this be happening to them? Why should a handful of consumers be so unreasonable over a few bits of glass? And what were their wives going to say when they told them the weekend was going to be ruined?

That was when they opened the second bottle of Scotch... and the business inexorably began to go down the drain!

The second scenario was very different. From the first hint that a problem had the potential of becoming more serious, a team of directors and senior managers had begun to implement the company's Product Recall and Crisis Management Plan.

They were all familiar with its workings... they rehearsed it at least twice a year, believing that if they were prepared for such an eventuality it might never happen.

But the unthinkable had begun to manifest itself. So they gathered in a room specially adaptable for such an occasion. Telephones had been plugged into dedicated sockets—some were regular switchboard lines, some were direct lines whose numbers were known only to a selected few; others were known to key staff throughout the company and soon would be made universally available to journalists and consumers. All the members of the crisis team were also switching on their mobile phones so there was an alternative means of contacting them should this be necessary.

In one corner, television sets had been brought in and connected to video and DVD recorders. A radio/cassette recorder had also been plugged in. Beside them stood a neat stack of video and audio tapes as well as compact discs (CDs).

The Crisis Committee had met earlier in the day. It was alerted when established procedures indicated that during the previous 48 hours, four consumers had complained of finding glass in one of the company's products carrying a production code which showed the jars were filled on the same line on the same day within 20 minutes of each other.

A swift trawl through the remainder of the day's post had revealed two more similar complaints. Clearly, there was a problem which could develop into a crisis.

At its second meeting of the day, the Crisis Committee wasted no time. With consumer safety and the integrity and reputation of the brand paramount in their minds, the decision was made to recall the entire production batch, destroy every jar produced during that particular period and X-ray the remainder to see whether they too contained glass fragments or could be put back on sale.

The overall strategy for the recall and the way it was to be communicated to the media, environmental health officials and food standards officers, consumers, trade customers and suppliers was agreed. The plans had been prepared several years previously and were regularly updated.

The meeting took just seven minutes.

Two hours later, the Crisis Committee held its third meeting of the day. Within 19 minutes, approval was given to media statements, advertisements, briefing notes for those who would speak to worried consumers phoning the special free phone numbers. The information that would be passed to the local environmental health officials, who were the company's link with the country's nationwide network of local officials, was quickly agreed.

There were murmurs of approval when Sales and Distribution reported on the progress they had made in tracing the customers—both multiples and wholesalers—to whom this particular production batch had been delivered. They had also nodded approvingly when it was reported that contact had been made with the suppliers of the jars and raw materials in case they could possibly be implicated in the problem.

In an adjoining room, the consumer relations officers were gearing up to handle the anticipated flood of telephone calls. Their desktop computers were ready for them to key details of each call into a pre-prepared database that could be accessed by Sales, Distribution, Production and the Technical Division as well as Public Relations.

Within minutes the public relations manager had arranged for the press statement to be sent electronically to national, regional and local media as well as major news agencies, national and local television and radio stations. Now he was talking calmly and confidently to one of the major news channels. He was speaking in a journalistic style, choosing words that anyone would understand rather than the more scientific language of his technical colleagues who were talking to the enforcement authorities. He was fully aware of the need to use the right language and words for the audience he was addressing. Pack shots and close-up photographs of the product code were ready to be transmitted electronically to those media that requested them.

On the PR manager's desk were color prints and transparencies of both the labels and the jars with the production code clearly indicated, proofs of the advertisement and also samples of the product from a different production batch which had been X-rayed to ensure they were satisfactory. Motorcycle couriers were standing by to rush them to any media who were unable to receive the images electronically.

A colleague was updating the company's web site, adding the press announcement and photographs of the product and production code as well as details of how consumers could be reimbursed for their purchases. A special section for journalists included background information about the company

and its products as well as copies of the press release, both in PDF (portable document file) format and as plain text, as well as images that could be downloaded for immediate use.

A film crew was on stand-by to produce video footage of the production line on which the jars were packed to emphasize the general standards of hygiene and good manufacturing practices which normally prevailed in the factory. The factory manager was being groomed for a possible appearance in the video which would be offered to television stations if events indicated this step would be beneficial for the brand and the company.

In another office, the marketing director and sales director were rehearsing their scripts for possible television or radio interviews. They were prepared to deliver 'sound bites' of various lengths or give more detailed interviews. Their plan was to try to use such opportunities to express the company's concern that such an incident had arisen, the action that had already been taken to safeguard consumers and also to tell people how they would be reimbursed for their unsatisfactory purchase.

Earlier in the day, all the company's TV commercials had been withdrawn and a newspaper advertising campaign due to run nationally on the Monday morning had been postponed.

In another office, a senior sales executive had begun ringing contacts in all the major multiples and wholesalers who stocked the product so they could put their own product recall and crisis management arrangements into practice and remove the jars from their shelves so the stock could be checked before being put on sale again if it was not from the suspect batch.

The future of the brand—and, perhaps, even the company—would depend on the next few hours and days.

If the media, consumers and government officials considered the company had behaved responsibly and reacted sufficiently swiftly neither the sales nor the reputation of the brand would suffer serious damage. Indeed, confidence in the company could be enhanced. If the perception was different... but that would be measured by consumer research and action decided upon if the recall developed into a long running saga.

Those two scenarios might seem to be pitched larger than life but each is a reasonable reflection of events as they can occur. Each paints a realistic picture of how a crisis could affect an organization unprepared for such an eventuality—surveys have shown that even companies that believed they might experience a crisis did not have a plan in place!—and how it would be handled by a highly professional and responsible company.

The purpose of this book is to help any business to draw up its own contingency plans and respond to a crisis in a professional manner should the need ever arise. In today's world, when methods of communication, both electronic and by satellite, are so extensive and swift it is more important than ever that a company is fully prepared for such an event; to be unprepared could lead to a company going out of business in little more time than it takes to read this book!

Protecting your brands and reputation

Famous brands, consumer loyalty and reputation can have a value far greater than a company's tangible assets. They have to be protected at all costs.

Millions of dollars are spent nurturing brands with persuasive advertisements, attractive promotions, and praiseworthy community relations programmes. However, if a brand falters and loses market share, this can be reflected swiftly in the company's share price. At the same time, brands are constantly under threat, not only from competitors in the marketplace but also from workaday problems that come to the attention of the media and so escalate into a crisis that hits the headlines.

In the food and drinks industry, such threats can range from a foreign body being found in a product or in a number of products from the same production batch, to bacterial infections, deliberate tampering or extortion attempts. However, it is not only food producers who can suddenly find themselves in the eye of a media storm. Farmers, meat producers, livestock transporting companies, caterers, cruise liners, and hotels have also found themselves swept up in a wave of undesirable publicity as a compensation culture grips many nations.

For some, there have been other problems. International restaurants have been fire-bombed, businesses and staff have received letter bombs, employees have been harassed, companies have been called to task because of the conditions of employment in a supplier's factory far away in a country where standards and expectations are different and the business has been reviled on the Internet by dissatisfied customers.

Yet, because of concerns that companies must be 'ethical' and accountable in every aspect of their operations, organizations now send senior members of staff or external technical auditors to inspect every aspect of the operation of even the most modest grower of spices or other ingredients. Rather than restricting their inspection to the production line and quality control processes, today, those executives even examine the conditions of employment of the workers involved, their rates of pay, housing and other facilities if these are provided by the employer.



Problems relating to food and foodborne illnesses constantly make headlines, as indicated by this selection of cuttings. These can be typical issues for those involved in crisis management.

The rapid spread of diseases such as foot and mouth and avian flu as well as the harm caused to people receiving letters containing powder contaminated with anthrax, demonstrates only too clearly how quickly and widely an infection and alarm can be spread by biological terrorists.

At the same time, the level of threat must be kept in perspective because, of course, problems occur in every business no matter how carefully it is operated and controlled. Fortunately, most are resolved in the normal course of events without attracting media attention. Others find their way into the public domain, and it is upon the communication aspects of the situation of these on which this book focuses.

Consumers take their complaints to the media; environmental health and other enforcement officers find shortcomings in standards when they inspect premises or products. Cases of food poisoning can be widespread and serious.

The food industry today is more complex than ever. Extended supply chains provide consumers with exotic fruits and vegetables year-round, and long distribution chains challenge the life of products and increase the problems faced by food manufacturers and suppliers. In addition, people want low-priced food that is safe, healthy and accurately labeled—a difficult balance to achieve.

Today, in addition to a compensation culture, there is also an accountability culture. At a conference staged in London, England, in 2003 by the magazine *Marketing Week*, Colin Farrington, director general of the UK's Institute of Public Relations,¹ described this expectation as an “endlessly beating tidal wave—ride it out or be drowned”. Speaking about the crucial importance of a company's reputation, he said: “Typically evolving over time as a result of consistent performance, reputation is a value judgment about a company based on: esteem, credibility, loyalty, and trust. The competitive edge gained by protecting and enhancing a successful reputation is cumulative.”

He went on to refer to growing expectations of transparency and accountability from stakeholders. “There is more real-time media coverage of business news than ever before. Share price movements on the strength of breaking online news stories, however unsubstantiated, demonstrate the array of risks—financial, management, political, supply related—to which reputations are increasingly vulnerable.

“The proliferation of the Internet feeds the 24/7 news media environment by speeding up and widening the potential flow of information. Fully understanding the impact of [information technology], and the Internet in particular, means recognizing the social as well as the economic consequences of this continuous technological revolution.

“The Internet now offers the basis of a better dialogue with consumers and shareholders, reducing the constraints of geography and resources. But now, not only do global consumers and shareholders have more choice, they also have more voice.

“Consumers are more concerned with corporate behavior than ever before. The impact of corporate social responsibility means companies have to create

¹ www.ipr.org.uk

mechanisms that demonstrate access, transparency, and accountability for all their actions.

"By implication, a company that enjoys a reputation for being an active corporate citizen is more likely to gain real long-term competitive advantage by building business sales, a motivated workforce and trust in the company as a whole.

"Extending control over the forces of perception through reputation risk management is every enterprise's most difficult task." He went on to underline the purpose of public relations in influencing behaviour to achieve objectives through the effective management of relationships and communications, of which reputation was a by-product.

Against this backdrop, people have become increasingly skeptical following a succession of corporate scandals in which, for instance, the financial reporting irregularities of world renowned businesses have been exposed. Journalists reflect this skepticism in their persistence to delve more deeply into stories rather than accept at face value the information they are given. The Internet also means they can have access to more detailed information than ever before, though there is no guarantee of its accuracy.

In turn, this puts greater pressure on company spokespeople who must be fully informed and sufficiently lucid to be able to explain the most complex and scientific issues in terms that anyone is able to understand. This can be particularly important when, perhaps, a scientific report makes claims that dangerous residues of a toxic chemical have been found in a particular product or ingredient. Science progresses by discussion and debate as well as by the publication of research that is then challenged by other scientists.

At times this can be difficult to explain, especially when one has not seen the actual report yet the spokesperson is expected to respond to a sketchy outline of the findings without it being possible to verify the number of people sampled and the techniques employed. Another factor is that, as methods of scientific detection become ever more sensitive, chemicals may be found in foods and ingredients that were previously unknown. Such claims can attract media attention despite the fact they are at barely detectable levels and that the food or ingredient concerned has never been known to cause a problem.

It can also be important to be able to put scientific information into context—"it can be extremely difficult to translate the results of tests on animals into their effect on people" or "what you have to bear in mind is that here we are talking of the equivalent of two or three drops of water in an Olympic-size swimming pool".

Companies with good consumer and media relations should also appreciate the importance of never 'over-spinning' their cause. A classic example of loss of trust is provided by the Labour government in power in the UK while this book was being written. When it first came into office in 1977 it enjoyed enormous credibility. The nation would have believed virtually anything they were told. But by 2004 it was distrusted by a large proportion of the population. Why? Because it had spun and spun so many issues as well as re-launched initiatives and programmes several times over as if each was an entirely new move. Yet journalists were easily able to disprove the basics of such announcements and expose the repeated use of the same underlying facts and statistics with a few

additional ones added to make it look like a new and even more impressive move.

Of course, the most crucial issue on which the British government needed to be believed was the decision to go to war with Iraq in 2003 when even many members of Parliament were skeptical about the intelligence on which the move was based. Subsequently, much of the information was shown to be flawed and inaccurate.

To put matters even more bluntly: never distort a fact if you can be found out! It is also important to bear in mind the consequences of damage to a reputation. There are examples in Chapter 17 and 18, where case histories show how a food scandal brought down the Belgian government and disappearing consumer confidence left Japan's largest dairy products company struggling to survive, even after closing factories and disposing of parts of the business.

There are many ways in which a company can demonstrate to its employees, suppliers, customers, consumers and the world at large that its prime concern is to produce safe, wholesome foods.

They include:

- Adoption of systems to identify and control possible hazards and risks at all stages of the chain;
- Rigorous food control procedures including quality, hygiene, and process controls;
- Display of a sense of social responsibility in marketing strategies, purchasing policies, relations with employees (especially during periods of cultural change or union negotiations) as well as in dealings with local communities and the public in general; and
- Encourage goodwill in the communities in which the company has operations by providing local managers with budgets for donations to local charities and other worthwhile causes.

Wide-ranging corporate philosophies such as these are common to most large, international organizations. They have been introduced by directors and managers convinced that the businesses should behave in a socially responsible manner and will benefit by doing so. To their credit, such policies have been in operation in numerous companies for many years. Even modestly sized businesses have similarly enlightened attitudes.

Such policies have provided a variety of benefits. Problems of all types have been at a minimum. Suppliers have wanted to do business with those companies. Consumers have wanted to buy their products. People have wanted to work for them. Should such a company ever become embroiled in a serious problem, its established philosophies will have stood it in good stead, perhaps even helping it to be given a more sympathetic public hearing than would otherwise have been the case.

Nothing shows more clearly to employees, suppliers, customers, and consumers that the company is committed to the production of safe and wholesome foods than an obvious dedication to good manufacturing practices.

Systems such as hazard analysis and particularly hazard analysis critical control point (HACCP) have been widely adopted in countries like the

United States, Canada, New Zealand, Australia, and Europe. They are also being recommended in codes of practice and guidelines for a number of food industry sectors.

2.1 Designing hazards out of a system

The application of HACCP makes it possible to design identifiable potential hazards out of food processing and manufacturing systems at the planning stage, and to ascertain where they might occur in existing systems and take suitable action. As well as helping to identify specific hazards, HACCP makes it easier to estimate the extent of any risks involved and identify the steps needed to prevent or control them.

The system helps to identify and control microbiological hazards as well as other general risks such as the inclusion of foreign matter, residues, and contaminants that can occur during food manufacture, from the production of raw material through processing, packaging and distribution to the ultimate consumer.

HACCP gets away from the traditional methods of testing food—quality control and end-product evaluation—and starts at the beginning of the chain. Application of HACCP principles will take a company a long way forward in ensuring the safety of its products, not only during manufacture but also at all stages, from growing or rearing, harvesting or slaughtering to purchasing, distribution, and retailing.

The approach also provides enforcement authorities with a logical way to identify possible food hazards and determine the steps needed to rectify them. In Europe, the European Community is applying the same principles to all aspects of food safety, from ‘farm to fork’.

All in all, HACCP provides general assurance to the world at large about the safety of products manufactured under such disciplines. The system is considered such an important aspect of improving the safety of food and raising perceptions of food safety, that the World Health Organization (WHO) produced guidelines for *Training Considerations for the Application of the Hazard Analysis Critical Control Point System to Food Processing and Manufacturing*.²

They were developed during a consultation on HACCP training convened by the WHO in Geneva, Switzerland, as long ago as 1993 and the Organization, in collaboration with the food industry, developed model training materials based on these considerations.

Originally, most food safety and quality systems focused on testing the end product. That was all very well, but if you wanted to be sure every meal was safe and wholesome you had to test each one... and then there wouldn't be any left to eat or to sell! Therefore, when the US was developing its Space Programme, a system was developed to provide a high level of assurance that the food was safe for the astronauts to eat.

² Food Safety Unit, Division of Food and Nutrition, World Health Organization (1993) *Training Considerations for the Application of the Hazard Analysis Critical Control Point System to Food Processing and Manufacturing*, WHO/FNY/FOS/93.3, Geneva, Switzerland.

It was drawn up by the Pillsbury Company working alongside NASA (National Aeronautics and Space Administration) and the US Army's laboratories. The system was based on FMEA, the engineering system Failure, Mode and Effect Analysis, which looks at what can potentially go wrong at each stage in an operation. It establishes the possible causes of such failures and the likely consequences before setting up effective control measures.

In the first edition of *A Practical Approach to HACCP*,³ a companion title in this series, joint authors Sara Mortimer and Carol Wallace wrote:

Like FMEA, HACCP looks for hazards or what could go wrong, but in the product safety sense. Control and management systems are then implemented to ensure that the product is safe and cannot harm the consumer.

HACCP is a proven system which gives confidence that food safety is being effectively managed. It will enable you to maintain focus on food product safety as the top priority, and allows us to plan to prevent things going wrong rather than waiting for problems then to control.

Because HACCP is a recognized, effective method, it will give your customers confidence in the safety of your operation and will indicate you are a professional company which takes its responsibilities seriously. HACCP will support you in demonstrating this under food safety and food hygiene legislation, and in some countries is actually a legislative requirement.

To implement a HACCP system, personnel from difference disciplines across the company need to be involved, and this ensures that everyone has the same fundamental objective ... that safety is more important than anything else. This is often otherwise difficult to achieve in a real business where there is a consistent pressure from a number of different areas, e.g. customer/commercial pressures, brand development, profitability, new product development, health and safety, environmental/green issues, headcount restriction, etc.

HACCP is applicable to everyone. You may be a multinational food corporation starting from within a sophisticated quality management system with documented procedures and well-defined practices, or a small manufacturer of goat's cheese in a shed on the farm, or the street vendor of ready-to-eat pizza slices. No matter, HACCP can be effectively applied to businesses at both ends of the spectrum.

The primary area where HACCP will help is in the processing of safe food. It helps people to make informed judgments on safety matters and removes bias, ensuring that the right personnel with the right training are making decisions. As HACCP is a universal system, it can be passed on to your suppliers to assist in assuring raw material safety and will also help to demonstrate effective food safety management through documented evidence which can be used in the event of litigation.

HACCP is the most-effective method of maximizing product safety. It is a cost-effective system which targets resource to critical areas of processing, and in so doing reduces the risk of manufacturing and selling unsafe products.

³ HACCP—*A Practical Approach*, 2nd edition, Sara Mortimore and Carol Wallace (1998) ISBN 0-8342-1932-8, Aspen Publishers Inc, Gaithersburg, now part of Springer Science + Business Media.

Users of HACCP will almost certainly find that there are additional benefits in the area of product quality. This is primarily due to the increased awareness of hazards in general and the participation of people from all areas of the operation. Many of the mechanisms that are controlling safety are also controlling product quality.

Another benefit of HACCP is referred to in the book—the prediction of opportunities for malicious tampering of products. The authors point out that HACCP will focus attention on points where individuals can have easy access to products during manufacture. They also warn that companies should be aware of reasons why operators might bear a grudge. Businesses should also ask themselves whether the packaging is resistant to tampering and whether, if it is tampered with, there will be signs that this has occurred.

They also pose the question: “Can a food manufacturer say anything in mitigation when a problem occurs with a product? Is there any acceptable excuse or possibility of claiming in defence that due diligence had been taken at every stage of production and distribution? The answer is that it can be helpful if it is possible to demonstrate that good working practices are employed in the manufacturing areas and that ‘due diligence’ is observed at all stages. Accreditation to ISO 9000 [series] Standards, no matter how much they might have been maligned recently, also administers a high level of reassurance.”

In the second edition of *HACCP—A Practical Approach*, the authors underline the benefits of the system. They point out:

HACCP is a system of food control based on prevention. In identifying where the hazards are likely to occur in the process, we have the opportunity to put in place the measures needed to prevent those hazards occurring. This will facilitate the move towards preventative quality assurance approach within a food business, reducing the traditional reliance on end-product inspection and testing.

All types of food safety hazards are considered as part of the HACCP system—biological, chemical, and physical. Use of a HACCP system should, therefore, give the growers, manufacturers, caterers, and retailers confidence that the food they provide is safe. Effective implementation of HACCP systems can involve everyone in the company and each employee has a role to play. The culture that evolves through this approach makes it much simpler to progress to additional programmes such as quality improvement, productivity, and cost reduction.

HACCP can, after the initial setting up of the system, be extremely cost effective. First, by building the controls into the process, failure can be identified at an early stage and, therefore, less finished product will be rejected at the end of the production line. Secondly, by identifying the Critical Control Points, a limited technical resource can be targeted at the management of these. Thirdly, the disciplines of applying HACCP are such that there is almost always going to be an improvement in product quality.

Consumer awareness of their right to purchase food that is safe has increased significantly over the past few years. Likewise, their awareness of quality features, for example the presence of unwanted harmless physical contaminants, such as extraneous vegetable matter. Here the controls used to prevent the presence of harmful contaminants, such as glass, are often likely also to prevent

the occurrence of less harmful contaminants, therefore providing brand quality protection as well as consumer protection.

2.2 Need for risk assessment procedures

Companies should have their own risk assessment procedures in place and there are moves to harmonize national standards and principles of analysis to reduce differences that can occur between countries and different organizations. This will be of enormous help to all those dealing with the media who have to try to explain why the minute traces of a certain compound or ingredient which are acceptable in one country are unacceptable in another and that this fact does not indicate the concealment of a threat to consumers.

A paper on risk assessment⁴ has been prepared for consideration by the Codex Alimentarius Commission, the WHO and Food & Agricultural Organization (FAO) body, which aims to develop international standards on many food matters. The paper reviews the risk assessment procedures associated with the Organization's work as well as those of its various advisory bodies, which cover additives and contaminants, residues of veterinary drugs, pesticide residues, food hygiene and meat hygiene. The report was prepared by Dr S.C. Hathaway.

The paper makes interesting reading for anyone who has to put such risks into perspective for journalists and consumers, and contains many useful phrases.

Another aspect of operating to the highest standards is referred to in the fourth edition of *Food and Drink—Good Manufacturing Practice: A Guide to its Responsible Management*,⁵ a publication produced by the UK's Institute of Food Science & Technology (IFST). The foreword refers to the ever-increasing interest among consumers, retailers and enforcement authorities for assurances about conditions and practices in food manufacture and distribution. This interest tended to support the view that, in the event of a prosecution, the ability to demonstrate that the principles and measures identified in the guide had been fully and effectively followed could help in demonstrating that all reasonable steps had been taken to avoid an offence being committed. Most of the principles in this guide have also been embodied in a similar publication from the New Zealand Institute of Food Science and Technology.

The manufacture of a food product must comply with relevant legal requirements, such as those of composition, safety, hygiene, and labeling.

Legally, adherence to the 'all reasonable precautions and all due diligence' guidelines could be a defense under the Food Safety Act 1990 (now replaced by

⁴ Review of Risk Assessment Procedures used by the Codex Alimentarius Commission and its subsidiary and advisory bodies by Dr S.C. Hathaway, Food Control 4(9).

⁵ *Food and Drink—Good Manufacturing Practice: A Guide to its Responsible Management*, 4th edition, Anderson K.G. and Blanchfield J.R. (eds), ISBN 0 905367 08 1, Institute of Food Science & Technology (UK), 5 Cambridge Court, 210 Shepherd's Bush Road, London W6 7NL. A fifth edition was in the course of preparation in 2005. The Institute also publishes other guidelines dealing with good catering practice, food hygiene training, the shelf life of foods, and the handling of chilled foods among other titles.

new legislation introduced by the European Community). Achieving ISO 9000 accreditation is a clear demonstration that a business has quality systems which have been appraised and which are regularly audited. It is anticipated these two areas will be dealt with in detail in future titles in the *Practical Approach* series.

2.3 Benefits of 'due diligence'

An example of the benefits of being able to demonstrate that 'due diligence' has been observed is given by Dr Ray Gibson, director of Reading Scientific Services Limited (RSSL). He cites the case of a company faced with a complaint from a man who, after drinking wine with a meal, was taken ill with vomiting and sickness.

Dr Gibson said: "The man had recently read a review on food contamination and had learned of an earlier problem of wine adulterated with ethylene glycol. He became convinced the wine had caused his illness, and so contacted the manufacturer."

RSSL was called in and conducted a full toxicity screening. The alcohol content of the wine was established, as well as the level of heavy metals and its acidity and alkalinity. No ethylene glycol was found in the sample nor were any alkaloid substances found which might have indicated the addition of drugs. Neither was there any evidence of the wine being adulterated.

"By presenting the full toxicity report, our client was able to prove it had acted with due diligence in responding to the consumer complaint. The evidence was even more convincing because the investigation had been conducted by an independent laboratory."

2.4 Marketers beware

Under the Consumer Protection Act 1987, in deciding whether a product is 'safe', UK courts can now examine the manner in which goods have been marketed, including the way they have been packaged as well as the instructions or warnings that have been provided. In the light of the legal concept of safety, it is the words and images used to create an impact which will be scrutinised. Perhaps there is a case for marketers to exercise due diligence over some of their more creative claims?

Most of these systems and practices boil down to the fact that, in this age of consumerism, companies are expected to be responsible and caring in every way and that they are expected to demonstrate a sense of social responsibility. Again, there are benefits if a company is perceived to be a good corporate citizen. The classic example is the oft-quoted case of a major oil company which was fined *only* £1 million (\$1.5 million) for polluting the UK's River Mersey because of the extensive support it gave to worthwhile causes, especially environmental and conservation initiatives.

This is a tangible example of the benefits of being regarded as a good corporate citizen, quite apart from the fact that enlightened managers believe their companies should put something back into the communities from which

they obtain their livelihoods and employees clearly like to work for such organisations.

2.5 Benefits of corporate citizenship

Corporate citizenship can include activities such as:

- Giving support and financial assistance to employees who have shown a clear commitment to help worthwhile causes in the areas where they live and work;
- Giving help and support to worthwhile causes and activities in the communities in which a company has operations;
- Linking selected brand and promotional activities with charities appropriate to marketing strategies and consumer audiences, such as young mothers with large families if you are a major food manufacturer;
- Co-operating with local schools and education authorities in connection with work experience programmes, teacher placements and Youth Training Schemes;
- Using the company's skills and resources to play a prominent part in a local issue, such as an environmental problem, or a matter relevant to food such as hygiene training for student caterers; and
- Support appropriate initiatives by trade and industry bodies and organisations.

In carrying out such programmes, companies are likely to find themselves in regular contact with the media. This will not only develop contacts which could be useful in other ways but might also help executives to discover that journalists are not always 'the enemy' but, in fact, can be useful allies.

However, don't ever think that, because you have contributed towards a local community centre, your local newspaper will overlook reporting the proceedings when your company is fined for polluting a stream or river—they too have their standards and practices that you would perhaps understand better if you had more contact with them.

Preparing for the unthinkable

No matter how professional and effective a company may be, there is always the possibility of a serious problem arising that is unforeseen or develops into a crisis. However, thinking through the possible ramifications of such an eventuality and preparing responses and scenarios to deal with it will always ensure that an organization is better prepared to face the unexpected.

Prepare for the unthinkable is sound advice and brainstorming sessions are an excellent way to tease out thoughts on the worst horrors that could affect a company, much as disaster recovery planning takes into account the collapse of a company's computer network, the destruction or sabotaging of all its computer programs and information, or the burning down of an office or factory.

Membership of trade associations and research organizations as well as regular scanning of the media helps one to keep in touch with prevailing threats and trends. This is essential. Even in the world of crises we are driven by fashion. Extensive coverage of a hazard or threat can spawn a flood of 'copycat' crimes to which every manufacturer and retailer must be alert. However, regular attention to such 'intelligence' should always be supplemented by input from executives who know the weaknesses and vulnerabilities of their own organization.

Therefore, a business should always prepare itself to cope with the worst conceivable events that could happen to it and its products as well as the possible consequences. Even the best systems in the world cannot eliminate the possibility of a defective product entering the distribution chain and reaching trade customers or consumers. Nor can they provide complete protection against the actions of criminals, cranks, extremists, disgruntled employees or dishonest consumers. Therefore, the universal advice of everyone experienced in crisis management is that plans to deal with such mishaps, no matter how small the business and how rare they might seem, should be prepared or at least discussed to avoid uncertainty in management reaction and communication should such an eventuality ever arise.

If a crisis flares up, speed is essential. The situation must be assessed rapidly, decisions made and suitable action taken before irreparable damage is done

to the brand or the company. In the first edition of *Crisis Management in the Food and Drinks Industry*, Peter Sheldon Green put an interesting perspective on crisis management and the need for such preparations and plans. In his book *Reputation Risk Management*,¹ he made the point that any business that failed to protect its assets would normally be regarded as incompetent. Such a company would ensure it had reasonable protection against fire, theft and vandalism and also have insurance cover in case its precautions ever failed. Yet the most priceless asset of all, a company's reputation, goodwill or brand value was often neither protected nor insured.

In his book, he suggested a value should be placed on the reputation of the company and its brands, and that a proportion of that amount should be allocated to 'reputation risk management'. Such a budget could include the cost of quality control, handling consumer complaints, PR involvement, monitoring brand and industry issues and hazards, etc.

This is a persuasive and sensible way to look at crisis management in its broadest sense—he used the term 'reputation risk management'—and put it into perspective. This approach also provides any company, large or small, with a formula by which an appropriate sum can be both calculated and justified.

In terms of thinking about the unthinkable, another point which experienced crisis counselors make is that the very act of considering what problems might arise and preparing strategies to deal with them is the first stage in putting such eventualities into perspective. It is always easier to prepare plans in a calm and detached atmosphere rather than amid the turmoil of an actual crisis.

A telling example of forward thinking concerns an aircraft that crashed in the United Kingdom as far back as the late 1980s. The actions of Sir Michael Bishop, chairman of the airline British Midlands Airways (now BMI), were exemplary by anyone's standards, partly because of his own style and personality and also because the company had had such a crisis plan in place and it was well rehearsed. Even all those years ago, it has been reported that the plan had been drawn up some 30 years previously—farsighted thinking indeed.

3.1 Threats to take into account

But what are the threats that should be taken into account by a company in a fast moving consumer goods market like food and drink, or a similar area?

Every company should conduct its own risk assessment—a brainstorming session involving a multidisciplinary group of senior executives can be very productive—and such potential problems usually fall under the following headings:

- Product contamination, either accidental or deliberate;
- Problems facing your particular industry;
- Extortion—a demand for money or the threat of particular action being taken, usually of a political or religious nature;

¹ *Reputation Risk Management* by Peter Sheldon Green, Financial Times/Pitman Publishing, ISBN 0-273-03869-9.

- Pressure from a consumer or environmental group;
- Incidents at a manufacturing plant, such as a fire, explosion or accident involving injury or loss of life.

Other problems like serious fraud, especially computer fraud, call for consultants with special skills and experience. There are also specialists in dealing with acts of sabotage, terrorist attacks, threats and even kidnapping. Others can provide bodyguards and protection services—all too necessary for companies with operations in some parts of the world.

However, long before a company has to face a serious problem, there are several steps that should be taken. The first is to appoint a crisis team or committee. The size of such a group depends on the size of the company concerned, but it should have executive powers in a crisis.

Therefore, it should include members of the board such as marketing director, commercial director and sales director as well as those responsible for external communications, especially with the media. Each should have at least one and preferably two nominated deputies, depending on the size of the business.

It is debatable whether the chief executive, chairman or managing director should be a member, no matter how serious the problem. He or she might not be the most suitable person to communicate to the media or other audiences. Some have a flair for doing so; others are unsuitable in that particular role. Furthermore, it is important that the remainder of the business continues to operate as normally as possible. His or her presence could well be vital elsewhere to ensure this happens as well as to reassure and inspire staff.

The crisis team should have its own operations room. The boardroom or a suitable meeting room is usually a good choice. Its equipment should include:

- Several telephones or sockets into which handsets from other offices can be plugged as required;
- At least one and preferably several private or ex-directory phone lines;
- Desktop and laptop computers with Internet facilities, including at least one laptop with a phone card or datacard so it can operate independently (in this day and age, every press office or public relations department should consider having at least one);
- Fax machine(s) in or near the room, though the Internet has replaced many of their uses;
- Television set(s);
- Video or DVD recorder(s);
- Radio(s) equipped with tape recorder(s);
- Small, handheld tape recorder(s);
- Cell or mobile phones; and
- Media directories, phone books, etc.

When news bulletins overlap each other on different channels it might be necessary to have more than one TV set. Even newspaper offices monitor TV broadcasts because rolling 24-hour news channels provide useful coverage of events. Sub-editors can begin scheming pages and writing headlines before

reporters have had sufficient time to file their copy. There are also instances where it is important to check broadcasts so that any inaccuracies can be corrected quickly. The Internet is also a good source for checking the news stories that are circulating—a list of the web sites of the on-line versions of the relevant media should be included among the list of favorite sites on at least one computer.

In most countries, it is essential to have a dish or cable connection so that both satellite and terrestrial stations can be monitored, especially if the company has brands that are marketed internationally.

The use of mobile telephones is now widespread but, if there is any possibility of an executive having to go to a remote part of the world in connection with a crisis, the purchase or hire of a satellite phone should be considered. If the executive has the necessary skills, a digital camera and laptop computer that will link with the satellite phone could be useful so that relevant images could be transmitted back to the crisis team for possible distribution to the media. Even video phones could be useful. These are the facilities used by many news photographers and reporters, even when operating in major cities.

3.2 First hint of a serious problem

The crisis committee should conduct an assessment of the risks and threats which could, in theory, face the company. They should be considered in the knowledge that the first hint of a serious food safety problem could come from several different sources:

- A complaint from a consumer;
- A consumer complaint referred back by a store;
- A complaint from the regulatory authorities;
- An alert from public or medical sources;
- A phone call from the police;
- A threatening message or extortion attempt;
- An enquiry from the media;
- A 'copycat' complaint, threat or extortion attempt;
- The knock-on effect of a problem in another country; or
- An industry issue, such as the use of an ingredient or additive, animal testing, over-packaging, or the apparent discovery of a compound such as dioxins in a product or its packaging materials.

Once the hazards have been identified, the next step should be to discuss strategies to contain or limit their effect as well as to convey the information to the media, consumers, the trade, enforcement authorities and other relevant parties. Depending on the severity of the problem it may even be necessary to consider informing shareholders.

Some complaints will be made in telephone calls that occur outside normal office hours. Large companies have switchboards which are permanently staffed. Smaller ones cannot justify providing such a service. However, there are several ways to ensure that calls received outside normal working hours can still be dealt with and such arrangements should be in place. One is to

install an answering service to record messages and/or to ask callers to ring an alternative number in the case of an emergency. This second telephone number could be that of a mobile phone carried by a 'duty' member of staff or that person's home number. Another alternative is for callers to leave their name, phone number and details of the nature of their call on the answering service, which could be regularly interrogated by the 'duty' member of staff. A third possibility is to use an outside agency, such as a security organization. Personal pagers or 'bleepers' are also useful though they are being replaced by more sophisticated devices or mobile phones.

Other companies, anticipating that serious out-of-hours telephone calls are most likely to come from the media or regulatory authorities, routinely provide them with the home and mobile phone numbers of key individuals like press officers and technical or quality control managers.

As well as such arrangements, it is important that the basic procedures to be followed are properly documented.

One person should be designated as the coordinator through whom all relevant information relating to a possible crisis is channeled. That person should also be responsible for keeping other members of the team informed of an impending problem. Frequently, this task falls to the company's public or press relations officer, corporate affairs manager or perhaps to the company secretary in a small organization. In other cases, the chief executive, chairman or managing director may insist on taking personal responsibility! The right choice will depend on the company ethic, but it is essential that the most competent person to deal with the situation is appointed, regardless of his or her position in the hierarchy. Also, the authority of the team must allow by-passing of normal management, while still involving a responsibility that line management be kept informed as quickly as possible.

The chairman of the team is responsible for calling any necessary meetings. Often the marketing, sales or commercial director is selected for this role.

It is vital that the crisis handbook is regularly updated and verified, especially telephone numbers. If such a system does not already operate, one should be introduced to ensure that members of the crisis team can be contacted when away from their offices. This is second nature to anyone who has worked on newspapers or in public relations, but many business people are lax about letting their offices or secretary knowing their precise movements.

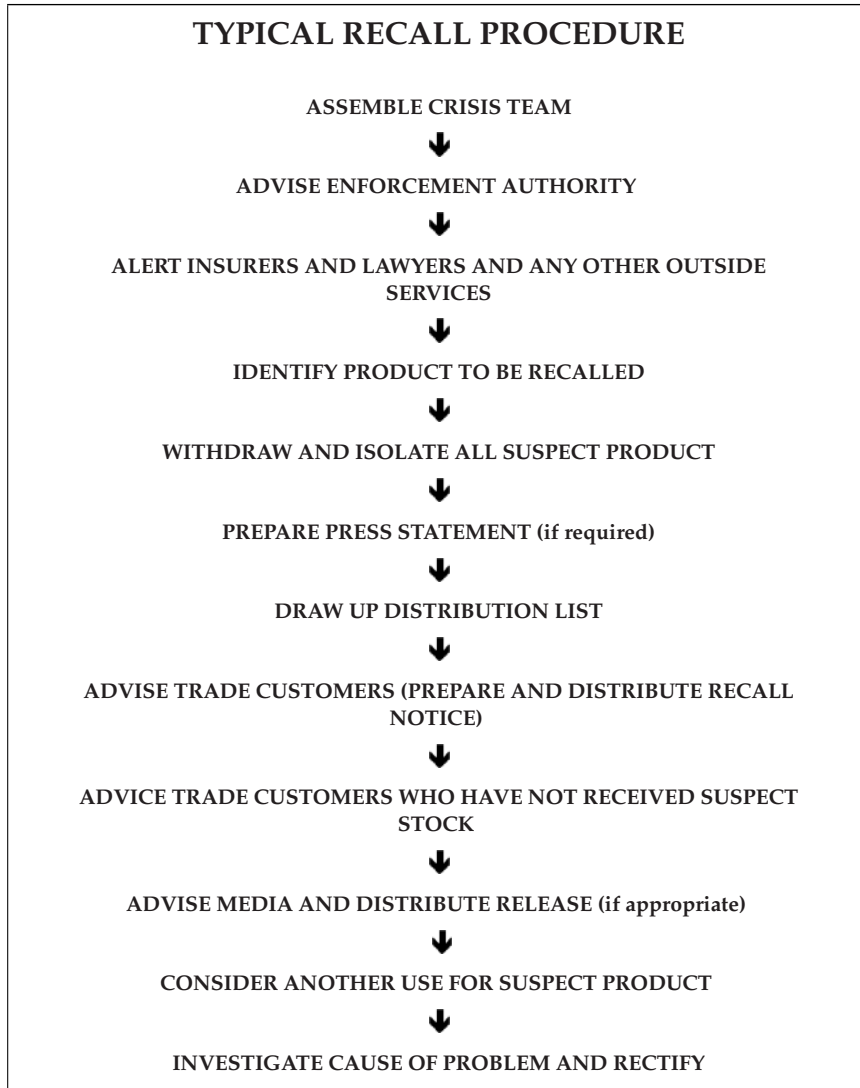
Not so every nation. The editor of one respected scientific weekly frequently recalls how, when working for an American publication, he was contacted by his office while on a domestic flight from one part of the United States to another. He was asked to follow up a particular story. He phoned his contact from the aircraft. That person was out of his office but an efficient secretary said he was in Japan and, at that moment, would be traveling on the famous Bullet train, the telephone number of which was . . .

Needless to say, when the call was put through from the plane to the speeding train, contact was made and the story phoned back to the publication long before the aircraft landed!

Thankfully, not everyone has to make phone calls under such pressure but there is a lesson to be learned from the tale. It shows the different attitudes

prevailing in some countries and also the speed with which journalists and others can operate—a theme emphasized elsewhere in this book.

The crisis manual should also take into account the company's established product recall procedures. Sales staff should be able to contact customers at any time if a problem arises.



3.3 Sources of help and advice

Today, there is considerable help and advice available to companies from their own trade bodies as well as the regulatory authorities. In the United Kingdom,

for example, the Food & Drink Federation² provides guidelines on malicious tampering and product security and the Institute of Grocery Distribution³ maintains a register of food industry contacts—an invaluable source of information if there is a serious problem or a product recall is being announced. Though available only to member companies, both are invaluable. Similar bodies exist in many other countries.

Essential contents of every crisis handbook are:

- Work, mobile, fax and home phone numbers as well as e-mail addresses of members of crisis committee;
- Phone and fax numbers as well as e-mail address of all company locations, including those of senior managers' direct, mobile and home phone numbers and e-mail addresses at home;
- Telephone and fax numbers of regional sales management, both office, mobile and home as well as e-mail addresses;
- Direct office, fax and home phone numbers as well as e-mail addresses of all senior quality control staff;
- Home phone numbers (and home fax numbers if this facility is installed) as well as e-mail addresses of head office manager and deputy;
- Office, fax, mobile and home phone numbers as well as e-mail address of company's medical officer;
- Office, fax and home phone numbers as well as e-mail addresses of any specialists such as new product development managers, purchasing managers and those with specialist knowledge of particular ingredients or product ranges;
- Non-company contacts such as local environmental health office, trading standards office, food standards agencies, government departments dealing with health, the environment, food and rural affairs, trade associations, relevant hospital poisons units, etc.;
- Specialist contract laboratories and food research associations (in the United Kingdom these would include Reading Scientific Services Limited, Leatherhead Food International Research Association, Ventress Technical Limited, Law Laboratories Ltd, Campden & Chorleywood Food Research Association, the Institute of Food Research⁴ and the Central Science Research Laboratory);⁵
- Police and other appropriate authorities;
- Public relations and security consultants who are already employed by the company or who have been singled out for use in a crisis;
- Insurers and external legal advisors;
- Office, mobile and home numbers as well as e-mail address of company's media buyer (if such a role exists) and directors and account manager of advertising agency(ies).

² www.fdf.org.uk

³ www.igd.org.uk

⁴ www.ifr.bbsrc.ac

⁵ www.csl.gov.uk/

Such an extensive list might seem unnecessary but it will prevent much valuable time being lost trying to make essential contacts at unusual hours. These days, in addition to having hard copies available, there is no excuse for not having this information as well as the crisis manual and product recall procedures on a CD so it is easy to pop it into a laptop or desktop PC for quick reference. It is also desirable to have pre-prepared lists of all appropriate media, including e-mail addresses as well as telephone numbers. This information should also be installed on at least one PC so there is no delay in distributing press releases or transmitting product photographs. All up to date media directories include e-mail addresses for the news desks or newsrooms of national and regional print and electronic media as well as similar information for magazines and trade journals. If some necessary publications are not listed, the information can be obtained by a simple phone call to their offices.

3.4 Checklist for crisis team

The crisis team should prepare a checklist of actions which it should take or to which it should give consideration. These actions, which should be tested regularly, include:

- Warn and brief switchboard operator(s), secretaries and others who may take phone calls;
- Ensure all media enquiries are directed to official spokesperson(s) and not dealt with by anyone else;
- Consider if other departments or disciplines should be alerted or involved;
- When to alert the chief executive, chairman and/or managing director;
- When to tell the parent company or subsidiary companies (if relevant);
- Consider the need for a warning about goods already sold, i.e. a public recall;
- Consider the need to stop all retail sales;
- Consider the need to withdraw any current advertising or promotional activity;
- Consider the need to warn other manufacturers and trade associations. In such circumstances, consideration should also be given to trying to ensure that any statements from these various sources are consistent;
- Consider need for product withdrawal from:
 - Specific local outlets,
 - All local outlets,
 - Specific regional outlets,
 - All regional outlets,
 - Specific national outlets or
 - All national outlets;
- Consider most appropriate way to dispose of withdrawn product to minimize financial losses;
- Confirm precise details of products, codes, and quantities involved;
- Determine mechanism of any product withdrawal and roles of Sales and Distribution;

- Decide arrangements for isolation, inspection and/or disposal of stock. Establish isolation areas for storage of suspect stock;
- Consider and propose replacement of affected stock;
- If it is suspected criminal activity may be involved, obtain as much evidence as possible and involve police and other appropriate authorities;
- Consider need to inform and reassure employees;
- Tell line management of actions being taken;
- If necessary advise insurers and lawyers; and
- Advise and involve enforcement authorities in line with national legislation or voluntary codes of conduct. In the United Kingdom, the 'home authority' should normally be advised. In countries with a larger geographical area, usually a regional office rather than the central one should be informed.

When a product has to be recalled, it is still possible to minimize losses. If the batch has a short shelf life, such as yoghurt or a fresh-chilled ready meal, it will be necessary to make a decision within a few hours of the problem being discovered. On the other hand, if the products are packed in jars or cans they can be isolated until the exact source of the problem is established. This might well take several days or even longer. However, in those circumstances it might be possible to arrange for all the products, such as pickles and sauces, to be X-rayed so that any jars containing fragments of glass can be destroyed while the remainder are returned for sale. Canned meat products, such as corned beef, might well be suitable for use in a different product such as pet foods or animal feed. Other losses might be minimized by arranging for product to be condemned by the local enforcement authority and disposed of. If insurance issues are involved, it may be necessary to clear any action with the insurer.

It is important that every member of the company likely to be affected by a crisis is familiar with the procedures involved. Examples not already referred to include:

- Other senior management;
- Mail room staff, secretaries and anyone else likely to open mail;
- Security staff; and
- Any key-holders registered with local police or other authorities.

On receipt of a hazard warning or threat by telephone, the recipient should note down the fullest possible details (see checklist in Appendix F) and immediately contact the committee's coordinator. If that person is not available, contact should be made with another member of the team who should set the agreed plans in motion. Every member of the committee, deputies and others who are likely to be contacted in a crisis must have a copy of the manual. Indeed, there is sense in each having at least two copies—one for the office and another to be kept at home or in their briefcase, plus the CD already referred to.

Switchboard operators can be a weak link. Many are 'temps' or security staff responding to out-of-hours calls. It is important that every newcomer is suitably briefed. It is equally important that all newcomers to departments such as the mailroom are also made fully familiar with the crisis arrangements. New secretaries should also be informed of the procedures, especially if they

are working for a director, senior manager or in any other position where they are likely to open correspondence.

If a threat is received in the mail, the document and envelope or wrapping paper should be handled by as few people as possible. All the items should be put into a transparent folder or plastic bag immediately. . . and long before they are passed from hand to hand round every curious individual in the office. It is a good idea to keep a supply of latex gloves for handling such documents—they are used in medical departments and laboratories as well as being obtainable from pharmaceutical stores. These are more suitable than those sold by auto spares suppliers and general stores because they are sterilized and more protective.

Even at an early stage, it can be sensible to alert senior managers, senior sales managers and technical staff so that teams can begin to be assembled or put on the alert. Where help is likely to be required from a specialist, such as a medical expert, it can be worth forewarning them.

It is important that these procedures are rehearsed at regular intervals. People change jobs and companies. Memories fade. If there is little cause to use crisis handbooks, they can be mislaid by complacent managers. Just as with the rehearsing of fire evacuation procedures, crisis management arrangements should be regularly rehearsed as well as updated and revised if improvements can be made.

3.5 No magic solutions

In the first edition of this book, Martin Langford, an internationally respected crisis management consultant, who has been involved in handling as many as four breaking crises on the same day, pointed out: "There is no magic solution that can be applied to any crisis. Each crisis bears its own markings and its own unique solutions. To draw upon strategies successfully used by others is not the key to develop a solution to your own problem. No-one else's situation is ever the same as yours.

"This is particularly true regarding the crucial decision—usually made in the first hours of a crisis—whether or not to recall a product. For obvious business reasons, recall is to be avoided as a solution to every crisis. It is costly and often difficult to reverse. But, at the same time, selective and targeted recalls can provide a clear resolution to concern about possible tampering or a presumed contamination. The trade-off, which can only be made in the particular moment, involves balancing between what is known about the true public health hazard, which can often be minimal or non-existent, and the advantages of satisfying the media's interest in action, versus the very real costs of a recall.

"The keys to developing the right crisis strategy are not in copying another corporation's success but in defining the real problem you are facing and setting objectives. For instance, if you are involved in a 'media scare' with little reality in the claims, the objective may be not to correct the coverage but to end it. In a boycott, the problem is not to correct the distortions about the company's involvement in an issue but to keep the opposition from spreading the word and motivating their troops. In the case of a death or serious injury, the objective

should be not to avoid liability, which is usually unavoidable, but to protect the company's reputation as a caring, honest and responsive organization.

"The only constant in any crisis is the media and every journalist will want answers to three basic questions: What happened? How did it happen? And what are you going to do about it?

"No matter what the issue, these are the crucial questions around which the media will formulate their stories and for which the spokesperson must always have a response. Indeed, every press statement issued and every briefing held should be preceded by a thorough review of the company's position on those three basic questions. Any public hesitancy in formulating their response will be viewed as a sign of confusion, lack of concern or incompetence.

"Therefore, the selection of the media spokesperson is one of the most crucial decisions in the first hours of a crisis. And while various criteria may apply regarding the position, expertise, media experience etc, only one criterion is truly important: the spokesperson must speak from beginning to end with authority from management. Changing the spokesperson in midstream is always a mistake. It creates confusion and destroys the one line of continuity in your relations with the reporters following your story.

"All the basic rules of media relations apply with full force in a crisis. Never lie. Do not speculate. Respect media deadlines. Try to keep control of an interview. Have your own message to convey and make sure you convey it."

It is interesting that Langford points out a major product recall is not always the correct solution to a problem. 'Technical' product recalls are not unusual. In some countries, they are accepted practice provided there is no risk to consumers. In other countries, even recalls restricted to the trade have to be publicized to avoid any suggestion of a cover-up. This is both unfortunate and unrealistic because, with continuous production and just in time deliveries, it is not always possible to complete quality assurance inspections before stock has left a factory. In such circumstances, no health risk is involved provided a product can be withdrawn before it reaches the consumer but one cannot go against consumer perceptions.

3.6 Crisis, what crisis?

An important aspect about any crisis is that the media are the ones who decide whether a company or a product is faced with a crisis situation. The company concerned might be puzzled that a problem it is dealing with is branded a crisis but one of the most important rules of crisis management is that you have to tackle the perception that is in people's minds and not what you may consider to be the actual problem.

As if that is not enough to bewilder many executives, the key elements of that perceived crisis may change from day to day as the agile brains of reporters search for new angles on the story to retain the interest of their readers. A classic example of what the media considered to be the real issue of a crisis was quoted in the first edition of this book.

In Holland, an El Al cargo jet smashed into a block of flats beside Amsterdam's Schipol airport. The crash raised questions about El Al's security because terrorist action was an obvious possibility. The accident also raised the question

of whether the makers of the aircraft, Boeing, had adequately disclosed repeated problems with the engine mounts of that series of 747's. Further questions were raised as to why flights were regularly sent over low-income flats rather than over more affluent areas of the city.

Three different Arab terrorist groups vied with each other to take credit for bringing the aircraft down. Virtually, every television channel and many newspapers throughout the world carried dramatic pictures of the 747's tail emblazoned with the Star of David protruding from the side of the block of flats.

Both El Al and Boeing had every right to consider they were facing a crisis and they set about dealing with it. However, the media decided the real crisis was the scandal that the flats had been built under such a major flight path. Amsterdam city government, who no doubt considered they were faced with a major cleaning up operation, found they were in the frame rather than the airline or the plane's manufacturer. El Al's security continues to be legendary. Boeing continues to make passenger aircraft. However, the cost of coping with the situation was substantial for every organization involved.

3.7 Feel and instinct

It is also important to be able to put a possible problem into perspective. Consumer relations officers develop an instinct for the genuine caller and the one who is making a dubious complaint. Journalists develop this instinct early in their careers. They soon have to distinguish the crank caller from the genuine, and the dubious story from a real one.

Of course, individual reactions can vary when faced with the same problem. The author still remembers putting to one side a sheaf of correspondence from a consumer claiming a reward and damages over a perceived issue. Some months later, the author was contacted by police officers carrying out an enquiry that ranged throughout much of the United Kingdom. It had begun because another food company received similar correspondence and initiated the full panoply of its crisis plan. In this instance, it involved the police. Somewhat embarrassed at not having reacted more positively, the author explained that, based on previous newspaper experience, he had dismissed the individual as a harmless crank. With a sigh, the detective said quietly: "You were very perceptive. I wish there were more with similar experience but people without that background cannot afford to take any chances."

The important points to remember from this chapter are that it is essential to:

- Prepare for the unthinkable;
- Prescribe every anticipated reaction;
- Identify your emergency response plan;
- Guard your reputation;
- Take potential threats into account;
- Ensure the appointment of a competent crisis management team;
- Appoint the right chairman for the crisis team;

- Ensure regular testing of crisis arrangements;
- Rehearse your procedures, and
- Keep on rehearsing them at regular intervals.

Another aspect of crisis management is the monitoring of food problems and issues that could affect a company or its products (see Chapter 7). If a business is being targeted by extremist organizations (see Chapter 15), it can also be necessary to keep a watchful eye on their web sites.

In even the smallest company, it can be useful to set time aside to consider such matters and also the published responses of other businesses and trade associations and discuss whether any lessons can be learned from them. Many trade associations and scientific bodies monitor and respond to industry issues. Indeed, this can be an effective means of diverting attention from a particular company or brand, especially the market leader. Trade and scientific bodies also brief their members on such topics—another benefit of membership. Some contract laboratories also circulate newsletters to their clients. Rival companies can also be useful sources of advice or help. Indeed, it is not unusual in times of a serious crisis for the more farsighted competitors to offer technical facilities and other resources to each other in the best interests of the industry.

Of course, it is all very well to draw up plans and prepare crisis manuals but they are of no more than cosmetic value unless procedures are rehearsed and tested from time to time. This is particularly important when executives frequently change their responsibilities and new staff are appointed and also when many activities are outsourced. However, it is important that such rehearsals are kept in perspective and not allowed to develop into a crisis in their own right (see Chapter 8).

Crisis plans need to be tested at various levels. Telephone calls to company locations at unusual hours are an excellent way of probing weaknesses and making people aware of the actions that should be taken. Equally, it is sensible to arrange much more testing scenarios for members of the crisis team. However, not only the participants but also everyone on the fringe of such an exercise, from the switchboard operator to the chief executive, should be aware such a practice is taking place. The theme of the rehearsal also should be relevant to the business and its operations, whether it is a problem identified in a product still within the distribution chain or one involving a growing number of consumers and enforcement authorities.

The crisis team should be based in the office area or room from which it would operate during a genuine crisis. Those playing the roles of environmental health officers, journalists, and consumers can use nearby offices so that contact can be made using the normal internal telephones.

The basis of the rehearsal could be that a clutch of similar complaints has been spotted by the consumer relations department. The team has to decide the appropriate action and pressure can be exerted on their decision-making by a telephone call from a journalist. Then the tempo can be further raised, for instance, by a call from reception that a television crew has barged into the building and is demanding an interview with the managing director. Other players can become involved. Calls from hysterical consumers, aggressive pressure

groups and other journalists can steadily increase the pressure on the team as less and less time is allowed for decisions to be made.

Role-playing can sometimes be derided as a training tool but it can, nevertheless, be exceptionally useful. As with media training (see Chapter 8), the playing back of video recordings of the rehearsals can be a salutary learning device. This practice is particularly useful because the individuals concerned have the opportunity to see themselves as others see them. They can be their own fiercest critics but in a way that is far less wounding to their self-esteem than if similar comments were made by another person.

When the exercise is concluded, those involved should be given an opportunity to review events and to suggest what they might handle differently on another occasion—not, you note, what went wrong. It can also be useful to ask them if there was any aspect of the 'crisis' and its handling which they found difficult. If beneficial lessons are to be learned, such a discussion must never be allowed to degenerate into an inquest where blame is being apportioned for mistakes or shortcomings. Otherwise, the rehearsal will not be a positive learning experience.

The Internet—a two-edged sword

In the decade since the first edition of *Crisis Management in the Food & Drinks Industry* was published in London, England in 1994, the scope as well as the influence and impact of the Internet has grown beyond all recognition. It has become one of the most powerful means of communication in the world as well as usually being the cheapest.

Today, there are millions of web sites and the Internet is growing at the rate of two million pages a day! The number of web pages is believed to be greater than the entire population of the world. At any moment at any time of the day or night, approximately 100 million people are connected to the Internet.

People keep in contact with relatives and friends by e-mail. Some join together in specialist groups, or news groups, to converse and exchange information with others interested in the same subject. Businesses and individuals create their own web sites. Companies publish information about their business and its products on the web. People create their own web logs or 'blogs' and use them for everything from publishing a personal diary to damaging attacks on businesses they consider have treated them badly in one way or another.

Specialist sites help these 'bloggers' to obtain each other's web addresses but not their actual identity. The web-loggers suddenly find they have become part of a community in which they can remain anonymous if they wish.

For example, you can click onto any station shown on a map of the New York subway in the United States or the underground network in London, England, and see a list of the addresses of fellow 'bloggers' who also use that stop.

Journalists as well as the print and electronic media have their own sites. They encourage interaction with their readers and viewers. E-mail messages have become part of newscasts around the world, with viewers encouraged to comment on news items and events. One of the most vivid accounts of life in Baghdad during Operation Iraqi Freedom in 2003 came from a 'blogger' living in the city while it was being attacked. There are also sites which feed potential news items to the journalists who subscribe to it.

Governments have their own web sites. People can write to the President of the United States and receive a reply, though it is unlikely to have been

tapped out on a keyboard in the Oval Office by the country's leader. Other governments also make effective use of the Internet, publishing press releases and other information on their sites.

In the UK in April 2004 the security service, MI5,¹ came out from the shadows and, for the first time, launched a web site containing security advice and an indication of the type of terror threats the nation could face. The site is reported to have received three million 'hits' on the first day.

However, there is no more dramatic example of the impact that the Internet has had on our lives than the speed with which images of the abuse of Iraqi prisoners by US troops flashed around the world in 2004 and the outrage and indignation they produced. Taken with the latest generation of digital cameras and mobile phones with built-in cameras, they were easy to download into web sites and include in e-mail messages for all to see.

Particularly effective use is made of the Internet by the US, Canadian, UK, Australian, and New Zealand governments as well as the European Union and European Community among others. They publish regulations concerning food safety and food control and most also contain guidance on how to meet those requirements. Governments also set out on the web how they require product recalls and crises to be dealt with and even provide examples of model recall procedures and crisis management manuals.

Most government sites also give details of product recalls or alerts, some even making available the press releases distributed by the companies involved.

All this information and more is available to anyone with a computer, a modem, and a connection to a telephone network or even a satellite telephone. It has never been so easy to find so much information. But the Internet can be a two-edged sword. Some years ago, before most businesses realized its potential, many environmentalists and single-issue pressure groups had already discovered that the Internet was a quick and cheap way to organize their members and conduct their campaigns.

Now the sites of pressure groups are professionally produced and detail their attacks on businesses or even the routes of proposed protest marches. The Internet highlights the fact that some campaigns still rumble on many years after the original event. One particular example is the site of the Friends of Bhopal. They continue to campaign actively for adequate compensation for the victims of the world's worst chemical leakage at a factory in India over a score of years ago. On December 3, 1984 a holding tank at the Union Carbide pesticide factory in Bhopal overheated and burst, releasing a highly toxic gas. Within three days, over 3 000 died from the fumes.

Animal activists are jubilant about their activities and the damage they claim to inflict on businesses using animals for research even though much of this work is required by law. It is daunting to trawl through their sites and discover the lengths to which they are prepared to go to disrupt a business (see Chapter 15).

In the early 1990s, in addition to universities and schools, some of the major international pressure groups as well as some smaller collections of campaigning individuals were already exploiting the Internet. They had seized

¹ www.mi5.gov.uk

upon its potential as a means of cheap and rapid communication as well as research.

A handful of campaigners had already used it effectively to orchestrate a global campaign against the world's largest food company, Nestlé, in connection with the manner in which its baby foods were marketed and promoted in some African countries. The campaigners claimed that mothers were encouraged to feed their babies breast milk substitute or follow-on feeds which they could not afford to use at their proper strength or mixed them with unsafe water supplies, causing malnutrition and illness.

Also in the early 1990s, WWF (the World Wide Fund for Nature) had begun to use the Internet and electronic mail by introducing an international group-working system linking around 1 000 people world-wide, many of whom were in remote areas of Africa, Asia, South America, and the Antarctic. While it was not the principal use of the system, when an environmental issue or crisis arose, the Fund was able immediately to pinpoint those within the organization able to advise on that particular matter. Then those experts could collaborate on the preparation of information and action.

The Internet—the concept was initially described as a Galactic Information Infrastructure—was first mooted in the 1960s but the United States Defense Department is credited with its serious development some years later. Subsequently, its use was greatly expanded by universities and schools long before it grew into the system we know today.

Today, there are few parts of the world where access is impossible. Remarkable technological developments are taking place all the time and clearly will continue to do so. News channels transmit video reports filed by Internet when conventional methods like satellites or video phones are not available. By using digital cameras, photographers can take pictures of an event six minutes before a deadline, download them into a laptop computer, make any necessary adjustments to the images and satellite them to a picture editor on the other side of the world—all in the space of 360 seconds.

A short-lived international magazine to which the author contributed was produced in England while the editor was based in the United States. Articles, photographs, and entire sections of the publication were transmitted back and forth across the Atlantic by high-speed Internet link.

Even while on scuba diving trips in remote areas, one of the author's colleagues remains in contact with his many interests by means of his laptop computer and a satellite phone. Each evening he retreats to the top deck of the boat on which he is traveling, establishes his satellite link and then transmits and downloads his latest messages. In addition, he ensures that he remains aware of world events by downloading the latest stories from the web sites of newspapers and news channels in various countries. There are few sheltered bays or coral reefs from which his equipment cannot receive a signal.

In 2003, the Internet gained a different type of recognition. China blocked access to a number of sites, including that of CNN, the TV news channel. Somehow, the IT experts of the People's Republic had created a firewall that blocked-off some 16 different sites because the authorities considered they were undesirable.

In the same year, the Indian government created outrage when it banned a Yahoo discussion group. The ban resulted in the blocking of all discussion groups hosted by the Internet giant in India, inconveniencing users throughout the sub-continent, reported the UK edition of BBC News. The government ordered the move because of fears that one particular discussion group, the Kynhun forum, had links with banned separatists. It used new technology laws to force Internet service providers (ISPs) in the country to block the forum after Yahoo refused to comply.

The government claimed the Kynhun forum was linked to an outlawed separatist group in a north-eastern state. It was claimed the discussion group contained material against both the government and the state of Meghalaya. Since the Indian ISPs lacked the technical expertise to block a sub-group, they responded by blocking Kynhun's Internet address but this led to hundreds of other web pages also being blocked and thousands of protests pouring into a government web site.

The Internet is a force to be reckoned with. It is an amazing source of information. A search using the key words 'crisis + management' produced nearly two million matches. They included information about crises of various types, the crisis management plans of many different organizations as well as details about businesses offering their services in such situations.

A search using the keyword 'food' produced nearly one million matches, depending on which search engine was used. They varied from enthusiasts who collected sweet wrappers to the views of single-issue pressure groups, position papers on hot topics by respected scientific bodies and details of food recalls in many different countries.

Refine the search to a topic like bovine spongiform encephalopathy (BSE) and you can find everything from government sites to scientifically accurate position statements such as those on the award-winning web site² of the UK's Institute of Food Science and Technology, articles from scientific journals and general discussions about the problem. During the BSE and foot and mouth disease outbreaks in the UK in 2001 and 2002, distraught farmers, who were forbidden to leave their farms, used e-mail to keep in touch with each other, bolster each others' morale and console each other as their herds were slaughtered.

When faced with a problem, the Internet can be the quickest source of information. A few years ago, when an *E. coli* outbreak was rampant in the UK, the author found that the most intelligible information was produced by a firm of American lawyers who were offering their services to claim compensation for victims of this particular strain of food poisoning organism. The document also contained a list of major outbreaks—invaluable both for a busy journalist and any hard-pressed company spokesman trying quickly to gather background information.

Another advantage of the Internet is that, if there is a sufficiently serious issue or crisis, it is possible to check news agency messages as well as the stories carried by newspapers, magazines, and TV channels on their web sites.

² www.ifst.org/

If necessary, you can check the on-line versions of major newspapers around the world, from America to Australia and many other countries in between. Such information can keep a crisis team better informed and enable it to react quickly and even proactively.

Monitoring the pages of pressure groups can also help identify impending problems and enable strategies to be prepared to manage likely issues.

However, even with the fastest combinations of computers, modems, and telephone connections, Internet searches take time and resources which, unless there is a specific requirement, usually only the larger companies can afford or justify. Nothing can beat a painstaking search by an intelligent and well-informed executive with an instinct for teasing out the significant messages from among the thousands on offer.

Small companies might find it useful to encourage a trusted member of staff to browse the Internet from time to time in exchange for a contribution to his or her phone bill and ISP subscription as well as some assistance in purchasing the necessary equipment.

However, a quirk of the Internet is that if you carry out a search you will not necessarily find the same information presented to you by every service provider or search engine. Also, you might find that the same information appears in slightly different versions depending on the search engine.

Today, organizations of all types use the Internet to their own advantage. Many have their own web sites on which they promote their products and give contact details as well as publish everything from financial information to news releases and images of products that can be downloaded by the media for immediate use. It is also possible for companies to have 'dark' web sites that, within a few minutes, can be substituted for the regular one. These are standby sites that can be quickly updated with media releases as well as advice and information for consumers relating to a product problem or recall. The design follows the established format of the business's site but considerable time is saved because the alternative site is already in place and it is only necessary to paste in the additional material.

Companies and governments use electronic mail for internal communication. An executive can have a special crisis symbol or icon on his computer screen or a special group of addresses in his e-mail address book so that he can be in contact with all the other crisis managers within that organization in a matter of minutes. Such an arrangement makes it possible quickly to alert colleagues to a particular problem and also to jointly discuss and agree a statement or a course of action while everyone is simultaneously on-line. Such links can be protected by the use of passwords so that only certain executives have access to them.

The Internet has become a fundamental way of communicating with mass audiences around the world and its use is continuing to increase. At one time knowledge was power. Now it is the speed at which you can access or communicate that knowledge that gives real power.

However, the Internet poses an additional problem. How can you be sure of the creditability and accuracy of the information it provides? Obviously, one can regard the sites of governments and scientific bodies as being reliable.

However, the information contained in the sites of other organizations such as pressure groups needs to be treated with caution.

The Internet has spawned the rise of the 'blogger' or web logger. As already mentioned, web logs have given consumers a new way to air their grievances. Now, instead of having to resort to buying books containing advice on how to complain about a faulty product and copying examples of model letters to the chief executive of the offending company, they have a new way of telling the world about their complaint. If they are dissatisfied with the response they no longer have to struggle to interest either a journalist or a radio or TV programme. Now, provided they have even a basic knowledge of the Internet, they have a new means of 'naming and shaming' a business. They can create a web log in which they specify the organization and list their grievances. The web log can become the story as the complaint is taken up by newspapers, radio stations, and television channels. The danger is that, no matter whether their allegations are justified or whether they relate to an isolated incident, the taint will remain even if the company concerned is an innocent party.

A web-based news service called Out There News even ran a half-hour question and answer session with an Iraqi journalist who was sitting in the press center in Baghdad and reporting 'live' as bombs fell on the city during Operation Iraqi Freedom in 2003. About 12 000 people participated in this 'new media experience', learning at first-hand what was happening ahead of all the television and other news channels. At the time, Out There News also compiled a glimpse of what al-Qa'eda thought it had achieved in its war with America and what it would be likely to do in the future, drawing on hundreds of pages of statements and articles on the terrorist organization's web site.

Bloggers even claim they were able to bring down two of the leading figures in US journalism, though not everyone agrees with this contention. Nevertheless, whatever the reason, executive editor Howell Raines, who won seven Pulitzer prizes for the *New York Times'* coverage of the September 11 attacks on the city's twin towers, and managing editor Gerald Boyd resigned from their positions in 2003 after weeks of scandal over reporting standards.

The UK also produced a highly publicized use of a web log. Dissatisfied with their treatment by the country's largest chain of high street electrical shops and stores, some customers set up a web site (www.mastercare.blogspot.com) to set out their problems. The principle allegation was that the company sold second-hand goods as new. They claimed that a digital camera they bought already had someone else's photographs on it, that a 'new' computer contained private files on its hard drive, and that a portable cassette recorder had been sold up to three times before.

In next to no time, several hundred people filled the site with details of their own dealings with the organization and its various stores. Some praised it, others criticized it. Some existing and former staff admitted shortcomings while others defended the policies and activities of the business. But best of all for the bloggers, the blogspot received extensive media coverage.

The lesson for every business and industry is simple. Anyone who has access to an Internet connection and is dissatisfied with a product or the way they

have been treated by a company is able to air their complaint, whether or not there is any justification for their allegation (see Chapter 5).

Satisfactory and sympathetic handling of complaints from consumers is more important than ever. The author's big worry is that, as more and more businesses outsource tasks like this and become 'hollow companies' not even manufacturing their own products, the likelihood of problems can only increase.

In the past, for example, both the author and the series editor have been horrified by the cavalier way in which handling agencies dealt with complaints relating to promotions they were dealing with on behalf of clients. The author frequently had to rewrite their standard letters because they were brusque and totally lacking in tact and sympathy. This was in marked contrast with the way similar issues were dealt with by the client company's own internal consumer relations department. The staff in that department had an intimate knowledge of the business and its products. They believed in treating consumers as they would like to be treated themselves and frequently provided the first indication of a problem arising with a particular production batch.

Their role was considered so important that the head of the department had the authority to telephone a factory and stop a production line before reporting this action to the production director. Such a drastic step was only necessary once in over 20 years. On that occasion, it prevented an extremely serious health threat arising because of a sudden rash of complaints of glass in jars of instant coffee.

With suggestions that some of the world's largest food companies are worried about claims that new evidence suggests some ingredients are addictive and that their products are to blame for people becoming obese, the threat presented by the army of bloggers cannot be taken lightly. The other worrying aspect is that the proliferation of blogspots is so great that the only way to monitor the hypothetical risk they pose is to conduct frequent web searches by company name and individual product names. However, such searches would be immensely time consuming and difficult to justify . . . until you found you were being 'blogged', when it would be too late! Obviously, the best defence is to try to ensure your consumers never have a reason to blog your company or your products and the way they have been treated . . . unless it is favorably.

Of course, today it is not only the Internet that can reach remote and inaccessible parts of the world. Thanks to satellite technology, even small villages in the most emergent communities have at least one television set. Villagers are exposed to Western advertising and films as well as other programmes, thus raising their awareness of environmental and health issues as well as stimulating their ambitions and desires for more attractive lifestyles and possessions.

However, there is a different aspect to the Internet. In an article in *Food Safety & Security* dated October 2004, headlined "Do you know what is happening behind your back" the author described a nightmare situation that can arise.

After describing the size and scope of the Internet he posed the question: "How do you know what people are saying behind your back? How can you

ever hope to keep track of such activity, especially when some may be vital to the success of your business?"

The article continued:

At one time, press cuttings agencies were invaluable in keeping track of what was being said about an organization and its products in newspapers and magazines. They cut to a brief and sent appropriate clippings to their clients. Indeed, media references were regarded as one of the major sources of information by intelligence operatives.

There is still a role for press cuttings agencies—today's more common term is 'clipping services'—but now such services have become electronic and can offer greatly expanded coverage.

Internet searches using the keyword 'press clipping service' and 'media monitoring service' will produce thousands of matches. Among the 27 886 'hits' a recent search found for 'press clippings services' there were agencies providing everything from global monitoring to coverage in specific countries or states, tracking advertising campaigns, monitoring television and radio broadcasts, checking the editorial comments of major opinion-forming publications, and keeping a watchful eye on news groups and web logs or 'blogs'.

If you suspect that one or more of your employees is leaking valuable information, there is software to surreptitiously check their e-mails. The companies providing these programmes are among those found by searching under 'media monitoring services', for which there were even more 'hits'.

This search also produced 'Excite Directory' (www.excite.co.uk/directory/News/Services/Media_Monitoring), which contains a list of 90 sites, including some agencies monitoring media in many different counties and providing translations of their content.

One service, 'Wake up News' (www.wakeupnews.com), can be set to open on your computer at a specific time each day, then automatically connect to the Internet and download the electronic versions of selected newspapers.

Others, like 'BotBox' (www.botbox.com), specialize in monitoring RSS news feeds (see below), blogs and so on. The service claims to help companies keep up-to-date with the latest news, trends and research findings by monitoring technology pages, research publications, and even competitors' press releases.

RSS news feeds is a system that monitors sites that carry constantly updated information, like newspapers and news agencies. It monitors them and alerts you when there is new content to view. This saves repeatedly opening the same sites in the hope that they may contain new information. Copies of the programme are available free (www.rssreader.com).

Based in Stratford, Connecticut, USA, CyberAlert, Inc (www.cyberalert.com) claims to be the industry leader in Internet monitoring and web clipping. Using its own proprietary software, it automatically indexes the entire contents of over 13,000 web publications every day and conducts keyword searches of some 1.2 million pages of published content covering the world's major news syndication services, newspapers, magazines, journals and on-line publications. CyberAlert claims these represent about 80 per cent of the news content published every day on the web.

In addition, the company monitors over 63,000 news groups daily as well as 'clips' from another five million web sites, comprising over 85 million pages of information.

Of course, not every company needs such awesome monitoring services. Small companies in niche markets can probably rely on a trusted member of staff trawling for relevant sites and information. However, if it is important for a company to be aware of future trends and research information, or if an issue begins to develop which could lead to it coming under attack by a pressure group or an extremist organization, then the employment of a specialist monitoring agency becomes sensible.

A keyword search will swiftly produce a list of such agencies. Most include a brief description of their coverage and specializations. Checking their details can rapidly produce a shortlist of suitable businesses. Many offer a free trial so it is easy to establish their usefulness. When considering the cost of such services, it should be borne in mind that searches by an individual can be very time-consuming, with the results dependent on their flair for finding appropriate sites.

CyberAlert provide a useful 20-page guide to internet monitoring and clipping (Guide to Internet Monitoring and Clipping: Strategies for Public Relations, Marketing and Competitive Intelligence), which is available free (www.cyberalert.com/whitepaper.html). The author, Amelia Kassel, has specialized in market research, competitive intelligence and worldwide business information since 1984.

Kassel writes: "Today, the 'buzz' about companies and products is on the Internet. In making buying decisions, wired consumers use the Internet as the primary information resource for product features and specifications, independent product reviews, consumer opinions, and other available information. As a result, the Internet has emerged as a key medium for marketing, public relations, and e-commerce worldwide.

"At the same time, the Internet has become the favoured weapon for angry customers, disaffected employees, consumer activists, stock traders, and others to bludgeon corporations and their products. Bashing of companies or products, rumours, and hoaxes can turn up almost anywhere on the Internet. These criticisms influence attitudes and purchasing decisions of thousands or even millions of people worldwide, threatening a company reputation or brand image, and potentially causing serious financial damage through reduced sales or a battered stock price.

"Often, the criticisms are one-sided, inaccurate, or simply false. Sometimes they are intentionally malicious. No company is immune."

Kassel continues: "These days, smart companies, large and small, use specialized Web monitoring services to learn what others are saying about the company, its products and services; to manage corporate reputation and brand image; to identify trademark and copyright infringements; to track press clippings; and to conduct market research and competitive intelligence . . . Corporations and other organizations employ the online clipping services to track mentions of companies, brands, executives and issues. The specialized services can monitor any subject of consequence daily, such as key topics that centre on trends, regulations, legal issues, and thought leaders."

Why monitor the Internet? Kassel quotes Cyber-Alert president and CEO William J. Comcowich: "Bad things happen to good companies on the Internet. Monitoring what is said about a company and its products has become a fundamental corporate responsibility to manage corporate reputation, protect brand images, track market opinion, correct misinformation, and improve customer service. A well-conceived Internet monitoring strategy provides an early warning system by finding key nuggets of market intelligence or spotting important trends or patterns in published articles or criticism."

Kassel points out that, for decades, corporations and other organizations have used traditional clipping services such as Bacon's in the USA, Bowden's in Canada, and Durrant's and Tellex in the UK. Their readers scan thousands of newspapers, business and trade journals, and broadcasts each day, clip pertinent articles, and mail or fax clips to clients. By clipping major publications worldwide, the services help companies measure the effectiveness and reach of corporate public relations activities, provide information on brand image, and glean insight into corporate reputation.

However, most traditional print publications now also publish on the Internet—often with more and different content than in the print version. Therefore, monitoring online publications is now just as important as monitoring print publications—probably even more so.

Comcowich concludes: "In pre-Internet days, effective market intelligence and reputation management could be achieved by tracking a few thousand publications. On the Internet, it's not just traditional publications that need to be monitored; anyone and everyone has the ability to publish information—accurate or inaccurate—and distribute it worldwide with few, if any, controls.

"In today's world, business buzz appears in the most unlikely places on the Internet, spreads rapidly . . . and then finds its way into more traditional publication channels. The unhappy customer who once wrote a private letter expressing outrage to the CEO about customer service can now publish that complaint on the Internet, making it available for viewing by over 100 million people worldwide, including attentive reporters from print publications and TV. And, unlike a letter to the editor that appears in one print publication on one day, a complaint on the Internet persists for months, and often is replicated in many other web sites, news groups, or e-mail discussion lists. With this wide-open publication channel read by millions, it is virtually impossible for corporations to conceal problems."

There is a further aspect of the Internet that can cause considerable disruption and concern to businesses—spam and junk messages. Some estimates suggest that 80 per cent of all emails are spam and that they have become a global problem, particularly because some carry unwanted code with the potential to worm its way into a computer and cause untold damage.

The European Commission estimates the cost of receiving and managing all these unwanted messages costs business around \$8–10 billion a year. However, for the spammers and junk mailers, it is a hugely profitable business. According to some estimates, it can cost a spammer as little as \$0.0002 per recipient and this is as much as 2400 times cheaper than conventional junk mail that can pile

up in mail boxes or drop through letterboxes. If these estimates are correct, it means that even if many thousands of e-mails generate only a handful of responses the spammers and junk mailers are in business.

There are now strong moves to clamp down on this cyber-nightmare. In the United States, 150 spammers were arrested in the late summer of 2004. Later in the same year, on November 4, a brother and sister who sent junk e-mails to millions of America Online customers were convicted in the nation's first felony prosecution of Internet spam distributors. A jury in Leesburg, Virginia, recommended the brother be jailed for nine years and the sister was fined £7500 after they were each convicted on three counts of sending emails with fraudulent and untraceable routing information. A third defendant was acquitted.

The court was told that, in one month alone, the brother received 10 000 credit card orders, each for \$39.95, for a "FedEx refund processor" that supposedly allowed people to earn \$75 an hour working from home. It was claimed he had amassed a total wealth of \$24 million peddling worthless products like the processor.

Virginia Attorney General Jerry W. Kilgore described the state's anti-spam law as the toughest in American and added: "Spam is a nuisance to millions of Americans, but it is also a major problem for businesses large and small because the thousands of unwanted emails create havoc as they attempt to conduct business."

However, even though there are many examples of the problems created by such messages, some ISPs appear to be reluctant to stem the flood of spam messages. Small wonder, one major operator that agreed to stop spam was said to be making up to \$2 million a month from just 148 of the world's most prolific spammers.

Of course, the other real threat is cyber-terrorism and there are examples of teenage 'geeks' hacking into sites that were considered to be the most secure in the world. However, it is unlikely that food and drinks companies would be the prime targets for cyber-terrorists. Much more damage and disruption could be caused to nations and businesses by directing attacks at other targets.

Tactics to avoid being caught off-guard

Consumers can be the eyes and ears of an organization. Taking account of their complaints or comments can help reduce the possibility of a business being caught off-guard and finding itself embroiled in a crisis.

Many organizations, including government departments, make it easy for people to complain about an unsatisfactory product, especially if they have an Internet connection. Most food packs now carry the address of the brand's consumer relations or consumer affairs department as well as a toll-free telephone number and e-mail address. In Canada, the web site of the Office of Consumer Affairs has a 'wizard' that makes it easy for a consumer to complain to the appropriate federal authority about a product, whether it is a packet of cereal, a car or air travel. The site goes as far as to provide a step-by-step wizard¹ to help people make their complaint to the appropriate authority in the right way with the correct information so that it can be dealt with more quickly and effectively.

In the United States, the Food and Drug Administration² (FDA) makes a point of the fact that it welcomes reports alerting it to problems and that they help ensure that the products for which it is responsible are safe and properly manufactured, labeled, and stored.

The Administration adds: "Every report is important to [the] FDA. In each case, the information the consumer furnishes is evaluated to determine how serious the problem is and what follow-up is needed."

When reviewing the information in such reports, the FDA considers the following factors:

- Is an illness or injury involved? If so, what is the health hazard?

¹ <http://consumerinformation.ca/ComplaintCourier/introduction.cfm?454312>

² <http://www.fda.gov/opacom/backgrounders/report.html>

- Is the illness possibly an allergic reaction to a food or a drug (such as penicillin)—or, in the case of drugs, is it a reaction already known to occur with that product?
- Is the problem life threatening?
- Is the product likely to be associated with the problem?
- Is the problem likely to be widespread or is this an isolated case?
- Is more information needed about the problem or the product?
- Is the product or problem within the jurisdiction of the FDA or is it the responsibility of another federal agency or local or state government?

Depending on the seriousness of the problem, the FDA either investigates it immediately or covers it during the next inspection of the facility responsible for the product. Obviously, top priority is given to products that have caused serious illness, injury or life-threatening situations. Swollen cans or even the mislabeling of a product fall into this category.

In instances where the FDA determines that the product could be a health hazard, an investigator could visit the consumer to obtain more detailed information and could also collect a sample of the product. This would usually be an unopened or intact example for laboratory analysis should it be required as evidence in a legal case.

At the same time, depending on the seriousness of the matter, the investigator could also visit retailers, wholesalers or the manufacturer concerned, to ascertain whether there had been any other complaints of a similar nature. Samples from the same production batch and code could also be collected for analysis. If the investigation revealed that the illness, injury or death was caused by using the product and that the problem was widespread, a recall could be initiated to remove it from the marketplace. In addition, to prevent further illness or injury, the FDA could issue a press release advising consumers not to use the product or to return it to the store where they bought it.

Nevertheless, the FDA points out that not all product problems present a health risk—like pieces of stems in a box of raisins—but they would still be of concern.

(There is a curious anomaly in the FDA's position concerning product recalls. The Administration can only advise a business to voluntarily recall a product but, if this does not happen, it has the powers to close the factory!)

In a background statement or 'backgrounder' on its web site, the FDA declares: "Consumer product reports serve as an important alert system. More than 21 cents of every dollar spent by consumers goes for products FDA regulates. This amounts to more than \$1.4 trillion a year. The FDA is responsible for overseeing more than 90 000 US facilities where food, drugs, and other products are manufactured, processed or stored. The FDA routinely collects samples from manufacturers, producers, supermarkets, drugstores, importers, and other sources to check quality, safety, and labeling. But FDA cannot be everywhere at all times. Therefore, consumer product reports are an important part of FDA's monitoring system and help ensure that the products the agency regulates are safe, properly manufactured and stored, and correctly labelled."

The FDA provides a blueprint for the way any business should regard a consumer complaint and address it.

Complaints Courier is an apt name for the wizard set up to help consumers register their complaints. It is designed to “empower consumers and level the playing field so that all can be effective, regardless of limitations in their knowledge and time”. As well as providing guidance on how to contact the business concerned and effectively voice their complaint, the wizard sets out to educate consumers on their rights and responsibilities. It helps consumers prepare complete and effective letters of complaint simply by filling in a customized template. There is also a Dialogue Coach to help anyone communicate with the business involved by offering guidance and suggestions for pertinent questions to ask, appropriate language to use and possible strategies to employ if a complaint is rebuffed.

The site’s powerful database automatically channels each complaint to the appropriate agency, thus saving everyone’s time as well as ensuring that each one is properly documented.

In the United Kingdom, the Consumer Gateway³ set up by the Trading Standards Institute tells people how to complain about a wide variety of goods and services. Links take consumers to Trading Standards Central, where several hundred different sites are listed. They include the UK’s Food Standards Agency and the sites of similar authorities throughout the world that list product recalls. There are also links to various consumer organizations and trade bodies as well as to European organizations including the Health and Consumer Protection Directorate and the European Food Safety Authority⁴ whose slogan is “Food safety—from the farm to the fork”. The site also provides a link to the European Union’s rapid alert system for food and animal feed, which has been in place since 1979.

Today many organizations have a very positive attitude towards consumer relations. Indeed, in an article in *Food Product Design*⁵ in 1998 the Pillsbury Company’s vice president of consumer relations, Sally Shlosberg, was quoted as saying: “We very much want to hear from our consumers. Such dialogue tells us how our products are doing in general and can also provide valuable feedback in the case of a specific problem.”

At Pillsbury, reported the publication’s contributing editor Pam Erickson Otto, all calls, letters and e-mail messages to its Minneapolis headquarters were handled by the consumer relations department, whose staff could swell to more than 60 trained associates during the fall and winter, the peak baking seasons for the company’s popular products.

In 1997, the company recorded 640 000 consumer contacts and Shlosberg anticipated that they would probably hit 700 000 in 1998, largely due to Pillsbury’s enhanced accessibility. Though the number of contacts had increased, the breakdown remained the same—about two-thirds involved questions and compliments only one-third related to complaints.

³ www.consumer.gov.uk/consumer_web/complaint.html

⁴ http://europa.eu.int/comm/food/index_en.htm

⁵ <http://www.foodproductdesign.com/archive/1998/1298rd.html>

Every consumer contact was recorded in the company's computer tracking system, including product codes and general comments made by consumers. Careful analysis of this information helped Pillsbury to rapidly identify emerging trends and take action if necessary, such as where health might be threatened. Consumers who reported problems were offered coupons for a free replacement product.

Shlosberg continued: "If we get one call from a consumer whose cake didn't rise we tend to regard it as an isolated incident, not necessarily due to product quality. But, if we begin to receive several calls describing the same problem, that trend is reflected in the analysis. When we see that other products produced on the same day produce similar problems, we take steps to initiate the appropriate action."

For problems of a serious nature—for example, where consumers' health might be threatened—the company enacted emergency procedures.

For cases of a very sensitive nature, many food processors, including Pillsbury, sometimes used the services of the National Food Processors Association's⁶ (NFPA) claims program. More than three-quarters of the Association's members had made use of the service at one time or another, which included claims investigation, litigation management, and crisis management support.

Like most food companies, the NFPA keeps records of chronic complainers and names are checked against this list. The most frequent type of complaint involves a foreign body in a product. Next is that the product made someone ill.

Though the Association's claims department investigates an average of some 3500 claims a year, only a small proportion are found to be fraudulent. More prevalent are claims from people trying to take advantage of liability laws.

A study⁷ released at the 25th annual meeting of the Society of Consumer Affairs Professionals in Business (SOCAP) in San Francisco, California, in 1998, revealed that what kept Americans buying a particular brand had less to do with pricing and merchandising than how well the company treated its customers. Over 5000 consumers were questioned to measure how their interactions with companies affected their future purchasing decisions. The study found a direct correlation between buying intent and a customer's experience with a company's consumer affairs department. Nine out of every ten consumers who were delighted with their experience said they would continue to buy the product or service whereas fewer than four out of every ten of those who were dissatisfied with their experience said they would remain loyal to the brand concerned.

The SOCAP Consumer Loyalty Study revealed that when consumers contacted a company's consumer affairs department they wanted courtesy and professionalism first and foremost (84.5%), followed by the amount of time the representative was prepared to spend with them and their problem (81.4%). Encouragement to call again rated 80.7% and the representative's expression of appreciation for the consumer's business was remarked upon by 79.2% of those questioned.

⁶ <http://www.nfpa-food.org>

⁷ <http://www.socap.org/Welcome/loyalty.html>

A total of 88% of those who gave “ability to demonstrate concern and interest” the highest ranking, said they would be very likely to buy that company’s products again while only 3% would be very unlikely to repurchase. The reaction to representatives who showed enthusiasm was similar—88% of respondents would be very likely and only 3% unlikely to buy that company’s products on another occasion.

Lou Gargia, SOCAP’s executive director, said: “This survey offers positive proof that consumer affairs departments can build customer loyalty, resulting in increased sales.” Indeed, the study also found that when customers were satisfied with the way a company handled their question or complaint, they sometimes became more loyal than customers who had never experienced a problem.

The Society also produced another study⁸ in 1998, when America was battling against a recession. It underlined the importance of making quality customer service a ‘must’ if businesses were to retain continued brand loyalty. Research referred to in an article in its journal *Customer Relationship Management*, showed that the demand for quality customer service applied right across the board to industries as diverse as chemical products, banking, pet foods, hospitality, insurance, fast food, auto service and home construction. The implications according to the authors, James E. Fisher of St Louis University and Dennis E. Garrett of Marquette University, were very clear: to prosper in the year 1999 and beyond, companies had to continually strive to meet the rising expectations of consumers.

Moving to the next level: how organizations are addressing the new consumer affairs challenges listed seven factors that research with focus groups indicated were shaping the future of corporate consumer affairs:

- Even though progress had been made, many consumers still had problems getting ‘excellent’ service. Some consumers who took part in the focus groups also reported bias in the marketplace because of continued stereotyping by appearance, race, and sex.
- The quality of a company’s employees had a direct and significant effect on customer satisfaction. The ‘attitude’ of employees in a store or on the phone was as critical as the quality of the business’s products or services.
- Customers’ expectations regarding the quality of products and services, while already high, continued to increase. Consequently, consumers were more likely to express their dissatisfaction and to actively seek resolution for their complaints.
- Progressive managers believed that customer complaints should be resolved quickly by front line employees who were closest to the customer’s problem.
- To improve customer service and satisfaction, progressive managers appreciated that they had to develop new and innovative techniques for selecting, training, and rewarding employees. Quality customer service started with the employees themselves.

⁸ <http://www.socap.org/Welcome/crm.html>

- For a company to maximize customer service and satisfaction, the top levels of management had to actively support and appreciate the customer service process.

Several of the managers involved in the focus groups emphasized the importance of having staff sufficiently competent to resolve a complaint quickly and during the first phone call. Having to ring back greatly added to the cost of the operation.

TARP⁹ is a global business based in Arlington, Virginia, that specializes in the measurement of customer satisfaction and loyalty. In a 21-page document entitled *Using Complaints for Quality Assurance Decisions*,¹⁰ it cautions that complaints are not directly projectable to the marketplace and the fact that there is a new complaint about a product or service does not prove there is a real problem in the marketplace in general. The complaint is only a flag that suggests further exploration is prudent.

The report also points out that if complaints go up, the incidence of the problem may not have doubled. It could be that customers had been provided with a new way to complain such as a toll-free phone system—that usually doubled complaints even when there was no change in product quality.

A third conclusion was that complaint data was not a substitute for market research. It was important that a sample of customers was surveyed to establish that estimates were correct. Complaint data was only a short-term flag of what might be going on—it was not, nor was it intended to be, all encompassing.

TARP found that at least one-third of customers' dissatisfaction with a product or service typically stemmed from either unfulfilled expectations or a lack of knowledge. Another third arose from company policies and procedures and the final third was caused by product defects.

Tony Hines,¹¹ MBE, who heads up Leatherhead Food International's crisis management operation in the United Kingdom, also underlined the importance of customer care officers. He said: "Very often, the customer care office will be the first point in a crisis—especially if consumers are involved. Its involvement in identifying complaint clusters is paramount to successful crisis management. Its value should never be underestimated. The customer care manager should also be incorporated into the crisis management team.

"Companies should always have a board level policy on consumer complaints. Such a policy should guide staff on managing complaints that may be fraudulent. No company wants to be involved in a recall at any level due to a complaint that is motivated only by financial reward. The policy must also give guidance on referring such claims to the police. If clear communication channels are established between the customer care manager and the crisis management team, confusion and false alarms can be avoided.

"Customer care staff should be trained in recognizing fraudulent claims, both written and over the telephone."

⁹ <http://www.tarp.com/index.html>

¹⁰ www.e-Satisfy.com

¹¹ thines@leatherheadfood.com

He listed as examples letters that:

- Seek cash or compensation by return;
- Are badly hand written, with spelling mistakes;
- Are written on scraps of paper;
- Refer to non-existent dental or other practices;
- Contain phantom or photocopied receipts;
- Refer to a foreign body that is no longer available; or
- Show the wrong date, brand or company.

Hines added: "Naturally, one has to be exceptionally careful not to confuse a genuine complaint with a fraudulent one. The company's policy on referring the matter to the police for further investigation must take into account the severity of the claim, the time and trouble involved in pursuing prosecution and the resultant publicity."

Most importantly, he adds: "However, if the compensation culture is to be tackled, responsible companies will want to play their part in reducing the impact fraudulent claims have on the food and drinks industry."

The other aspect of consumer complaints is compensation. *Consumer Complaints and Compensation—a Comprehensive and Clear Reference for the Food Industry* (ISBN 1-904007-62-7) was published in late 2004 to support Leatherhead Food International's courses for training consumer care personnel to deal with complaints and enquiries. The author, Lisa Carson, a qualified solicitor, has advised food companies and trade associations on consumer handling, especially in fraudulent complaints and product liability cases. She now works at a research center specializing in food industry supply chains and corporate social responsibility.

She pointed out: "There is little doubt that the UK is heading towards a compensation culture as seen in America and Ireland. It is a difficult balance between compensating consumers adequately in the event of a genuine problem but also detecting the potentially fraudulent or exaggerated claims and protecting the economic interests of the business." The book deals with both civil and criminal prosecutions as well as giving advice on how to spot possible fraudulent claims and when, why and how much to recompense a genuine consumer.

Hines points out that legislation exists to protect consumers from illness or harm when they eat or drink. He remarked: "It therefore follows that producers, manufacturers, importers and retailers share the legal responsibility to 'protect the health of the nation'. The legislation in place puts the responsibility squarely on the shoulders of this group to prevent the sale and consumption of food or drink that is unfit for consumption."

He too regards the members of its consumer relations department or consumer affairs officers as being the eyes and ears of a company. Producing weekly analyses of the complaints received and circulating them to directors and senior executives responsible for production, quality assurance, purchasing, distribution and logistics, marketing and sales, as well as the managers of the producing factories quickly alerts all concerned to an emerging problem

or trend. The value of such reports also underlines the need for information on product packs to indicate the batch code as well as the producing factory if more than one location is involved. Otherwise, human nature being what it is, every factory manager will defend their own plant and blame another location.

Product tampering—a constant threat

A constant cause of concern facing all food manufacturers is that, no matter how tamper resistant the packaging they use for their products might be, it is always possible to interfere with them usually as a prelude to demanding large sums of money to indicate where the contaminated packs have been placed. Usually, those intent on tampering with a product take it away from the outlet where they bought it so they can open the pack or container, contaminate the contents and conceal what they have done before returning it to the shelf. In a few cases, they might attempt to insert a foreign body into the pack while they are still on the premises but this increases their risk of being detected.

Typical contamination threats involve a poison like cyanide or rat poison, HIV-contaminated blood and infected needles or even snake venom.

At least five tampering cases have resulted in deaths. They and other crimes of this nature have also made large numbers of people seriously ill. Four incidents involved pharmaceutical products: Tylenol, Exedrin, Sudafed and Goody's Headache Powder. In 1986, cyanide added to Lipton Cup-A-Soup resulted in one death (see Chapter 18).

Serious incidents like this receive global news coverage. The tampering of Tylenol capsules in 1982 (see Chapter 17) received more television news air time than any incident since the assassination of US President Kennedy. Indeed, many believe this saturation coverage inspired others to begin contaminating products and demanding huge sums in blackmail attempts. Today, with the spread of 24/7 news channels and global satellite coverage coupled with the increased speed and flexibility of facilities means that such serious incidents are likely to receive even more media exposure and create wider concern. Sensational media coverage inevitably leads to outbreaks of 'copycat' crimes and false alarms as well as a climate of fear among consumers.

Of course, extortion threats involving product tampering create a dilemma for both manufacturer and the media. The manufacturer would no doubt prefer that no publicity was given to the problem. At the same time, if there could be

a serious threat to public health, it is incumbent on a company to warn its consumers. Journalists are torn between being able to run a ‘good’ story and their responsibility to help the authorities track down a criminal. Indeed, there are remarkable instances of voluntary media blackouts taking place over extensive periods which have helped the police successfully trace the perpetrators.

The first indications of such threats are listed in Chapter 3, where it is mentioned that any letter or document containing a threat should be carefully preserved for forensic examination and that details about any telephone call should be carefully noted (see Appendix F).

6.1 Keeping issues in perspective

Of course, whenever there is a food scare or a crisis arising from a tampering or extortion threat, the media frequently are blamed for exaggerating the matter, taking it out of context or even distorting the facts. However, all too frequently, the blame can be placed at the door of those who do not realize the importance of being prepared to help a reporter obtain a clear picture of an issue within the limited time-frame within which a journalist has to operate.

Hopefully, many in the food and drinks industry will be enlightened to learn of the journalistic profession’s own efforts to help reporters keep such matters in perspective. The advice is sound and repetition of it in this chapter will help those involved in crisis management to understand better the media’s position.

The Foundation for American Communications (FACSNET), the voluntary organization funded by a number of major media groups to improve the quality of information reaching the public through news, offers background and advice on its invaluable web site¹ to journalists reporting incidents of product tampering. Though the advice was originally posted in April 1999, it remains relevant today and the background information is interesting.

Forensic packaging expert Jack Rosette, who assists law enforcement agencies in detecting tampering, wrote at that time: “Product tampering became a household term because of the publicity of the 1982 Tylenol cases in Chicago. Constant news coverage increased consumer’s awareness of the potential threat. Then coverage declined, awareness declined, and consumers once again became complacent about the chances of product tampering affecting their families.

“Since Tylenol, this pattern has repeated in almost every incident. Consumers’ awareness is related to the level of news coverage of tampering. Ideally, consumers should be continually aware of the potential problem, rather than panicking immediately after every announced incident.

“When the tamperer is the news source calling in to report his or her actions, journalists are obligated to notify law enforcement and assist the investigation. Even though the organization or person receiving the threat possesses an ‘exclusive’, it should not be broadcast until the validity and severity of the threat are determined by investigators.

¹ <http://www.facsnet.org/tools/ref.tutor/tampering/>

"When a company determines (either through prior reports or through threats) that a product tampering incident may harm consumers, it has a responsibility to alert them. Journalists can help by disseminating that information. On the other hand, the company or law enforcement agency may determine that the report or threat is unfounded. In that case, alerting the public could create a problem, or even harm consumers by causing violations that would not otherwise have occurred.

"Journalists should leave the task of determining the level of threat to those trained to assess it. If discussions with the manufacturer reveal a lack of threat or danger to the consumer, responsible journalists will not sound an alarm to the public that might cause unwarranted concern. Like the boy who cried 'wolf', if news organizations announce threats and none materialize, audiences will be less likely to heed warnings of legitimate threats.

"When threats are real, news organizations have a responsibility to alert the public, and thus in many cases have effectively fulfilled their responsibility. Occasionally, news people have crossed the line between responsible journalism and sensationalism, exaggerating the risk to consumers and creating near panic.

"The media can help to protect consumers by being responsible when publicizing reports of product recalls or at times when use of a product poses a risk. Often, giving an incident the wrong publicity has encouraged copycat incidents. Responsible reporting of product tampering incidents begins, for instance, with obtaining accurate information from the product's manufacturer. This can include a description of a secure package, but not indications of possible violation. If the method used to violate the package is reported, the likelihood of copycat incidents increases.

"If a news organization receives an announcement of product tampering that poses a threat to consumers, responsible journalists are obligated to make sure that the information is accurately conveyed to their audiences. To assure accurate reporting of the threat, [journalists should] contact experts in the packaging field, law enforcement agencies and the manufacturer to make sure the statements broadcast or printed are accurate and will achieve the intended objective: preventing injury to others.

"By accurately identifying what consumers should look for in checking their products for tampering, the media are part of the education process. An educated consumer is a vital part of the effectiveness of tamper-evident packaging. If consumers inspect their packages before use, incidents of injury from product tampering will decline."

Other guidelines on FACSNET's web site also posted in April 1999 were prepared by Deborah Lowe, Doug Ramsey, and John Warner. The authors pointed out that, at that time, product tampering was emerging as a major problem in the United States and abroad. The trend internationally was toward incidents coupled with extortion demands. Overseas marketplace terrorism cases covered in the news fell into two categories: malicious tampering and politically motivated tampering.

In instances of malicious tampering with extortion, the motive was money. The terrorists usually contacted a company and made demands before going

to the media. In such circumstances, companies with suitable insurance cover might decide to make the payment rather than suffer a drop in sales. If a company did not make the payment, the terrorists would then call newsrooms.

"Extortion tampering can be political or social in nature, with the money to be used to finance a cause. In this tampering threat or incident, the terrorists call news organizations first and make threats, attempting to reduce public confidence in the company or the government. If the attack is against the government, then the objective is to damage the country's economy. If the company is the target of the attack, the objective is to damage sales of its products."

The other category was politically motivated tampering. In Europe, past tampering threats had usually been made by individuals. However, a new type of malicious tampering, sometimes coupled with extortion, had become a reality for foreign countries and corporations as well as American multinationals. In this new form of marketplace terrorism, groups, rather than individuals, were behind the threats.

Political and social causes aimed at the economies of countries had emerged as a motive behind product tampering in countries outside the United States. Examples offered by Brian Jenkins, an experienced product-tampering terrorism security expert from Kroll and Associates in Los Angeles, included anti-apartheid extremists in Canada and Europe, who threatened South African fruit; Tamil separatists from Sri Lanka who wanted to create a separate state and threatened to contaminate tea, the country's number-one export; and tampering threats aimed at Israel's leading export, citrus fruit.

He also mentioned animal rights activists in the United Kingdom who had threatened companies involved in animal testing (see Chapter 15). Along with animal rights issues were anti-smoking issues in the United States. Smoking issues in general, however, had provoked threats against companies that sold tobacco products. Tampering contamination of products by animal rights groups had been aimed at cosmetic companies involved in animal testing.

International marketplace terrorism had also struck in the United States. Threats had been directed against US consumers and American companies that imported Chilean grapes for wine production and table use. In 1989, the tampering problem surfaced in the vertical marketing chain, moving backward from manufacturer to supplier. Terrorists phoned the US Embassy in Santiago and claimed to have laced all Chilean grapes with cyanide. The threat was directed at US consumers, American wine companies involved in production and distribution, and the Chilean economy. It was taken extremely seriously by the US government because, after assessing the nature of the threats made by the terrorists, it appeared that American consumers and wine manufacturers were at risk. The Food and Drug Administration worked with the press, manufacturers, distributors, and retailers to assess the threat and all fruit imported from Chile was quickly removed from grocery shelves.

In 1989, Anthony Morphew, then-president of American Underwriters International's (AUI) Special Services Division, which provides specialized insurance for product tampering, predicted that tampering coupled with extortion

would be an emerging trend in the next decade. He was proved correct. Morphew had remarked that in Colombia and Brazil "it's a full-time business to raise money", while in Europe "the tampering tends to have people who are doing it for a cause". Countries targeted in 1989 and 1990 included Israel, the United Kingdom (at that time including Hong Kong, which is now part of China), France, Sweden, Italy, Brazil, Spain, Colombia, and Taiwan.

David Samuel, president of AUI Special Services, confirmed that in 1991 and 1992, "about 60 percent of the tampering incidents in Europe are tampering with extortion and the other 40 percent are random malicious tampering". He claimed that "countries that are currently coping with product-tampering incidents coupled with extortion threats include the UK, Australia, Germany, Brazil, and Spain, with the products targeted being mostly food and beverages".

According to Samuel, "the difference in 1992 is that we have seen much of the malicious tampering move beyond single individuals to organized groups". He said organized tampering fell into two groups. "The first group disagrees with a company's policies and targets the company or companies using malicious tampering as a form of protest. The second group is criminal in intent and is using malicious tampering to raise money."

In April and May 1989, the London *Daily Telegraph* reported more than 250 tampering incidents connected with extortion threats in England and Ireland. According to the newspaper, a "gang of extortionists had threatened to poison food and received \$85 000 from one supermarket chain". The gang then reportedly asked two other companies for \$1.7 million not to poison baby food. After H.J. Heinz and Cow and Gate Limited allegedly refused to pay the extortion, 50 babies were rushed to hospital after eating baby food spiked with glass and needles. The gang had made good on its threats.

In 1989, tampering extortionists threatened to poison candy made by the Morinaga Candy Company in Japan. The ransom payment was not completed because of a series of problems. The terrorists then called news organizations and made threats. Finally, terrorists actually sent samples of poisoned candy to newsrooms. Morinaga's candy sales dropped drastically. Ten months later, in an extraordinary move, the terrorists called the Japanese media to tell them to inform the public that it was safe to resume buying Morinaga candy.

Other companies involve the police and enlist the help of specialized security firms. Usually, extortionists do not go public with their threats while they believe their claims are being met. Coded messages are exchanged, usually in advertisements placed in specified publications—even an airline in-flight magazine was used in one case. As soon as the demands are ignored or refused, the extortionists seek media attention to increase pressure on the business or businesses they have targeted.

In an effort to help journalists effectively report incidents of product tampering and extortion, the Foundation developed seminars to create a partnership among them, government agency sources, experts, and corporate executives willing to share their experiences with such tampering threats and incidents. Other groups also brought government, journalists, and businesses together to manage the problem of marketplace terrorism.

In the United Kingdom, a series of seminars created for companies helped executives develop crisis teams and strategies to handle external crimes such as tampering combined with extortion.

The Foundation revealed that, in England and Belgium, food and pharmaceutical companies had been grappling with the problem of product-tampering terrorism and that many of the US trade associations had been helping them in their crisis planning and were also consulting to trade associations overseas.

Over the previous 10 years, the Non-Prescription Drug Manufacturers Association, the Grocery Manufacturers of America (GMA), the Food Marketing Institute and the National Food Processors Association had helped US companies trying to cope with the problems of product tampering. These trade associations had also worked to strengthen tampering legislation and succeeded through the passage of the 1983 Anti-Tampering Act.

Sherwyn Gardner, of GMA, thought that Europe was coping with more serious tampering problems than those experienced in the United States in the decade before 1999. "What they are facing", he said, "is organized terrorism directed against products, and what we faced was disorganized marketplace terrorism".

Gardner said the GMA had helped the Food and Drink Federation (FDF) in the United Kingdom as well as the Belgium Food and Agricultural Industries Association with their tampering problems.

Other guidelines pointed out: "Journalists covering a marketplace terrorism story face an ethical quandary. They want to act in the public interest and not obstruct the process of catching the terrorist. On the other hand, they want to cover the story. They must weigh those considerations against the public's right to know about threats. Many journalists will hold back a story if a person's life is in danger. A journalist will hold back a story if he thinks a group is using him to panic the public. Every story requires its own judgment call. Each newsroom must define what guidelines and fact verification procedures are necessary before reporting an incident.

"Companies faced with product tampering terrorism have a choice too: whether to be open and proactive with news people, or to take the advice of security experts and maintain a low profile."

A national study, *The Development of Corporate Management Responses to Incidents of Consumer Product Tampering*, completed by Dr Deborah Lowe in 1988, examined 45 Fortune 500² companies in the food and pharmaceutical industries. All had experienced product-tampering threats or incidents. Seventy-eight per cent were food companies, 22% pharmaceutical companies. Each threat or incident took place in 1986 or 1987 and was directed at a name brand packaged consumer product. If the incident had received news coverage, its effects were studied.

Companies in the wake of a product-tampering threat or incident chose either defensive or proactive communication strategies. Because the experts on media strategy were divided over whether to seek or avoid news coverage

² A list of America's top 500 companies prepared by *Fortune* magazine.

during tampering threats and incidents, different media guidelines had been developed. They depended on the outcome of threat assessment of the incident, the crisis communication philosophy of the company and the extent of media involvement in the tampering threat or incident.

The Fortune 500 manufacturers in the study chose a proactive public relations strategy that informed the inquiring media about all parts of the threat and the threat assessment process. The crisis communications argument for openness was that talking to the media reassured customers that the company was acting in the public interest and would take socially responsible actions. A proactive communication strategy included a policy that the company must tell its side of the story in the first 24 hours of a crisis taking place if the public was to perceive that it cared.

As part of the survey, each company executive was asked: "In retrospect, what would you recommend to other executives facing a tampering threat or incident?"

These were among their suggestions:

- To show concern to the general public, respond with your side of the story within 24–48 hours of a crisis;
- Provide broadcast journalists with visual evidence of action the company is taking for the safety of the public;
- Don't speculate, report the facts;
- Demand responsible reporting from journalists;
- Be open with the media, but be brief; and
- Employ high-tech solutions like decision-aiding software and computerized threat assessment to secure information quickly. Then use global news conferences when they are needed.

Journalists can expect that companies will try to assess a marketplace terrorism threat quickly and give them information as soon as possible. More companies are trying to respond in a proactive, open way with the press during a marketplace crisis and give factual information as quickly as it can be verified.

Kroll security expert Brian Jenkins offered an important warning to reporters facing tampering incidents: "The reporting... ought not to be instructive to current or future perpetrators. An example of this would be the coverage during the Cow and Gate incident in the UK where baby food was being contaminated. Baby food comes in jars with a vacuum seal that creates a little indentation in the top of the cap that pops when it is opened. The newspapers published how to unscrew the jar, put something in the jar, and then get the pop back into the cap. That is instructive to people doing tampering."

Security experts indicate that informing the public and the press can support terrorist threats by causing panic. In their article, *Contingency Planning for Terrorism*, in the August 1986 issue of *Risk Management*, Mayer Nudell, executive director of the Institute on Terrorism and Subnational Conflict in Washington, the US capital, and Norman Antokol, a Foreign Service officer, argued the case for downplaying coverage. Although the case the authors described concerned companies facing an executive kidnapping with extortion, their argument remains the same for all marketplace terrorism incidents. Nudell and Antokol

argued that in such a crisis “it is best if everyone, company management, crisis action team members, and the victim’s family, play down a crisis as much as possible.”

They suggest that company spokespeople:

- Provide essential, accurate information;
- Combat the spread of rumors;
- Avoid premature or unnecessary publicity;
- Play down the incident as much as possible;
- Express confidence in those charged with handling the case;
- Discourage media contact with friends and family of victims, because even a seemingly unimportant remark could damage negotiations; and
- Avoid inflammatory language in press statements because kidnappers may well have access to newspapers, radio, and television.

That is the security viewpoint. More companies are choosing a proactive approach to news coverage. However, covering marketplace terrorism is a complex task. The journalist who wishes to report it in a responsible, comprehensive way will verify threats and talk to experts in business, crisis management, government, security, law and packaging. Before any such crisis occurs or before it breaks, the corporate news source will need to choose between a proactive, news-friendly approach and a tight-lipped ‘security’ approach.

In 1974, the US Department of Defense began a \$10 million research effort aimed at upgrading its computer-based political and military crisis warning and decision-making systems. The Department of Defense conducted this research because a study determined that, at that time, American companies had no structured way to deal with crisis situations.

The importance of having crisis teams in place was illustrated by a study of various disasters by Steven Fink entitled *Crisis Management: Planning for the Inevitable*. He found that companies having crisis management procedures in place recovered from them 2.5 times faster than companies without such plans. Fink also noted that 52% of the responding companies, both with and without crisis management strategies, reported that a crisis caused direct and calculable damage to their profits.

Issues tracking and management

Most crises arise unexpectedly. That is their very nature. That is why they are a crisis. However, by keeping a watchful eye on issues, events, and research findings that may affect your industry, your company or any of its products it is possible to greatly reduce the possibility of being caught unprepared. As the first indications begin to appear that an issue could attract the media spotlight, it is important to develop strategies to tackle them.

Taking such precautions can be time-consuming and perhaps only fully justified in a large organization but efforts should be made by even the smallest business at least to be aware of such possibilities.

Frequently, the first warning of an impending issue will appear in the media—a national newspaper or a specialized trade journal. Other indications might result from membership of a trade organization or a professional body. Research associations and analytical laboratories also circulate this type of information to members or subscribers to such services. Specialized newsletters such as *Food Safety & Security*¹ also can help to identify trends or patterns that could subsequently develop into a serious issue as can monitoring food alerts published on the web sites of enforcement authorities.

In a large organization, relevant cuttings or clippings from national print media and trade journals as well as transcripts of radio and television programs are automatically circulated to selected executives each morning. In some cases, the clipping service may also include Internet ‘chatter’ from pressure groups and the web sites of extremist organizations as well as reports from the on-line versions of newspapers and magazines which can often contain more stories than that appear in the print versions. If an issue begins to emerge, the next step would be to prepare a background statement or ‘backgrounder’ and possibly a Question and Answer Sheet. These would be particularly relevant if the company’s product was the brand leader in the market and so could be affected. This is a burden every market leader has to bear because the media frequently regard its manufacturer as the source for information and quotes on any matter that affects that particular sector.

¹ This international newsletter ceased publication in June 2005.

If the industry concerned has a particularly strong trade body, the role of dealing with an issue can sometimes be taken over by that organization. Indeed, this can be a particularly good strategy to divert attention from a dominant brand. In such circumstances, however, the person speaking to the media has a particularly delicate path to tread because he or she might have to take into account differing interests among its members.

A useful format for a typical 'backgrounder' is for it to begin with a core statement—the issue summed up in a few 25-words paragraphs—followed by a more expanded statement or Q&A about the issue as guidance for anyone dealing with a journalist who wants to delve more deeply into the matter.

This type of exercise has the advantage that such a document can be prepared without the pressure of an immediate deadline or, indeed, the need to update it every few hours as the crisis develops. It provides time for all the necessary information to be assembled and careful thought given to the phraseology used. Such a document can and, indeed, must be revised as the issue develops.

The first edition of *Crisis Management in the Food and Drinks Industry* contained two case histories that demonstrated the value of tracking and managing possible issues. One concerned people cutting their fingers when opening canned foods. The other related to an ingredient that had always been considered to be safe, but more sensitive detection methods had shown that it could cause sterility in rats when fed to them in excessive quantities.

7.1 An orchestrated campaign

In 1985, a report by the UK government dealing with accidents in the home highlighted the number of occasions on which people cut their fingers when opening canned foods, especially corned beef. A report published by the Consumer Safety Unit of the Department of Trade and Industry² claimed that at least 25 000 injuries from accidents involving cans and can openers were treated at hospitals in England and Wales each year. About half of them, said the report, involved rectangular-shaped corned beef cans: "...the ones with the [tear-] strip running round the sides, which you open by winding [with] a little key". However, the square-shaped containers were only a fraction of all those sold, so the accident rate with corned beef cans was 1 000 times higher than with other types of cans. Treating the accidents was costing the country's National Health Service some \$800 000 a year.

Media attention focused on Fray Bentos corned beef, the market leader, and other major brands but it was quickly deflected.

Why? Because the consumer relations department was part of Brooke Bond Oxo's public relations department and, three years earlier, had begun to track a growing number of complaints from people who said they had cut their fingers when opening a Fray Bentos can.

Regular analysis of the letters revealed that many complaints came from people who had been urged to complain by their GP or the doctor or nurse

² *The Home Accident Surveillance System, Report of 1984 Data* (1985). Report prepared for internal use on Accidents Involving Tins available from the Safety Research Section.

who treated them in the accident and emergency department of their local hospital. It began to appear that a carefully orchestrated campaign was being waged against the traditional corned beef can.

From an occasional letter, complaints rose to as many as 40 in one year. The content was usually highly emotional. In response, each consumer received a personal and individual reply, the general tenor of which was constantly adjusted if that particular type of response had sparked an unfavorable reaction.

Fray Bentos, however, considered that it was on firm ground because the brand had always paid special attention to maintaining high standards of quality. Those standards covered every aspect of the product, including the integrity of the can and its opening efficiency as well as the quality of its contents. The brand was probably only one of the three at that time that set detailed quality inspection standards in the producing canneries, visited them on a regular basis and also conducted random inspections in the United Kingdom of every consignment before releasing it for distribution to retailers.

The UK inspections involved tests not only on product safety, seam integrity, organoleptic quality, net weight, etc., but also on how easily and safely the cans could be opened. They included checks on the depth of scoring of the traditional tear strip and the quality of the tinplate. An entire consignment could be rejected if the cans chosen at random did not open satisfactorily. Detailed records of those inspections had been kept for many years.

The company had always advised consumers on the best way to open the cans. That advice was researched and refined before being agreed with the British Association of Canned Food Importers and Distributors (BACFID) and was printed on the label wrapped round the can.

The occasional enquiry from a newspaper or consumer magazine—inspired again?—provided an opportunity to test the general response that was being developed. That explained the reason for the traditional shape of can. A robust container was necessary to withstand the manufacturing process, shipment, and distribution.

The traditional rectangular can and tear strip were also highly successful because of the lack of need for a can-opener, its weight-to-volume packing density and acceptability of rectangular slices of meat. Because of these features the product was also popular with the armed forces and as ships' supplies. An additional factor was that the canneries were equipped to handle that particular style of can and any change would involve costs that would affect the shelf price. The advice on the best way to open a can was repeated at every opportunity.

Surveys were also conducted among consumers to determine their attitude towards the 'traditional' shape of can. The findings showed a marked preference for the rectangular cans. Among other things, they were distinctive and easy to pick out on the supermarket or store shelf.

During this period, it was also learned that the Consumers' Association had been commissioned to conduct research into accidents involving cut fingers. Similar information was passed to its researchers.

Finally, the government report was published. Fray Bentos countered with quality control statistics gathered over many years showing that complaints

from people cutting their fingers on its cans were rare, especially in relation to the level of sales. The virtues of the traditional can were explained and advice given on the best way to open them. The only significant outcome was that the presenter of one consumer program cut a finger when opening a can live on TV. And no wonder. She had ignored one essential piece of advice from Fray Bentos—avoid direct contact with the can by using a towel, especially to remove the lid!

In 2003, the issue emerged again in the United Kingdom. Researchers at Nottingham University were asked by the Department of Trade and Industry to investigate the potential dangers of badly designed packaging.

The research showed that more than 60 000 people required hospital treatment each year after injuring themselves opening difficult packaging. They ranged from cuts and bruises to injured bones, sprains and even severed fingers. The injuries were costing the country's National Health Service \$12 million (\$18 million) a year. Among the most common injuries were cuts sustained opening cans of corned beef that required a special key. The previous year, in 2002, more than 9000 people were injured while removing the sharp lids.

Excluding corned beef, food cans in general resulted in 17 671 people requiring hospital treatment. Researchers even found people had cut off their fingers while using a knife to cut a can in half.

Among the most serious hazards were glass bottles. They caused a large number of cuts to hands when the bottles broke while being opened. People hurt their feet if the bottle was dropped and teeth were damaged when people used them to open the bottle by gripping the top.

The most common accident seemed to happen when a knife slipped and people cut their fingers while cutting vegetables or meat. Other accidents occurred when people were trying to separate items of frozen food, usually with a knife.

7.2 A suspect ingredient

During the late 1980s, as the result of limited research, concern was expressed in two European countries about certain protein hydrolyzates that were widely used in many different food products throughout the world. In these two particular countries, they were used in a virtually undiluted form in a group of products popular as a general seasoning, rather like soy sauce. New research suggested that, in this form, very low levels of chloropropanols arising during the processing might make male laboratory animals sterile but there were fears that the implications could have an effect on any product containing hydrolyzates.

The findings had resulted from the use of more sensitive methods of detection than had ever been available previously. As is so often the case in such situations, the findings were extremely difficult to translate into terms which could be appreciated readily by the lay person. However, it was not difficult to anticipate the intense media interest that might arise, especially in view of the difficulty of putting the information into a sensible toxicological and technical perspective.

Clearly, there were several aspects to be considered. Contingency statements were required urgently to deal with media interest in the prevailing situation if the findings attracted the attention of the European press and to ensure there was a true representation of the facts. The industry needed to be forewarned and both the industry and individual companies needed to consider their own positions if the research was substantiated by further tests.

Apart from the highly emotive nature of the preliminary findings and the fact that such results were particularly difficult to translate into human terms, the entire matter was highly technical.

It was also essential to make the public at large aware of the long-term research program to which the industry was committed in this area, with the support of governments and trans-national trade associations.

A briefing paper was prepared by the appropriate trade associations. It brought together all the available information and the views of a number of eminent toxicologists, food scientists, and technologists. The document was distributed to members of these bodies, who were encouraged to make use of it in responding to any media or consumer enquiries so that all concerned were fully informed and able to speak with a consistent 'voice'.

The document explained that this particular ingredient had been used in foods for over 100 years. Extensive safety tests over the years had never revealed any indication that it could be harmful. The paper then explained the extensive use made of the ingredient throughout the world and the types of foods in which it was incorporated. It went on to explain that a recent study claimed to establish that one of the compounds in the ingredient was carcinogenic in rats when ingested in extremely large quantities, though it did not elicit carcinomas at the lowest levels tested, still less than at any realistic levels of human consumption.

The document continued: "It should be recognized that the extrapolation of toxicological data of this nature from rats to the human situation is very difficult. In this case, even the lowest dose used in the study would constitute for humans an exposure of many orders of magnitude greater than would result from the consumption of any of these foods. The lowest level test so far carried out equates to a consumption of over two and a half tonnes a day for an average person or about 50 tonnes a day of food or drink containing a typical proportion of the ingredient."

"Since these tests, analytical methods of improved sensitivity have been developed in both regulatory and industry laboratories. These improved methods have revealed the presence of another compound which can be mutagenic in some tests, but not in living animals. This compound has previously been reported to affect the fertility of male animals of some, but not all species. However, recent studies have shown that the minimum level to produce an effect on the fertility of rats was equivalent to a far higher human intake than that provided by this ingredient in the diet."

Despite the fact that the work carried out showed no signs of toxicity, the industry set out to reduce the levels of the compound in the material it used. Discussions were initiated with regulatory authorities and further tests set up to assess any risks to human health and to eliminate them.

Companies reacted differently to the problem. Some were convinced that those of their products which contained this particular ingredient were entirely safe and wholesome and were prepared to say so in public.

Others were in a more delicate position. The company for which the author worked was in the process of changing its formulations but for totally different reasons. Research had produced an alternative ingredient which was preferred in consumer tests and which would provide a technologically based commercial advantage... but the timing could be misinterpreted!

The company's Question and Answer Sheet tackled the issue head on. It suggested the response: "We had what we considered to be a commercial advantage—both in terms of consumer preference and in manufacturing efficacy—by using a new ingredient and took advantage of the situation as quickly as possible. Also, we recognized there could be an additional commercial advantage for us if the use of this particular ingredient became a public issue, but we do not believe there is any real cause for concern over the safety of the original ingredient."

Subsequently, this was refined to: "We are using a different ingredient because new formulations have proved more popular. We began making these changes two years ago. They reflected new developments in flavor technology, some of which were unique to us at one stage. The new ingredients also proved to be easier to handle and more suitable for our manufacturing processes."

The second version shows how statements can be simplified and refined, and how important it is to do so when dealing with technical matters.

In the end, in the United Kingdom, the issue attracted only a brief reference in a highly specialized technical journal. Some might say that, in view of such an outcome, there was little justification for the extensive contingency preparations that were made... but just think what might have happened if the findings—for which there was no soundly based scientific evidence—had attracted media attention. Such preparations are never wasted. Ironically, many times when such steps are taken, the issue does not develop as was originally feared but that is the advantage of being prepared to tackle even the most serious eventualities.

7.3 Putting matters in perspective

Another interesting aspect of the statements quoted above is the difficulty of understanding the information in the first version compared with the greater simplicity of the second. Excessive quantities of any food or drink, including water, can have an adverse effect on some people, but it is always difficult to say what is 'normal' for one person and 'excessive' for another. The contingency statements dealing with this particular situation endeavored to translate the laboratory findings into human terms in a way that put the possibility of an adverse effect into an understandable perspective. Clearly, it was impossible for anyone ever to eat the quantity of food necessary to ingest the equivalent of the doses used in the laboratory trials.

A more recent example of trying to put a completely different problem into perspective arose when a spokesman said: "What we are talking about here is

the equivalent of a few drops of this substance in an Olympic size swimming pool." In another example, it was pointed out that one was talking of the equivalent of a single grain of sand on a large beach. This type of analogy is far from easy to devise in the heat of the moment but always useful. It puts the risk into perspective and helps to reassure both the media and consumers. In those proportions, how could there be any risk to human health? The consumer is given sufficient information to make up his or her mind.

A consequence of scientific progress is that methods of detection always will become more sensitive, year after year. There will continue to be alarms and fears as researchers seek to publicize their findings. Issues like those concerning hydrolyzates will continue to arise. Businesses will always have to be on their guard and be in a position to respond to such research and put it into perspective.

Interesting advice on dealing with research findings is given on the web site of the Foundation for American Communications (FACS), the organization which has already been referred to in Chapter 6.

It reproduces an article entitled *Assessing a Study's Validity*³ by Martha L. Walter, Michael A. Kamrin and Delores J. Katz that was posted on April 23, 1996 and revised on February 7, 2000. The source was *A Journalist's Handbook on Environmental Risk Assessment*.

The authors point out that the perfect study has never been done because there is always the possibility of human error in its design, its execution and analysis. They point out that the results of a single study are seldom definitive because of the inevitable presence of chance and the possibility of improper design. They also caution that observed differences between groups of experimental animals or between populations of humans may be due to chance rather than real differences.

They make other points. The rarer the effect and/or the smaller the effect, the larger the sample needed to detect it. Sometimes, researchers will let their desire to see a certain result color their interpretation of the data. Small studies can reliably only find big risks. All studies have bias. The question is whether investigators took care to reduce bias as much as possible.

It is encouraging and particularly helpful that such an effort is being made to help journalists interpret and report scientific studies and research findings.

The advice was underlined in an article in the United Kingdom's quality broadsheet the *Sunday Telegraph*, on May 30, 2004. The headline was: Researchers ignore 'inconvenient' drug trial results. The story began: "Scientists are routinely cherry-picking the results of clinical trials so that they can present the findings that they want, a study by Oxford University shows."

The article went on to explain that the research, which assessed the published results of more than 100 scientific trials, also found that inconvenient findings were often not disclosed to the public. In several cases, the stated purpose of the trial was altered as it progressed so that acceptable findings, rather than inconvenient results, could be published.

³ http://www.facsnet.org/tools/ref_tutot/risk/ch5valid.php3

The manipulation, which contravened official guidelines on reporting medical research, was uncovered by academics at Oxford University, one of the most respected seats of learning in the United Kingdom.

The team which carried out the survey declared: "The reporting of trial outcomes is not only frequently incomplete but also biased and inconsistent with protocols. Published articles, as well as reviews that incorporate them, may therefore be unreliable and overestimate the benefits of an intervention."

Of course, these findings related to research projects concerned with medicinal and pharmaceutical products. However, human nature and sponsorship being what it is, there is no reason to doubt that such practices might also be applicable to research related to the food industry and food products.

Meeting the media

It will take only few moments to read this page. That is not very long. But it is much more time or words than you are likely to have in which to explain why your company is recalling a particular product or how it is handling a food or beverage crisis in which it is involved.

Typically, a company's response in a newspaper is likely to be restricted to one, two or sometimes three 25-word paragraphs. The opening paragraph above totals 56 words. That is just how brief you have to learn to be! This discipline is important because the design of many newspapers—certainly in the United Kingdom—is based on the number of 25-word paragraphs in a story. Apart from any other considerations, such short paragraphs make it easy to trim or 'sub' stories to any required length. Also, reporters can be instructed to write a 'ten par' item on a particular event.

Turn to any tabloid or 'red top' newspaper and count the number of paragraphs in the main story on the front page. The story is usually dwarfed by the headline and great skill is required to deal with the item in so few words.

In terms of words, radio and television reports are even briefer. A spokesperson might find him or herself limited to 10 or 15 seconds . . . or even less! If the statement or response receives 30 seconds of airtime you are either particularly persuasive or the crisis is extremely serious. Either way, in very much fewer than the number of words you have read so far, you will have to find a way to explain how the problem arose and how it is being resolved so that your consumers are reassured and do not lose confidence in your products.

It is instructive to go to the web site of any major news channel that carries the actual scripts from which its broadcasts are made. The scripts demonstrate how skillfully the reporters and presenters are able to deal with even major issues in very few words. Their ability is even greater when you take into account how little time they frequently have in which to research and prepare their reports.

No one involved in crisis management and communication today can afford to ignore the impact and widespread tentacles of cable and satellite news channels, especially since the development of 24-hour news. Remember, television is the most powerful medium of communication in the world and rolling

news channels abound. CNN (Cable News Network) has been the most dominant since its formation in 1980 but is now under increasing pressure from rivals, especially since the proliferation of cable news stations. On its web site, CNN claims to be the leader of news coverage and that its role is informing Americans about the events that most directly touch their lives.

The CNN News Group operates in 38 bureaus worldwide, 11 of which are in the United States, and employs a staff of 4 000. The company also runs various other channels including a financial one as well as a number of Internet sites and frequently is the English speaking news channel available in many hotels worldwide.

Its main rivals in North America are CBS Television Network and Fox News Network. Other significant forces in 24-hour news coverage are Sky News, part of the British Sky Broadcasting Group (BSkyB), in which Rupert Murdoch's News Corp owns a major slice. The Group claims that more than 17 million viewers in 7 million households in the United Kingdom alone enjoy its various channels and that it is the country's leading pay-TV provider. Sky News is also another 24-hour news channel that appears frequently in many countries, as does BBC News 24.

The BBC (British Broadcasting Service) produces daily news not only for its own domestic television and radio channels in the United Kingdom but also for many worldwide audiences. Its global news operation involves more than 2 000 journalists in 48 news gathering bureaus, 41 of which are outside the United Kingdom. It is a global news provider reaching more than 260 million viewers through its international television news channel BBC World and more than 150 million people listen on their radios to its World Service.

Euronews, a channel based in the French city of Lyons, broadcasts simultaneously in seven languages and is available to 146 million homes in 78 countries in Europe, the Middle East, Africa, and North and Latin America.

A newcomer to the world of 24-hour news stations is Al-Jazeera, an Arab news channel based in Qatar that plans an English version. It has attracted global attention for showing footage of dead United States and British soldiers as well as being a favored source for videos purporting to be by terrorist leader Bin Laden and other terrorist groups. During the Iraq war in 2003, its worldwide audience reached 54 million.

At the same time, one cannot afford to ignore the print media. Newspapers and magazines in every country are served by national and regional news agencies as well as other organizations specializing in specific subjects and aspects of news. In this day and age, not only do the editorial staff watch rolling television news programs but they are also well served by the news agencies to which they subscribe.

The coverage provided by the major news agencies is awesome. Reuters, the biggest and probably the best-known, has 2 400 editorial staff in 197 bureaus worldwide. The American-based agency, Associated Press (AP), has journalists in 242 bureaus and transmits news in English, German, French, Dutch, and Spanish. The French agency, Agence France Presse (AFP), has over 2 000 staff and operates 16 main bureaus and 16 secondary offices. It publishes in French, Arabic, German, Spanish, Portuguese, Russian, and English.

News has become more immediate and global than ever before. A problem affecting a major food or drinks brand could be round the world within minutes. Even in the 1990s there was an example of a story which broke in Sweden running on Australian television within 11 minutes. Today, communication is even faster!

For any company spokesperson, mastery of the television sound-bite is essential. With a print journalist it is often possible to discuss and refine the remarks that will be attributed to you, but not when you are 'live' or being recorded for TV or radio.

A typical object lesson occurred when Turkey's prime minister, Recep Tayyip Erdogan, appeared on a particularly influential UK television program in 2003 following two terrorist attacks that killed many people in the country's capital, Istanbul. The dead included the British ambassador and two staff at the UK embassy. The prime minister embarked on a long monologue that had to be translated into English. He droned on. The translator was difficult to understand. And the message—that his country was still a safe holiday destination and that already several suspects had been arrested—never made any impact. It could have been conveyed within a few seconds. Instead, both the audience and the cause were lost in even fewer seconds.

You might think it is a tough call to have to convey so much information in such a short time, but that's the world of crisis management. In a fairly straight-forward crisis it is not unusual for a company spokesperson of a major company to receive 100 telephone calls in a day, especially in a country like the United States where there are so many media outlets to cater for. In a serious situation the number of phone calls can easily be twice that total.

People watch countless hours of television, listen to the radio extensively and read thousands of words every day in their newspapers and magazines. Consequently, the media has great influence. It can help to make—or break!—governments, businesses, and individuals.

In a crisis, the media can be a valuable ally... or an enormous headache. Much can depend on the way in which you or your company deals with the journalists involved in a situation in which they and their viewers, listeners or readers have a valid interest.

For people thrust unexpectedly into the limelight, it can be a daunting experience. Television news reports frequently show what it can be like. Politicians and others in the public eye can be surrounded by a scrum of reporters with notebooks or tape recorders and microphones. Walls of photographers snap away with noisy motor-driven cameras and blazing flashguns. Television crews and radio reporters push their cameras and microphones close to faces and under noses!

These are extreme situations but meeting the media can be stressful unless you are properly prepared. Fortunately, there is no lack of advice available to help anyone handle media interviews and television appearances. However, nothing beats a natural flair for such activities coupled with experience. In particular, you must be able to explain briefly yet convincingly and in an understandable way matters that might be highly technical and difficult for the layperson to grasp.

It is the role of scientists to challenge and qualify almost everything. It is how science advances. But it also explains why contradictory views can often be expressed. For the public at large, scientists and technologists should try to limit how much they qualify what they say, perhaps by making an opening observation that they are expressing the facts as best known within current knowledge.

8.1 Presentation skills

However, much can be done to improve the way in which a person projects themselves. Advice and training will help to cope with media invasions, 'doorstepping' or ambushes and 'down-the-line' interviews. Specialist companies and consultants will coach groups of people or individuals in successful techniques and also put them through simulated interviews before they go off to face the TV cameras or to deal with a real life incident.

Some companies regard presentational skills as being so important that they provide one-to-one coaching for all their senior executives so they can create a better impression and put over their messages more effectively, whether it is to the searching eye of a video camera, an outraged pressure group or a meeting with their own employees.

Most media training courses concentrate on the skills necessary to perform well on television because it is such a revealing medium but the lessons apply to many other situations, whether or not they involve the media. The skills of coming over well on the small screen can be difficult to master but both the audiences and the influence are enormous.

As the mass appeal of television continues to grow, it is noticeable that news items have been getting briefer in recent years and that those in American bulletins are usually shorter than is usual in the United Kingdom and certainly elsewhere in Europe. At the same time, news bites are being condensed and popularized to a greater and greater extent.

Attending a media training session will help you to gain a better understanding of these requirements. Many people approach these sessions with a sense of awe, especially if they are being coached by a well-known TV 'face'. However, there is much to be gained from media training in both your business and private life. It can be a fascinating and instructive experience. You learn and begin to appreciate the skills and disciplines of a different profession with enormously different requirements and pressures.

What is even more interesting is that, perhaps for the first time, you have the opportunity to see yourself as others see you. You might even be pleasantly surprised to discover that, no matter how much you may be quaking on the inside, your image exudes confidence and assurance on the outside. The hesitant pauses that so worried you might actually appear to be moments when a serious, responsible executive is carefully considering his response before giving a measured reply.

On the other hand, you will learn that the television camera can be merciless. It can reveal your uncertainty and confusion for all to see, and that impression will not be helped by the way in which your performance contrasts with that of

the television presenter sitting confident and poised in his or her own familiar, high-tech world.

8.2 Reacting to a problem

However, let's return to our crisis situation. The company has discovered that it has a problem. If that information has come from an unexpected media enquiry and you do not know the answer you must establish the facts as quickly as possible.

But first note down the journalist's name, telephone number and the publication or program for which he or she is working. Also, establish whether they are a freelance or staff reporter. Responsible journalists will make a point of giving you this information at the beginning of the call. If in any doubt about their credentials, make an excuse—you are in a meeting—and ring back on the number provided or on the number of the publication or program as it is listed in the telephone directory or given to you by directory enquiries. If you need time to gather your wits, again say you are in a meeting and ring back in a few minutes. It is all too easy to be caught off guard.

Obtain as much information as possible from the journalist before promising to return the call. Ask what the deadline is. That will give you an indication of how quickly an answer is required. It will also imply that you have an understanding of the pressures under which the reporter is working. Unless you know and trust the journalist, try to avoid making any specific comments other than, perhaps, something to the effect that you are not aware of the problem and will look into the information which has been given to you as quickly as possible. Beware of making a brief, indiscreet remark which will be embarrassing if quoted.

Having promised to call back, do so within the deadline. If that is not possible, phone back and explain that you need more time and why the delay is necessary.

Deadlines vary. It is possible to receive an enquiry while a news program is on air . . . and to hear your response before the bulletin is finished! On the other hand, a weekly newspaper or trade magazine may be able to wait two or three hours for a response. It is rare a journalist can wait any longer. If a breaking news story is involved do not expect much leeway. Just in Time Management was invented by journalists long before management consultants ever thought of the technique!

When you are caught unexpectedly by a media enquiry, speed of response is important no matter how difficult it may be to check the journalist's version of the story. Never forget, the most effective place for your response is for it to appear as part of the actual news item to which it relates. After that, no matter how justified your position, you are likely to find yourself wrong-footed.

8.3 Opportunities and pitfalls

Television offers enormous opportunities in a crisis but, like other media, it has its own pitfalls. There is no fixed formula for success, but it is essential to have a real determination and commitment to communicate your message clearly

and effectively. You must take the time and trouble to prepare thoroughly, either by seeking advice from a specialist consultant or by rehearsing with the help of a trusted and discreet colleague, in front of your own camcorder or with a tape recorder. Vary the tone of your voice and the speed at which you speak to see which is the most effective. Time how long it takes to convey your message and try to be even briefer if necessary. Never try to be something you are not. If you pretend to be a technical expert it will be obvious you are not what you claim to be. Above all, do not use technical jargon in an attempt to impress with your own expertise. People will fail to understand you. You will lose both your audience and your cause unless you are addressing fellow experts when, of course, it is appropriate to use 'their' language.

A particularly revealing insight into the secrets of dealing effectively with the media in a crisis and presenting your case effectively on television is provided by New York-based Steve Dunlop. He is a veteran TV reporter and anchor-man who now runs a media training operation (www.dunlopmedia.com) that has trained people from a host of blue chip companies in a wide variety of industries. When he is not helping others develop their media skills he works part-time at CBS, where he is a special correspondent assigned to the television network's Bulletin Centre. He is responsible for late updates to the CBS Evening News and other CBS programs and is also a substitute anchor for the CBS news program *Up to the Minute*. In his long career in television, he has interviewed everyone from presidents to personalities like Frank Sinatra and Jesse Jackson.

He points out: "Food and beverage products play a special role in people's lives. Just as we do with our money and our health, we have an intimate connection with the things we eat and drink.¹ We take them into our bodies. Anything out of the ordinary involving a major food and beverage product, therefore, tends automatically to meet the criteria for news.

"In 1971, a 61-year old New York area man died, and his wife was critically incapacitated, by Type A *Botulism* poisoning. An investigation determined they were sickened after eating a can of Bon Vivant Vichyssoise soup. More than 6400 cans of the soup were found to have been tainted, and nearly a million cans had to be destroyed. The incident became a huge ongoing story in the New York area. Bon Vivant was driven into bankruptcy by the ensuing scandal."

"If a Bon Vivant-like story were to surface in today's media saturated age, it would surely feature the real-life anger and tears of a victim's relative, juxtaposed with a corporate attorney reading a statement on camera. Who wins that kind of face-off? The answer should be self-evident.

"The biggest single mistake that large corporations make in a media crisis is to forget the human element. As in the Bon Vivant incident, the very reason a media crisis exists in the first place is that people have been hurt in some way. Yet compassion for people is usually the last theme you'll hear from a corporation when it's under the gun.

"In most cases, the messages you hear from companies in the midst of a crisis sound tentative, defensive, and overly cautious. That reluctance appears

¹ A point made many years ago by the series editor.

to bear the mark of too much influence from the legal department, which typically fears that any show of humanity could prove harmful in a future lawsuit.

"From the reporter's perspective, however, the tendency of corporations to be cold, distant, and 'corporate' in a crisis plays into the bad-guy role that many journalists create for their stories. Companies often make their situation worse by trying to hide from reporters, or stonewall their requests for comment. That often sets up what I call a 'newsmagazine moment', where the reporter ambushes a hapless executive in a parking lot or some such venue. By that point, it's too late to escape embarrassment that could have been easily avoided by arranging a controlled sit-down—that's why it riles me to hear corporate titans blame the media for these so-called ambushes!"

Dunlop goes on to point out that there are really two morals to this story for corporate leaders. The first is that if a reporter with the right resources wants your comment badly enough, he or she will track you down. Better to take your 'lumps' in a sit-down interview where you can exert some modicum of control, than to be caught running from an impromptu ambush where you can't.

The second moral is to listen to your communications team in a crisis, and not allow either its recommendations or your own common sense to be overruled by your legal team.

He pinpoints the need for brevity in explaining a company's situation in a crisis, especially on television. "The incredible shrinking sound bite is a sad fact of life in the American news media. Reporters deplore it but simultaneously thrive on it. The 'thought leaders' who have mastered it get called back to top media outlets again and again. Those who fail to recognize its importance and yield to its discipline do not.

"The most famous statistic about media brevity comes from the Center for Media and Public Affairs at Harvard University. It found that during the 1968 presidential race between Hubert Humphrey and Richard Nixon, the average length of the candidate's statements on the three network newscasts was 42.3 seconds. By 1992, the average had dropped to just 7.3 seconds.

"The pithy turn of phrase has become, in effect, the newsroom's ultimate language. If we are to communicate in 21st century mass media, we have no alternative but to employ it.

"The conventional wisdom is that sound bites are simply shrinking in tandem with our attention spans. But there are actually technological factors at work that few have considered exploring.

"The first, and most obvious, is the sheer proliferation of media outlets. When I started reporting professionally in 1974, there were three major US broadcast television networks: CBS, NBC and ABC. Today there are six (including Fox, UPN and The WB).

"What's more, cable television as we know it today was non-existent in 1974. Back then, cable was known by its original moniker of CATV, which stood for Community Antenna Television. Its primary purpose was to deliver watchable broadcast television signals to remote areas with poor over-air reception.

"But today, according to a review by the US Federal Communications Commission in August 2003, there are more than 308 non-broadcast networks

available for carriage by cable systems. With more than two thirds of US households now subscribing to cable TV, these outlets appear in our living rooms side-by-side with their broadcast cousins. (For more information on this topic, see Federal Register document 03-19106.)

"But that crowded landscape only partly explains the increasing need for conciseness in today's media world," emphasized Dunlop. "The other factors in this mix are also technological in nature: more sophisticated TV newsgathering equipment, more advanced receivers, cable and satellite's crystal clear transmission, and the now ubiquitous remote channel 'flipper' or controller.

"What do these have to do with short sound bites? Together, they have helped lower reflection time and have fostered instantaneous decision making by viewers.

"Think about it. In the early days of television, news was gathered on film. Film was slow to develop and cumbersome to edit. A producer's instinct was to make the most of each clip. Videotape changed that. Video could be edited electronically (and now digitally) at much greater speed and with finer precision. The result was a heretofore unknown ability to condense statements in a TV edit suite to 'make them fit'.

"Things changed on the viewing end too. We forget what a labor intensive experience television watching once was. The audience would need to invest time, patience, and even ingenuity in the very act of preparing to watch a program. Those pioneer viewers became adept at warming up their set, adjusting a TV's rabbit ears to pull in a clear signal, adjusting the horizontal and vertical holds, and the brightness and contrast of the screen.

"Depending on your set's proximity to the transmitter, it could take quite a while. By the time you were done, in Madison Avenue parlance, you've 'invested' in the product. You were less inclined to immediately repeat the process if the program didn't immediately satisfy, and more likely to simply sit down and watch, for at least a little while. TV sets have obviously come a long way since then.

"The remote control's effect on viewers' attention spans is already well documented. Add it to this already powerful dynamic, and the effect is multiplied.

"All of these factors have combined to create a superheated atmosphere in which broadcasters must go head to head with not just a few competitors, but with hundreds. In this environment, viewers, one could argue, have too many choices and not enough time or inclination to make intelligent ones."

Calling on his many years experience reporting for the small screen and anchoring programs, Dunlop outlined the secret of the successful sound bite and what a company spokesperson should be aiming to achieve. "First of all, we need to recognize that sound bites and quotes are two sides of the same coin. They are two different names for the same animal. One is a broadcast term, the other print. Whatever you call them, memorable sound bites or quotes are something of a holy grail for reporters. Like surfers on a quest for the perfect wave, journalists are always searching for the perfect summary of an issue in a form that can be exported into the story and used.

"But just as the typical surfer could not describe the process by which the oceans produce waves, the typical reporter does not think about how sound bites are created. He or she simply operates on gut instinct and an ability to

recognize them. Like US Supreme Court justice Potter Stewart once said about obscenity, 'I can't define it but I know it when I see it'.

"Nevertheless, I like to say that if you forced a reporter to think about and define the ingredients of a 'successful' sound bite or quote—and by successful I mean one that makes the cut and gets into the story—he or she would probably offer up five criteria, all of which happen to begin with the letter C: Complete, Clear, Candid, Concise, and Colorful."

He then listed the criteria in more detail:

- A good sound bite or quote is usually a **complete** thought—a sentence or phrase that contains at least one action verb and stands on its own;
- It is also **clear**—meaning you hear it once and immediately get the gist of what is being said;
- It is delivered **candidly**—in a way that appears to have been not just honest, but spontaneous and unrehearsed;
- It is **concise** (as discussed above) and
- **Colorful** (or, if you prefer, clever) is a double-edged sword.

"Reporters are drawn to colorful or clever statements in a sound bite—apt analogies, for instance. The key is in how relevant they are to the matter under discussion. If your comments are colorful or clever and you hit your mark, you score points, and the chances of your sound bite or quote being used go up. On the other hand, if they miss the mark—and they don't have to miss by much—it could hurt you.

"Of all of these rules, **concise** is king," he emphasized. "Run-on responses are the number one explanation when interviewees feel they've been taken out of context. If you don't exercise discipline in keeping your answers brief, don't blame the reporter when he or she is forced to exercise that discipline for you."

Another interesting topic is the power of the TV news magazines and how one can survive when tackled by one of them. Steve Dunlop's advice is simple. The techniques of avoiding an ambush also apply in this instance. Try to choose your own ground. If you are asked to participate in a group discussion find out the names of the others who will be involved. If you do not know who they are find out more about them and the causes they promote or are interested in before you agree to be involved.

When you are preparing for a television interview you should remember that it is a visual medium rather than a verbal one. The impression you create and leave with the viewer is what matters. Your appearance and manner must reflect and strengthen what you actually say. If you express optimism you must create an impression of optimism. If you express regret for a problem that has occurred, your expression and manner must convey that regret.

The television camera relays your image and your words into millions of homes. Your audience has the opportunity to judge you just as effectively as if you were sitting talking to them in their lounge. They will know instantly if you are not being sincere.

There is another factor involved in your message on television. In the same sound-bite you are communicating to a variety of audiences. They could be: your bosses, your peers, your own colleagues and staff, shareholders and

investors, consumers, trade customers and suppliers, government officials, trade union officials and even your competitors.

In television terms, there are two types of interviews—pre-recorded and live. In the pre-recorded interview, what you say will be edited to fit into a longer item, usually with contrasting views and comments from other participants. If you are unlikely to appear for more than two minutes do not give a 30-minute interview. You must be succinct and put your point of view clearly if you want your key message to come over to the audience. If it takes an hour for a reporter to obtain sufficient material for editing into a two-minute interview you have failed dismally. Such an interview should be completed in no more than 10 minutes.

An important point to bear in mind is that your interview will be cut by an editor who is busy, working to a tight deadline and with other tapes to edit after he has finished dealing with your item. If you want your main points to come across you must headline them. You should make them obvious by remarks like 'this is the main point of the issue', 'a point I wish to particularly emphasize' or 'for me, the most important thing is ...'.

When agreeing to an interview you should think carefully about the setting in which you will be portrayed. Think about what you wear and about the best location for the interview. If you are a food scientist or technologist it could be appropriate for you to wear a white coat. If you are interviewed in a factory or beside a production line you should be dressed correctly: white coat, hair net, even a safety helmet if that is what regulations require.

The other type of interview is a 'live' one. This is when the adrenalin really does begin to flow! There are no opportunities for a retake ... you have to get it right first time!

Live interviews are the most demanding but they also provide a unique opportunity to seize the initiative and put over your message if you are comfortable in such a situation. However, it is important that you are a master of all relevant facts. No matter what direction the interview may take, you must learn the technique of following your own agenda by turning questions and remarks in such a way that you are able to cover the key points you wish to bring out.

Above all, you must remain calm and unruffled. Some interviewers are aggressive and attempt to confuse and disconcert those they are confronting. They rattle off a new question before you have a chance to answer the previous one. That is their style. Nothing is more convincing than someone who does not rise to the bait but keeps their cool and answers quietly and confidently. You might even find it is the interviewer who begins to get ruffled!

Whatever you do, never make any unguarded remarks while there is the slightest possibility of a camera running or of the sound still being recorded. It is an old trick of some investigative programs that might spend an hour trying to obtain one damaging remark.

Make sure you arrive at the studio in plenty of time. Take a cab or hire car, ask a colleague to drive you to the studio or take advantage of a courtesy car. Take as much stress out of the situation as possible. Be careful in the hospitality area. Have one drink if you must; never more. Be guarded. Never admit to the

other participants or the producer that above all you hope no one asks you about a particular aspect of the situation! Someone is bound to try to nail you on it if you are so indiscreet. Do not be embarrassed if the make-up artist wants to powder your forehead. Let them help you, even ask their advice. Also, check how you will be introduced.

When you sit down in the studio always try to make sure you can see the monitor set and also hear the sound track of any film which is run before you are interviewed or before any discussion takes place. That will give you an opportunity to check how you look and to adjust your posture or expression. If you feel the camera angle is unflattering or conveying the wrong impression, ask for it to be changed.

Ensure that your impression reflects the fact you are playing an intelligent part in any discussion. Look at the person who is speaking. Your expression should mirror your reaction. It might be more telling than anything you could say. The right sort of smile and a shaking of the head or a nod of agreement could be the revealing reaction shot the cameraman is seeking.

When you are taking part in an interview or discussion remember that, at any time, you could be in shot or singled out for a close-up. When a red light glows on the front of a camera it means that whatever is being framed by the lens is being transmitted. Never forget, you are on stage until the last camera is switched off and the lights extinguished.

It is important that you approach any broadcast interview with your own agenda—the points YOU want to put over. If opportunities do not present themselves to make those points you must create them. No matter what the question you should turn it to your advantage by a remark such as ‘I will deal with that in a minute, but the real issue here is . . .’ or ‘the crux of this matter is not the point you raise but . . .’ You must create your own opportunities and seize the initiative. That’s what everyone else will be trying to do for their own particular cause. You have to beat them at their own game.

When preparing for a television interview, it is essential to obtain specific answers to a number of questions. Indeed, in difficult situations, it is vital to obtain this information before you even decide whether to participate.

If the interview is to be prerecorded, you need to know:

- Who else is being interviewed for the same item?
- How long will it be?
- When is it going to be broadcast?
- What is the angle or the thrust of the item?

You will be lucky if you receive a clear answer to the last question but the replies to the others should give you a reasonable indication.

If the interview is live, you should ascertain:

- How long will the item last?
- Who else will be in the studio?
- Will the discussion or interview be preceded or interspersed with film, if so what?
- What is the angle?

Dr Alan Holmes, OBE, of the Holmes Partnership (Consultancy Services) in the United Kingdom and a former president of the United Kingdom's Institute of Food Science and Technology (IFST), has much detailed advice for people preparing to meet the media, particularly food scientists and technologists.

In the first instance, he also stresses the need for careful preparation and emphasizes the dangers of thinking that knowledge and experience will carry you through. "You must not only be master of your subject in terms of scientific detail but also in its significance to the public," he points out.

He adds: "Being regarded as an expert has its traps. You are expected to be aware of all available scientific evidence, whether it is favorable to your case, scientifically valid or otherwise.

"This is especially so if you are appearing as a scientific expert on behalf of your employer. Yet it is still both reasonable and possible to bring out the good points about your company or product.

"Specialist coaching will help you to quickly realize the pitfalls of using the qualifying phrases so beloved of many in your profession, if you are a scientist or a specialist in a similar area. Such remarks can be misconstrued. For instance, if you say that, to date, there are no known cases of such-and-such, the remark is likely to be interpreted as implying there may be one some day! On the other hand, a completely different impression can be created by saying 'There has never been a case' yet both statements are correct."

Holmes also brings out the fact that one 'bad' result can be more significant than dozens of 'good' ones. Therefore, it is essential you know about both, as well as why the 'bad' result occurred. As an example he points to how, especially some years ago, the disaster at Russia's Chernobyl nuclear power plant frequently was linked to food irradiation even though it had nothing to do with the process.

Above all, he stresses the need to avoid scientific jargon. "Remember, you are not talking to scientists who are expecting full and reasoned statistical analyses of your results with all the normal scientific reservations. Be positive about what you know and don't pretend to know what you do not. Instead, explain why it doesn't matter or what you are doing to find out."

Research has shown that somewhere between 60 and 80% of all communication is conveyed through non-verbal channels such as body language. People attribute messages to gestures.

For example, says Holmes, palm gestures are historically associated with truth and honesty. Oaths are taken with the palm over the heart, on the bible or held up in the air, for instance.

"One of the most valuable ways of discovering whether someone is being open and honest is to study their palm gestures. Those wishing to be totally open or honest will usually hold one or both palms out, up or open. As someone begins to open up or be truthful, usually he or she will begin instinctively to expose some or all of their palms. However, when being dishonest, they will have a tendency to keep the palms closed or hidden from view. The classic example is that of a child who is trying to conceal something. They will hide their hands behind their backs!

"Other messages arise from the way people interpret what is said. Phrases like 'you know', 'sort of' or 'kind of' are used regularly and often unconsciously.

However, they are annoying because they are really saying 'I know I am not really making myself clear but you're intelligent enough to know what I mean'.

"Clichés are also to be avoided. They prevent the imaginative use of language and suggest you are too lazy to describe the situation perceptively."

One of the most used clichés in the English language, he points out, is 'incidentally'. It is used to play down the importance of what the speaker is saying. 'Incidentally' also comes in a variety of guises such as 'by the way', 'while I think about it', 'before I forget' or 'I was just wondering'.

Dr Holmes emphasizes: "Such phrases should warn you that the words which follow are really the key points in the statement, particularly if they are used by someone you regard as an opponent."

Other words and phrases are used to disguise the truth or to mislead. For example, while many people habitually use such words as 'honestly', 'frankly' or 'sincerely' to preface honest statements, they are often used to disguise the truth or to mislead. Therefore, even when used truthfully, it is unfortunate that they can make an honest statement sound untrue!

'Only' is another word that can be misleading. Often it can be used to relieve guilt or to put the blame for unpleasant consequences elsewhere. Whenever you hear the word being used you should ask yourself why the speaker is attempting to minimize the importance of what he is saying!

Holmes quotes a fascinating example. "If you say '*Listeria* are present **only** at a low level' the uninformed will interpret it to mean that *Listeria* **are** present. In their minds, the word emphasizes the presence of the bacteria rather than minimizes it, as was intended.

"Yet, exactly the same information can be conveyed by saying: 'We take such care that *Listeria* cannot be present at a level which could cause disease.' You are being entirely truthful while conveying scientific information in a way which is positive, relevant, and comprehensible but the impression is quite different."

"Language, even that in common usage, can get us into trouble if we don't think about it carefully. It is in our interest to think about what we want to say and to choose our words with care," he points out.

These few examples show that there is much to be learned from skillfully handled media training sessions, especially in front of a video camera.

In addition to commercial organizations, many professional bodies run such courses to help their members understand the requirements of the media and to put over their own specialized subjects more effectively. Bodies such as the IFST produce guidelines and background statements to help members, who may be approached by the media for an expert view on a topic in the news.

If you are being approached to give a radio or TV interview you do have certain generally accepted 'rights'. You have every right to ask about the area to be covered; indeed you would be unwise not to do so. This enables you to draw attention to points you would like to make and to areas about which you are not qualified to speak. It is also considered reasonable to ask what the interviewer's first question will be and how you will be introduced. If you are asked to go to a TV studio it can also be appropriate—and not an act of personal vanity—to check the color of the background which will be used so you can dress accordingly.

Of course, such niceties are not always possible. But, when they are, questions on these lines indicate a degree of experience and confidence that can work in your favor. Indeed, if you are anticipating a media 'storm', it can be a sensible precaution to have, say, a blue and a gray suit, a couple of clean shirts and a selection of ties or a discreet dress or two-piece and several blouses in the boot of your car.

If you are approached to give an interview, especially as an 'expert', remember to:

- Explore as far as possible what is wanted and whether you can help;
- Find out what event or news has provoked interest in the topic;
- Check if the same topic is being followed up with other people;
- If you are contacted by a radio journalist or researcher, enquire at the outset whether the phone call is being recorded for subsequent transmission. (The author is sorry to sound cynical, but this has happened to him and others without their knowledge). Do not conduct the interview immediately but agree to phone back in 15 minutes after you have collected your thoughts (always keep your promise);
- If the call is to arrange an interview, find out what ground it is intended to cover, what sort of questions are likely to be asked, and whether other interviewees will be taking part (if so, who they are); and
- If you have any doubts, tell them you need to check (you cannot be an instant expert on everything) and you will ring back (and make sure you do).

Avoid offering 'off the record' material unless you are dealing with a journalist you know particularly well and trust. Otherwise there is no such thing! Be careful how you make use of such a request. It is a classic trick to try and gain a reporter's temporary silence. Abuse the technique and you will not be trusted again.

If you want to speak off the record—this might not be unreasonable if you are providing general industry background or an expert view but do not want to be named—it is important to make this point at the outset and obtain the journalist's agreement. Otherwise you will be facing a very unhappy reporter. It is also accepted that information provided off the record can still be used if not attributed to the source.

When you are preparing for a television interview:

- Avoid fine checks or stripes—they appear fuzzy and thus distract the viewers' eyes;
- Avoid white or other very pale colors, but also avoid large areas of loud, bright or strong colors (for example, red, green or orange) which will dominate the screen;
- Avoid shiny fabrics or material with a sheen, and bright or glittering jewellery; and
- For sitting down interviews, it is best for men's suit jackets to be unbuttoned to prevent bunching. Sitting on the jacket tail can also help.

'Five o'clock shadow' shows badly. Men being interviewed late in the day should shave just before the interview even if they did so that morning.

There are many lessons to be learned from studying the appearances of accomplished TV personalities, especially the way they perform when 'under fire'. The performances of people such as union leaders are an interesting example of how presentational styles have changed. Some have always been lucid, rational, and persuasive. Others have forsaken their tub-thumping style of old to become similarly calm and reasoned in their arguments.

The main difference between radio and television interviews is that the listener cannot see you. The general advice relating to TV interviews applies equally well but it can be a strange experience if you are not familiar with the medium. In a 'news' situation, you can find yourself talking into a reporter's microphone in your office, at the factory gates, at your home or even out of the window of your car. On other occasions, you might find yourself alone in a cramped studio talking and responding to a voice coming through a set of earphones from many miles away, or giving a 'down-the-line' interview on the 'phone from your office (make sure everyone in the vicinity keeps quiet).

With radio, you only have your voice through which to project yourself and your message, whether your listeners are sitting in a traffic jam, speeding down a motorway, eating their breakfast or preparing the family's evening meal. If there is a problem with one of your products, your voice and its inflections and your words are your only means of conveying your company's concern for the safety of its consumers, its regret at the incident having occurred, and its genuine intention to rectify the situation. As with television, you have to try to put something of yourself into the interview and give your message and your organization a human 'face' even if you only have a few seconds in which to do so. That's usually considerably fewer words than would fill half of a letter-size or A4 sheet of paper in double-spaced typing.

As with television, some people have a natural aptitude or voice for the medium. When a company spokesperson is being selected, it is important that the most suitable person is chosen. In a really serious or clear-cut situation, the appearance of the chief executive might be appropriate. In other cases, it might be advantageous to keep him or her in reserve by fielding a 'deputy'. This can also be a wise tactic in controversial circumstances, because an even more senior member of the company can retrieve the situation if necessary. However, not all successful crisis communications specialists agree with this course of action. Many advocate the top man appearing at all times.

It also has to be borne in mind that some senior directors or managers might well be a disaster talking to the media let alone appearing on TV or radio. They might be driven by vanity or some other motive that makes them utterly unsuitable. They might be unable to cope with a situation in which they are not the one in control. A tactful way has to be found to persuade them to allow someone else to face the cameras, which might be far easier said than done.

Some consultants in broadcast techniques are great believers in simulating real life situations. An electronic newsgathering team (ENG) ambushes the managing director or marketing director in the car park and grills him on a particularly sensitive topic, or a radio reporter confronts him at dawn on the doorstep of his home.

Of course, simulations can be invaluable but they should be constructive. The author recalls the experience of one company—not in the food industry—which brought in a team to put them through a crisis simulation. The consultancy devised a vivid scenario. Without prior warning to all but a handful of people, a deluge of media calls indicated there had been a major incident at the company's principal manufacturing location. The disaster left the plant without any means of communication with the outside world. The only details came from 'journalists' who were phoning the company and what appeared to be a national news item on the TV set in the directors' dining room as they were eating lunch—it was, in fact, a carefully doctored videotape.

The result was chaos. Caught on the hop, people at all levels found themselves wanting and were demoralized not strengthened by the experience. The only person who rose to the occasion with great aplomb was the head of security. A former senior police officer, he was on familiar ground because he had dealt with many serious incidents in the past.

A company with its own in-house or external public relations specialist or consultant with previous media experience would also find it had someone who was on familiar ground. He or she would be able to act swiftly with calls to the local fire brigade, ambulance service and police to verify the situation and gain more information before deciding on the best course of action, such as hiring a helicopter to fly a crisis team to the factory.

There was an even more extraordinary example of how not to conduct a crisis simulation in South Africa in 2001. A 24-hour radio news station announced that an armed gunman had taken nine people hostage aboard an aircraft at a small provincial airport. Police confirmed the story. Television stations sent reporters, camera crews and satellite trucks racing to the scene. CNN went live with the item as did other TV channels and radio stations. News agencies flashed the dramatic story round the world.

Not surprisingly, the media clamored for details. A police spokesman told reporters that a man armed with an automatic weapon had taken nine people hostage on board a 'plane' and was demanding fuel. At least three explosions resembling stun grenades had been heard coming from the aircraft.

Then, to the astonishment of the assembled journalists, a senior police commissioner appeared and told them that the drama was, in fact, a crisis rehearsal. He is reported as saying: "I don't know what you are doing here. The person who informed you about this took you on a wild goose chase."

A police spokeswoman added: "It is a very intensive training exercise and only the people who have to know have all the information."

Of all unlikely names, the scene was Wonderboom Airport and the rehearsal was so secret that even the official police spokeswoman at first told journalists she had no idea what was happening. When the truth came out pandemonium ensued and, as one might expect, complaints poured in from the media organizations who had been misled.

The lesson from these two examples is clear. Any scenario should be realistic and produce a positive learning experience. In the first instance, the testing of

procedures could begin with a simple telephone call to a distant manufacturing plant on a Sunday or a national holiday.

Of course the security staff on duty should be aware of the company's crisis procedures and be in possession of the out-of-hours phone numbers of all key staff and their deputies. Of course, the factory manager should not respond to the phone ringing in his home when the security man tries to tell him that a known company executive wants to contact him urgently because of a serious product problem.

So what does the security guard do next? Of course, he should ring the deputy manager and so on until he is able to pass the message to someone else in authority. But what do you think happened in reality? Well, in one case with which the author is familiar, having received no response to his call to the factory manager's home, the security man left a note in his In Tray so he would see it the following morning! After all, it was a Sunday afternoon and he did not want to spoil rest of the manager's day.

Without doubt, companies should check their crisis arrangements at least once a year. No matter how careful they are, companies might well have to face a major incident at some time. They need to rehearse their plans and procedures frequently. This applies to small companies as much as to the industry giants. Indeed, many larger businesses are accustomed to such exercises and take them in their stride—a classic ploy is to send out an alert to cell phones and beepers just as the members of the crisis team are driving into the company car park to start work in the morning! However, even companies which are not so likely to face major disasters should still arrange rehearsals and simulations, but in a less dramatic fashion.

When a crisis management plan is tested or challenged for the first one or two times, care should be taken at every stage to explain that the system is being evaluated. The scenario involved should be described and then that particular individual should be left to take the next step in the plan.

It is imperative that, afterwards, there should be a de-briefing session. It should be conducted in a constructive manner and not with the ominous air of an inquest, the outcome of which might influence career prospects. People should be asked to describe the action they took, why they took it and what they might do differently if faced with a similar situation in the future. Indeed, it would help such a session to get off on the right note if the person calling the exercise was to begin by outlining the steps he or she took and then saying what they would do differently on another occasion.

Once the validating procedure is established, or if the managers are aware that a simulation is about to be mounted, it could be appropriate for them to experience being mobbed by journalists, TV crews and photographers. However, it would only be constructive if earlier training sessions had prepared them and they were aware that it could take place. As familiarity increased, they would become even better equipped to take the unexpected in their stride. It is a favorite technique at some conferences on crisis management for a video crew to charge unexpectedly into the proceedings and begin filming and interviewing participants. Moral—never sit in the front row or in an

aisle seat unless you have already thought of a suitable response if you are 'jumped'.

8.4 Video news releases

One way of making media appearances less uncomfortable and more controllable is to prepare a video news release (VNR). In essence, it is a press release in the form of a professionally filmed and edited piece of transmission quality videotape. Economies in staffing and the need to contain costs have led to many television networks being unable to cover all the events they would wish. Video releases shot to professional standards enable them to still report items they would otherwise have been unable to include in their schedules. This has led to newsrooms becoming increasingly more receptive.

Many major companies already supply stock footage to television libraries and regularly update it so that, for instance, tape of a particularly new and modern food retail store is always available. The fact it is clearly identifiable as being that of a particular multiple is to that company's benefit and more than repays the cost of producing it. Pressure groups use VNRs to help obtain greater coverage of an issue in which they are involved. In one instance, some 70% of the footage aired on TV came from the group staging the protest, which concerned the disposal of an oil rig.

However, the use of VNRs does raise ethical issues which have been tackled by the Public Relations Society of America (PRSA). The Society has pointed out that, because they are a basic public relations tool used by corporations, organizations and others to provide news content to television stations, it is important that there is a better understanding of their role and usage.

In a statement on the issue, the PRSA points out a VNR is the television equivalent of a press release and, as such, should always be truthful and represent the highest in ethical standards. Producers and distributors of VNRs and the organizations they represent should clearly and plainly identify themselves. Also, TV stations airing VNRs should identify the sources of the material.

Just as some advertisers try to make their advertisement look like an editorial item, some VNR producers use similar ploys such as a reporter signing off at the end as if it was a regular news item. The Society considered that this could be considered as confusing and/or misleading.

By comparison, VNRs have been produced to a high standard for more than 25 years and media outlets have used them on a regular basis. Such VNRs consist of many elements including a complete story with visuals and narration/voiceovers, a suggested written script, added video that can be used by the station and suggested ways the story can be localized.

The PRSA's position is that the organizations that produce them should clearly identify the VNR as such and fully disclose who produced and paid for it at the time it is provided to the TV station. It also recommends that the organizations that prepare VNRs should not use the word 'reporting' if the narrator is not a reporter. The Society also believes the use of VNRs or footage provided by sources other than the station or network airing it should be identified when it is screened.

8.5 Video bites

In a crisis as well as for other public relations purposes, use is also made of 'video bites' such as interviews with experts and representatives of an industry. This is less time-consuming than if a spokesperson was giving separate interviews to several different channels. Also, both they and VNRs can be useful if health and safety regulations make it difficult to allow TV crews access to production lines. It also ensures only the most modern practices are shown rather than outdated library footage. As with VNRs, video bites enable you to control the messages and images being provided to the media.

Everyone involved in any way with crisis management should try to keep up-to-date with changing strategies and technological innovations. At the same time, the basics of meeting the media remain unchanged and nothing can beat a cool head, a clear idea of the key message you wish to convey and the desire to do so.

8.6 Keeping issues in perspective

In any dialogue with the media during a crisis, it is likely that scientific and technical issues will arise. It is imperative that close links are maintained between scientists, technologists, and public relations personnel and that each cross-checks with the others what, why and how they are likely to make any communications so they are consistent.

Of course, whenever there is a food scare or a crisis, the media frequently are blamed for exaggerating the matter, taking it out of context or even distorting the facts. However, all too frequently, the blame should be placed at the door of those who are not prepared to help a reporter obtain a clear picture of an issue within the necessary deadline.

At the same time, credit should be given to the profession's own efforts to help journalists keep such matters in perspective. The outstanding example of this is the information and guidance provided by the Foundation for American Communications to improve the quality of news reaching the public.

Do I need help?

Do I have a problem? Am I likely to have a problem? Do I need help, and if so when should I call for that assistance?

These are often difficult questions to answer, especially if they are facing a small or medium sized company that might never have experienced anything worse than the occasional offensive consumer with an unrealistic idea of the level of compensation he or she could expect following a problem with a product. In that position, it is natural for most small businesses to dismiss the highly publicized crises that affect bigger companies and brands, and assume they could never strike them.

But highly publicized problems can affect even major organizations with experienced teams of food scientists and technologists and the most sophisticated procedures of hazard and risk control. What, then, are the chances of smaller companies without such large or highly trained resources being able to avoid being swept up in an unexpected situation? Every organization is vulnerable, though some problems can arise from unexpected sources like an employee pursuing a grudge against a colleague by contaminating products for which that particular person is responsible or from an individual making wild and unfounded allegations against a business.

Brands have disappeared off the shelf forever and companies have gone out of business because of complacent attitudes towards good manufacturing practices, hazard analysis and quality control, or because the technical staff lacked adequate experience or training. Businesses can also be affected by the complacency of suppliers or because adequate controls were not placed on them. Ingredients produced without sufficient control and monitoring of quality and hygiene standards can contaminate foods, with the result that people can be made seriously ill or even die. Such tragedies have occurred in many countries and have affected companies of all sizes.

Dismiss the possibility of being embroiled in such a situation if you wish but, as mentioned earlier, can you ever exclude the prospect of a disgruntled employee contaminating your products? Can you be sure your production processes will always operate satisfactorily; that your controls and hygiene

checks will always be without fault? Do you say: "I am just a small business, it will never happen to me?"

The temptation exists to sidestep the issue but just glance through your daily newspaper, listen to the radio in your car or watch the news bulletins on television while you are at home and think of all the people whose lives are suddenly and without warning turned upside down by an incident that has unexpectedly thrust them into the news.

At the least you should spend some time considering what problems could possibly affect your business or the company for which you work. You are interested enough to read this book. Your next step should be to attend a crisis management course or go to a conference on the topic. There are many to choose from. Your trade association might well be able to advise you. So may the professional public relations body in your country. Some arrange courses and conferences of this type. They are usually more modestly priced than those of commercial conference organizers. Whichever you decide to attend, it will be money well spent and you will gain a greater understanding of the subject. Talking to other delegates will also broaden your knowledge.

Having gained an insight into the subject, you should take a calculated look at your own business and ask yourself the following questions:

- Are your controls and quality control checks on your suppliers sufficient to ensure the detection of unsatisfactory ingredients?
- Are you confident your production and supply lines are always operated to the highest standards?
- Are your food control measures adequate (quality assurance and quality control)?
- Have you conducted a hazard analysis¹ (HACCP) or had one carried out for you (see Chapter 2)?
- Are the packs in which your products are sold tamper-resistant or tamper-evident?
- In the worse conceivable scenario, what could go wrong with your products?
- Is there any aspect of your business that might attract the attentions of a pressure group or extremists?

You should then list the hazards you have identified. For example, they might be

- Faulty ingredients;
- Faulty processes leading to contamination by organisms such as *Salmonella* or *Listeria*;
- Sabotage by a disgruntled employee; and
- Deliberate contamination accompanied by a threat or demand for money or political advantage.

This book concentrates on the public relations aspects of crisis management, but other chapters make reference to various systems and practices that can

¹ HACCP—A Practical Approach 2nd edition, Sara Mortimore and Carol Wallace (1988) ISBN 0-8342-1932-8, Aspen Publishers Inc, Gaithersburg, now Springer Science + Business Media.

greatly reduce the possibility of experiencing a problem involving ingredients or manufacturing processes. It is also important to recognize that, if your own technical department does not have skills in statistical analysis or any other specialized discipline, you should not hesitate to hire in that expertise. It will save a considerable amount of time and money. Another factor to bear in mind is that during a crisis you may receive unsolicited offers of help from various consultants. They should be treated with caution because it is unlikely you will have time to properly evaluate them. This again emphasizes the importance of preparing in advance and choosing the specialists best suited to your own requirements should the need arise.

One particular pitfall of which every director and manager should be aware is the situation that might exist in a factory or business which has just been taken over. Its systems and practices might well be different and even downright unsatisfactory. It is important to get them up to standard and integrated as quickly as possible because this is an area where an efficient, well-managed parent company might become vulnerable.

You could well be dealing with people who resent their new employer, are worried about their jobs and pensions or are disgruntled at the latest pay offer. The level of consumer complaints from that unit might be revealing, especially when compared with previous records. You do keep such records, don't you? You might discover a sudden surge in complaints about foreign bodies in products, or note that the number of such complaints goes up at crucial points in the annual wage negotiations.

Has there been a widely reported case of a product similar to those which you produce being tampered with? If so, beware of copycat incidents. Do you have a good rapport with your consumer relations or consumer affairs department? Do they keep you aware of the trends that emerge from the complaints they receive? What do they think could be a threat?

Does your company have efficient systems to monitor the levels and types of complaints received? Can those systems warn you that a particular type of complaint, perhaps the presence of a foreign body, has occurred for the third time in one particular production batch?

Good statistical techniques can be invaluable, including trend analyses which may explain peaks and troughs by taking into account seasonal variations or promotional activities. If your own technical department does not have skills in statistical analysis, do not hesitate to hire in that expertise. It can save both time and money.

These are real problems that have had to be faced in the food and drinks industry everywhere in the world. With the spread of consumerism and the globalization of news, all countries are now becoming aware that they have to be better prepared to manage such problems, ideally by preventing them ever occurring.

As already mentioned, the realities of today are that every food company should assess the worst possible problems it could face and prepare contingency plans accordingly. Companies should also monitor the trends of product recalls on the web sites of the major enforcement agencies. It is important to be aware of worldwide trends.

Unless your organization has already experienced the trauma of a crisis, it is difficult to get the balance right between taking sensible precautions and showing such excessive zeal that your colleagues will start to dismiss your warnings as exaggerations and even become defensive and antagonistic.

The reality of a crisis is that the pressures imposed on a company and individuals can be enormous. The thought that any delay in recalling a product could result in a consumer becoming seriously ill or even dying is an unforgettable experience. The thought of a blackmailer being at large is also extremely alarming. If possibilities such as these have been identified and discussed in advance, appropriate decisions and actions are easier to take should they ever be necessary.

In such a situation, if you do not have your own seasoned experts within the company, there is no time to learn. It is time to seek expert help but it would have been more satisfactory for both sides if the specialist(s) had been involved and familiar with your business before a problem ever arose. However, before such a situation can ever arise, it is better to carry out an appraisal either by your own staff or by the outside consultant or agency to establish potential risks that could arise in the future so that all concerned are prepared for such an eventuality.

Faced with the issues for which you want assistance, you should search for a suitable agency or consultant. But first you need to understand that consultancies can provide a wide range of services or specialize in particular areas. Some concentrate on investor relations or sponsorships, others have expertise in product marketing, community relations, employee relations or corporate identity. You want an agency that includes among its skills crisis and issues management as well as reputation management.

Professional public relations bodies in various countries provide lists of member organizations that claim these skills and trade bodies can recommend businesses with known experience in these areas. Marketing consultants, advertising agencies and trade journalists covering the food and drinks industry are other sources for recommendations.

Once you have a shortlist, it is sensible to check out the web sites of each firm. This will help you narrow down the search to a handful of consultancies who should be contacted to establish whether they would be interested in pitching for your business or whether they might be faced with a conflict of interest because of other clients already on their books.

You may then wish to have a credentials presentation to determine the background of the senior members of the agency, especially those who could be working on your account, and discover the extent of their experience in the areas in which you are seeking help.

Other questions to establish at the outset are the basis on which they charge for their services. Some require a monthly retainer, some charge by the hour and some by the magnitude of the assignment as it unfolds. It is also important to ascertain how expenses would be charged; some charge at cost, others add a mark-up.

It is also worth trying to contact existing clients to find out how satisfied they are with the work of the agency or consultant but be prepared to be cautious about recommendations from referees suggested by the consultancy.

By this stage, the shortlist should be reduced to two or three businesses. It is then important to meet those who would be actively working on your account. Large agencies have a habit of rolling out their 'big guns' for the main presentation and then handing over the work to a less-experienced team if they win the account. Obviously, if you are dealing with a small consultancy or an individual consultant this will not be the case.

If you want a detailed presentation focusing on your own company and the specific areas for which you are seeking help, you should expect to pay a fee because of the extensive work and research that will be involved.

Of course, if you are in the midst of a crisis and urgently seeking assistance, there is no time for such niceties but some quick phone calls to your national PR body, your trade organization and perhaps a friendly journalist should put you on the right track. Even in the midst of a desperate situation, it is still important to establish who would be working on your account, the level of their experience and how fees and expenses would be charged so you are not faced with some unexpected bills.

Never forget, there are situations where there is no substitute for experience. The average man in the street has little idea of the threats which companies and products can face. Product contamination and extortion are problems which occur in most countries in the world.

Many individuals and organizations are eager to claim expertise in crisis management and its specialist areas. Few have the experience in the necessary depth to successfully manage really serious problems. Indeed, a significant proportion of the business handled by some of the leading crisis consultancies is retrieving situations that, initially, were being dealt with by less-experienced agencies. Many consultancies claim expertise in crisis management; few can wear the real campaign medals.

If you do decide to involve outside specialists, there are three essential questions to ask:

- What specific experience do you have of handling crises such as this particular one?
- Will the team that made today's presentation be the one working on your crisis? and
- What are your fees and the terms of your professional liability insurance?

There is an additional question to ask a consultant or an agency if you are not currently facing a crisis but wish to be prudent:

- What crises would you predict 'my' company might face in the future?

Crisis management is not cheap, but then everyone is playing for high stakes and the overall cost can be insignificant in relation to the permanent damage which could be inflicted on a brand or a company.

Sources of technical help

The prime focus of this book is the communication aspects of crisis management. However, it is still relevant to mention the services of additional sources of help, particularly in the provision of general laboratory services and assistance in the examination of products which may have been contaminated or infected.

Contract laboratories and research associations not only provide routine facilities for clients or members but some offer round-the-clock 24/7 crisis management services. They provide facilities and services appropriate to the requirements of the countries in which they are based. Each usually has its own particular niche and specialization.

In the UK, the reputations of three establishments are particularly linked with such crisis management services. They are Reading Scientific Services Limited¹ (RSSL), Leatherhead Food International (LFI)² and Campden and Chorleywood Research Association.³

The RSSL is a contract laboratory providing a wide range of services. Though the Emergency Response Service (ERS) only represents a small proportion of its work, that is the area for which it is widely known. Dr Ray Gibson, director of RSSL, said : "Our prime task is supporting processors and manufacturers in the production of safe foods. However, our role goes much wider than providing clients with analytical services that can 'pass' or 'fail' a food or an ingredient for any one of a number of contaminants. We also have a duty to keep pace with the latest research, new legislation, and the development of food quality and safety schemes such as HACCP (Hazard

¹ <http://www.rssl.com/>

² <http://www.leatherheadfood.com/>

³ <http://www.campden.co.uk/>

Analysis Critical Control Point system), NFPA-SAFE,⁴ BRC⁵ and ISO⁶ 15161: 2001.

"The issue of food safety is an ever-changing challenge for the food industry. New problems are constantly emerging, partly because methods of detection are continually becoming more sensitive and problems that previously were undetectable are being found. It frequently seems that the research community is always finding new strains of pathogens that can cause disease or identifying more naturally occurring food chemicals that might be carcinogens."

The company's ERS was established in 1987. Its aim was to provide an immediate analytical response to product crises. Since its introduction, the Service has dealt with more than 8000 cases and RSSL uses this experience to help clients decide on the best response to emergencies such as product contamination, process and packaging failures, deliberate tampering, and extortion threats.

In 2003, the service handled 548 cases and RSSL's work for the food industry represented nearly a third of that total (29%). Work on alcoholic beverages accounted for 6% and retailers for another 3%. Serious customer complaints amounted to 7% while extortion threats involved 2% of the cases, but those figures also included RSSL's clients in the pharmaceutical and healthcare industries (46%) and drinks industry (14%).

Just over half the 548 investigations (54%) involved microscopy. Most were classified as foreign matter while 'other' categories included materials as diverse as blood, plant tissue, capsules, tablets, 'black bits' and haze or sediment. Metal, plastic and glass accounted for a fifth (20%) of these investigations.

From this background, the company has developed many of its training and consultancy services to help clients develop best processing practices.

Dr Graham Pettipher, general manager of quality, microbiology and development projects, who heads up the crisis team, added: "We constantly have to research and innovate. A new food scare has no historical precedent. It is unlikely there will be any published analytical methods and, even if there are, they might not be appropriate to all foods and all situations.

"For example, extracting and identifying acrylamide from a potato chip poses a different analytical challenge from that presented by a meat and vegetable pie. Nevertheless, clients faced with an acrylamide scare will want to know if their own products are contaminated.

"There are many other examples. In July 2003, routine analysis of a range of bottled foods for nitrofurans revealed the presence of semicarbazide (SEM). These veterinary drugs are banned in the European Union because SEM

⁴ National Food Processors' Association now renamed Food Products Association. It is the voice of the \$500 billion food processing industry on scientific and public policy issues involving food safety, food security, nutrition, technical and regulatory matters and consumer affairs worldwide. The NFPA-SAFE programme was designed by leading food companies to meet the global industry's audit needs. It provides a reliable, comprehensive assessment of a company's food quality and safety system.

⁵ British Retail Consortium, the lead trade association in the UK retail industry, which produces global standards on food, consumer products, packaging and non-GM foods.

⁶ International Organization for Standardization

belongs to a family of chemicals (hydrazines) that are known to cause cancer in animals. Yet SEM contamination was found in baby food, fruit juices, jams and preserves, honey, pickles and sterilized vegetables, mayonnaise, mustard sauces and ketchups, most of which would have been considered unlikely to contain any kind of veterinary drug.

"In this instance, a possible explanation was that the presence of SEM emanated from the material used in the seals and gaskets of the metal lids as the result of the high-temperature processing involved. Indeed, we subsequently detected SEM levels of 1–7 mg/kg in extracts from the gaskets, but when it was first detected in foods and packaging materials there was uncertainty about how it could have occurred. It was not clear whether SEM was already present in the gaskets and the foods or whether it could have been formed from a precursor during the analytical procedures.

"To overcome this element of uncertainty, within a few weeks RSSL developed a method based on liquid chromatography-mass spectrometry that did not involve any analytical steps that could in themselves result in the formation of SEM and capable of detecting SEM in the lids at levels as low as 10 ppb. This is just one illustration of the speed with which contract laboratories have to respond to new problems."

The company has also built considerable expertise in the identification of foreign bodies and has recently used such technologies as X-ray microfluorescence spectrometry because it offers a much quicker route to the elemental analysis of surfaces than techniques involving X-ray microanalysis linked with scanning electron microscopy.

Gibson pointed out: "New techniques for identifying food pathogens have also emerged in recent years. Rapid screening methods have now become commonplace. They give the food industry a much firmer basis on which to operate positive-release policies. Molecular biology also now offers the possibility of developing more rapid methods for identifying specific strains of bacteria, based on the amplification of specific DNA sequences.

"We also use DNA analysis to differentiate between genetically modified and non-transgenic crops as well as to determine meat and fish species from their DNA profiles. These methods also have a role to play in identifying nut species that are known to be allergenic.

"Interestingly, because of the skills we have developed, clients are even air-freighting samples to us from America. Because of time differences, we can analyze those samples during their night and fax or e-mail the results by the time they wake up and return to their offices the next morning.

"Food safety can never be taken for granted. Changes in ingredients or in processing regimes can create unexpected problems. A modest reformulation may shift the pH balance of a product and make it vulnerable to microbiological spoilage. Bad practice by a single employee working for a trusted supplier can contaminate an entire batch of raw ingredients, or the emissions from a local factory might damage the entire crop on a farm. Such constant challenges ensure there is always a role for analytical laboratories in helping the food industry to provide safe products for people to eat and enjoy."

As a research association, Leatherhead Food International is a global provider of information about food legislation, labeling, E-information and market intelligence concerning the food and drinks industry. It also offers technical and food research services as well as assistance and advice in connection with crisis management situations. Tony Hines,⁷ MBE, who heads the crisis management operation, also enjoys an international reputation for his lecturing and training courses.

Describing the role of the association, Hines said: "Our aim is to be the preferred partner of our clients worldwide for legislation, market intelligence, foods research and analysis, business and technical information, and training. Based on our awareness of market trends, the establishment's objective is to swiftly deliver innovative solutions to problems.

"Within Leatherhead, we can provide all the services a food manufacturer or research partner might require to create and launch a product. These services can include market intelligence, research, checking consumer reaction to the product through consumer and sensory awareness techniques, product development through the formulation of ingredients, manufacturing processes involving quality and safety, packaging and even legislation issues.

"In addition, the association carries out large scale public and privately funded research and analytical projects concerning food. We also run conferences on a wide variety of topics as well as comprehensive training programs including crisis management.

"Above all, we believe we can offer clients practical solutions that will help them achieve and maintain their vital competitive edge."

Other laboratories and research establishments in Britain have their own specialties and focus which are relevant to various aspects of crisis management. Law Laboratories Limited⁸ (LawLabs) provides services to the food, retail and consumer goods industries. Formed in 1987, it specializes in assisting companies in meeting their legal responsibilities under food and trading law by providing legal and technical advice, analytical services and third party inspections. The company employs over 170 people including scientists, technologists, trading standards officers and environmental health officers.

Its laboratory is accredited to UKAS (United Kingdom Accreditation Service) Testing No. 0730 for over 300 methods and the company participates in a number of performance schemes to ensure the validity of its results. The company employs two analysts with the prestigious mastership of chemical analysis, the qualification required by public analysts and their certificates of analysis can be supported in a court of law in the event of a civil or criminal proceeding.

In recent years, increased UK and EU legislation has impacted greatly on the food, consumer products and services industries. Having a full appreciation of the difficulties faced by companies in ensuring legal compliance, LawLabs provides practical advice and comprehensive services in the form of consultancy, training, inspection services and information bulletins. The company's unique strength in the event of a crisis is the multi-disciplinary resource

⁷ thines@leatherheadfood.com/

⁸ <http://www.lawlabs.com>

providing a coordinated service of product testing and independent legal and technical interpretation. Many of its personnel have come from an enforcement background in public analyst, environmental health or trading standards. The company is independent and does not carry out any enforcement work, but in the event of a crisis, this enforcement view can provide practical advice to limit the liability of a business.

LawLabs also provides inspections of facilities and its sister company Lawlabs Limited is accredited by UKAS to carry out certification to the BRC Global Standard: Food and the BRC/IoP (Institute of Packaging) Packaging Standard. The company is in partnership with International Supplier Auditing (ISA), a business based in Holland, to provide food manufacturers with a European network of inspectors. It is the only body in the UK permitted to offer the new International Food Standard (IFS). This was developed by German retailers to remove much of the subjectivity and scope for interpretation found in other audit reports and has been adopted also by their French counterparts. It is now the preferred method of inspection by retailers in both those countries. LawLabs through the ISA partnership is one of only a limited number of organizations that can offer combined BRC/IFS audits which has the benefit of acceptance by both the UK and German retailers.

LawLabs will continue to be innovative in the development and identification of solutions which will reduce the cost to the industry and support them in the event of a crisis.

Campden & Chorleywood Food Research Association undertakes research and development for the many industries associated with food and drink manufacture, distribution, retailing and food service. It is the largest independent membership-based organization carrying out research and development for the food and drinks industry worldwide and is committed to provide the industry with the research, technical and advisory services needed to ensure product safety and quality, process efficiency and product and process innovation.

Contract research and development work is also carried out on behalf of UK government departments, levy boards, industrial consortia and the European Union. Consultancy work is done under Aid-funded programs for countries with a developing economy.

A particular strength of Campden is its multi-disciplinary approach to research. By working with other research organizations around the world, Campden acts as an interface on behalf of its members, keeping abreast of developments in academia and elsewhere. The knowledge and skills developed can then be used by its members to help ensure the safety and quality of foods, increase the efficiency of production and lead to innovative products and processes.

Ventress Technical Limited⁹ is another laboratory with a unique niche. It offers a comprehensive range of food consultancy and laboratory services and specializes in confidential projects of an investigative nature as well as product authenticity, fraud and spoilage. Its directors are frequently called on to act as

⁹ <http://www.ventresstechnical.co.uk>

expert witnesses in court proceedings and to offer expert opinions based of their extensive experience in the food industry. They are also expert in areas such as Food Safety Act prosecutions and 'due diligence' matters.

Bodies that have used the company's services include government agencies, local authorities in the UK, consumer organizations, importers and exporters, manufacturers, retailers, research and trade associations, publishers, fast food companies, universities, medical training associations and hospital authorities.

The company has a reputation for original thinking in the solving of problems. For example, during the first unfit meat scandal in the UK (see Chapter 14) Professor Tom Toomey, technical director of the company, achieved a significant breakthrough by developing his own methods to establish the identity and origin of various meats involved in the fraud.

The powers of enforcement authorities

Today, it is commonplace to see media stories about the recalling of faulty goods, from motor vehicles to bottled water, as well as advertisements warning consumers about such problems and telling them how to have the problem resolved. People have become accustomed to such actions and regard them as reassuring indications of an organization's sense of responsibility towards its consumers and society in general.

The first industry to be affected by the pressures of such consumerism was automobile manufacturing. This was primarily due to the activities of Ralph Nader, the American reformer. He initiated a campaign on behalf of public safety that started the consumer-protection movement in the 1960s. The focus of his campaign was the safety of US cars and subsequently he turned his attention to other issues like radiation hazards, food packaging and the use of substances such as cyclamates and DDT.

His influence spread throughout western society, where auto makers were forced to begin publicly recalling models when faults were discovered. The first notices created enormous media interest, not least because cars had become such important status symbols, and it took many years for the recalls to be treated in a more routine fashion. Today, such problems usually attract only brief references in the media.

Subsequently, the food industry became swept up in a wave of similar consumerism and one national daily newspaper in the United Kingdom even had a policy of always featuring such scare stories on its front page because they increased sales. At the same time, issues such as 'E' numbers—a system introduced in Europe to identify additives used in food formulations so consumers would be better informed—added fuel to the fire because it was poorly presented to the public. One journalist became a sterling millionaire virtually overnight by writing a popular paperback listing the 'E' numbers and their possible harmful effects. Housewives could be seen pushing their shopping trolleys round supermarkets while clutching a copy of the book so they could

study packs then check the ingredients. Consumer suspicions of 'E' numbers and the confusion they caused became such a problem that many brand managers reverted to putting the actual ingredient names back on packs.

Today much of the novelty has gone out of recall notices. Nevertheless, there continues to be media interest in problems and threats to health. After all, everyone has to eat to live. Initially, companies, crisis communicators and regulatory authorities dealt with situations according to experience, intuition and generally accepted guiding principles. Slowly, strategies developed which became regarded as good practice and so evolved into various protocols as well as systems of alerts and warnings.

Now nations throughout the world, headed by countries like the United States, Canada, the United Kingdom and Australia/New Zealand, have their own regulations and requirements. They have exploited the fact that the Internet has become such a universal source of information, especially in countries where the centers of population are scattered over wide geographical areas, by setting out their requirements on their web sites.

In addition, some also provide model product recall plans, press releases, recall advertisements and notices to appropriate officials as well as even contact details for major newspapers in which to place advertisements to help companies should they experience a problem. Australia has even introduced a standard format and design for such press advertisements, which makes them instantly recognizable.

These sites are an invaluable source of information when preparing documents like crisis manuals and product recall procedures for a company, though they might well have to be adapted to suit your own business and the requirements of the country or countries in which you operate.

As mentioned elsewhere in this book, these authorities also publish food alerts—details of product recalls or other problems—on their various web sites for the information of all concerned, including consumers.

In Europe, a raft of new legislation has been introduced which gives the European Union¹ (EU) sweeping new powers concerning food safety and hygiene. They apply to all member countries and importers.

On its web site,² the EU provides an overview of the regulations. It states: "Consumer confidence in the safety of food products has sometimes been shaken in recent years by the cumulative impacts of food-related health crises. Responding to the challenge, the European Union has put in place a comprehensive strategy to restore people's belief in the safety of their food 'from farm to fork'."

¹ Initially, the European Union consisted of just six countries: Belgium, Germany, France, Italy, Luxembourg and The Netherlands (Holland). Denmark, Ireland and the UK joined in 1973, Greece in 1981, Spain and Portugal in 1986, Austria, Finland and Sweden in 1995. In 2004, the biggest ever enlargement took place with 10 new countries joining. The Union's web site (<http://www.europa.eu.int/>) is available in 20 languages to accommodate all the member countries.

² <http://europa.eu.int/food/overview.en.htm>

It goes on to set out three pillars to this strategy: new legislation on the safety of food and animal feed, sound scientific advice on which to base decisions and enforcement and control.

Dealing with the safety of food and animal feed, the EU points out: "The general principles of food safety are set out in a regulation adopted in 2002 and often known as the General Food Law. This constituted a thorough overhaul of EU food safety legislation, with a new emphasis on feed because feed contamination has been at the root of all major food scares of the last few years. A major change as a result is that food and feed businesses must ensure that from January 1, 2005 all foodstuffs, animal feed and feed ingredients are traceable right through the food chain.

"The General Food Law is supplemented by targeted legislation on a raft of food safety issues, such as use of pesticides, food supplements, colorings, antibiotics, and hormones in food production; and by stringent procedures on release, marketing, labeling and traceability of crops and foodstuffs containing genetically modified organisms (GMOs). Updated rules on hygiene come into effect on January 1, 2006. The basic rules apply to all food and feed, and from farm to fork, but in addition there are specific precautions for a number of products ranging from meat to gelatin, and from dairy products to frogs' legs.

"EU responsibility extends also to the welfare of animals and poultry both on the farm and when they are transported. The European Commission overseas measures to protect public health if there are outbreaks of animal or poultry diseases. The EU also facilitates the movement of animals when that is desirable. The 'pet passport' scheme allowing travelers to take pets on holiday with them is one example.

"To spot food and feed risks effectively, the EU operates a rapid alert system. All member states—and there are now 25—notify the Commission of any problems they uncover in imported or EU-produced food. By passing information to all member states straightaway, every government has an early warning system when feed or food could be unsafe because it has not been handled or processed properly, thus exposing consumers to the risks of food-borne illnesses such as salmonella.

"Warning bells also sound when banned substances are identified or legal limits for high-risk substances have been exceeded. These substances may be veterinary medicine residues, food colorings known to be carcinogenic or naturally occurring toxic moulds. The system deals with several hundred alerts on immediate risks each year.

"What happens will depend on the type of risk. It may be enough to stop a single batch, or it may be necessary to stop all shipments of a particular product from the farm, factory or port of entry. Products already in warehouses and shops may be recalled. Sometimes every shipment from one source is tested for some months, as has happened with imported shrimp. In emergencies, the European Commission can step in directly to protect public health rather than waiting to consult EU governments.

"Science is the essential foundation on which the EU bases its decisions on any part of the food chain. The European Food Safety Authority (ETSA), currently temporarily headquartered in Brussels but scheduled to move to

Parma in Italy, plays a central role in this. EFSA has a wide brief. It can cover all stages of food production and supply, from primary production to the safety of animal feed, right through to the supply of food to consumers. It can also look into the properties of non-food and feed GMOs and nutrition issues."

The EFSA provides the European Commission with independent scientific advice that is also made public to enable it to be fully open to scrutiny. EFSA provides input when legislation is being drafted and advice when policymakers are dealing with a food scare, such as 'mad cow disease', dioxin in milk or 'bird flu' in poultry (see Chapter 18). In deciding what to do, the Commission applies the precautionary principle. In other words, it will act without waiting for scientific certainty if the scientists say there is at least a potential danger.

The overview goes on to point out: "Legislation is pointless if it is not enforced. The Commission enforces EU feed and food law by checking that EU legislation has been properly incorporated into member state law, by double-checking compliance through reports from member states and other countries and through on-the-spot inspections in the EU and outside.

"Inspections are the job of the Commission's Food & Veterinary Office (FVO) based at Grange, in Ireland. The FVO can check individual food production plants, but its main task is to check that EU governments and those of other countries have the necessary machinery for checking that their own food producers are sticking to the safety standards.

"New rules taking effect on January 1, 2006 will streamline controls across the EU and put more emphasis on relating checks to likely risk. The European Commission will monitor whether EU governments are running their control systems effectively. Producers breaching the law will be dealt with more severely in many cases."

The overview underlines the fact that it is not enough for food to be safe. "Consumers are entitled to know what they are buying and that it meets their needs. EU food labeling rules have existed for many years, but they are constantly being updated. As a result, consumers will in future be able more readily to identify ingredients to which they may be allergic. Clear definitions identical across the EU are under discussion for the use of terms like 'low fat' and 'high fiber'.

"While the framework for food safety is a common one, it accommodates diversity. The EU takes great care in designing the rules to ensure that traditional foods are not forced off the market by its food standards, that the rules leave room for quality improvements, that innovation is not stifled, and that variety and choice are not curtailed."

In the United Kingdom, various consultations have already been carried out in connection with some of the implications of the new EU regulations and legislation has been changed to conform with it. Information about the consultations and guidance notes concerning the implications of the new legislation can be found on the web site of the Food Standards Agency³ (FSA) and by trawling through various documents available as PDFs (Portable Document

³ <http://www.food.gov.uk/>

Files).⁴ In general, the requirements and responsibilities concerning product withdrawals have not changed. Food companies continue to be required to recall products that are unfit for human consumption as well as to advise and involve their local food authority of such action.

At the same time, food authorities are responsible for investigating and dealing with food that fails to comply with food safety requirements in their areas. Such problems can be identified following microbiological examination of chemical analysis of samples, complaints by members of the public either directly or through other parties such as the police or citizens' advice bureaux, notifications from a manufacturing company, trade association, retailer, importer or caterer, information from enforcement agencies in other countries, or as the result of notification by a GP of one or more cases of communicable diseases, including food-borne illnesses, etc.

The FSA issues Food Alerts to let both local authorities and consumers know about problems associated with food. In some case, the alerts provide details of specific action to be taken. They were previously known as Food Hazard Warnings but the new system took effect from October 25, 2004.

Alerts are issued under two categories, either for action or information. Food alerts are also copied to consultants in communicable disease control, trading standards officers and food trade organizations so that they are also aware of current food issues.

The alerts are often issued in conjunction with a product withdrawal or recall by a manufacturer, retailer or distributor.

Referring to the general requirements, Tony Hines, MBE, crisis management manager at Leatherhead Food International, points out: "The legislation exists to protect consumers from illness or harm when they eat or drink. It follows that producers, manufacturers, importers and retailers share the legal responsibility to 'protect the health of the nation'. The legislation in place puts the responsibility squarely on their shoulders to prevent the sale and consumption of food or drink that is unfit for consumption.

"Food containing foreign bodies falls into this category and, under the Food Safety Act, contamination of any unit in a batch, lot or consignment potentially renders the entire batch unsafe unless the manufacturer can demonstrate otherwise.

"Enforcement officers can insist on the removal from sale of any batch of product that is in breach of the Act when they represent a significant safety hazard. Failure to act on this professional advice may lead to prosecution and the associated negative publicity for the brand or manufacturer."

The FSA has formal powers to enter premises, inspect records, take samples and require information on the production and supply of food. The first use of this power was made in January 2002 in relation to the recall of canned hot-dog sausages (see Chapter 18).

Nearly two years before the EU requirements about traceability in the food chain became law, the FSA carried out a preliminary study.⁵ Launched in March

⁴ <http://www.food.gov.uk/multimedia/pdfs/>

⁵ <http://www.food.gov.uk/pdfs/traceabilityinthechain.pdf>

2002, the study, entitled *Traceability in the Food Chain*, makes interesting reading for any business or country either facing or considering the introduction of such a system. The Agency conducted it to provide a view about the role of traceability systems both in connection with food safety and also to protect other interests of consumers in relation to food.

The study reviews the various methods of record keeping, from simple handwritten or printed labels to machine-readable methods like bar codes and radio-frequency tags and provides an assessment of current systems. It pointed out that the role of traceability systems was to deliver intelligence in emergency systems.

While the cost of introducing such systems can run into huge sums of money, they can also result in significant cost savings. A US food company involved in a product recall in mid-September 2004 was able to pinpoint the problem to 35 minutes production because the packages were individually time-stamped. T.R. Rizzuto Pizza Crust Inc, of Spokane, Washington, recalled 109 cases of cheese bread sticks after fragments of a glove were found to have inadvertently entered the product but, because of its traceability system, was able to avoid having to destroy most of the batch.

Food Standards Australia New Zealand (FSANZ) sets out much useful information on its web site.⁶ Under the heading of Assistance for Industry, it lists resources accessible from the site. They include:

- The Food Standards Code;
- Fact sheets relating to the Code;
- User guides incorporating extensive interpretation and compliance advice for manufacturers and retailers on key standards, including many working examples;
- A web-based nutrition panel calculator developed to simplify the calculation of mandatory nutrition labels required for most foods under the Code;
- Contacts list for state, territory and New Zealand health department officials who can provide advice on the standard; and
- Industry advice service, available by e-mail (advice@foodstandards.gov.au) or telephone, to help small businesses interpret and comply with the Code.

In addition, departments of health in a number of Australian states and territories as well as New Zealand have resources and other activities to help food businesses interpret and comply with the Code.

The FSANZ defines a food recall as action taken to remove from sale, distribution and consumption any foods which may pose an unacceptable safety risk to consumers. They occur in consultation between FSANZ, state and territory health authorities and the manufacturer or importer.

Information about food recalls is available on the agency's product safety recalls web site⁷ so consumers can learn about current publicly announced safety-related recalls.

⁶ <http://www.foodstandards.gov.au/>

⁷ <http://www.foodstandards.gov.au/recallssurveillance/>

The site also provides a guide to writing a food recall plan and how to conduct such a recall. The plan is comprehensive and includes model notification forms as well as recall letters and messages to distribution centers, wholesalers and customers. It also advises on the choice of print media for recall advertisements and media releases, providing the telephone and fax numbers of Australia's major newspapers and an example of a food recall advertisement.

In the United States, the Food and Drug Administration (FDA) also makes effective use of its various web sites, one of which provides information about product recalls. Included is recall guidance for industry, alerts on product recalls, withdrawals and safety measures as well as details of all FDA enforcement reports, including all classes of recalls. There is also an index of model press releases relating to product recalls.

The gateway to the US government's food safety information⁸ is also particularly comprehensive. It lists government agencies, state and local government sites and many other sources as well as providing advice for consumers and assistance for industry.

In mid-2004, the US Department of Agriculture's Food Safety and Inspection Service⁹ (FSIS) revised its recall procedures. Now all classes of recalls will result in the publication of a notification report on its web site. 'Educational' press releases will be issued where a product is suspected of being linked to an outbreak of a food-borne illness, but no source has been legally identified.

The FSIS said it was no longer issuing press releases for most recalls that did not involve potential threats to consumer health or in cases where a company had already recovered the entire batch or consignment of a suspected product. All press releases would be sent to the business concerned 30 minutes before their release to allow the company an opportunity to verify its accuracy. In the author's view, this is an extremely short period of time in which to point out any inaccuracies and arrange for them to be amended unless the business concerned had already been involved in the drafting of the release.

In July 2004, changes were made in recall procedures following the largest-ever product recall in the history of the US Department of Agriculture (see Chapter 17).

It is interesting that, in the United States, it is acceptable for a food manufacturer to employ a specialist company to visit every outlet in the various States, whether it is a store belonging to a major outlet or a modest 'corner shop', and remove every suspect pack. If this action is taken, it does not normally require any public announcement.

Canada's Health Products and Food Branch Inspectorate also sets out its product recall procedures on its web site.¹⁰ It states: "Recall is an effective method of removing or correcting volatile products that may represent a health hazard to the consumer or user. It is an action taken by a manufacturer, distributor or importer to carry out their responsibility to protect public health and well-being."

⁸ www.FoodSafety.gov

⁹ www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8080.1Rev4.pdf

¹⁰ www.hc-sc.gc.ca/hpPb-dgpsa/inspectorate/recall.procedure.entire.html

During recalls, the primary role of the Inspectorate is to monitor the effectiveness of the firm's recall actions and to provide scientific, technical and operation advice. If a recalling firm's advice is deemed to be inadequate, the Inspectorate is prepared to take appropriate action to remove the product from sale or use. At the same time, a firm's recall does not preclude enforcement actions being taken either during or following the completion of the recall.

'Volative' products are defined as those that contravene the *Food and Drugs Act* and other legislation. Recalls are classified into three types of risk. The first is where there is a reasonable probability that the use of, or exposure to, a product will cause serious adverse health consequences or death. The second type means a situation in which a product may cause temporary adverse health consequences or where the probability of serious adverse health consequences is remote. The third category relates to a situation in which a product is not likely to cause any adverse health consequences.

A recall does not include one where a firm removes from further sale or use, or correction of a marketed product that does not violate legislative or regulatory requirements.

Managing a crisis

Fortunately, few chief executives in the food and drinks industry are ever likely to have to face a crisis on the scale of 9/11, the horrifying terrorist attack on the twin towers of New York in America. However, the tenets that enabled Mayor Rudi Giuliani to display such an outstanding example of leadership hold good for any CEO facing a crisis.

As he tackled the most testing time in his career, Giuliani was largely surrounded by a team he had built up and worked with for some time. Together they had driven new policies and brought about changes in attitude and the way of life in one of the world's most outstanding cities.

The Mayor led by example. He appeared on the streets in the midst of the chaos and the mayhem. He held impromptu media conferences on street corners as events required. He lost personal friends and close colleagues in the attack but still remained focused and steadfast. He not only inspired his colleagues and the people of New York but he gained the respect and plaudits of the world.

In his book, aptly entitled *Leadership*,¹ he sets out the principles that were so effective for him as mayor of America's biggest city. As the dust jacket states: "Whether dealing with a major catastrophe or the day-to-day challenges afflicting a large city; controlling and using a budget effectively or addressing infrastructure problems; handling complex human issues or assembling a team—Giuliani's approach applies to any manager in any sized enterprise.

"On September 11, the world watched as Rudolph W. Giuliani led New York City and the American nation through the tragic aftermath of the World Trade Center attacks. With a steady hand, the man who had already established himself through two incredibly successful terms as mayor of New York City proved his reputation for exceptional leadership."

Compared with the nightmare of 9/11, a food problem seems insignificant but it is still a serious matter for the company or industry concerned. So what should happen when the unthinkable occurs? What actions should a business

¹ Giuliani, Rudolph W. with Kurson, Ken, *Leadership* (2002) Little, Brown, ISBN 0 316 86101 4.

take when a problem has escalated into a crisis? If you have already read the previous chapters, by now you should have begun to acquire a 'feel' for the general environment with which you are about to be confronted. Your confidence in handling the situation may be further supported by your awareness of some of the services and facilities referred to in the Appendices and elsewhere in this book.

12.1 Immediate actions

On the assumption that the situation has been triggered by a media enquiry, or because information from an internal or external source indicates a problem is widespread, there are a number of steps which should be taken immediately:

- Alert crisis committee;
- Alert public relations consultant if appropriate;
- Hold immediate meeting to discuss action;
- Reinforce crisis procedures with switchboard operator(s) and anyone else likely to receive calls on the subject;
- Ensure all media calls are referred to nominated company spokesperson (without comment or divulging any information) by the switchboard or anyone else in the company who might receive an enquiry from a journalist;
- Ensure all sales and technical enquiries are directed to appropriate experts;
- Establish facts and scale of problem;
- In the light of information obtained, decide on action;
- Is a 'technical' or 'trade' recall adequate to contain the situation or is it sufficiently serious to require a local, regional or national recall?
- Is it necessary to involve the enforcement authorities or the police?
- Begin preparation of media statement, Question and Answer Sheet and recall advertisement, prepare material for company web site, including media material, and advice for consumers and trade;
- If alerted by a media enquiry, decide response and any follow-up action;
- If alert has come from an enforcement authority, a trade customer, consumer complaint or quality control check can the problem be contained without a public recall?
- Is it necessary to cease production or even close the factory concerned?
- Immediately isolate any similar stock in factory, distribution chain or customers' warehouses;
- Involve, forewarn or advise local or 'home' enforcement authority;
- Involve outside technical assistance if particular expertise or facilities are required, or if report from independent experts would be helpful;
- If appropriate, consider withdrawal of TV commercials and press advertisements for the product involved and any other brands;
- Consider need to postpone any promotional campaigns;
- Involve advertising agency if recall advertisements are required;
- If press advertisements have been withdrawn can the space already booked be used for recall announcements?
- Decide when and how employees are informed, bearing in mind that some will be able to access the company's web site if it is being used to inform

various audiences or they might learn about the problem from radio, television or newspaper reports;

- Is the problem likely to become so serious that a spokesperson should be rehearsed for television and radio interviews?
- Initiate a diary of events, list all media enquiries and consumer complaints, keep careful note of names, publications, telephone numbers, nature of call and how it was dealt with;
- Set up telephone hot line and brief those who will be dealing with consumer enquiries and complaints;
- Alert press cuttings and broadcast monitoring agencies, ensuring that they are provided with a clear and concise brief on precisely what coverage is required and how the cuttings, transcripts and video recordings are to be presented and with what urgency (immediately by e-mail, fax, messenger, once a day, and so on);
- Inform media;
- Involve other disciplines in the company and advisors such as lawyers and insurers;
- Consider what steps can be taken to minimize loss (see also Chapter 3); and
- Consider the need to commission research to monitor consumer reaction to the problem and action the company is taking.

In the midst of the immediate pressures that are created by the crisis it is essential to devote time to devising the strategy for handling the situation while ensuring that the general business continues to operate normally.

12.2 Is a public recall really necessary?

While the public's health and safety must never be jeopardized, it is both legitimate in some countries and also sensible to determine whether it is possible to discreetly withdraw the affected stock from the retail trade before any has been sold. In making such a 'technical' withdrawal, the company is acting responsibly by eliminating a potential problem and thus avoiding the creation of unnecessary public concern.

If this point has not been raised during informal meetings with representatives of the relevant enforcement authority or government body, it should be established whether such a withdrawal would be acceptable. In the United Kingdom, for instance, many companies would choose to conduct a public withdrawal or to announce it had withdrawn a particular batch of product to avoid allegations of a cover-up. The Food Standards Agency is also particularly keen to be seen as being transparent. As mentioned in the previous chapter, in other countries like America, Canada, Australia, and New Zealand, this type of recall is acceptable.

However, should a public recall be appropriate, the company has to decide a number of issues: will it admit responsibility, exactly how did the problem arise, and could it spread to any other products or to rival brands.

If competitors also are threatened, most companies consider it only ethical to forewarn them. This can be particularly important at the technical and public relations levels, where communications between professionals can be

extremely good and where support, both theoretical and practical, can be invaluable. Such approaches also have the merit that all those concerned are speaking with a similar message. If the problem has wider industry implications, trade association as well as suppliers, etc should be advised.

As already pointed out, in addition to the incident room in which the crisis committee meets, it is extremely helpful to have a 'quiet' room for discussions away from the buzz of media enquiries and consumer complaints.

When considering crisis arrangements, it can also be important not only to have facilities for making drinks and sandwiches but also to know the location of fast-food outlets which serve food late at night, at weekends and even during public holidays.

When the author worked at Brooke Bond Foods, in the United Kingdom, the offices in which the public relations and consumer relations departments were located were planned so that they could be used as the crisis center. Happily, the occasions on which such a need arose were extremely rare, but all that was necessary was to clear desks and activate a special 'hot line' for consumer calls. Computers were on hand, a photocopier was nearby, as were such basic facilities as toilets, 'quiet' offices and direct phone lines, including direct links to senior technical staff. Everyone knew where crisis manuals, phone books and media lists were kept. The crisis committee operated in a nearby meeting room, making the whole operation self-contained, highly efficient and also discreet.

There should also be direct phone links to all key locations and departments if they are not on the same site, as may be the case with technical laboratories and factories. Indeed, there can be many circumstances where it is desirable for factory managers and departmental heads to have their own direct lines in addition to the normal switchboard extensions to ensure confidential conversations can take place. Mobile phones can also be very useful.

12.3 Directing media enquiries

It is important to forewarn all company locations of a possible crisis and remind them that all media and consumer enquiries should be passed to the appropriate spokesperson or department without comment and without divulging any information. This is important because local or regional media and consumers usually contact their nearest company location, whether it is a factory, distribution depot, head office or regional sales office.

However, never encourage anyone to say to a journalist: "No comment". That is the type of response which can be quoted! The best reply to a reporter is something like: "I can't help you. The person you should ring is so-and-so. Their telephone number is..." A reporter would be hard-pressed to get a quote out of that! It is also a response that most journalists and consumers understand and accept.

There are several traditional methods of informing the media of an item that may be of interest: by telephone, the issuing and distribution of a press release, individual briefings or a press conference.

Unless a major catastrophe is involved, the issuing of a press release is the quickest and most common method. In the United Kingdom, if a 'normal'

product recall notice is being distributed fairly early in the day—before 2 pm—it is usually sufficient to e-mail or fax it to the key media and wait for any follow-up enquiries. There are also organizations that will distribute your release electronically to all appropriate media as well as enforcement authorities. Later in the day, especially if the recall involves a high profile brand and a serious threat to life, the best practice is to phone selected media such as Press Association (PA) (the major news agency supplying national and regional media with a large proportion of their news) plus national newspapers, television channels, and radio stations before e-mailing, faxing or dictating the statement to them. There are also businesses that can circulate information to enforcement authorities.

It is usual to place display advertisements in selected media to draw further attention to the problem, giving code numbers of suspect stock and details of how consumers can be reimbursed. These advertisements also represent the manufacturer's only opportunity to have total control over the message being conveyed to consumers. They form an important part of any recall strategy.

The same information should appear on the company's web site.

Tony Hines, at Leatherhead Food International, has researched the effect different type fonts can have on the impact of a recall advertisement. He has found that the use of a sans type face—a font without any serifs, they are the projections finishing off some type faces such as the one employed for the text of this book—have greater impact. The 'typical' recall advertisement in Appendix D is reproduced in both Times New Roman and Arial, two particularly widely available fonts. It is also interesting that a sans face usually works better on a web site because a computer screen is even coarser than that used in the printing of newspapers. The projections on a serif face like Times, probably the most widely used front in the world, can begin to break up when displayed on a computer screen.

12.4 Beware of this information channel

Anyone involved in a product recall for the first time should be aware that, as soon as space is booked, the newspaper's advertising department is likely to tell the editorial staff. When booking space, it is usually necessary to give an indication of the nature of the advertisement to ensure it appears on a suitable page. A food company booking space at short notice is only likely to be announcing a product recall... and some newspapers charge more for such advertisements.

You might have to book space by noon even though neither the press release nor the advertisement will be ready until 4 pm or even later. In the meantime, you might have to fend off journalists who already know the essentials of your announcement and have sufficient information to begin writing a story for the first editions which come off the presses earlier than many people realize, especially Sunday newspapers which can begin printing on Saturday afternoons.

Sometimes, due to internal delays in distributing e-mailed or faxed press releases, the journalist speaking to you may well be working from a copy of the advertisement and not your carefully crafted media statement.

12.5 Preparing a media statement

All the above assumes that readers of this book have some experience of crisis management, no matter how limited. If someone is handling a serious problem for the first time without the help of an in-house expert or has decided not to involve an outside specialist, it is essential that careful thought is given to the preparation of the media statement and answers to likely questions.

Such an announcement should be brief (ideally, no more than one letter or A4 size page, double spaced typing) and accurate. It should also be dated. An example of a typical press statement and Question and Answer Sheet are provided on the web sites of various government agencies such as the Food and Drug Administration in the United States,² Canada's Health Products and Food Branch Inspectorate³ and Food Standards Australia New Zealand,⁴ as well as in Appendix C. These are a good format to follow and should contain all essential information such as:

- Name of brand;
- Nature of problem;
- Details of suspect product, batch number, etc;
- Explanation of how the problem occurred;
- Expression of regret and concern;
- Action company is taking to safeguard and reimburse consumers;
- Details of consumer 'hot line'; and
- Name(s) and phone number(s), both day and night, of the person(s) to contact for further information.

Though not suggested on the various web sites mentioned earlier, it can be helpful to include on a second sheet of paper brief background about the brand, its history, value, and market share. The conventional heading for this information is Note for editors.

The formal notice should be printed on brand letterhead, company notepaper or with a special press release heading. It must always give the name of a contact who can be rung back for further information, with both work and out-of-hours telephone numbers as well as the numbers of any mobile phones. If possible, both a PDF (Portable Document File) and a printer friendly version should be available for journalists.

Generally speaking, there is no justification for placing an embargo on a product recall statement. Apart from the fact that, if a recall is necessary, the sooner it appears in the media the better, embargoes are easy to overlook and, in this instance, will only irritate a journalist.

The Question and Answer Sheet should deal with the most difficult questions that might arise. However, it should be appreciated that this is a document for

² http://www.fda.gov/ora/compliance_ref/recalls/ggp_recalls.html

³ http://www.hc-sc.gc.ca/hpfb-dgpsa/inspectorate/recall_procedure_entire_e.html

⁴ <http://www.foodstandards.gov.au/recallssurveillance/foodrecalls/index.cfm>

guidance in dealing with media enquiries and other internal use and *not* for passing to journalists.

Whenever possible, the responses should be couched in such a way that an opportunity is created to bring out points in explanation, mitigation and reassurance.

The Questions and Answers should expand on the details in the press release and be the basis of all responses to the media, consumers, sales customers and enforcement authorities. All information and replies **MUST** be consistent, that is one of the cornerstones of successful crisis communication.

To be able to answer any 'local' enquiries, the questions and answers should provide details of the particular areas affected and the quantity of suspect product delivered to those localities or believed still to be in people's cupboards and, therefore, not used or consumed; whether sabotage is suspected and the location of the plant where the batch was produced. It might be important to point out that it was imported and that the problem does not affect any of the company's own factories or any other brands or products other than the particular size of the pack. That will depend on whether the product is marketed under its own individual brand name or whether all the business's products are linked by the same corporate name.

When you put together all the information in these documents, it comprises your hidden agenda, the points you should strive to mention to every journalist or to bring out in any TV or radio interview.

Depending on the extent of the difficulty, you can also consider providing a video news release (VNR) for television bulletins (see Chapter 8). The VNRs can be pro-active. Pepsi-Cola used a series of VNRs to help defeat an extortion hoax and make it clear to consumers that the soft drink cans were filled so quickly in the bottling plant that there was no opportunity for them to be contaminated (see Chapter 17).

The purpose of agreeing to give an interview to television or radio is to provide consumers with essential information to safeguard themselves from a hazard, to portray the company as a concerned and caring organization which is acting swiftly to correct a problem, and that all other production batches and brands are safe and wholesome.

Opportunities to appear on major news bulletins are not for personal aggrandizement. They are for the benefit and protection of the brand. Invitations to appear in discussions with 'experts' known to hold particular points of view or with representatives of certain organizations are unlikely to be of benefit to the brand under scrutiny or the company concerned. Neither is it likely that such an appearance will be a career enhancing move!

If the incident is serious, it is also advisable to place recall advertisements in national newspapers... but if the problem is as serious as that it is essential to enlist the help of an outside crisis communications consultant if you do not have your own public relations expert or press officer. The media notice will provide the basis for the advertisement but it is also a good idea to cut out and keep for reference any recall adverts which you consider to be well prepared.

12.6 Going 'live'

The first step in going 'live' with your announcement is to provide the enforcement authority, in the United Kingdom usually the local environmental health office or your 'home' authority, with a copy of the statement and your timetable for its release as well as a copy of any recall advertisement and the media schedule. Indeed, you might either wish to or be required to involve and consult them at an earlier stage. The contacts for doing so should have been established and fostered long before any crisis arises. If the initial warning came from this source, you might well have been involved with them from the outset in preparing the press material and advertisement as well as drawing up the general recall strategy.

At the same time, once the press release is ready, go into a quiet room and ring the media—either the local newspapers if it is a problem restricted to one particular area, or the national news agency, such as Press Association in the United Kingdom, if you are announcing a national recall.

Contacting a national news agency is the quickest way to ensure widespread distribution of your announcement. Its journalists and 'stringers' or freelance journalists in particular areas, gather and distribute a combination of news, sport, features and photographs to every national daily and Sunday newspaper, virtually every regional newspaper, and all radio and television stations 24 hours a day, every day of the year.

Because of this wide distribution, it is vital to ensure the accuracy of any story likely to be distributed by a national or international news agency.

After that agency has been advised, subsequent calls can cover national or Sunday newspapers, radio and television stations. With newspapers in the United Kingdom ask for the News Desk. In the United States, the usual convention is to ask for the Newsroom. For radio and television channels in the United Kingdom, it is usual to ask for the Newsroom or the 'desk' of the program concerned, such as News 24 Desk or Food Programme Desk.

In doing so, you will speak to one of the team of journalists who decide whether your announcement is of interest. If so they will take details themselves, transfer you to a reporter or ask you to e-mail or dictate your press release. Usually, however, it is more satisfactory to ring the News Desk, explain the essentials of the announcement and then offer to e-mail or fax it to them or refer them to your company's web site. This approach gives you the opportunity to present your version of the problem as you would like to see it reported.

A journalist will then inevitably ask further questions to ensure he or she fully understands the situation before they write their version of it. They will also want to reassure themselves your call is genuine, probably cross-checking with industry or government contacts. NEVER give them a copy of your Question and Answer Sheet. That is for your internal use though either it or a modified version can usefully be passed to the enforcement authorities and sales customers.

In ideal circumstances, you might already have established good relations with a particular journalist, such as a food correspondent. In this case, it could

be better to contact them first, but on larger publications product recall stories are usually handled by a general reporter rather than a specialist.

The next step is a matter of judgment. If you are not dealing with a major brand and there is no serious risk to life, you might even sit back and wait until journalists contact you.

However, if you are dealing with a nationally famous and long-established brand, especially the market leader, you should actively seek more extensive coverage.

Offer pack shots of the product. Digital images can be e-mailed to most media these days though a few might prefer good quality, 35-mm color transparencies.

You now have to start operating in a strange world. You have to do the most difficult thing imaginable—seek adverse publicity. However, if you are honest, accurate and helpful most journalists will treat your story more sympathetically.

At all times it is important to be positive and businesslike in your manner. Explain, for instance, that a problem has been found in a small batch of product and that, as a precaution, it is being recalled. Never speak with the voice of doom. The company is acting out of a sense of responsibility to its consumers and customers. Never flap or allow yourself to get flustered. Journalists sense when matters are more serious than they seem and that they are not being told the truth, or that facts are being concealed.

When dealing with the media, Michael Bland,⁵ a specialist consultant in the United Kingdom who has trained over 7000 people, gives the following tips:

- Be as outgoing, honest, human and communicative as possible;
- Never speculate;
- Choose your ground, avoid 'doorstep' interviews. If doorstepped and the cameras are rolling, tell them you are prepared to give an interview but not at that moment (give a reason if possible) and arrange a time and place for an interview in more controlled circumstances;
- If appearing on camera don't read company statements. By all means memorize an agreed statement so you don't slip up, but reading aloud to the camera and public takes away the all-important human concern and credibility that come from a spontaneous response;
- Avoid press conferences if you can. Sometimes they are unavoidable if you are embroiled in a major crisis, but you will have better control if you can deal with the press one at a time. Once they get together, the pack mentality comes into play. The least bright ones pick up the difficult and probing questions from the smarter ones. If you must hold a press conference ensure that the top person is capable of handling a barrage of hostile questions and, very importantly, keeping his/her cool;
- The press pool. In a serious disaster where it is impossible to cater for all the media at once, such as showing them round a damaged factory, they will often agree to a pool, under which selected reporters and crews from

⁵ www.michaelbland.com

the three main media—press, radio and television—will cover the story and then share their coverage with the rest;

- Try to keep tabs on them. Where are they staying, for example? Consider putting them all up somewhere so you have them all together and can issue statements and information in a controlled fashion; and
- When you issue information to the media make sure you let employees know, especially those manning the ‘hot line’.

12.7 Be prepared for ‘the treatment’

In announcing a public recall, you have to be prepared for the contrasting manner in which different newspapers will display the same 12 or 15 paragraph story. It could make lurid headlines and be the main story on the front page of a tabloid. Yet, the identical item might appear as a single column story on an inside page of a broadsheet. It is all about different news values and formats.

Equally, a story concerning a problem with a product like corned beef might receive more extensive coverage in Scotland than other parts of the United Kingdom because the Scots eat more of it. A problem relating to pets, babies or old people might well make headlines everywhere as will one about alcohol, especially beer.

12.8 Aim to prevent problem escalating

When faced with having to make a public recall, the aim should be to contain the situation and couch the announcement in terms that will prevent the matter escalating.

This is an increasingly realistic possibility. More and more product recall advertisements attract little editorial attention. However, a problem involving a market leading or heavily advertised product will usually rate at least a brief item. If it concerns a product close to journalistic hearts, such as beer, it will often result in a more prominent story, especially in the Red Top tabloids!

However, a warning that isolates the problem to a particular production batch and code, explains how the incident arose and what positive action the company is taking is more likely to be treated in a restrained fashion.

Nevertheless, one which has greater implications for an industry or the nation, like the deaths of consumers, BSE, foot and mouth disease or the slaughter of thousands of chickens, will inevitably receive extremely prominent coverage. In those circumstances, one has to accept the inevitable.

12.9 Remember your customers

Whenever information is being passed to the media and enforcement authorities it is important that, at the same time, it is passed to trade customers, including those who have *not* received any consignments of the affected batch—otherwise they will remove the stock from their shelves rather than take any chances.

Major retailers have their own systems for tracking and recalling batches of product. Buying groups also have their own systems to flash warnings to their

wholesalers so the information can be cascaded out to members within a short space of time.

Some independent outlets are more difficult to cover, especially small corner shops. Frequently, the simplest or only way to reach them is through seeking publicity. Whatever the situation, your aim has to be to obtain maximum balanced coverage to ensure your consumers and trade customers learn of the problem as quickly as possible.

At all times, your prime concern must be the well-being of your consumers. The future of the brand and even your company might well depend on how efficiently you do so and the caring and concerned attitude that you project while doing so.

12.10 Employees can be your best ambassadors

Employees are an important audience that should never be overlooked. In a crisis, when the situation is constantly changing, it can be extremely difficult to keep them adequately informed. However, all their friends and neighbors will regard them as their most authoritative source of information. This asset should be exploited. E-mail has speeded up and simplified communications so much that there is little excuse now for not keeping all locations as fully informed as all your other audiences.

The problems that can arise from placing a product recall advertisement have been mentioned already. Pressure could well force you to make your general announcement ahead of your own timetable. If your announcement is not ready, undertake to e-mail or fax it to the journalist by a specific time—their requirements will be governed by edition times—and keep your promise. You now have to finalize your press release without delay because the reporter has sufficient information to write a story anyway. Even if not every party involved has commented on the draft you might be forced to release it to try to ensure any story is as accurate as possible.

12.11 Accept the quirks of fate

Such are the quirks of fate that the prominence your announcement receives will also be dictated by other events occurring on the same day. Recall a product when there is a Royal or Presidential indiscretion, a major air disaster, a train crash or carnage on a motorway and the story might be tucked away on an inside page. Warn of the danger of glass fragments in bottles of beer on a dull news day and the threat to the nation's drinkers could top the news agenda of every tabloid, television channel and radio station in the land.

12.12 Keep media coverage in perspective

When you sit down to look at the press cuttings, TV and radio transcripts and possibly Internet 'chatter' resulting from your announcement, do not allow your judgment to be clouded by the extent and tone of the coverage. What matters is the way your consumers, trade customers and other audiences

respond to the news. Sensational headlines often have little effect on sales even though media crazes can and do devastate both companies and industries. Sometimes sales have even increased!

The tendency to focus solely on the daily media coverage is one of the biggest mistakes in a time of crisis. From the corporate perspective, the media is the new unaccustomed player at the table so its involvement is blamed for creating the crisis rather than the actual problem. Therefore, a natural inclination is to regard the day's articles and tapes as being the crisis rather than focusing on the underlying issue that caused the coverage. Too often, a typical crisis meeting can involve the endless replaying of video clips for every new person who enters the room. Eventually, the tape itself becomes the accepted view of what the crisis is about.

In fact, the real issue to be addressed by the crisis committee should be not what the media said, but what important audiences, such as customers, may have heard or decided. The real challenge facing the crisis team is not to focus on yesterday's headline, but to decide what to say and do that day and beyond. If possible, the real objective should be to stop the crisis in such a way that the story itself dies out.

12.13 Fixing the blame

In a crisis, the media will seek to attribute blame, often more quickly than the facts justify. In the nature of our times, the tendency will be to point the finger at the company, even for events imposed from outside. People want someone to blame.

Lawyers might argue, but within the limits of prudent legal counsel, companies should never avoid responsibility. Large institutions are expected to act responsibly and to respond with the broadest interpretation of the scope of their potential responsibility.

Admissions of error, when error has occurred, can give nightmares to legal counsel but often, examined rationally, do not increase the actual liability beyond what is likely. A failure to acknowledge responsibility when culpability is obvious, will significantly damage a corporation's goodwill. Usually, it costs nothing to say: "We are regret" or even "We are sorry."

Anyway, it is usually true that, in most instances, when there is a crisis the company is at fault. In a large percentage of cases, a problem arises because someone has failed to do his or her job. Indeed, on some occasions, drugs, sex, alcohol or greed on the part of employees is involved.

The message is clear. Management must be wary in times of crisis, even of its most trusted employees. Somewhere inside the corporation there is a strong likelihood of culpability. Secondly, in answering the media's demands for "What happened?" and "Why did it occur?", prudence suggests a great deal of digging before proclaiming answers with confidence. Today's explanation may become a mere shadow of the facts that emerge the next day.

There are standard journalistic ways of safeguarding a statement or admission, like 'It is believed...', 'At this early stage it would seem...' but it is important to ensure the explanation is accurate, or as accurate as it can be in the circumstances.

These phrases might not stop you from being prosecuted by the regulatory authorities or sued for damages by the individual(s) involved, but they might well take the sting out of the media coverage. Whether or not there is a possibility of prosecution, the first priority must be to deal with the immediate crisis as quickly and efficiently as possible.

12.14 Insurance cover

If the fault is traced to a supplier or to its own short failings, the manufacturer might well be able to obtain compensation. For this reason, many companies insist that their suppliers have adequate insurance cover against such liabilities. It may need to run into many millions of pounds, dollars or other currency.

Whether or not a case emerges to claim compensation from a supplier, it is good business practice to be able to quantify all costs and losses involved in an incident. This is easily covered by allocating all such charges to a special budget. It can be nominal and only sufficient to cover the everyday costs of maintaining special phone lines, beepers, mobile phones and so on.

However, if a crisis arises, all costs can be allocated to that budget, including telephone calls, overtime payments, press advertisements, charges for media monitoring and general clippings services, for inspecting suspect stock, uplifting and replacing it, stopping production and so on. Unless there is clear evidence of these costs, it will be more difficult to substantiate a claim for loss and consequential damages.

It is important to note that product liability insurance and professional liability insurance premiums can vary substantially according to the part of the world for which coverage is required, and to note any limitations on the cover provided. Such variations may reflect the propensity for litigation in the areas covered as well as the difficulties and costs involved in a particular country. It will also behove any consultant to recognize this factor in their quoted charges.

12.15 Selection of crisis leader and team

Long before the possibility of a serious problem, careful consideration should be given to the selection of the chairman of the crisis team (see Chapter 3). That person must have the respect of other members of the committee and also have the best interests of the company at heart. Under the pressures of some management systems, individuals can be tempted to try to seize the leadership because it will look good on their annual appraisal form rather than because it is in the best interests of either the company or the consumer! It is also possible the sales, marketing, production or personnel director might attempt to take over control to conceal a mistake within their own division, for example. Therefore, it is essential that responsibilities are clearly defined before a crisis ever occurs and adhered to if that is ever necessary.

If any brands are being marketed internationally, it can be advantageous to ensure that at least one member of the committee is multilingual and has a personal appreciation of the markets concerned—for instance, the consumers affected might not be fluent in English and, therefore, this must be taken into

consideration. Similarly, if the company markets ethnic products, at least one member should have a thorough appreciation of the requirements of the market involved and be fluent in the appropriate language.

Failing this, it may be necessary to line-up interpreters who understand the technicalities of both the industry and the area involved. International trade bodies may be able to provide suitable contacts and professional bodies for interpreters exist in some parts of the world.

Major and widespread crises often have a habit of becoming an unfolding disaster as a steady succession of revelations and disclosures hit the headlines or lead the newscasts day after day, spreading further disbelief and distrust. Yet, if the case had been properly researched and presented in the first place, perhaps backed by reports from independent experts and with proper warnings and discussions, the public reaction might well have been more understanding.

12.16 Other types of crises

Of course, product recalls are not the only crises that food companies have to face. Manufacturers and retailers can find themselves under fire over such emotive issues as drift net fishing, whaling, minute traces of harmful chemicals revealed by new and ever more sensitive methods of detection and so on. Companies can find themselves having to refute claims about products or ingredients that are extremely difficult to investigate and might take several weeks to verify. Much of the surprise element of such campaigns can be avoided if a company is sensitive to the concerns and interests of such groups. With the widespread use of the Internet, this is easier to establish than previously.

Corporate responsibility has replaced ethical retailing as a buzz phrase. No one can argue with the motives behind such a requirement. Today the expectation is that companies should be responsible and upstanding in every way despite the fact the majority have always endeavored to operate in this way. The manner in which a company addresses this responsibility can also affect insurance premiums.

Policy statements on ethical retailing read like mission statements with remarks such as: "We have a range of products which have been household names for as long as a century. We are dedicated to ensuring that the high standards expected from those products and from us as a company are maintained at all times. We attach great importance to offering consumers wholesome products that are safe to eat. We are also concerned to ensure our manufacturing processes are safe to operate as well as being friendly to the environment.

"It is part of our philosophy that our standards are so stringent they usually exceed the requirements laid down by food scientists, medical and industrial health experts and existing legislation.

"We buy our ingredients only from reputable suppliers who conform to the highest standards and who we regularly audit, whenever in the world they may be."

In some circumstances, it might also be appropriate to mention that the company's employees and staff as well as shareholders are also consumers

of its products and would not wish to see either them or their own health jeopardized.

To live up to such a creed, among other things companies are expected to know about the conditions of employment of workers in overseas countries who produce the ingredients they use or manufacture the actual products, to be concerned about them if those conditions seem unfair and to have those businesses regularly audited.

No matter how well prepared a company may be to handle a crisis, new problems continually emerge to provide new challenges. Nevertheless, careful monitoring of indicators such as worldwide trends in problems and consumer complaints will help to ensure that not too many unexpected twists emerge.

Diet and health

In the affluent parts of the world, a new crisis is leading to criticism of the food industry: the increase in obesity. It has become the most common health problem in the United States and is also causing concern in the United Kingdom as well as parts of Europe and Australia. Governments are being attacked for not cracking down on TV advertisements aimed at children which promote foods and drinks containing excessive quantities of salt (sodium), sugar, acid, and artificial sweeteners. The fast-food culture is being blamed for worldwide obesity.

Perhaps equally disturbing for travelers is the fact that a commuter plane crash that killed 21 people in North Carolina, United States, in 2003, was blamed on the passengers' greater than average weight. The increasing weight of passengers was reported in Britain's *Daily Telegraph* on November 6, 2004 to be the cause of US airlines using more fuel to transport them. It was claimed that even by 2000 'this additional adiposity' had caused airlines to use an additional 350 million gallons of fuel at a cost of £149 million and leading to an additional 3.8 million tons of carbon dioxide being released into the atmosphere.

Airlines were introducing desperate measures to reduce the weight carried by their planes. Metal cutlery was being replaced by plastic and larger magazines were no longer being provided for passengers to read. Lighter materials were also being used for seats. Some airlines had also begun to insist larger passengers bought a second seat.

At the other end of the scale, in November 2004, a 27-year-old man who weighed some 30 stone was sacked from a UK nuclear processing plant because he was too fat to squeeze through the security turnstiles or to wear a protective decontamination suit to perform some of his duties.

Food companies are accused of producing and promoting a variety of unhealthy products. Restaurants are being criticized for serving excessively large portions. Soft drink producers are under fire for marketing unhealthy beverages. Doctors are warning that children are becoming so overweight that they are suffering serious sleep disorders because they are choking on their own fat at night. In a bizarre twist, veterinarians concerned that pets like cats and dogs have become heavier than is healthy for them are now even offering health reduction programs.

Most chilling of all, experts are warning that children have become so obese that they are likely to die before their parents. A scientist, Professor Andrew Prentice from the London School of Hygiene and Tropical Medicine, has also claimed that worldwide obesity has become so prevalent that it represents an evolutionary shift in the shape of the human body. A study in the United Kingdom's respected *British Medical Journal* in May 2004 claimed that children's waistlines had expanded by two clothing sizes in the past 20 years. Research from the Archives of Disease in Childhood claimed that their waists had increased by some 1.57 inches over the last two decades. The researchers also said the figures showed that girls were getting fatter more quickly than boys.

Obesity—quick facts

More than one billion adults are overweight and at least 300 million of them are clinically obese. Current obesity levels range from below 5% in China, Japan and certain West African nations, to over 75% in urban Samoa. But even in relatively low-prevalence countries like China, rates are almost 20% in some cities.

Childhood obesity is already epidemic in some areas and on the rise in others. An estimated 17.6 million children under five are estimated to be overweight worldwide. According to the US surgeon general, in America the number of overweight children has doubled and the number of overweight adolescents has trebled since 1980. The prevalence of obese children aged 6–11 years has more than doubled since the 1960s. Obesity prevalence in youths aged 12–17 has increased dramatically from 5 to 13% in boys and from 5 to 9% in girls between 1966–1970 and 1988–1991.

The problem is global and increasingly extends into the developing world. For example, in Thailand the prevalence of obesity in 5–12-year-old children rose from 12.2 to 15.6% in just two years.

Obesity accounts for 2–6% of total health care costs in several developed countries; some estimates put the figure as high as 7%. The true costs are undoubtedly much greater as not all obesity-related conditions are included in the calculations.

Source: World Health Organization web site (Obesity and overweight¹).

Even more astonishing is research that as the number of fat children increases, many parents see their overweight children as being normal. According to a study carried out in the United Kingdom and presented at the American Diabetes Association's annual meeting in Orlando, Florida, in June 2004, three out of every four parents did not realize when their children were overweight.

The research was carried out by Derriford hospital, in Plymouth, and the findings were described by the team leader, Alison Jeffery. When she interviewed 300 children nearly two out of every three (62%) thought they weighed less than they really did. Just over two out of every three mothers (67%) and

¹ <http://www.who.int/dietphysicalactivity/publications/facts/obesity/en/>

nearly one out of every two fathers (47%) did not realize that their child had a weight problem and saw him or her as normal.

She remarked: "If parents aren't even seeing it in their children they are unlikely to do anything about it... we are now seeing people who are overweight as [being] normal." She added that she has parents coming to see her with perfectly normal children asking whether they should feed them more.

In the United States, hospitals have been buying expensive new equipment such as reinforced toilets and oversized beds to treat the growing number of severely obese patients. They are also buying larger blood pressure cuffs as well as wider, reinforced wheelchairs. A coroner has even had to install special lifting equipment and enlarge the morgue because the corpses have become bigger and heavier.

In the United Kingdom, sonar technology originally developed for the Royal Navy to locate mines at long range is being used to penetrate the depths of human fat. Conventional ultrasound scans cannot penetrate deeper than about 4.75 inches with any clarity. Obtaining clear images of dark internal organs such as livers and kidneys is difficult in patients with large amounts of fat. The new ultrasound equipment uses unique 'beam forming' technology to increase its range.

Thousands of obese people in the United Kingdom have been provided with pedometers in a move to persuade them to shed weight by walking. Costing only £10 (\$15) each but provided free, it is hoped the devices will 'provide the motivation for individuals to increase their walking'. The move came a few days after fast-food giant McDonald's launched a scheme to give away pedometers with some of their adult Happy Meals. In the United States, it is becoming common for the developers of new housing estates to incorporate a walking trail on which residents can take exercise.

In the midst of this storm, few voices point out that individuals are responsible for what they put in their mouths and that parents are responsible for raising and influencing their children. The dramatic changes in many lifestyles are ignored. It is conveniently overlooked that people now drive or are driven where once they would have walked. Also, the fact is overlooked that today young and old spend hours at computers, either working or playing video games as well as watching television instead of running around or involved in other healthy activities and sports.

Governments in different parts of the world have begun to tackle the problem in various ways. In both the United States and the United Kingdom, public consultations have been held to seek people's opinions on either the overall problem or particular aspects of it.

General pressure has led to schools serving healthier meals at lunch times and to removing vending machines from their premises or peeling off the logos advertising the soft drinks and other products on offer in them.

The campaign has been likened to that waged against smoking and victims have tried suing some food companies, blaming them for their obesity. Several major food companies have responded to public pressure by reducing the size of some meals and offering what they claim are healthier alternatives.

The World Health Organization (WHO), which began sounding the alarm bells in the 1990s, describes obesity as one of today's most blatantly visible yet mostly neglected public health problems. It warns that an escalating global epidemic of overweight and obesity is taking over many parts of the world and warns that, if immediate action is not taken, millions will suffer from an array of serious health problems.

It points out that globally, there are more than 1 billion overweight adults and that at least 300 million are obese, and that obesity and overweight pose a major risk for chronic disease, including type-2 diabetes, cardiovascular disease, high blood pressure and strokes as well as certain forms of cancer. The health consequences range from increased risk of premature death to serious chronic conditions that reduce the overall quality of life. Of special concern is the increasing incidence of childhood obesity.

It identifies the principle cause as increased consumption of energy-dense foods high in saturated fats and sugars as well as reduced physical activity. They have led to obesity rates rising three-fold or more since 1980 in some areas of North America, the UK, Eastern Europe, the Middle East, the Pacific Islands, Australasia, and China. Ironically, the Organization adds that obesity is not restricted to industrialized societies; the increase is often faster in developing countries than in the developed world.

Describing the problems of obesity and overweight on its web site² the Organization points out: "The rising epidemic reflects the profound changes in society and in behavioral patterns of communities over recent decades. While genes are important in determining a person's susceptibility to weight gain, energy balance is determined by calorie intake and physical activity. Thus society changes and worldwide nutrition transition are driving the epidemic. Economic growth, modernization, urbanization and globalization of food markets are just some of the forces thought to underlie the epidemic.

"As incomes rise and populations become more urban, diets high in complex carbohydrates give way to more varied diets with a higher proportion of fats, saturated fats, and sugars. At the same time, large shifts towards less physically demanding work have been observed worldwide. Moves towards less physical activity are also found in the increasing use of automated transport, technology in the home, and more passive leisure pursuits."

Accordingly, the WHO has launched a broad-ranging global strategy on diet, physical activity, and health.

The Food and Agricultural Organization of the United Nations has also expressed its concerns. The chief of its nutritional planning, assessment and evaluation service, Prakash Shetty, said: "We believe obesity is a significant problem that needs to be dealt with, along with the problem of the underfed."

In February 2004, for the first time, European food safety agencies agreed a common action plan to improve dietary health across member states. It said the increasing incidence of obesity, especially in children, high salt levels in food and low levels of folic acid in women's diets are issues of concern throughout Europe.

² www.who.com

The United Kingdom's Food Standards Agency (FSA) reported that, in a new commitment to work together to address these and other issues, the European agencies had agreed a statement to:

- Work more closely on the issue of obesity, using a range of approaches including changing consumption patterns and promoting physical exercise, and calling on the food industry to recognize their responsibilities and work with the Agency to reach a solution;
- Look for ways to influence changing consumption patterns and nutritional content of high-energy foods, and explore ways of approaching the problem of obesity in particular groups, especially children;
- Reduce the amount of salt in the diet by raising consumer awareness and enlisting the co-operation of the food industry to reduce the proportion in their products;
- Promote the harmonization of European rules for salt labeling, especially for a simple way to identify high-salt products; and
- Increase awareness among consumers, especially women, of the benefits of increased folic acid in the diet.

Various bodies have been formed to tackle the problem. Among them is the International Obesity Task Force (IOTF). It is part of the International Association for the Study of Obesity³ (IASO), an organization that represents 43 national obesity associations across the globe. The task force is composed of recognized experts in the field of obesity and related diseases from around the world, including China, Japan, Chile, Australia, Brazil, the United States, Canada, and Europe. It is a non-governmental organization (NGO) with formal links with the WHO.

The IOTF has four main goals:

- To increase awareness among governments, health care professionals, and the community that obesity is a serious medical condition as well as a major health problem with substantial economic costs;
- To provide evidence and guidance for the development of better prevention and management strategies;
- To secure the commitment of policy makers to action; and
- To foster the development of national, regional, and international structures that will enable and support the implementation of action on overweight and obesity.

In the United States, the Department of Health & Human Services (HHS) unveiled a strategy to help reduce obesity. On March 12, 2004, HHS Secretary Tommy G. Thompson released a new Food and Drug Administration report outlining another element in the Services' comprehensive strategy for combating the obesity epidemic. It focused on the message 'calories count'.

The report by the Food and Drug Administration's Obesity Working Group included recommendations to strengthen food labeling, to educate consumers about following a healthy diet and weight as well as to encourage restaurants

³ www.iaso.org

to provide calorie and nutrition information. It also recommended increasing enforcement to ensure food labels accurately portrayed serving size, revising and reissuing guidance on developing obesity drugs and strengthening scientific research to reduce obesity and to develop foods that are healthier and low in calories.

He said: "Counting calories is critical for people trying to achieve and maintain a healthy weight. This new report highlights FDA's overall strategy for getting consumers accurate, helpful information that allows them to make wise food choices at home, at supermarkets and in restaurants. Taking small steps to eat a more balanced diet and to stay physically active can go a long way to reversing the epidemic of obesity that harms far too many Americans."

The Working Group's recommendations are centered on the scientific fact that weight control is primarily a function of caloric balance. This is why they focus on the message that 'calories count'. The action plan is based on scientific fact.

It is estimated that the total economic cost of obesity in the United States is about \$117 billion a year, including more than \$50 billion in avoidable medical costs—more than 5% of the total annual health care expenditure.

In the United Kingdom, in May 2004, an all-party group of members of Parliament (MPs) produced a damning report criticizing the government and the National Health Service (NHS) for failing to tackle the crisis. They condemned the food industry for 'cynically promoting' junk food to children as young as three.

In their report, the group called for a ban on junk food advertisements during children's television programs and the introduction of a simple system of traffic light-style health labels for food. The MPs also wanted children to do a minimum of three hours physical education a week in school and to be given cookery lessons to help reduce their preference for high-fat, high-salt convenience foods. They also want children's weights to be regularly monitored at school.

How obesity is calculated

How are people classified as obese? Body mass index (BMI) is a measure of weight versus height. People fall into this category if their index is over 30. If their BMI is 25–30 they are considered overweight.

To check your own BMI divide your weight (in kilograms) by your height (in meters squared).

The report stated that obesity in the United Kingdom had risen four-fold in 25 years and that three quarters of adults were overweight, with 22% clinically obese. It added that obesity had risen faster in England than anywhere else in Europe, with childhood obesity tripling in 20 years.

The following day the current government was caught on the back foot when it was revealed that obesity was removed from official public health

targets when it came into power in 1997, whereas the previous government had identified there would be health problems from an increasingly overweight population by 1992. However, the current government had only set four main targets when it published a Green Paper in 1988 entitled *Reducing Coronary Heart Disease and Strokes, Mental Health, Cancer and Reducing Preventable Accidents*.

On November 6, 2004, the British government introduced a White Paper (a government report giving information or proposals on an issue) that, among other things, proposed curbs on the promotion of unhealthy foods to children including a ban on TV advertising. An advertising ban would also apply to food and drink with high fat, salt or sugar content, affecting not only burgers, confectionary, crisps, and fizzy drinks but also some soups, breakfast cereals and convenience foods. It also proposed 'radical action' to increase the number of smoke-free workplaces, clear, unambiguous labeling of the nutrition content of food and even the introduction of personal trainers in the NHS to tackle social and geographical inequalities in health.

Introducing the White Paper entitled *Choosing Health*, the health secretary John Reid said: "The document aims to make it easier for people to change their lifestyles so they eat more healthily, exercise more and smoke less. It also sets out moves to improve sexual health, encourage sensible drinking and improve mental well-being.

"It is clear we need to do more as a society to improve people's health. Having defeated many deadly infectious diseases, we now face the challenge of avoidable ill-health caused by poor diet, lack of exercise, and smoking."

The measures include a new 'traffic light' labeling system to identify unhealthy foods. A red light would indicate fatty, salty or sugary foods that should be eaten sparingly. Amber would indicate fatty but nutritious foods to be eaten in moderation. A green light would indicate fruit and vegetables that should be eaten frequently.

At the time of writing this book, it remained to be seen how many of the measures would actually come into force. This particular UK government has a reputation of trailing new initiatives and then drastically modifying or even dropping them depending on the public outcry.

The previous month, in October 2004, McDonald's, the burger giant and one of the world's best-known food brands, took a leap in the dark and said it was dropping its golden arches logo. Like other burger restaurants and producers, the company has been under sustained pressure about the high-fat, high-salt nature of its famous products. It abolished super-size meals and added salads to its menus.

In contrast, another American company launched an even bigger, monster burger for the delight of those who wanted to gorge themselves!

In Australia, a new Food Standards Code was introduced in December 2002. On the surface it dealt with the compositional and labeling requirements of food but the underlying intention was to revolutionize the eating habits of Australians so that thousands of lives would be saved. Referring to the new code at the 29th national conference of the Australian Institute of Environmental Health held in Sydney, Ian Lindenmayer, managing director of Food

Standards Australia New Zealand (FSANZ), said that much of the burden of enforcing its provisions would fall on the profession.

Expanding on the theme, he said: "Traditionally, in their food regulatory role, environmental health officers have placed the highest priority on protecting public health and safety from microbiological hazards. This is entirely appropriate. Defects in the handling and preparation of food that compromises the immediate health of consumers deserve your attention.

"However, there is a growing body of evidence indicating that the nutritional make-up of the food supply is crucial in determining long-term health and longevity. In other words, the advent of nutrition information panels on all packaged food labels, in conjunction with public debate on food issues such as obesity, could lead to significant changes to diet in the population—changes that could have a profound influence on morbidity and mortality."

Businesses were given a two-year period in which to conform with the new code. To help them prepare nutritional information for their food labels, FSANZ produced a web-based nutrition panel indicator. The agency also went to considerable lengths to tell people about the introduction of the code and help them understand the new system.

Tackling obesity is a particularly complex issue for which there are no easy and quick fixes. People are responsible for how they choose to live their lives. They also have to bear a responsibility for the demand for ever-cheaper foods that has been a driving force behind the production of tasty yet competitively priced meals based on low-cost ingredients. Certainly, successive governments in the United Kingdom are to blame for removing domestic science (cooking) and physical education (games like football and school sports days) from the national curriculum. Poor and unreliable public transport systems and a car culture have led people to use their motor vehicles in preference to buses and trains because they are more comfortable and convenient.

However, despite all these factors, growing public pressure is forcing food companies to change and the more enlightened are already introducing alternative choices. An excellent, simple message has been coined: 'Energy in equals energy out'. This is a subtly worded warning that if you eat too much and fail to exercise it off you will get fat—a brilliant example of the adman's flair.

Nevertheless, there is another aspect to the necessary drive for healthier foods: if governments and pressure groups become excessively demanding, the price of foods will have to go up to take account of new formulations and so could become unaffordable to some people. It is a difficult path to tread and will require the co-operation of all concerned to make constructive progress.

13.1 Are fish a crisis waiting to surface?

In addition to obesity, there is another dietary problem on the horizon: fish. For many years, health campaigners and medical experts have been urging people to eat more fish. It will keep us healthier, we were constantly told. The fatty oils will keep our arteries in better condition and help us to ward off high

blood pressure, strokes, and heart disease among other diseases as well as help in the fight against cancer.

But is that true, any more? Researchers are beginning to warn against eating too much fish, especially some of the oily varieties like tuna but also some bottom-dwelling varieties as well.

Why? What has brought about the change in advice? The answer is simple. For centuries the sea has been the dumping ground for all sorts of rubbish. At one time, the world's oceans surrounded land masses that were not heavily populated. It did not matter if sewage was discharged into the sea or boats and sailing vessels threw their rubbish overboard. The oceans covered an enormous area of the globe—five times greater than the land—and the quantities of rubbish and sewage were small and easily disposed of or forgotten.

But the world has changed. Populations have exploded. Despite regulations, some ships continue to dispose of their rubbish over the side; oil tankers flush their tanks and discharge sea water from their ballast tanks into the oceans. Worse still, the sea continues to be regarded as a convenient dumping ground for toxic chemicals and garbage, munitions and even nuclear waste.

In addition, untreated sewage continues to be discharged into the sea in many parts of the globe. The world's population explosion is making the situation worse day by day. Tourism is also aggravating the problem.

It is a daunting prospect, for instance, to gaze at Egypt's Red Sea coastline. It fringes what was once one of the most unspoilt underwater habitats in the world. Understandably, the country's sandy beaches and hot, sunny climate attract growing numbers of tourists. But that very popularity could eventually be the 'death' of the sea unless the developments are regulated and controlled.

Realizing that tourism represents an enormous goldmine, local and international businesses as well as entrepreneurs are creating more and more hotels and marinas along its sandy shores. Coral reefs are dredged up to provide building materials for new construction work. But what will happen to the sewage and other rubbish from these new developments? Mostly, it will be disposed off in the time-honored fashion... into the sea where it will pollute the Red Sea and its marine life will die or be greatly reduced in numbers.

Of course, this situation is occurring in many parts of the world. Egypt is just one example. And who can blame the businesses and entrepreneurs who exploit the situation? There is desperate poverty in the countries concerned and tourism creates jobs and wealth. But eventually there will be a price to pay as there will be for every country in the world that does not take environmental matters to heart.

These are strong words and the author should admit to a deep interest in the issue because one of his hobbies is underwater photography. He has been diving for some 45 years and, like others who are fascinated by the world beneath the waves, he has seen fish populations decline and disappear from their previous haunts.

The issue of the health of the world's oceans and seas was raised in the United Nations Environment Program's first ever Global Environment Year Book which was launched to governments attending the Global Ministerial Environment Forum in Korea in March 2004.

A new report⁴ by UNEP claimed there were nearly 150 oxygen-starved or dead zones in the world's oceans and seas. The dead zones were linked to an excess of nutrients, mainly nitrogen that originated from agricultural fertilizers, vehicle and factory emissions, and wastes. The report pointed out that low levels of oxygen in the water made it difficult for fish, oysters, and other marine creatures to survive and also affected important habitats such as sea grass beds.

The report continued: "Experts claim that the number and size of deoxygenated areas is on the rise with the total number detected rising every decade since the 1970s. They are warning that these areas are fast becoming major threats to fish stocks and thus to the people who depend upon fisheries for food and livelihoods.

Klaus Toepfer, UNEP's executive director, said: "Human-kind is engaged in a gigantic, global experiment as a result of the inefficient and often over-use of fertilizers, the discharge of untreated sewage and the ever rising emissions from vehicles and factories. The nitrogen and phosphorous from these sources is being discharged into rivers and the coastal environment or being deposited from the atmosphere, triggering these alarming and sometimes irreversible effects.

"Some of these so-called dead zones or oxygen-starved areas are relatively small, less than one square kilometer in size, whereas others are far larger at up to 70 000 square kilometers. What is clear is that unless urgent action is taken to tackle the sources of the problem, it is likely to escalate rapidly.

"Hundreds of millions of people depend on the marine environment for food, for their livelihoods and for their cultural fulfillment. Reducing the impacts of agriculture, human wastes and air pollution on the oceans and seas will be a key component in helping us to meet the Millennium Development Goals and deliver the World Summit on Sustainable Development's Plan of Implementation in areas ranging from fisheries and biodiversity loss to sanitation and poverty."

Sometimes the effects of depleted oxygen levels are mild. On other occasions, they can be dramatic with fish fleeing the suffocating waters of the dead zones and creatures like clams, lobsters, oysters, snails and other slow-moving, bottom-living creatures dying en masse.

Some of the earliest recorded dead zones were in Chesapeake Bay in the United States, the Baltic Sea, the Kattegat, the Black Sea and the northern Adriatic Sea. The most well-known area of depleted oxygen was the Gulf of Mexico. Its occurrence was directly linked to nutrients or fertilizers brought to the Gulf by the Mississippi River. Others have been appearing off South America, China, Japan, south east Australia and New Zealand.

In some parts of the world, actions have been taken to reduce the quantities of fertilizer and sewage running off the land. In Europe, a number of countries agreed to halve the levels of nitrogen being discharged into the River Rhine. The move resulted in discharges to the North Sea being reduced by 37%. However, there was concern that more oxygen-starved areas would emerge in coastal

⁴ http://mirror.unep.org/gc/gcss-viii/PresRelease_E2.asp

waters off parts of Asia, Latin America and Africa as industrialization and more intensive agriculture led to an increase in the discharge of fertilizer nutrients.

Some food manufacturers have displayed a responsible attitude to falling fish stocks. Bird's Eye Foods in the United Kingdom, for instance, stopped using cod from the North Sea in their popular fish fingers some years ago. But when you range up and down the aisles of any supermarket or major store in the world and look at the shelves stacked with canned fish, especially tuna, and the freezer cabinets stocked with frozen fish it is difficult not to wonder how many other businesses will have the foresight to take similar steps to preserve the world's declining fish stocks.

However, an indication of the threat that could be lurking in the sea is that in late March 2004 several national food safety agencies around the globe issued updated advice on limiting consumption of fish contaminated with mercury. This followed the publication of a new European Food Safety Authority (EFSA) study.

Mercury occurs naturally in the environment and accumulates in the aquatic food chain, resulting in fish all containing some methylmercury. Therefore, for most people they are the main source of this chemical in the diet. Big, long-living or predatory fish tend to accumulate higher levels and human symptoms associated with the resulting low-level mercury poisoning include hair loss, fatigue, depression, difficulty in concentrating and headaches. Unfortunately, methylmercury cannot be cooked out.

The EFSA warned that estimated mercury intakes for European consumers were close to internationally safe limits. Per-country average mercury intakes were below but 'at times rather close to' the provisional tolerable weekly intake of 1.6 µg/kg bodyweight for methylmercury established in 2003 by the joint Food and Agriculture Organization (FAO)/WHO Expert Committee on Food Additives. Some high-level consumers exceeded this limit. Several per-country average intakes exceeded the more conservative limit established by the US National Research Council of 0.7 µg/kg bodyweight/week.

This is what other agencies advised.

In the United States, the Food and Drug Administration and the Environmental Protection Agency announced a joint advisory on methylmercury in fish and shellfish for reducing the exposure to high levels of mercury in women who may become pregnant, pregnant women, nursing mothers and young children. At the same time, the two bodies continued to emphasize the benefits of eating fish and that both fish and shellfish can be important parts of a healthy and balanced diet. It pointed out that they are good sources of high-quality protein and other essential nutrients. However, as a matter of prudence, it suggested women might wish to modify the amount and type of fish they consume if they are planning to become pregnant, are already pregnant, nursing or feeding a young child.

They advised them not to eat shark, swordfish, king mackerel or tilefish, a bottom feeding food fish found in the Gulf of Mexico. At the same time, it advised that five of the most commonly eaten fish that were low in mercury were shrimp, canned light tuna, salmon, pollock, and catfish. Another commonly eaten fish, albacore or 'white' tuna, had more mercury than canned light tuna.

So, when choosing the recommended meals of fish and shellfish, one could eat up to six ounces of albacore tuna a week.

The two agencies also advised people to check local advisories about the safety of fish that might be caught by family and friends in local lakes, rivers or coastal areas. Otherwise, it suggested only eating up to six ounces a week of fish caught from local waters and that no other fish should be eaten during the same period.

They said the same advice should be followed when feeding fish or shellfish to young children but the portions should be smaller.

In June 2004, the California Attorney General's office began legal action against the three biggest canned tuna companies in the United States for failing to give 'clear and reasonable' warnings about mercury levels in albacore and chunk light canned tuna. It was being claimed that by doing so they exposed the public to 'known carcinogens or reproductive toxins'. Bill Lockyer was reported as stating that recent tests had shown that mercury levels were well above that which would require a food safety warning on the cans to comply with the terms of California's Proposition 65 law because of their mercury content.

The defendants—Del Monte Foods, Bumble Bee Seafoods and Tri-Union Seafoods—claimed the lawsuit was baseless. In a robust defense of the industry, the US Tuna Foundation said the suit was not grounded in science and would needlessly scare consumers away from affordable foods that were good for them. The Foundation declared that the industry was "prepared to demonstrate in court that canned tuna products are safe and that the industry is in full compliance with California's Proposition 65 provisions".⁵

It declared that the industry's perspective on the issue was consistent with the advice issued in March 2004 by the Food and Drug Administration and the Environmental Protection Agency that states "fish and shellfish are an important part of a healthy diet and contain high-quality protein and other essential nutrients, are low in saturated fat, and contain omega-3 fatty acids". The suit sought fines and a halt in sales until warning labels were posted in grocery aisles or attached to cans of the fish.

In August 2004, the tuna industry renewed its calls for a revision of the risk assessment for mercury in fish, saying there was "mounting evidence that the US was not aligned with the rest of the world when it comes to how methylmercury levels in fish are evaluated". It called for federal regulators to re-examine US policy "in the light of the real world experience of countries like Japan and the UK". Studies in these countries, claimed the foundation, showed that high fish-consuming populations had much greater concentrations of mercury in their systems without any evidence of resulting neurological problems.

In February 2005, a Congressional Review declared that the health benefits of consuming seafood far outweighed any risk due to trace amounts of mercury in some fish. The report stated that every scientific study had found that no-one in the US had "anywhere near the amount of mercury in the system from eating seafood known to cause health problems". The amount of mercury in the most

⁵ www.tunafacts.com/press/2004/june21.cfm

commonly consumed seafood, such as canned tuna, was well below the trace amounts allowed by the Food & Drug Administration and “far removed from any level of concern”.

Food Standards Australia New Zealand issued similar advice for Australia only. Pregnant women, those intending to start a family and children should continue to eat a variety of fish as part of a healthy diet but limit their consumption of certain species. It advised these groups to limit their intake of shark (flake), broadbill, marlin and swordfish to no more than one serving a fortnight and to avoid eating any other fish during that same period. For orange roughy (also sold as sea perch) and catfish, the advice was to eat no more than one serving a week with no other fish being consumed during the same period.

The media were provided with simple charts to show the number of servings of different types of fish that could be consumed safely as well as a video news release for TV channels. Additional information was provided in the form of answers to common questions. Further information was provided about mercury in fish, the benefits of eating fish and a reminder of the Australian dietary guidelines plus reported fish intakes for the country.

Reference was also made to international advisory statements on mercury in fish made by the United States, the United Kingdom, Canada and Japan and the media releases contained links to them. It was pointed out that FSANZ’s advice had been specifically developed for the Australian population and reflected local knowledge of the country’s diets. Technical information in the statements by other governments was similar to that of FSANZ but the details might vary because the risk of mercury exposure from the diet for each population depended on the environment in that particular country as well as the types of fish commonly caught and eaten, the patterns of fish consumption and the consumption of other foods that might contain mercury.

FSANZ’s chief scientist, Dr Marion Healy, said: “Our investigations show that the level of mercury in most fish caught and sold in Australia is low. This means we can all continue to enjoy the many benefits from eating fish without concern. Fish is an excellent source of protein for all people. It is low in saturated fats and high in ‘good’ unsaturated fat and omega 3 oils and is an excellent source of iodine. Because of this, it is important that women in particular continue to eat fish during pregnancy.

“However, some types of fish, usually those large species that are at the top of the food chain or that live a long time, may accumulate higher levels of mercury. We, therefore, advise against eating too much of these types of fish.”

He added that it was important that people did not misinterpret the advice and stop eating fish because it was in their interests to eat portions on a regular basis. However, pregnant women and young children should limit their consumption of those species with high mercury levels.

In Japan, a nation of fish eaters, the Department of Health advised pregnant women and those planning to start a family to limit their consumption of bottlenose dolphin to one serving of 60–80 g once in every two months or even less frequently. Meat from various whales—beaked, short-finned and sperm—as well as some kinds of shark should be limited to one serving of a similar size once a week or less. Similar sized portions of swordfish and alfonsino, a

bottom-dwelling deep water fish found in the Pacific Ocean, could be eaten up to twice a week.

In June 2004, the United Kingdom's Food Standards Agency (FSA) advised that no one should regularly eat more than four portions of oily fish a week. The Agency said that it considered the advice by the FDA was too cautious and that, for most people, the benefits to the heart and brain outweighed any risks.

After a year of research, the FSA recommended that girls and women of child-bearing age could safely eat one or two 145-g portions of oily fish a week. Men, boys, and post-menopausal women could eat up to four portions a week. The advice was different for girls and younger women because of the potential risk to babies in the womb.

Pregnant and breast-feeding women could eat between one and two portions of oily fish a week. However, the Agency said they should avoid eating large amounts of fresh tuna, shark, marlin, and swordfish because of concerns about mercury contamination.

Ironically, not many people in the United Kingdom will be affected by the advice. On average, they eat only one-third of a portion of oily fish a week. Seven out of ten never eat any oily fish.

Further controversy is bound to involve fish in the future because apparently over 35 species of transgenic fish—including salmon, carp, catfish, zebrafish, and tilapia—are being raised and studied in many parts of the world. Environmentalists are already expressing fears that the introduction or escape of these fish could lead to the extinction of native populations. Also, they are warning that if transgenic fish escaped, the increased competition for food and shelter could affect the natural ecosystem.

Problems facing the food industry

Think of crises that have recently swept the food industry. Remember bovine spongiform encephalopathy (BSE)? It was suspected BSE, or 'mad cow disease', arose from unsuitable animal feed being fed to ruminants. A frightening offshoot of that was new variant vC-JD, which tragically led to the deaths of its victims and even raised questions about its transmission through blood transfusions. Amid the concern about the implications of the disease, many countries stopped importing British beef. France was among the most vociferous and raised a storm about British beef. Yet, on July 4, 2004, the United Kingdom's *Sunday Telegraph* claimed that the mad cow disease epidemic had gone undetected in that country and had led to almost 50 000 severely infected animals entering the food chain. The report was based on a 'shocking' report by France's own government researchers.

Their report revealed that while blustering French politicians blamed Britain for the emergence of the disease and attempted to create a *cordon sanitaire* by banning imports of British beef, they failed to adopt measures to prevent a hidden epidemic at home. The researchers at France's official Institute of Health and Medical Research (Inserm) claimed that more than 300 000 French cattle had contracted BSE in the past 13 years, 300 times more than the number of officially recorded cases.

Few who have seen them with their own eyes, on television or in newspaper photographs, will forget the funeral pyres that marked the burning of the carcasses of cattle slaughtered because of a different infection, foot and mouth disease. More recently, there has been a devastating outbreak of bird flu. It swept through the Far East, resulting in illness and many deaths and, at the time of writing, was occurring again (see Chapter 19). Then again, consider the food scams, the sale, to the general public, of meat that had been declared unfit for human consumption.

One is left wondering whether members of the public can have any confidence at all in the food industry. It is an intriguing question for which a survey¹

¹ <http://www.foodstandards.gov.uk/news/pressreleases/ca2003press>

conducted by the United Kingdom's Food Standards Agency provided some interesting and surprising findings.

The survey was carried out in 2003 to provide the Agency with information covering consumer attitudes, knowledge, behavior and awareness of food issues. It highlighted a number of key trends. They included the fact there was a significant decline in concern over BSE (down to 42% in 2003 compared with 61% in 2000) as well as a drop in concern about the safety of meat, particularly raw meat, as well as a reduction in concern over eggs.

A year-on-year increase was observed in the number of people who were aware that, in the interests of their health, they should eat five portions of fruit and vegetables each day. More consumers said they checked the total salt content on food labels and a third thought they had changed their eating habits over the previous year and were now eating more healthily.

As far as food labeling² was concerned—another contentious issue—nearly eight out of every ten said they checked food labels, though only one in three said they always did so. Six out of every ten found information on food labels easy to understand but one in five found some labels 'fairly difficult' to understand and one in twenty found them 'very difficult'.

Four out of every ten consumers said they were concerned about the accuracy of food labels compared with about a third in previous years. Just over half said they were concerned about health claims for various foods. With an aging Western population, there is some concern about label clarity, print size and ease of reading.

Particularly interesting for those involved in crisis management is that there was a year-on-year drop in the number of people who felt that food safety was a 'lot worse'—6% in 2000 compared with 5% in 2001 and 4% in 2002 and 2003.

In the 2003 survey, nearly four out of every ten (38%) expressed concern about genetically modified foods. This compared with 43% in 2000.

More people were concerned about ready meals—up from 13% in 2000 to 17% in 2003. Half those interviewed were concerned about the amount of fat (53%), salt (50%) and sugar (47%) in food and claimed this affected their eating habits.

Between a third and a half of all consumers surveyed claimed to have changed their eating habits in 2003 because of increased concern about hygiene in catering establishments and seven out of every ten had stopped buying food from an outlet about which they had hygiene concerns.

It is remarkable that the results of the survey do not show a greater gap in consumer confidence when one considers the incidence of examples of poor quality control and hygiene in abattoirs (banned offals such as spinal cord being found in boned-out beef), of feed containing dead broiler chickens and their droppings being fed to ruminants, and bird flu sweeping the Far East because of generally poor hygiene standards, particularly in 'wet' markets.

The results are also surprising because, in a background briefing in May 2002, the European Commission (EC) said: "The series of food crises of the past decade have plunged European Union producers and consumers

² See Blanchfield J.R. *Food Labelling* (2000) Woodhead ISBN 1 85573 496 6 for a comprehensive global guide to food labelling.



Typical headlines cast doubt on the quality and content of many foods.

into a state of confusion, shaking people's confidence in the ability of the food industry and public authorities to guarantee the quality of their food.

"It is true that illnesses originating in food, such as *Salmonella* and *Listeriosis*, are on the increase in Europe. In addition, there are a number of chemical risks (dioxin, lead, cadmium) and risks linked to pesticide residue. Yet, at the same time, products are safer today than they have ever been—which is not to say that the system is perfect."

The briefing continued: "Europe has a good system of detection, but the great diversity of European policies and regulations coupled with the evident lack of cooperation between the national authorities are weak links in the system."

There are other bizarre ways in which our food can be contaminated. In July 2002, thousands of farms were placed under surveillance in Holland, Belgium, Germany, and Luxembourg after a growth hormone—banned in Europe but used in the United States, Australia and elsewhere to make heifers put on weight faster—was found in animal feed and in the renal fat of some Dutch pigs after slaughter. The synthetic hormone called *medroxyprogesterone acetate* (MPA) is used in pharmaceutical products for people, both as a contraceptive and as a hormone replacement.

It transpired that it found its way into the feed through a tortuous route. The process of sugar coating the contraceptive and hormone replacement pills produced run-off water with sugar in it. In 1997, instead of shipping the water to a Danish company for incineration, the pharmaceutical company involved arranged for the waste to be recycled by a Belgian concern. Three years later, in 2000, the Belgian company accepted for treatment a new stream of waste sugar water known to be contaminated with MPA. Some was converted into glucose syrup and sold to several soft-drinks companies and to two large Dutch feed mills. The glucose syrup was mixed into wet feed for pigs and used as a component in a molasses-based feed supplement. Yet another example of how events can chip away at the credibility of the food industry.

Perhaps the United Kingdom has been particularly affected by the sale of meat unfit for human consumption. The situation was considered sufficiently serious for the Chartered Institute of Environmental Health (CIEH) to hold a major conference in Cardiff, the Welsh capital, on November 24, 2003, entitled *Cracking Down on Meat Crime: a Trade with Deadly Consequences*. Its aim was to examine the trade in illegal meat and to develop ways to eradicate it.

It was suggested there was a 'meat mafia' diverting thousands of animals not fit for people to eat back into the food chain and that this multimillion pound trade in illegal meat represented a major risk to public health. It was claimed that criminals saw food crime as an activity with high rewards for low risks.

Among the examples given to the conference were a gang convicted of redirecting more than US\$1.5 million of unfit poultry back into the food chain and another of blow torching illegally slaughtered sheep carcasses to sell as 'smokies', a West African delicacy. The carcasses were bought for £1.00 (\$1.5) and sold for GB£100 (US\$150). It was suspected the scam was more widespread than previously thought. The skin of a sheep or a goat is blow-torched to give a characteristic charred flavor. The 'smokies' are illegal in the European Union (EU) because the spinal column is left intact but the trade also includes

conventional cuts of meat from sheep that are slaughtered illegally without health and safety checks.

In another case that was referred to, chickens declared unfit for human consumption found their way into schools and even police canteens.

Other practices of concern to the conference included the illegal dumping of by-products such as entrails into rivers and the fear that illegally imported 'bush meat' was a potential health hazard and could even spread such deadly pathogens as the dreaded *Ebola* virus.

Julie Barratt, CIEH director for Wales, said: "The food chain is a long and complicated one, and no single organization, agency or government department can stamp out this criminality on its own. We need to build strategic partnerships where all parties adopt the same level of responsibility and commitments to prevent criminal gangs from exploiting enforcement loopholes."

In a typical prosecution, in December 2003, a man known in the meat trade as 'Maggot Pete' was jailed for six years. He had been on the run in southern Europe ever since police uncovered a racket in which 450 tons of chicken and turkey, classed unfit for humans and in most cases unfit even for pets, was doctored to make it appear healthy. Then it was sold on to schools, supermarkets, hospitals and restaurants.

It was claimed in court that, between 1995 and 2001, the company with which he was involved made more than £1 million (\$1.5 million) by buying condemned chicken from abattoirs. The birds were earmarked for incineration or to be turned into fertilizer. Employees cleaned up the meat and repackaged it as fit for human consumption before using a countrywide network of suppliers to sell it on to more than 600 customers.

The meat, often gathered from skips where it had been left to rot, was trimmed and cleaned at his rat-infested premises, where raw sewage flooded the floor.

In another case a few months earlier, a man was jailed for selling meat that was considered only fit for use as pet food. The court heard that, for years, the man had collected condemned meat from an abattoir. He would then clean it up and wrap the meat in trays before selling it in markets and to butchers.

When environmental health officers (EHOs) raided his premises, they found enough trays to wrap 200 000 chickens and nine tonnes of decomposing meat, as well as poultry carcasses covered in rat droppings and maggots. They also found evidence that dead pigs had been illegally fed putrescent poultry carcasses.

In 2001, age-old practices at small slaughterhouses and butchers in the United Kingdom were blamed for a cluster of deaths from the human form of mad cow disease, new variant Creutzfeldt-Jacob Disease. The official public health report of the five deaths blamed traditional techniques at small abattoirs linked to local butchers in the vicinity of Queniborough, a village in the county of Leicestershire.

The official investigation said the victims had all eaten beef that had been contaminated by BSE-infected animal brains. Small slaughterhouses in the area had used a recognized method that involved inserting an object, usually a rod, into the brain to ensure the cows did not kick out during the slaughter process.

Because it was 'plausible' that herds in the area were infected with BSE, it was possible the technique led to infected material leaking to other parts of the animal.

14.1 Unfit meat is persistent problem

Enormous profits can be made from the sale of meat that has been condemned as unsuitable for human consumption or is not from the species claimed. It is a multimillion dollar trade. In the United Kingdom, such scandals emerge with worrying regularity and feature in disturbing investigative television reports, widely reported court cases and jail sentences. Other prosecutions involve endangered primates and other animals that are considered delicacies in their countries of origin but usually have deteriorated badly by the time they have been smuggled into Britain and elsewhere in Europe, where they are termed 'bush meat'.

Even during a major epidemic of foot and mouth disease, a gang of rogue farmers and butchers was moving animals and carcasses about the country in secret.

Chicken that has been 'laundered' to disguise its original condition is one of the favorite frauds, especially when it has been frozen or mixed among good meat. A typical example led to five men being sentenced to over 24-years imprisonment for recycling more than 1300 tons of condemned chicken and turkey meat that netted more than £3 million (\$4.5 million) in profits. The stinking meat was often covered in slime, mould or feces. It was hosed down, soaked in brine to remove the stench and perhaps treated with hydrogen peroxide as a bactericide, oxidant and bleaching agent before being sliced up to remove whatever scraps of pink meat could be recovered and sold.

One of the biggest meat scandals ever to hit the UK meat trade continues to be of interest. It sets an example of how a major issue could be tackled by widespread co-operation between all those concerned. It also demonstrated how a crisis could be exploited to quickly inform consumers and others of the problem.

The scam ran for several years, especially during the 1980s, and involved meat from kangaroo, horse, donkey and even cancerous cattle as well as other carcasses condemned as unfit for human consumption, collected from knackers' yards or had not been inspected for human consumption. When evidence began to emerge, some local EHOs used the media most effectively to warn other enforcement authorities and consumers . . . and in doing so created a situation that required careful handling by food companies and the meat trade.

Many well-known companies were involved as well as the police, local EHOs, trading standards officers, public analysts, veterinarians, abattoirs, meat wholesalers, horse-dealers, rest homes for horses and animal welfare campaigners, millionaires, canned food importers, airlines, members of the UK parliament, and even foreign governments.

The frauds led to the conviction of a number of people and no doubt helped to fuel the general suspicion and distrust of the food industry that prevailed at the time and continues to this day.

The meat trade had always been based on mutual trust. Meat buyers dealt with companies they had known and trusted over many years. Unfortunately, a few unscrupulous individuals were tempted by the enormous profits that could be made by selling as suitable for use within the human food chain meat which was not fit, from a different species, and/or intended for use in pet foods.

One big source was meat resulting from extensive culling of kangaroos and wallabies in Australia. The cull was authorized by the Australian Government and it resulted in substantial quantities of meat being available. When prime cuts were vacuum packed or canned and other kangaroo meat was frozen, it required considerable skill and experience to establish its origins and the fact the animal had not been hygienically slaughtered.

There was also a loophole in British practice. Originally, meat unfit for human consumption was stained with a green dye, but this practice was discontinued only to be replaced some time later by the use of a black dye, the color of which was not heat stable (thermolabile) so that it could be used, for example, in pet food where the thermal processing would eliminate the stain. Consequently, opportunities arose for the unscrupulous to use this material as processed meat.

Tests to establish the origins of the meat were highly specialized and initially took several days to verify, by which time the consignment could well have been processed. Some of the unfit meat failed the routine inspections of a few food companies because it fell short of their general quality requirements. Only one or two samples were identified as not being beef as few companies tested for species at that time. Meat rejected by one company, however, was soon sold to another as only one company was prepared to go public with what they had found. The rest just returned it to the supplier. Meanwhile, detection technology improved apace.

From the point of view of crisis management, the situation was interesting for two reasons. Firstly, a situation that was beginning to emerge of its own accord was exploited. The crisis was turned into a campaign to help track down the criminals involved and to warn all concerned about the 'unfit' meat. At the same time, companies that used such meat in their products were swept up unwittingly in the media investigation of the practices, which had been exposed and were doing their best to disassociate their brands from such damaging publicity. (At least one household name helped a vast consignment of hamburgers to disappear after it had been identified as coming from contaminated sources but before EHOs could seize the evidence.)

The overall scandal generated several investigative television programs as well as many news items and resulted in over 1000 press cuttings plus hundreds of hours of radio and TV time.

The truth was slow to trickle out. Reports appeared in two national newspapers. Then other national, regional and local newspapers as well as trade journals began warning that unfit meat was being offered for sale or that it was being used in food products.

The most persistent was the *Sunday Times*. In September 1980, it reported that one hamburger chain with 600 High Street restaurants twice came close

to selling hamburgers made from pony and other horse meat. In January the following year, it claimed hundreds of cans of contaminated meat, including kangaroo and donkey flesh as well as beef from cancerous cattle, were being sold for human consumption.

The uproar led Bruce Cova, MBE, the then enlightened EHO of a London borough, Hammersmith and Fulham, to launch Operation Meathook when it was suspected that some consignments of unfit meat came from an animal foods company in his area.

Looking back, he recalls: "At the time I was told that I had no hope of achieving change unless I created a fuss. So I went out and created a fuss!"

This proved to be a highly effective way of obtaining suitable evidence and also of involving and forewarning other enforcement authorities, consumers, the meat trade, food companies, retailers, and caterers. Creating such a fuss was also cheaper and quicker than if he had attempted to tell all those people himself! By taking such action, he was also acting with a great sense of responsibility as was Hammersmith and Fulham Council in fully supporting his actions.

Emotive headlines warned everyone of the situation and brought rapid assistance from many different bodies and companies.

While working for W.J. Adkins (Cambridge) Ltd, Professor Tom Toomey, now technical director of Ventress Technical Limited, liaising with Professor Keith Anderson, of Brooke Bond Oxo, and others in the industry, developed his own methods of establishing the identity and origins of various meats following worldwide research and rapidly became one of the established authorities on the analytical detection of unfit meat. They even built up a library of species-specific animal hair types with the collaboration of London Zoo. Hence, it became possible to establish whether the animal had been properly slaughtered and also to identify its species, such as kangaroo, donkey, camel, cat or, dog as well as the usual bovine, porcine or other variants.

This was achieved by the application of standard biochemical techniques such as the use of immuno-precipitating sera, electrochemical determinations of fatty acid composition and the comparative studies of the proteins by electrophoresis.

Further information regarding the history of suspect materials was obtained by consideration of the microbiological condition by hair typing, as well as by routine inspection of physical characteristics by skilled meat inspectors. Telltale signs revealed whether the meat could have originated from an animal that had been slaughtered in an approved manner or whether it did not comply with the standards set for meat for human consumption.

Many of these methods have now been superseded by DNA technology.

A comprehensive, on-going Information Index about the entire issue is maintained by Ventress. This archive is available on three CDs to bona fide researchers by contacting the company.³

³ Ventress Technical Limited, Neath Farm Business Park, 154 Church End, Cambridge CB1 3LD, UK. Fax: +44 (0)1223 248123, telephone: +44 (0)1233 244141, e-mail: beaker@ventresstechnical.co.uk

While the meat trade and food industry were under siege, many reputable companies and leading personalities, such as Professor Anderson and his technical colleagues at Brooke Bond Oxo (subsequently acquired by Unilever PLC), worked closely with Bruce Cova and a public analyst, Sidney Landsman. They offered additional laboratory facilities and assistance to help cope with the immense volume of analytical work which arose. Recognizing the industry's concern, the British Meat Manufacturers' Association (then the Bacon & Meat Manufacturers' Association and now renamed British Meat Processors Association) rapidly produced a code of practice and a format for inspections to establish sound practices and advise its members on the identification of unsuitable meats.

Food companies spent their time reassuring the media and consumers about the care with which their meat supplies were purchased and inspected as well as the high standards of their quality control procedures.

A typical background briefing statement used by one food company at the time read: "Meat may be unfit for a number of reasons. It may have originated from illicit slaughtering or recovery operations involving rejected or condemned material. It may also be meat from other than the species claimed. From time to time disreputable sectors develop in the industry and such meat is found on the market for both retail and manufacture, this giving rise to much adverse publicity affecting the whole industry.

"There are very real microbiological risks associated with unfit meat which can give rise to food poisoning and/or tainting of the finished product. Historically, microbiologically unsound meat has been 'cleaned up' by various techniques. Further, meat of differing species has been mixed with legitimate material and this can make it difficult but not impossible to detect in blocks of frozen or minced meat.

"Members of the Bacon & Meat Manufacturers Association, such as ourselves, adhere to a code of practice intended to safeguard them against unscrupulous suppliers. This involves both microbiological testing and authentication of the species from which samples of meat have originated.

"Our policy is to buy meat only from reputable suppliers and in compliance with the BMMA code of practice. Where meat is purchased from outside the UK, it is obtained from EC [European Community] licensed establishments. If we became aware of any incident involving unfit meat we would report it to the appropriate enforcement authorities immediately."

The development of the code of practice enabled statements to be extremely positive. The frankness of the background information was designed to reassure journalists and consumers of the honesty and dependability of that particular company and also all reputable companies in the industry. This is also an example of the valuable role a trade body or research association can take in making the issue an industry matter, so diverting attention from individual manufacturers.

Bruce Cova, representatives of industry and selected spokesmen from the BMMA visited many local authorities to tell councilors and enforcement officers about the trade in unfit meat and how to detect its presence in fresh and frozen consignments as well in food products.

In retrospect, Bruce Cova said: "It is unfortunate that the activities of a few sullied the reputation of the meat trade as a whole. However, the methods of operation in the meat market did allow an illicit trade to develop and flourish for a time.

"Originally, a food problem was a local matter. It related to a local producer or shop. However, during the last 50 years or so, the food industry and meat trade has changed dramatically. The number of small traders has diminished while there has been dramatic growth in the number of multiple retailers and international food companies with the result that, today, a problem can affect or concern large numbers of people.

"The facilities of any local council are limited and, at that time, methods of communicating with other environmental health officers were not as sophisticated as they are today. The swiftest and most cost-effective way for us to publicize the use of unfit meat was via the media.

"We set out deliberately to do this and it worked well. However, it was extremely time-consuming. While we were conducting a major investigation we had to set staff aside specifically to deal with the press. Because of the nature of journalism and shift working, we found we had to repeatedly give the same detailed briefing to several different reporters from the same newspaper, radio or television station. This was very frustrating but had to be done. We learned rapidly that it was best if the same members of staff always spoke to the media to ensure consistency of approach and information. Also, we quickly discovered which journalists were reliable!"

Another problem was that the Environmental Health Department's offices at Hammersmith and Fulham were burgled three times during the investigation. Therefore, all papers were locked in a vault overnight . . . including the contents of every waste paper bin! One document that was left out was being acted upon by the press within 48 hours.

Food manufacturers and the meat trade faced a dilemma. Meat buyers were shrewd and experienced individuals. Dealings were based on long established reputations and mutual trust. Suddenly those traditions were being questioned. Food manufacturers inspected the meat they used in their products but tests to establish whether it was beef, lamb, pork or otherwise were complicated, slow and expensive.

Nevertheless, they had to restore the public's confidence. The BMMA realized it had to act quickly and decisively. Its time-honored methods were no longer adequate. It had to develop a code of practice for members and the trade, and to give them guidance on how to determine the origin of the meat they were dealing with if they were unsure.

In doing so, the Association had the help of many professional food technologists and scientists, some of whom were already making a special study of the issue, as well as the industry, whose members could offer extensive supporting facilities. The Leatherhead Food Research Association (now Leatherhead Food International) and Campden and Chorleywood Food Research Association were also involved on behalf of the industry and its members.

However, the BMMA could not produce the code and other information overnight. It had to obtain the support of a consensus of all the major players in the trade as well as the major food companies. While this was proceeding, the Association was in the difficult situation of having to stonewall media enquiries with general assurances about the integrity and standards of the meat trade.

Once the code of practice and other information had been agreed, the Association was able to speak much more positively about the issue and so could its members.

The Association considered an important point was that it co-operated fully with the authorities, including Bruce Cova. Furthermore, some of its members had discreetly provided EHOs with considerable assistance and the BMMA had acted swiftly to put its own trade in order by producing a code of practice and other guidelines to which all members had to adhere.

The investigation led to the successful passing of a private members Bill by the UK Government, *The Food & Drugs (Amendment) Act 1982*. Since repealed, this small piece of legislation created the basis for penalties for food offences, and the task of steering it through Parliament was greatly helped by the support of the media, newspapers and television alike.

14.2 New member states pose problem for EU

There is a fresh problem looming on the horizon for many European countries now that the EU has been expanded to include 10 new nations. Experts have warned that some have deficient sanitary conditions and inadequate measures to tackle diseases like BSE. Failings have been identified such as substandard hygiene in slaughterhouses and dairies as well as lax surveillance of veterinary practices. This has led to 586 businesses being closed in the Czech Republic and a further 217 in Slovakia.

The EC, the enforcement arm of the EU, has reported that 8% of companies in the food sector in these particular countries do not meet their sanitary standards, which are among the most stringent in the world. These figures are only for industrial-sized operations and do not include smaller businesses where standards are more lenient.

The 10 countries involved—Cyprus, the Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia and Slovenia—became part of the EU in 2004. The EC has granted a period of grace to businesses that do not meet the standards so they have an opportunity to improve. In the meantime, they can only sell their products within their own country and must label their goods accordingly.

Poland, a major agricultural economy, is alleged to be one of the biggest culprits. In the month before it joined the EU, 721 out of 1006 businesses still did not meet the safety standards. They were mainly abattoirs, many of which were old and did not have refrigerated rooms, thus increasing the risk of contamination by bacteria such as *Salmonella*.

It is also claimed that monitoring has been inadequate through these 10 new states because microbiological analysis often is not done because of cost and since grain, fruits and vegetables contain too many traces of pesticides.

However, in addition to those involving meat, there are other possible problems that the food industry may have to face in the future such as those with regard to fish, which were dealt with more fully in Chapter 13.

Dealing with extremist organizations and terrorist threats

The most challenging areas of crisis management are dealing with attacks from individuals and organizations with extreme views as well as terrorist threats. They are distinct from product tampering and extortion demands linked with them, which are dealt with in Chapter 6.

In some volatile parts of the world, kidnapping not only threatens wealthy local families but even also ordinary business travelers. Mexico City is the world capital for kidnappings with as many as 10 occurring every day and leading politicians are even having chips inserted into their arms so that their location can be traced if they are taken hostage!

Other threats come from extremist organizations like those opposed to the use of animals in laboratory experiments and testing such as the Animal Liberation Front (ALF) and Stop Huntington Animal Cruelty (SHAC). They have operations and supporters in many parts of the world but, in 2004, it was claimed that their activities were more prevalent in the United Kingdom and were costing the country £1 billion a year—in the first four months of 2004 there were 117 arrests and 21 convictions. The extent and ferocity of their actions depend on the leaders or individual members and can vary not only from country to country but also according to the influence and ‘enthusiasm’ of those involved.

They are not pacified by the fact there are legal requirements that some food ingredients and additives—also new drugs and pharmaceutical products—must be tested on animals before they are approved for human consumption.

For many years, those involved in such industries and activities have been targeted. Their cars have been firebombed, their families terrorized, their homes vandalized—the terrorists describe these as ‘home visits’—and businesses disrupted. One can only marvel at the fortitude and conviction of those still prepared to continue with such work. Their families are threatened. They have to check their cars each morning for bombs and incendiary devices. They have to vary their route to work each day. They have to work in

laboratories and buildings protected by tight security and usually located in remote areas. The majority of scientists involved in this type of work are appropriately qualified and subscribe to codes of professional conduct that are in the public domain.

The effects of such attacks can be so devastating that, in the United Kingdom, some of those involved have formed their own support group to help each other cope with the trauma and aftermath of the attacks directed against them. The experiences of some of the members—Victims of Animal Rights Extremism (VARE)—were described in a feature in the London *Daily Telegraph* on May 23, 2004. They make chilling reading. The group also called on members of Parliament for legislation to curb the assaults, intimidation, and harassment that they claim had increased during that year. The animal research community was also pressing for an animal rights extremism act because of the limitations of existing laws. When approached to join VARE, many victims said they were too frightened to become members.

To the dismay of scientists, a campaign of harassment by such organizations caused the United Kingdom's respected Cambridge University in 2004 to shelve plans for a £32 million research centre. Later the same year, the main contractor building a new £18 million drugs research laboratory at Oxford University, another of the country's best known seats of learning, withdrew from the project following a campaign of intimidation. Extremists wrote to shareholders threatening them with exposure on the Internet unless they sold their holdings. The company consequently saw its share price plunge. Even the firm supplying cement for the work was targeted. Staff were phoned in the middle of the night and sent letter bombs. Site vehicles were also destroyed.

The laboratory is being built to conduct research into cures for diseases such as leukemia, Alzheimer's and asthma. Mice, amphibians, and monkeys will be used at the biomedical facility. It became the main target for animal rights campaigners following their success in blocking the proposed development at Cambridge University, where it was decided the cost of protecting the laboratory from terrorist attacks was too high.

Subsequently, in November 2004, the university was granted a landmark High Court injunction banning any harassment of its staff and students as well as any protests within the city center. It was also granted a 50 yard exclusion zone round the building and a 100 yard exclusion zone round the homes of anyone connected with the university. The injunction extended protection to contractors and sub-contractors working on the university as well as their shareholders and offices. The use of e-mails to harass anyone connected with the university was also banned. The terms of the injunction were not unusual but its widespread effect was unprecedented. However, up to 25 activists were allowed to protest between 1 pm and 5 pm every Thursday in a designated area outside the new laboratory.

The widely reported problems concerning the laboratory in Oxford led to the UK government announcing a crackdown on animal rights extremists who "intimidate and harass legitimate businesses".

The changes were designed to give the police powers to arrest individuals protesting outside someone's home; give the police powers to ban protesters

from the vicinity of a person's home for three months; and to strengthen the harassment laws to deal with campaigns of harassment aimed at groups of people working for the same company.

The detailed proposals were set out in a joint Home Office and Department of Trade and Industry paper entitled *Animal Welfare: Human Rights—protecting people from animal rights extremists*.¹

Home Office minister Caroline Flint declared: "Animal rights extremists are determined and committed. And our response is equally determined and committed. The new measures give further tools to the network of specially trained prosecutors so they can deal with the extremists and ensure they feel the full weight of the criminal justice system."

In other measures, the government set up a cabinet committee chaired by the Home Secretary to drive forward work on tackling the extremists. At the same time, a specialist police unit, located within the National Crime Squad, was created to target leading organizers of violent animal rights protest.

The Home Office also produced a guide entitled *Extremism: Protecting People and Property* for security managers of companies that might be targeted to help them ensure their employees' personal safety.

In May 2004, the UK government established a National Centre for the Replacement, Refinement and Reduction of Animals in Research. It reports to the Office of Science and Technology and focuses on current developments in science which provide opportunities to do work on the replacement of animal use, refinement of the procedures involved to minimize suffering and reduction of the number of animals used.

The head of the United Kingdom's second-largest pharmaceuticals business, AstraZenica, remarked on November 11, 2004 that such extremists were deterring foreign drug makers from investing in Britain and so posed a serious threat to the nation's science base. Chief executive Tom McKillop said AstraZenica had no plans to pull out of British-based research but pointed out that the company's investment had been rising faster in the United States and other countries. "Companies that are already here are unlikely to stump up sticks and go. But there is always competition for where you are located. We are seeing Asia emerging very strongly. China and India are becoming highly talented research bases in their own way."

The previous month, on October 8, it was announced that the number of animal experiments in Britain in 2003 had risen to its highest level since 1994. This prompted condemnation from animal rights campaigners who said that the government had failed to curb cruelty.

Anti-vivisectionists expressed particular concern about a 20% rise in experiments on primates, including marmosets and macaques, to 4799. Overall, animal experiments totaled 2.8 million in 2003, an increase of 2.2%.

The government said 85% of the procedures involved mice and other rodents. Most of the remainder was carried out on fish and birds. Home Office minister Caroline Flint said there was a clear need to use animals in vital scientific research where no alternative was available.

¹ <http://www.homeoffice.gov.uk>

Earlier in the year, the *Daily Telegraph* (July 28, 2004) said that Britain was seen by activists as the focus of the most successful anti-vivisection campaigns in the world. It reported that the head of the country's biggest drug company, Glaxo-SmithKline, said his organization was spending tens of millions of pounds on protecting staff and buildings from militants. This was money that could be spent on developing new drugs.

Jean-Pierre Garnier, who lives in Philadelphia, USA, said members of his staff had faced extreme threats because of their involvement in testing potential drugs on animals. The company employs 6000 research scientists in the United Kingdom, about half the company's total research staff.

He made his comments a few days after an academic had estimated that threats from anti-vivisection militants were costing the country £1 billion a year. Garnier also said the attacks were driving investment out of the United Kingdom.

The Association for the British Pharmaceutical Industry said the threats were putting Britain's dominant position in the pharmaceutical industry at risk yet its research was important. A quarter of the top 100 drugs were discovered in the United Kingdom but there was a risk this knowledge and expertise would move elsewhere or even be lost.

The business community in the United Kingdom was reported to be offering £25 million in rewards for information leading to the conviction of extremists but it had proved difficult to pin down the groups, who claim they do not condone violence.

The extremist groups are clandestine and organized like terrorist cells. Few members know each other. Many use several different names. Information is published on their web sites, such as details of companies that have dealings with particular businesses as well as the names and home addresses of their directors and senior staff. Then it is up to individual members or groups of members to target the companies and individuals as they see fit.

Members trumpet their exploits as examples to others, usually on other web sites. Their tactics can range from swamping a business's telephone switchboard with so many calls that it is paralyzed to raiding their premises and gluing up door locks, smashing furniture, destroying files, and deliberate arson and pipe bomb attacks. Laboratories have been raided and animals 'liberated'. The proliferation of small video cameras has enabled footage to be taken by undercover members and released to the media or the public showing animals undergoing experiments or being kept in poor accommodation.

In an article on November 14, 2004 Britain's *Sunday Times* claimed that animal rights activists were collecting more than £500 000 in public donations through street stalls in Central and South London. It said the money was raised to finance the campaign against Huntingdon Life Sciences (HLS) and some was also given to groups carrying out direct action targeting employees of the company and their relatives.

The article continued: "The huge amounts of money being raised are not monitored in any way because the organization raising the funds is not a charity and, therefore, does not have to provide any paperwork.

"The police are so concerned about the sums flowing into the coffers of animal rights extremists that they have set up a unit to investigate the funding.

"While some of [the money] is banked, large sums are held in cash and used to finance actions against employees of companies connected with HLS. These include spray painting cars and attacks on animal laboratories."

As part of a program a few days later, on November 18, 2004 BBC Radio 4 included a recording of an activist talking to 12-year-old children at a London school about animal testing. After the talk, one pupil said she was so concerned she wanted to join the protest movement.

The program also reported visiting a conference and training camp for activists in the United Kingdom and said that the animal rights movement in America was copying and learning from the tactics used in Britain and also those employed by anti-abortion campaigners in the United States some years previously.

When faced with action by any extremist organization, obviously the first step is to inform the police and enlist their help. Many forces have special units for dealing with such organizations but, in the United Kingdom, they are powerless to act unless an actual crime is being committed such as a burglary or physical assault. However, following the intimidation of the company constructing the research laboratory at Oxford as well as other businesses and staff, tougher laws were being introduced in 2004. In response, the activists declared that such restrictions could force them to more extreme measures, and a series of training camps and workshops was announced. Topics covered included how to deal with the police, including mock interviews, security techniques, self-defense and unarmed combat, camera and video skills, fox hunt sabotage skills and how to work undercover.

In the United States, the Animal Enterprise Protection Act passed in 1992 made it a federal offence, punishable by a fine and/or imprisonment to cause physical disruption to the functioning of an animal enterprise resulting in economic damage exceeding \$10 000. The Act also imposed sentences of up to 10 years or life imprisonment on persons causing serious bodily injury or death on another person during the course of such an offence.

As well as contacting the police, help and advice in dealing with such extremists can be obtained from companies that specialize in providing security services. However, even in these instances, some firms—usually listed in telephone directories as Security Services—have caved in to pressure and avoided taking on such clients or severed their contracts once they are targeted or threatened. For example, it has been reported that, following intimidation, over 100 companies have stopped working with or supplying Huntingdon Life Sciences.

Another problem is that businesses and their staff can find themselves being subjected to attacks despite the fact that none of their products is tested on animals. Once on a 'hit list' it can be virtually impossible for a company to persuade the fanatics that they are not involved in any way. Obviously, if such companies find their premises are being picketed by extremists—staff can find this an unsettling experience in itself—one obvious move is to try to reason

with those involved if anyone appears to be approachable. One could even offer to show evidence that none of the business's products are tested on animals, but there are no assurances that such information will be accepted as genuine or that the extremists will be deflected.

Even if the protesters appear to be satisfied and turn their attention to a different business, there is no guarantee that, in the future, new members will not assume the original information was soundly based and launch renewed campaigns against the same organization. This makes it important to do one's utmost to correct any incorrect or misleading impressions as quickly as possible. This applies to any dealings with pressure groups, whether or not they are extremists.

Once false claims appear in a published document they are likely to be repeated evermore. This is also true of stories and articles appearing in the media. Cuttings have always been stored in libraries for future reference. Now they can be stored electronically for even easier access. It is unlikely that corrections or letters of complaint are ever linked with the original material so the errors are likely to be perpetuated if it is ever necessary to refer to the original material. TV stations also keep extensive archives.

Even when dealing with environmental organizations, it can prove virtually impossible for the truth to be accepted. Though the example was trivial compared with being attacked by extremists, a company for which the author worked was repeatedly accused of using meat from animals raised in de-forested areas of the Amazon basin in its corned beef. No matter how persuasively the company tried to correct this unfounded impression, nothing had any impression until a questionnaire was circulated by one of the groups. At that time, environmental and conservation organizations bombarded UK businesses with such questionnaires. They were extremely time-consuming and often took several days to answer. However, on this occasion, the claim that none of the cattle was born, bred or raised in de-forested areas was accepted because it came from such a source. The pressure disappeared.

Obviously, there is no such simple solution to correcting the misconceptions of extremist organizations but it is always worth trying to open a dialogue, perhaps in the first instance through a more sympathetic third party if one can be found. However, be warned, it is a calculated risk. You are in danger of having your remarks misquoted, taken out of context and used against you. Nevertheless, it might be worth taking a calculated risk if any of those involved seem reasonable and approachable.

Leaders of the biomedical research community have begun urging scientists to take an aggressive approach in response to the tactics of animal rights activists. In 2003, David Amaral, as chairman of the Society for Neuroscience's (SfN) committee on animals in research, declared: "What you are going to see in the next couple of years is that the SfN is going to take a much more proactive approach towards educating the membership and the general public on the ethical use of animals and the absolute need and necessity for animal research in neuroscience. Neuroscientists can no longer be simply reactive in their dealings with animal rights groups who vehemently oppose the use of animals in medical research."

The Society said it was updating a handbook on pre-emptive crisis management, outlining steps that could be taken to prevent "disjointed and unorganized reactive tactics that are often employed too late to be effective". Important pre-emptive tips included preparing an 'animal use project file' that consisted of a written lay summary of the research projects being carried out and documentation supporting the approval of the use of animal models.

A strong posture is also adopted by the National Association for Biomedical Research. Dealing with Lab Animal Issues, the Association points out on its web site, that virtually every major medical advance during the last century depended on research with animals. It declares: "Data from experiments on humans are obviously the most scientifically reliable; however, in many cases human research is ethically unacceptable. Researchers first must use animals [with] living systems closely related to humans, before humans are asked to participate in experimentation. Animals serve as surrogates in the investigation of human diseases and new ways to treat, cure or prevent them. The health of animals has also improved due to animal research."

The Association points out that scientists have significantly reduced the number of animals used in product safety testing and that, because this reduction has been possible, activists would like the public to believe that the use of laboratory animals can be eliminated in this field altogether despite the fact this is incorrect.

It is generally accepted that the animal rights movement originated in the United Kingdom. It was an offshoot of the Hunt Saboteurs Association (HSA), which was founded in the early 1960s. It is credited by many with initiating the trend towards 'direct action'. Certainly this was the more aggressive stance adopted by the Band of Mercy, a spin-off from the HSA. The group was dedicated to taking more violent action and the ALF developed from it.

The first documented attack by the ALF was in 1975, when it was connected to the firebombing of an animal research center in the United Kingdom. In the early 1980s, the ALF's activities spread to the United States, where the first documented attack took place in 1977. Two dolphins were released from the University of Hawaii. Since then, firebombing, arson, and break-ins have continued coupled with the release of laboratory animals. Targets have included universities, meat trucks, circus vehicles, and a mink farm.

It is believed that there are as few as 100 hard core members who are willing to take unlawful action to further the ALF's aims but recruitment is largely from younger people, mostly under 25s, frequently while they are at university. Other members range from housewives to senior citizens.

The basic doctrine of ALF is to release animals from 'places of abuse' and place them in good homes, to inflict economic damage on those who profit from the misery and exploitation of animals, and to reveal 'the horrors and atrocities committed against animals behind closed doors'.

The SHAC and the Animal Rights Militia are other extremist organizations. SHAC was formed specifically to target Huntingdon Life Sciences in the United Kingdom. As well as picketing HLS's premises, members are blamed for temporarily blinding staff with sprays, beating up the managing director with

baseball bats, and targeting investors in the company as well as suppliers and customers.

In January 2002, HLS moved its stock market trading from London to the NASDAQ in New York and, on paper, the company was taken over by Life Sciences Research, a shell company that had been set up. However, SHAC formed an American branch and the attacks have continued.

Despite being the target for prolonged attacks by SHAC, Huntingdon Life Sciences' web site² is open and sets out in detail the research it conducts and the benefits resulting from that work. This is an approach that is recommended by experts who believe that companies should be prepared to explain the nature of the work they carry out and the resulting benefits, both to people and other animals. It should also be pointed out that much of the work is a legal requirement.

The HLS site points out that the company works with a wide variety of products, including pharmaceuticals, agrochemicals, industrial chemicals, veterinary products, foods and flavorings to help manufacturers develop safer products for the marketplace. It makes the point that Huntingdon is at the forefront of pioneering various in-vitro techniques and that one of its key objectives for many years has been replacing animal studies with reliable in-vitro studies. Indeed, it is a supporter of the Fund for the Replacement of Animals in Medical Experiments.

The site also tackles the ethical issues of the use of animals in scientific research and points out that, for many years, people have been benefiting from the healthcare advances that have been achieved from animal-based research. It lists the average number of operations or techniques performed in the United Kingdom in a year that would not have been possible without previous animal research. It notes: "The contribution that animals have made to human wellbeing is immense."

These are the operations and procedures it mentions: 3 000 000 operations carried out under a general anesthetic, 90 000 cataract operations, 60 000 joint replacements, 13 000 coronary bypasses, 10 000 pacemaker implants, 6000 heart valve repairs or replacements, 4000 heart defects corrected, 2500 corneal transplants, 2000 kidney transplants and 400 heart-lung transplants.

Huntingdon point out that, in the United States, five billion animals are used in the food industry compared with the 18 million used in research generally: a ratio of 294:1. Compared with those figures, the Royal Society for the Prevention of Cruelty to Animals (RSPCA) in the United Kingdom has to destroy an average of 1000 unwanted or sick animals every month. It gives the figure for the United States as nearer to 1.2 million a month.

The Company also adds: "As consumers we strive for a 'no-risk' guarantee. In response, government regulatory bodies insist upon stringent and comprehensive safety testing, including testing on animals. Huntingdon Life Sciences provides this essential service for a wide variety of customers, including government agencies. It is our job to ensure that these tests are performed to strict

² <http://www.huntingdon.com>



Barbed wire and CCTV cameras are necessary to protect scientists working in animal testing laboratories.

scientific criteria, provide reliable results that can be reproduced, and with leading standards of animal care and welfare. This places an important burden of responsibility upon us, one which we do not take lightly. We have to respect the needs of the animals and to be fully aware of the welfare issues involved. We are committed to providing the highest levels of animal husbandry and welfare.”

The site also lists a range of legislation that implicitly requires animal experimentation under EU legislation. The legislation relates to the animal trade, animal nutrition products, veterinary medicinal products, proprietary medical products, the classification, packaging and labeling of dangerous

substances and preparations, food additives, cosmetics, food contact materials and pesticides.

In the United Kingdom, individuals or companies that defy the activists can pay a high price. The landlord of a public house who refused to stop serving a drink to one of the owners of a guinea pig breeding farm was sacked by the brewers. The owners of the farm, situated in peaceful countryside, were targeted over a five-year period. Their properties were raided, windows were smashed and they became the victims of threatening letters and one member of staff found his village was being leafleted to say he was a convicted pedophile and that his partner had a sexually transmitted disease.

Even the boy who delivered newspapers to one of the owners of the guinea pig farm was targeted. But even worse was to come. In a move which appalled many people, the body of the 82-year-old grandmother of the family was dug up and her bones were stolen.

In a 20-mile radius round the village and farm, there have been over 50 incidents. As well as bricks being thrown through windows, a golf course was dug up, paint-stripper poured over cars, telephone lines cut and packages containing dog feces have been left on doorsteps.

However, Huntingdon Life Sciences, both in the United Kingdom and the United States, continues to be the target of the majority of the activity. In a new move in 2004, SHAC began targeting businesses that supplied or delivered everything from stationery to chemicals, animals, blood samples and freight. One by one, those businesses announced they had severed links with the beleaguered company, and SHAC gleefully declared on its web site that, during 2004, the number of suppliers who had pulled out totaled some 70 businesses.

General statistics relating to attacks by animal activists are not readily available. A measure of the threat such attacks pose, however, can be obtained from a special report prepared for the US Congress in 1993. It was in response to rising complaints of actions of terrorism against people involved in animal-based industries.

In America at that time, the most prominent of the new 'animals rights' organizations was the People for the Ethical Treatment of Animals (PETA). It was established in 1982 and, in just 10 years, gained a membership believed to be over 350 000. By 1993, the report estimated that, in the US alone, there were as many as 7000 animal protection groups of varying sizes, interests, and objectives.

During the period from 1977 to June 1993, a total of 28 different types of animal enterprises in the United States were attacked by extremists. The attacks included serious vandalism and arson. Though they only involved 8% of recorded cases, the attacks resulted in the loss of millions of dollars from damaged or destroyed equipment and facilities.

In one instance, a veterinary diagnostic laboratory at the University of California was destroyed while it was under construction, resulting in damage estimated as \$4.5 million.

The establishments most frequently attacked were university laboratories in which animals were used for testing. They suffered 63 attacks and, in one instance, the direct damage exceeded \$1 million. Individuals and their personal

property were targeted with increasing frequency with 48 recorded attacks on them or their homes. Meat packing and processing companies as well as slaughterhouses, livestock and poultry farms were also attacked as were butchers shops. Animals were stolen or released on 77 occasions. Ironically, some of the animals were unable to fend for themselves in the wild and others returned to the establishments from which they had been released.

There were more incidents in California (143) than any other state though the animal rights movement in the United States first appeared on the eastern coastline.

The activists most recent target has been the production of foie gras by force-feeding ducks and geese. In October 2004, California governor Arnold Schwarzenegger signed a bill banning the practice starting in 2012. After that date, fines of up to \$1000 a day will be imposed for force feeding.

Governor Schwarzenegger pointed out: "The bill's intent is to ban the current foie gras production of forcing a tube down a bird's throat to greatly increase the consumption of grain by the bird. It does not ban the food product foie gras. The bill provides seven-and-a-half years for agricultural husbandry practices to evolve and perfect a humane way for a duck to consume grain to increase the size of its liver through natural processes."

Activists had made the issue a priority, saying that enlarging the birds' livers to produce the delicacy was cruel. In the process they trashed a Sonoma County restaurant north of San Francisco and threatened its co-owner at home.

In essence, before it becomes the subject of an attack, a business should examine every aspect of its operations to ascertain whether there is any reason why it could become the focus of an attack even if its products do not involve animal testing. For example, could it be considered to be behaving unethically in any part of the world, might any of its processes be considered to be harmful to the environment or can any of its activities be considered to harm animals?

Such an examination will indicate why people might hold certain views and why they might turn their attention to your business. If there is any possibility your company could be vulnerable, the next step is to discover as much as possible about the group or groups that might campaign against it.

Checking the groups' web sites is always a good starting point as well as a general Internet search for matches against their name and also that of your company and its various brands. Most detail why they were formed and outline their campaigns and targets. In some circumstances, it can be worth a member of staff joining the group as a private individual, using his or her home address, provided it is not a militant or extremist organization. This might provide an opportunity to learn more about the organization. Some produce newsletters and magazines; others mail their members on a regular basis.

Some individuals and businesses might have reservations about joining such organizations but remember, if your company is listed on the Stock Exchange and is the focus of attention of a pressure group, it is likely that one or more of their members will have purchased shares so they receive stockholder mailings and can attend annual meetings. It is all part of the 'intelligence' game.

Obviously, if one is faced or is likely to be faced by a hostile group, one should be cautious about the manner in which you obtain your information

but there are advantages in being better informed. Then you can begin to develop protective strategies should they ever be required. The worst tactic of all is to ignore them in the hope they will go away. They will not. They will regard your business as a soft target and redouble their efforts.

If there is any possibility your company could be the focus of hostile attacks, it can be sensible to enlist specialist help. Both security consultants and certain insurance companies have experience of dealing with extremist attacks. They are best-placed to provide advice and assistance.

In the United States, the Animal Agricultural Alliance³ partnered with Law Enforcement Academic Research Network, a company specializing in threat management systems, to offer intense hands-on anti-terrorism training courses specifically for the food, agriculture, and animal industries. The courses included advice on assessing credible threats to staff, facilities and the public and employing the necessary processes to protect the workplace to prevent or manage threats before they became crises.

It is impossible to calculate the full economic impact of attacks of this sort because of the indirect costs of paying staff while they are unable to work, increased insurance premiums, increased security arrangements, loss of shareholder confidence and delay to research projects and business generally. However, the cost of defying even less extremist organizations can be daunting. A United Kingdom breakers' yard that obtained a £10.6 million contract to break up 13 ships for the United States Maritime Administration found itself the target of a campaign by Friends of the Earth in 2004 because they contained hazardous material. A High Court ruling that required new environmental checks of the yard and the ships halted work on the first vessels. Work was delayed for over a year at a cost of nearly £16 million a year as well as the loss of jobs while rivals in Denmark and the Netherlands were busy building competing yards because they saw the potential of such work.

In a move that angered and astonished many, in February 2004, a British company launched a computer game in which players as young as seven were asked to destroy an animal testing laboratory. The game depicted animals being abused in the laboratory. In one experiment, a hamster was fired from a cannon and in another monkeys were forced to run on treadmills. Players were asked to free the animals, wreck the laboratory and chain-whip police officers. The game urged players to break everything and drive the evil corporation into bankruptcy. The game was developed by a Californian company and was being marketed by one of the world's leading publishers of entertainment software.

The threat posed by bioterrorism is dealt with in Chapter 16.

³ <http://www.animalagalliance.org>

Bioterrorism—a clear and present danger

Until a few years ago, the thought of anyone highjacking a crowded airliner and deliberately crashing it into skyscraper buildings in one of the world's major cities would have been dismissed as fantasy. The event would have been unthinkable. But then, on September 11, 2001 fantasy was turned into chilling fact.

However, long before the tragic happenings of 9/11, bioterrorism has been recognized as a creditable threat and its employment is not new. Until recently, the threat was more popularly known as germ or chemical warfare and, as such, the tactic is centuries old though today it is more sophisticated. In addition to its use in times of war, terrorists have long since discovered that they can use food as a weapon to obtain funds for their cause or to attack and even destroy a country's economy.

All stages of food production are vulnerable, from seeds being grown to crops being harvested, packaged, shipped and supplied to manufacturers as well as to the factories in which food products are manufactured and the network through which they are distributed and sold to the public. Even crop dusting techniques could be employed with devastating effects on growing crops. In addition, the rapid spread of diseases such as the foot and mouth epidemic in the United Kingdom and avian flu in the Far East as well as the anthrax scares in the United States and the devastating effects of the release of sarin gas on the Japanese subway underline the fact that bioterrorism poses a very real threat.

Certainly, the threat to the US food supply is more than theoretical. When American troops entered the caves and safe houses of members of the al-Qa'eda terrorist network in Afghanistan in the months following the 9/11 attacks they found hundreds of pages of US agricultural documents that had been translated into Arabic.¹ A significant part of the terrorists' training manual

¹ Katherine Peters, *Officials fear terrorist attack on US food supply*, Government Executive (June 10, 2003).

was reportedly devoted to agricultural terrorism such as the destruction of crops, livestock, and food processing operations.

However, scientists regard those outbreaks as 'low tech'. They are concerned that the findings of life science research could be used to engineer deadly viruses that could be unleashed on the world. The threat is sufficiently credible for the Royal Society, the United Kingdom's most respected body of scientists, and the Wellcome Trust to have called a meeting of scientists and policy makers to discuss the issue.

Speaking in London on October 7, 2004 Professor Julia Higgins, vice-president of the Royal Society, said: "Scientists have a responsibility to minimise the possibility of their work being misused. At the moment cutting-edge work such as targeted modification of viruses is probably well beyond the capabilities and resources of those who wish to cause harm. However, as the technologies progress these processes are likely to become cheaper and easier to perform.

"What we want to look at in this meeting is whether it is possible to monitor the flow of information into the public domain without unduly hindering scientific progress and how we can raise awareness with scientists that their work may be open to misuse."

Dr Mark Walport, director of the Wellcome Trust, said: "SARS (Severe Acute Respiratory Syndrome) and bird influenza are recent examples of human vulnerability to new and dangerous natural infections. Responsible international research conducted in an open fashion is essential to understand and find effective vaccines and treatments for infections such as these. While it is always important to do what we can to minimize the risk of research being used for evil purposes, we must guard against inhibiting the vast majority of medical research which is carried out for the benefit of mankind."

A report of the meeting was being submitted to the government's Foreign & Commonwealth Office to help with the preparation for the annual meeting of the Biological Weapons Convention in 2005, which will be chaired by the UK government. It will focus on how the content, dissemination and adoption of codes of conduct for scientists could strengthen the convention.

Obviously, any epidemic on such a scale would be a matter for the relevant government to handle and be beyond the resources of individual companies or industries, as had already been pointed out, but there are advantages in being well-informed while keeping such threats in perspective.

In the United States, the Center for Infectious Disease Research and Policy² at the University of Minnesota lists six diseases (Category A agents) as most likely to be spread by terrorists. They are anthrax, botulism, plague, smallpox, tularemia or 'rabbit fever' and viral hemorrhagic fever (VHF) of which Lassa fever, Ebola, Rift Valley and Indonesian dengue fever are examples. At present, healthcare systems and effective drugs and vaccines are nearly non-existent.

A measure of the seriousness with which such threats are viewed is that, on November 2, 2004, the National Institute of Allergy and Infectious Diseases

² <http://www.cidrap.umn.edu/cidrap/content/bt/bioprep/index.html>

(NIAD) awarded contracts worth \$73 million to study the mechanisms by which certain infectious agents, including potential bioterror agents, trigger immune reactions.

Examples of bio-warfare

Bioterrorism is not new. As early as 184 BC Hannibal is reputed to have ordered pots filled with serpents—presumably poisonous snakes—to be thrown onto the decks of enemy ships. At the same time, in the days of the Roman Empire, soldiers catapulted corpses and dead animals into besieged cities.

In 1346, it is recorded that Tatar forces besieging Kaffa (now Feodosia in the Ukraine) catapulted plague corpses into the city. More recently, in 1763, a British officer distributed smallpox infected blankets to native Indians during the French and Indian War in North America.

In 1942, as the United States began research into biological weapons, Britain tested anthrax on sheep on the uninhabited Scottish Island of Gruinard. It is still believed to be contaminated.

Iraq used chemical weapons against Iran during its 1980–1988 war with its neighbor. Some years later, Iraq also used chemical weapons on Kurds living in the north of the country, killing large numbers of men, women and children as well as livestock.

During subsequent wars in Iraq—Desert Storm and Operation Iraqi Freedom—there were fears that the country's dictator, Saddam Hussein, would use chemical and biological weapons against coalition troops but they did not materialize.

In the late 1970s, Palestinian terrorists were reported to have spiked Israeli citrus fruit for export to Europe with liquid mercury. In 1986, Tamil separatists threatened to poison tea exports from Sri Lanka with arsenic but no traces were found despite every consignment being checked by importing countries for many years afterwards.

During World War I, the Germans used various human and animal pathogens as agents of germ warfare in Europe.

During World War II, the Japanese used germ warfare against the Chinese and Russians. In 1995, a cult placed containers of deadly sarin nerve agent on five trains on three major lines of the subway system in Tokyo, Japan's capital city. Twelve people died and over 5500 were injured as the gas spread through the trains.

More recently, in 2001, many facilities in the United States received anthrax-threat letters. Some of the envelopes were empty, others contained a white powder. The attacks led to deaths and illness.

Fourteen contracts were approved for the Large-Scale Antibody and T Cell Epitope Discovery Program. Studying epitopes, the regions of infectious agents that elicit immune responses, may uncover new targets for vaccines, therapies, and diagnostic tools against potential terror agents. Such research could also reveal targets among emerging and re-emerging infectious diseases like influenza and West Nile virus.

The NIAD director Anthony S. Fauci, MD, said: “The information generated by this program will deepen our understanding of how components of the immune system defend against certain infectious agents, enabling researchers to design new and improved medical countermeasures.”

Institutions in the United States, the United Kingdom and Denmark are involved in the work.

Realistically, much of the responsibility for preventing or detecting the contamination of food products must lie with the growers, shippers, and processors of our food products. Governments would have to deal with the aftermath.

In September 2002, in a paper published under the aegis of the University of Florida and entitled *Impact of the Bioterrorism Threat on the Food Industries*,³ Douglas L. Archer and Fred H. Degnan⁴ remarked: “What would such an attack on the food supply accomplish? It is difficult to envision that widespread serious harm and death would result, at least no more so than we experience in large outbreaks of food-borne disease. Nevertheless, even if relatively little harm to human health resulted, economic consequences could be great and consumer confidence in the food supply and regulatory agencies shaken.

“The Tylenol tampering episodes of the early 1980s provide a good model of the types of considerations and prophylactic steps the industry should be considering. The episodes energized Food and Drug Administration (FDA)-related industries to implement meaningful anti-tampering plans, including new or modified drug forms and tamper-resistant packaging.

“FDA and the regulated industry developed a cooperative relationship as never before and industry did the creative problem solving.

“In the current situation, FDA likely has its hands full in generally improving its state of preparedness and ability to respond to a bioterrorism emergency. Increased inspection of imported foods also will stress FDA’s existing work force and its program priorities will shift dramatically.

“Recognizing that the level of sophistication in the response to potential bioterrorism will vary with the size of a given company, among other factors, there seem to be some common points for food growers, packers, shippers and processors to consider in the light of current circumstances.

“In the absence of better knowledge about the nature and seriousness of a threat, the distinction between under-reaction and over-reaction is blurred.

“A strong focus on facility and personnel security is a must. Where possible, background checks for all personnel should be required. No one who is not so authorized should have access to the finished food product.

“Do you know who is delivering raw material to your facility and who is transporting the finished product out? What security precautions are those entities taking?

³ http://edis.ifas.ufl.edu/BODY_FS091

⁴ D.L. Archer is a professor in the Food Science and Human Nutrition Department of the Institute of Food and Agricultural Sciences at the University of Florida, Gainesville. F.H. Degnan is a partner in King & Spalding and a distinguished lecturer at the Catholic University School of Law in the United States.

"Anti-tampering plans, if they exist, should be re-evaluated. If they do not exist they should be developed, adopted and implement.

"GAPs (Good Analytical Practices), GMPs (Good Manufacturing Practices) and HACCP (Hazard Analysis and Critical Control Point system) plans should be re-evaluated. Are they sufficient to protect from purposeful acts of food contamination? Do they cover the following points: raw material integrity, packaging integrity, air flow systems, end-line activities, storage and transportation."

Archer and Degnan then list procedures and practices that already should be commonplace in food companies. Consumer complaint handling practices should be checked and fine tuned as should product recall procedures. Companies should know whom to contact at their local enforcement authority—the FDA office in the United States—and how to reach them. They should also know who could provide quick access to analytical methods or microbiological or chemical analyses and improve preparedness among all employees through regular training or simulations.

Companies should also be aware that they should deal differently with a possible bioterrorism event. In any such situation, the enforcement agency should be contacted early in any investigation.

They note: "False alarms will be one price of vigilance." Nevertheless, companies should be aware that the enforcement authorities are likely to be in a helpful mode because everyone recognizes that terrorism is the fault of the terrorists and not that of a farm or a food company.

"Large companies will likely have the resources to take a risk-analysis approach to their operation and use a team of experts to devise prevention strategies, intervention strategies, containment strategies and education strategies . . . aimed at dealing with possible bioterrorism.

"The sharing of strategies and experience among companies with similar attributes, or sharing facilitated by trade organizations will strengthen the whole of the effort and should be encouraged by government. At all costs, complacency needs to be avoided for, as time passes, the spectre of possibly more and more sophisticated terrorist acts looms."

Much useful advice and guidance can be obtained from various Internet sites, especially those of major governments as well as bodies like the World Health Organization (WHO). Obviously, prominent international companies and heavily advertised products are the most likely targets but it is sensible for even the smallest business to be aware of these sources of information and advice.

The WHO has published a 30-page document entitled *Terrorist Threats to Food*. It can be downloaded from the Food Safety Department's site.⁵ In the Introduction, the document warns that threats from terrorists, criminals, and other anti-social groups who target the safety of the food supply are already a reality. It also notes that, in May 2002, the 55th World Health Assembly adopted a resolution expressing serious concern about threats against civilian populations by deliberate use of biological, chemical or radionuclear agents. The purpose of the publication is to provide policy guidance to member states

⁵ <http://www.who.int/fsf/>

for integrating consideration of deliberate acts of sabotage of food into existing prevention and response programs. It details special measures for consideration by the food industry.

In the United States, the Bioterrorism Act of 2002 became law because it was considered necessary following the events of September 11, 2001, which reinforced the need for security to be enhanced. The Act deals with national preparedness for bioterrorism and other public health emergencies; enhancing controls of dangerous biological agents and toxins; protecting the safety and security of food and drug supply; and also water security and safety. The best starting point to check details of the Act is its home page.⁶ It lists the relevant web sites of the federal government as well as those of state and local government and provides copious guidance and advice.

America's first bio-attack

The largest germ warfare attack in America's history occurred in 1984. In a bizarre plot to influence the result of an election for a county commissioner, followers of a 10 000-member religious sect contaminated salad bars in 10 restaurants in The Dalles, a small town in Oregon, with *Salmonella*. As a result, 751 people became ill and 45 people were hospitalized.

The Bhagwan Shree Rajneesh cult reproduced the *Salmonella* strain and slipped it into salad dressings, fruits, vegetables, and coffee creamers at the restaurants.

When that attack proved successful they plotted to take over the Wasco County Commission by making so many people ill on election day that they would be unable to vote, thereby paving the way for the cult's own candidates to be elected.

However, that threat did not materialize. The cult collapsed in 1985 after its leader was convicted of immigration fraud and deported to India, where he died in 1990. His top aide was convicted for masterminding the *Salmonella* attack and other crimes.

One of the largest naturally occurring food-borne outbreak's in American history infected some 220 000 people in 1994. It was the result of a national brand of ice cream becoming contaminated with the same pathogen at the factory.

A 49-page report entitled *Agroterrorism: Threats and Preparedness*⁷ was submitted to the US Congress on August 13, 2004. It was prepared by Jim Monke, an analyst in agricultural policy at the Resources, Science and Industry Division of the Congressional Research Service. In it he writes: "The potential of terrorist attacks against agricultural targets (agroterrorism) is increasingly recognized as a national security threat, especially after the events of September 11, 2001. Agroterrorism is a subset of bioterrorism, and is defined

⁶ <http://www.fda.gov/oc/bioterrorism/bioact.html>

⁷ <http://www.fas.org/irp/crs/RL32521.pdf>

as the deliberate introduction of an animal or plant disease with the goal of generating fear, causing economic losses and/or undermining stability. Attacks against agriculture are not new and have been conducted or considered by both nation-states and substate organizations throughout history.

"The result of an agroterrorist attack may include major economic crises in the agricultural and food industries, loss of confidence in government and possibly human casualties. Humans could be at risk in terms of food safety or public health, especially if the chosen disease is transmissible to humans (zoonotic). Public opinion may be deliberately sensitive to a deliberate outbreak of disease affecting the food supply. Public confidence in government could be eroded if authorities appear unable to prevent such an attack or to protect the population's food supply.

"Agriculture has several characteristics that pose unique problems for managing the threat. Agricultural production is geographically dispersed in unsecured environments. Livestock are frequently concentrated in confined locations, and then transported and commingled with other herds. Pest and disease outbreaks can quickly halt economically important exports. Many veterinarians lack experience with foreign animal diseases that are resilient and endemic in foreign countries.

"Agriculture and food production generally have received less attention in counter-terrorism and homeland security efforts. But more recently, agriculture has garnered more attention in the expanding field of terrorism studies. Laboratory and response systems are being upgraded to address the reality of agroterrorism."

The report also pointed out that the number of lethal and contagious biological agents was greater for plants and animals than for humans. Most of the diseases were environmentally resilient, endemic in foreign countries and not harmful to humans. This made it easier for terrorists to acquire, handle, and deploy the pathogens.

It continued: "Thus, the general susceptibility of the agricultural and food industry to bioterrorism is difficult to address in a systematic way due to the highly dispersed yet concentrated nature of the industry and the inherent biology of growing plants and raising animals."

However, the report also made the point that because an agroterrorist attack might not necessarily cause human casualties, be immediately detectable or have the 'shock factor' of an attack against the more visible public infrastructure or human populations, it might not be the terrorist's first choice of targets. Nevertheless, some types of agroterrorism could be relatively easily achieved and have significant economic impacts. Thus, the possibilities were treated seriously.

Health Canada's Population and Public Health Branch⁸ is another example of a government agency providing useful advice in connection with the measures being taken to protect the security of the nation's food supply. Much additional information can also be obtained by a web search using the keyword 'bioterrorism'. Many sites will be listed, including those of respected universities and

⁸ <http://www.hc-sc.gc.ca/pphb-dgspsp/publicat/ccdr-rmtc/01vol27/dr2704ea.html>

other bodies who have made special studies of the implications of a bioterrorist threat or attack.

Many Internet resources are listed on the site of the Institute for Bio-security at Saint Louis University School of Public Health.⁹ At a different site,¹⁰ the Institute also lists key documents, including documents produced by a wide variety of professional organizations.

Even though businesses should be aware of the threat posed by bioterrorism, international terrorists are more likely to resort to conventional methods as their first choice, like the use of explosive devices. International terrorists are patient. They do not plan outrages to occur on the anniversaries of particular events. They wait for an opportunity to strike when circumstances are right for them and they are unlikely to be caught. The events of 9/11 and the outbreaks of animal diseases like foot and mouth disease and bird flu have taught them that a comparatively small or highly targeted attack can have devastating effects on an industry, a country or even a number of countries.

⁹ <http://www.bioterrorism.slu.edu/bt/internet/academic.htm>

¹⁰ http://www.bioterrorism.slu.edu/bt/key_ref/professional.htm

Significant crises

17.1 The company that set the standard

One of the classic crises which continues to be quoted is that which hit Tylenol in 1982. It was a tragedy without precedent. Yet there were no established guidelines to follow, no public relations agencies or crisis communications experts with experience of dealing with such a calamity. Nevertheless, drug maker Johnson & Johnson (J&J) demonstrated how a major business should deal with such a situation and their actions have long been a textbook example of the finest socially responsible behavior by a major business. They continue to be followed to this day.

Johnson & Johnson, with 165 companies in 53 countries throughout the world, employed 77 000 people at its international headquarters in New Brunswick, New Jersey, USA. But no one had ever conceived the possibility that some of the company's popular pain-relief capsules would ever be poisoned (with cyanide) and lead to the deaths of seven of its hundred million users. Even in the 1980s, with emerging world crises affecting major international companies, no one thought such a thing could happen.

The first inkling of the problem occurred when a reporter asked the company for a comment because the medical examiner in Chicago had claimed that people were dying from poisoned Tylenol capsules. J&J gathered information as quickly as possible. Then, because public health and lives were being threatened, the company issued a warning through the media to everyone in the United States because it was impossible to know the extent of the tampering.

In addition, J&J alerted the medical community, the Food & Drug Administration (FDA) and the Federal Bureau of Investigation (FBI), stopped production and 'pulled' all advertising for the headache remedy. The company also offered a \$100 000 reward for information leading to the identification of the person or persons responsible for the poisoning.

Within a few hours of the journalist's telephone call, a crisis team had been set up. Its strategy was simple—protect both consumers and the brand, no matter how costly and difficult. Little did they realize that the disaster would

eventually cost the company a staggering loss of some \$100 million in the currency of the day.

The team's first action was to withdraw from sale all Tylenol capsules in Chicago and the surrounding area. Millions of them were inspected and two bottles of contaminated capsules were found in one store. This led to the national recall of every bottle of Tylenol and the placing of full-page advertisements in all leading newspapers warning of the problem.

Johnson & Johnson destroyed its entire stock of Tylenol. The risk of further deaths was too great. The company also set up a toll-free consumer hotline to deal with calls from worried consumers. Many of the 33 phones were manned by employees who had been affected by the closure of the factory. They dealt with 30 000 calls in the four weeks following the announcement of the hotline.

In all, there were 80 000 separate news stories in US newspapers as well as hundreds of hours of national and local television and radio coverage. Journalists made over 2000 telephone calls to the company. Three press conferences were held, two of them being transmitted throughout America by satellite. Journalists could ring free-phone numbers to listen to recorded statements from the company—a shrewd way of easing the direct load on the press center. Some 730 calls were made to these special numbers.

Simultaneously, J&J launched an extensive employee relations program—an audience often neglected by companies under siege. But most employees are good, committed ambassadors for their companies and an ideal channel of communication. As much as anyone else, they too wish to be reassured that they are working for a caring, responsible organization.

Like every major international company, Johnson & Johnson's marketing was extremely sophisticated—as one would expect from a pharmaceutical giant. From the first day of the crisis, surveys were carried out to determine people's reactions to the actions being taken by the company, to track their awareness of the problem and their attitude to the product. Physicians and pharmacists were surveyed. Even journalists were regularly quizzed to get their reactions to the company's actions and the service it was providing for them. Thousands of video interviews were conducted in the street and the tapes were analyzed to find out more about what people were thinking.

Within two months, most of the medical profession and pharmacists indicated they would recommend Tylenol capsules again provided they were in tamper-resistant packaging. Consumers understood the capsules had been contaminated after leaving the factory. Johnson & Johnson canvassed support for the re-launch, coupled with a call for legislation to make product tampering a crime. More than 160 Congressional offices in Washington were visited as part of this massive recovery effort. Tylenol came back on the market in the first tamper-resistant packaging ever to be introduced. The capsules were triple-sealed in a glued carton with a cellophane wrap over the neck of the bottle and a foil membrane sealing its mouth.

The medical community and pharmacists were told in detail about the steps which J&J had taken to make the packaging tamper-resistant, samples of Tylenol tablets were distributed to them as well as samples of the capsules in their new packaging. The re-launch was supported by massive advertising.

Then the nightmare began all over again, just when the brand had clawed back an even greater share of the over-the-counter analgesic market. A young woman died in Bronxville, New York from Tylenol capsules poisoned with cyanide.

A crisis team immediately stopped all production, offered a \$100 000 reward, began to trace the suspect batch of capsules and again withdrew all advertising... but not in time to stop a new commercial being screened just before the story of the woman's death.

The FDA analyzed thousands of Tylenol capsules from the Bronxville area and found a bottle containing five which had been poisoned. It came from the same store from which the woman had bought her capsules. The triple-seal had been opened and subsequently closed again.

The company withdrew the capsules permanently from sale and replaced them with oval pills. The criminal, or criminals, who poisoned the capsules have never been found.

The effects of such a crisis would devastate most businesses. Johnson & Johnson were able to survive the succession of tragedies because of their size, their resources and the professionalism of their management. While it did not have any written crisis plans or procedures, the company operated in a delicate and highly ethical market place. Long before the growth of consumerism in America, Robert Wood Johnson, son of the founder of the company, had declared: "In a business society, every act of business has social consequences and may arouse public interest. Every time business hires, builds, sells, or buys, it is acting for the people as well as for itself, and it must be prepared to accept full responsibility." That was written in the 1940s. It holds as good today as it did then, for any organization, no matter how big or how small.

(An extensive description of the Tylenol crisis can be found in *The First 24 hours—a comprehensive guide to successful crisis communications* by Dieudonné ten Berge, published by Basil Blackwell, £25, in 1990; ISBN 0-631-17069-3. The book may well be out of print but perhaps a second-hand copy could be tracked down using the Internet).

17.2 The company that fought back

Another American company, soft-drinks giant Pepsi-Cola, wrote a new chapter in crisis management in June, 1993. It led to the company and the FDA being praised for their handling of the situation by both the president at that time, Bill Clinton, and in the House of Representatives.

Events began to unfold at noon on Thursday, June 10, when a Seattle television station informed Pepsi's local franchise bottler, Alpac Corporation, that an 82-year-old Tacoma man was claiming to have found a syringe in a can of Diet Pepsi though nothing similar was used in any aspect of Pepsi's manufacturing or quality control processes.

Initially, Pepsi-Cola judged the matter to be a local issue—standard operating procedure for the company's franchise bottlers and a logical and sensible approach. The local bottler was obviously in the best position to respond to its 'own' local product quality issues.

Alpac's crisis management team and manufacturing staff worked round-the-clock with regulatory officials to investigate the complaint. From the outset, management responded to all press, customer and consumer enquiries with a policy of openness and honesty.

The FDA officials began a thorough examination of the plant, its production records and its personnel. Television crews were allowed to tour the factory to see for themselves how its production and quality assurance processes were such that product contamination or infiltration was virtually impossible.

Yet, within 12 hours, another report of a syringe being found in a can of Diet Pepsi hit the headlines. This led Alpac and the FDA to issue a regional warning to those areas supplied by the plant—Washington State, Oregon, Hawaii, Alaska and Guam. Consumers were advised to inspect all cans of Diet Pepsi for signs of tampering and to pour the contents into a glass or cup before drinking.

Though it was a regional alert, because Pepsi is such an internationally famous brand, the warning received nationwide attention on network news programs on Sunday, June 13, and the issue became the nation's top news story for the next 96 hours.

By the next day, copycat claims were beginning to be made in different parts of the United States. Within a few days, they were coming in from 23 states, from Alabama to Wyoming.

What began as a local matter had exploded into a national issue! Pepsi expanded its core crisis team to manage and respond to the situation. Media reports were widespread. Thousands of enquiries were pouring in from worried consumers, customers, reporters, employees and regulatory officials. The team provided the facts as Pepsi-Cola learned them to all these groups, serving as the clearing house for new information as it came in.

The team was 12-strong. It was headed by Pepsi president Craig Weatherup. The crisis coordinator was Rebecca Madeira, vice-president of public affairs. She directed the team's actions and coordinated communications to ensure that the company spoke with a single voice to all its audiences.

The key groups in the team included:

- **Public Affairs.** A team of six handled the onslaught of press calls and dealt with hundreds of radio, television, and print interviews. A separate team wrote and developed material for the media, including video news releases, audio tapes, press releases, charts, and photographs. Six government affairs managers helped to disseminate the latest facts to Pepsi's 400 bottlers.
- **Consumer Relations.** Two dozen specialists manned Pepsi's toll-free telephone lines 24 hours a day to allay consumers' fears. They were helped by 40 volunteers from within the company. The tenor of the phone calls also provided a useful indication of public attitudes.
- **Scientific and Regulatory Affairs.** Technical and product safety experts were the link to the FDA's Office of Criminal Investigation and tracked each syringe complaint.
- **Sales and Marketing** was the channel through which information was relayed to supermarkets, restaurants, convenience stores, and others who sold Pepsi products. Attention to these important groups helped to keep the business running smoothly.

- **Manufacturing.** Experts helped the local FDA investigators and in developing effective explanations of the production and quality control processes for the press and the public.
- **Legal Department.** In-house experts coached the crisis team on legal aspects of communications and reporting issues.
- **Communications.** Constantly updated information was channeled through a *Communications Clearing House*, whose responsibility was to relay it to Pepsi bottlers, the company's 50 000 employees and hundreds of thousands of customers and consumers.

With this structure in place, the team assessed the situation. Rebecca Madeira said: "We had to be absolutely sure this tampering could not possibly have happened in any of our plants. At the same time, we needed to develop a responsible way of talking about the situation before we went public on the issue."

Therefore, the core team focused on three critical questions:

- Was there a health risk?
- Was there any possibility that syringes could be getting into cans at Pepsi bottling plants?
- Was nationwide tampering occurring?

The FDA took the lead in answering the question about a health risk. The agency determined that the two Seattle needles carried no risk of infection. (Colas are acid products of low pH, both as a result of carbonation and of the phosphoric acid ingredient generally used.)

The agency also exhaustively inspected Pepsi's manufacturing procedures. Every canning line at the plants from which contaminated drinks were alleged to have originated was studied carefully to see if there was any way to infiltrate the process. Consumers making complaints were also interviewed. The result: it was decided that the high speed and integrity of the lines ruled out internal tampering. Whatever was turning up in cans of Diet Pepsi had been placed there after they had been opened.

As more cases surfaced across the country, the possibility of sabotage was ruled out. There was no correlation between the complaints, when the cans were made or where they were made. They were produced at different plants, some as much as six months previously, others around six weeks before and some as recently as six days prior to the complaints being made. For so many cases to turn up in so many different circumstances was illogical.

Both FDA commissioner David Kessler and Pepsi president and chief executive officer (CEO) Craig Weatherup agreed there was no health risk and that, most probably, there was no relationship between the tampering allegations cropping up right across the country. They also agreed that a recall would not solve the problem.

Rebecca Madeira explained: "We were committed to putting consumer safety first, but clearly a recall would not end the crisis or restore consumer confidence. The only thing that would do that was to discourage any tampering with an opened can . . . in the strongest possible terms."

Secure in its grasp of the facts and backed by the FDA, Pepsi went on the offensive. Craig Weatherup repeatedly declared: "A can is the most

tamper-proof packaging in the food supply. We are 99.99% certain this didn't happen in Pepsi's plants."

The crisis team set about producing video footage that would clearly show just how safe Pepsi cans really were. The pictures they needed were in the company's bottling plants, where high-tech, high-speed equipment turned each empty can upside down, cleaned it with a powerful jet of air or water, inverted it, filled it and closed it—all within nine-tenths of a second and at the rate of 1200 cans a minute!

On Tuesday afternoon, June 15, the video footage was beamed by satellite to hundreds of TV stations across the country. It was seen by some 187 million people, breaking all records for such a 'feed'. The total represented more viewers than watch the Super Bowl, America's major sporting event which is equivalent to the Football Association Cup Final or the Grand National horse race in the United Kingdom or the crucial mountain stages of the Tour de France cycle race in Europe.

Pepsi instinctively knew it had to fight videotape with videotape. It did so with four video news releases issued in as many days, reaching some 365 million viewers. By the end of the week, Weatherup had appeared in person on a dozen network television news shows, including the *MacNeil/Lehrer* newscast, ABC's *Nightline* and *Good Morning America*, NBC's *Today*, CBS's *This Morning* and CNN's *Larry King Live*. Several of these programs were seen on satellite television throughout the world. During the same period, Pepsi spokespeople conducted more than 2000 interviews with newspaper, magazine, TV, and radio reporters.

"Our strategy was to reassure the public that this was not a manufacturing crisis," recollected Madeira. "What was happening with syringes was not occurring inside our plants."

Probably the most sensational video news release was that made available on Thursday, June 17. It featured a surveillance tape showing a woman putting a syringe in a can while in a convenience store.

Shot in the store in Aurora, Colorado, the tape purported to show the woman putting a syringe into an open can of Diet Pepsi while at the checkout counter and later claiming the can had been tampered with. The VNR (video news release) was seen by an estimated 95 million viewers and helped to turn the tide in favor of Pepsi-Cola. The woman was found to have 16 aliases and a lengthy record for forgery, fraud, and theft. Subsequently, she was sentenced to 51 months in prison.

Between June and September, 55 other people were arrested for making false claims and others started to retract their stories.

David Kessler also helped to write this new chapter in crisis management by appearing on some TV programs with Craig Weatherup and stating at a press conference that not one tampering report had been confirmed by FDA investigations and that the agency rejected the possibility of nationwide tampering. As far as the author is aware, this was the first time a major regulatory authority had given such a public assurance.

The FDA's involvement gave greatly enhanced credibility to Pepsi-Cola's general stance over the tamperings. Indeed, Rebecca Madeira said that the

agency was the company's crisis counselor, using its vast experience in copy-cat crimes to help Pepsi. Madeira also made the point that the FDA was valued by the general public as the neutral third-party, protecting consumer interests, perhaps expressing more confidence in the authority than has been seen elsewhere.

On Monday, June 21, Pepsi-Cola continued its bullish stance. Display advertisements were run in a range of newspapers, from *USA Today* and 11 other nationals to between 300 and 400 regional and local newspapers proclaiming 'Pepsi is pleased to announce . . . nothing'.

The adverts emphasized that the stories were a hoax with no evidence to support a single claim and went on to announce special offers to save consumers money throughout the summer. It ended by thanking "the millions of you who have stood with us" and declaring: "Drink all the Diet Pepsi you want".

In adopting such a positive approach, Pepsi-Cola had a number of factors on its side. The brand was well established, popular and trusted. Its management was highly professional. The company had long-established links and extensive experience in dealing with its key audiences—the media, consumers, customers, regulatory authorities and employees. Also, Pepsi knew it had to act swiftly and decisively to defend its multi-billion dollar market, especially a few days before the July 4 Independence Day celebrations and holiday period, a vital sales period in the United States. Its 50 000 employees worked to assemble the facts and to allay customer and consumer concerns. Even the FDA came to its support. It had truth on its side and presented its case in such a way that it was perceived to be acting in the best interests of its consumers.

There is much to learn from this case history, no matter how large or modest a company may be. While this was the most serious crisis which Pepsi had had to deal with, the people who dealt with it knew each other well and had worked together successfully on many lesser incidents. They were not a group of strangers meeting for the first time in a highly stressful situation. They had long established procedures and the necessary resources for handling such incidents. When the problem arose, they established the facts quickly and accurately. They set up the structure to deal with the crisis and those involved had clearly defined roles—dealing with the media, consumers, customers, regulatory officials and employees. A clearing house was established for all communications so that the company spoke with a single and unified voice.

At the outset, when the pressures must have been enormous, the core crisis team developed a responsible way of talking about the situation before the company went public on the issue. They provided the media with what they needed to report the crisis—video tape, press releases, photographs, diagrams, constantly updated information, skilled press officers who understood their requirements and a chief executive officer who was well-prepared and readily available for television appearances and other interviews.

The company operated to the media's timetables and provided simple, clear messages. It fought videotape with videotape, being fully aware that television is one of today's top news-making tools and that people believe what they see with their own eyes and hear with their own ears.

Rebecca Madeira said: "We concentrated on what consumers care about—the can of Pepsi in their hand, not some kind of assault on Pepsi's national name. We also gave them as many opportunities as we could to let them see real people solving real problems."

Obviously, a modestly sized company will not have the same resources and skills. But it can still ensure it knows its own regulatory officials and that it has contact with its local and trade media. The company will have dealings with its trade customers. It should ensure that it has emergency contacts within all those companies and is aware of the crisis arrangements within each one. Unless its business is exclusively that of a supplier, agent or importer, it will have dealings with its consumers.

It should always strive to make those dealings friendly and informal. Letters should be clear and free from technical jargon so that they are easily understood. All letters from consumers should be monitored to identify any trends or patterns which may be emerging. Every time anyone complains about the manner in which a complaint has been dealt with, consideration should be given to whether it reveals a need to improve or change the methods involved. When there is a serious problem no company should ever forget one group of people who will be seriously concerned about the matter—its own employees. If the relationship with them is that of a good employer, the business will find they are an invaluable asset. Pepsi had 50 000 employees on their side. They were kept well informed. They were good ambassadors for the company. They were also effective communicators to their own families, friends and neighbors because they were well informed and they too were able to speak with a single 'voice'.

The cohesion within the Pepsi team and the company generally, also underlines the need for a good interface between all functions within an organization. In terms of crisis management and issues tracking and management, it is vital that such a rapport and understanding exists between marketing, public relations, technical, sales and legal departments. Good communications between these various expertises is an essential part of any smooth-running business. It is the only way to ensure that a business does not find itself in embarrassing situations, such as being in the midst of a crisis of which the employees are unaware until they go home and switch on their television sets or go out for a drink with their friends in the evening. Do not laugh. It has happened!

At least one or two senior executives of any company should undergo some media training and attend at least one if not occasional crisis management courses or conferences. This will give them an insight into the media's requirements and also enable them to decide whether to handle a serious crisis internally should one arise or whether the company would be better served by employing an outside specialist. Again, if a consultant or agency is to be involved, it is essential to make contact with them before any problem arises rather than at the point when matters are clearly getting out of control!

Pepsi had a guiding philosophy or mission statement: "We will be an outstanding company by exceeding customer expectations through empowered people, guided by shared values".

That operating dictum served the company well, especially when Pepsi was under fire and, writing about the way the company's mission statement stood the test, Pepsi said: "A crisis means accelerated events, unexpected turns and constant pressure. There is no time to think about what your company stands for. Those values have to be well-entrenched.

"Ours were. By instinctually and constantly checking ourselves against what was best for our customers, we constantly made the right choices. Not just management, everyone. Our philosophy lighted our steps in the midst of the storm.

"Likewise, the merit of empowered people became readily apparent. When a crisis threatens your very existence, an organisational chart is of limited utility. Employees must be ready, willing, and able to accept extraordinary new responsibilities at a moment's notice.

"Pepsi's were—and for the simple reason they were used to it. Everyday they are expected and encouraged to use their own wits, judgement and initiative to make decisions based on customer needs.

"So, in a crisis situation, when employees suddenly found themselves with important, often crucial duties, they did not hesitate. But, rather, responded with singleness of purpose.

"Finally, and most important in this crisis, Pepsi's guiding philosophy bound us together and braced our resolve. All 50 000 employees were unified in a sole mission: Do what's right for our customers.

"So, at least in this sense, the Pepsi Hoax gave us something very valuable. An appreciation of that this company is all about. A vision isn't worth much if it only works on a clear summer day. The hoax defined the power of teamwork, the energy we get from each other and the pride we share at Pepsi."

During the week of the hoax, Pepsi lost approximately \$40 million in sales. The impact varied widely from market to market. In one location, on the first day of the scare one bottler lost the sale of thousands of cases. In other markets business held steady. In some, sales actually went up.

But the dips proved temporary, and sales rebounded strongly. One week after the hoax, consumers bought 800 000 more cases of Pepsi products than the week before. American Independence Day, on July 4, proved to be Pepsi's strongest sales week of the year as millions stocked up for holiday parties. Pepsi had survived the crisis and emerged stronger than ever!

President Clinton said on July 2: "I was pleased to see that [FDA] so effectively resolved a potentially harmful situation."

A few days previously, speaking in the House of Representatives on June 30, the Hon Hamilton Fish, Jr, said he rose in support of one of the companies in his constituency and the over 50 000 people who work for it nationwide.

He declared: "Two weeks ago, the Pepsi-Cola Co underwent a series of scurrilous attacks—public accusations that went to the very heart of the safety of the product that Americans and the rest of the world have been enjoying for almost 100 years.

"Needless to say, these accusations were proved false. There were no syringes or needles in sealed Diet Pepsi cans. This deception was perpetuated by hoaxers who were out for celebrity or personal gain.

"Let me applaud both the Pepsi-Cola Co and the US Food and Drug Administration in the way they reacted. This was no simple scam, but a challenge against the security of the nation's food supply.

"The employees of Pepsi, and in particular its CEO Craig Weatherup, made it clear from the moment the issue became one of national concern that they were willing to share all relevant information with the public at large.

"It was apparent that the first concern of Pepsi was for its consumers. Their can line is virtually tamperproof. The fact that so many different can lines, spread out all over the country, could be tampered with at the same time, was patently impossible.

"This was a message that was so self-evident that the media reported it clearly and precisely.

"The FDA, and especially commissioner David Kessler, should be commended for their swift reaction. The agency's new criminal investigation team swung into action immediately. Inspectors worked tirelessly to investigate each and every claim. And when the truth came out, Dr Kessler did not hesitate to inform the public in no uncertain terms that the suspected tampering was a sham.

"Many arrests have already been made. Despite all the claims—and they were numerous—the FDA has not discovered one single case of tampering with an unopened can."

He went on to commend Pepsi and its employees for 'in typical Pepsi fashion' not playing the victim, even after such an emotional and personal attack on their good name. Instead, they were taking the high ground and thanking their customers for standing by them.

The manner in which the crisis was handled also points up the change which has been under way in public perceptions of product problems as well as the strategies to handle them. Most notable, was General Motors Corporation's (GMC) dramatic exposure of the fact that NBC had staged footage of a GMC truck exploding for use in an investigative program, which was revealed when the automobile giant successfully took the television company to court.

After the Pepsi incident, leaders of opinion began to declare that journalists should be concerned about the impact of 'scare' stories. The Foundation for American Communications pointed out that a ten year study of product tamperings showed that widespread publicity generated an increase in copy cat tamperings. In one example, after news coverage of some isolated cases of foreign bodies being found in one particular product, the rate of tampering complaints rose from fewer than 20 a month to over 200 in a similar period. In all, there were 487 complaints after that first report... and none was ever substantiated or verified.

After years of being pilloried by critics and adversaries of all types, big business had begun to fight back when it was convinced it was in the right!

The author welcomed such a change as much as many other communications professionals but, in his view, it is a path that can only be taken with confidence by a company or a brand which has a long-established reputation, is generally trusted by its consumers (showing yet again the benefits of being regarded as a good corporate citizen) and which has substantial expertise and financial resources on which to call.

In a very different type of incident, the author was involved in a problem when a river was polluted, apparently by effluent from a pickle factory which was new to the area. The company owning the pickling plant was well-known nationally but was only just starting up the plant in that area so there had not been any opportunity to build rapport and trust with the local community. Therefore, it is not surprising that, without hesitation, everyone blamed the newcomer. The company was convinced it could not be responsible for the incident or that, if it were involved, it could only have been partially to blame. So it stuck to its guns through thick and thin. The issue raged for months and was resurrected every time there was a problem relating to the river.

Many years later another local company was prosecuted for polluting the river in a different incident. In court, it explained that the discharge had come from an effluent outlet about which it was unaware. Perhaps that unknown pipe also had been the source of the original contamination, but it will take many years yet for the stigma to leave the first company, even though it would seem to have been vindicated by the evidence given in court.

Ironically, the matter would have been resolved and no doubt soon forgotten if the company had fallen in with the public perception and accepted responsibility, paid compensation to those affected by the pollution and restocked the river with fish at a carefully staged photo opportunity. However, it is not easy to accept responsibility for something you are convinced you did not do, no matter how expedient such a course might appear to be.

The Pepsi-Cola incident led to calls for the public and the media to accept that businesses, like defendants in court, should be regarded as innocent until proved guilty. However, before critics begin to give companies the benefit of the doubt, more businesses have to be seen to be acting swiftly and positively to defend their genuine innocence—and not just their profits!—while still acting in the best interests of their consumers. That is a tricky path if you accept that many product problems, inevitably, will always be caused by human error no matter how hard everyone tries to produce safe, wholesome foods, drinks and other products.

Source: The Pepsi Hoax: What went right?, Pepsi-Cola Public Affairs, 1 Pepsi Way, Somers, New York 10589-2201, United States; Public Relations Society of America; Wall Street Journal, June 17, 1993; New York Times, June 17, 1993; New York Post, June 17, 1993; Advertising Age, June 21 and 28, 1993; Jack O'Dwyer's Newsletter, June 23 and 30, 1993; Beverage Periscope, June 30, 1993; Business Weekly, July 5, 1993; Progressive Grocer, August 1993; and Public Relations Journal, August 1993.

17.3 Anatomy of a crisis

June 10 (Thursday):	First syringe complaint is reported.
June 11 (Friday):	Second syringe complaint is reported.
June 12 (Saturday):	Pepsi's franchise bottler in Seattle issues a consumer advisory note.
June 13 (Sunday):	Food & Drug Administration issues warning to Diet Pepsi drinkers in four states and Guam.

June 14 (Monday):	Pepsi hoax is lead story on all four news networks in United States.
June 15 (Tuesday):	Pepsi president Craig Weatherup appears on all networks with video footage of canning line. FDA announces first arrest.
June 16 (Wednesday):	186 million viewers hear Pepsi's '99% sure' message.
June 17 (Thursday):	FDA's Kessler confirms hoaxes. Pepsi airs video of open can tampering.
June 18 (Friday):	Pepsi declares the scare is over.
June 19 (Saturday):	Pepsi surveys consumers in five regions to gauge public response.
June 20 (Sunday):	Editorials in national media in US debate the cause of the hoax.
June 21 (Monday):	'Pepsi is pleased to announce . . . Nothing' advertisement runs in major US newspapers.
June 22 (Tuesday):	Employees rally for Pepsi rebound plans.
June 23 (Wednesday):	Media reports Pepsi sales drop 3% during hoax.
June 24 (Thursday):	Local Pepsi teams launch 'Thanks America!' program.
June 27 (Sunday):	Media calls for stiff penalties for hoaxsters.
June 28 (Monday):	Employees hit the street to say thanks with dollar-off coupons.
June 29 (Tuesday):	Employees build sky-high displays in stores.
June 30 (Wednesday):	'Thanks America!' advertisements appear in papers throughout United States.
July 1 (Thursday):	Retailers support Pepsi with special congratulations advertisements.
July 2 (Friday):	President Clinton congratulates FDA and Pepsi.

17.4 The scandal that sucked in an industry

More than 14 000 people in Japan became ill after consuming the milk or yoghurt products from the country's largest dairy producer, Snow Brand Milk Products, in June and July 2000. The first complaints of food poisoning symptoms prompted the Osaka municipal government to order the company to recall the milk. However, Snow Brand failed to recall two other products even though it knew they came from the same production line.

Tests on samples of low-fat milk showed evidence of contamination with *Staphylococcus aureus*, and *S. aureus* was also found in a milk storage tank. Subsequently, *Bacillus cereus* was found in the valves of other tanks used to store the company's low-fat and calcium-enriched milks as well as a yoghurt drink.

The municipal government ordered Snow Brand to recall some 300 000 items from a total of 59 lines produced at the plant and also to cease production indefinitely. Allegations flew thick and fast. It was claimed the company had failed to file a mandatory report concerning the construction of at least one of its milk storage tanks, resulting in an oversight by health officials. On top



'Mad cow disease' (BSE) led to the United Kingdom's government being heavily criticized.

of that, it was further alleged that, when the first contamination occurred, the tank valve had not been cleaned for three weeks—a clear contravention of health and safety regulations.

But worse was to come. Police swooped on the Osaka plant and the Japanese health minister announced sweeping government checks of all the company's dairy facilities throughout the country. Consequently, Snow Brand found itself accused of illegally mixing returned and out-of-date milk products back into the production line as well as carrying out the mixing without sanitary or temperature controls. It was reported the product recalls alone probably cost the company more than Yen 5 billion (some US\$45 million).

Snow Brand was accused of trying to cover up the scandal and of failing to warn consumers quickly enough. At the same time other companies found themselves drawn into the crisis. Murayama Milk recalled four tones of its products and temporarily suspended production after reports that three people experienced abdominal pains after drinking its milk. Subsequently, traces of *Bacillus cereus* was found in some bottles of milk.

Morinaga Milk Industry Co Ltd, the country's third largest dairy producer, closed one production line after some 20 schoolchildren complained of abdominal pains and nausea after drinking milk it had supplied. Some also said the milk smelled strange.

The company explained that the milk had become contaminated with residues of a solution used to disinfect the bottles before filling. The concentration had been increased because of an impending check by health inspectors in the wake of the Snow Brand incident.

But Snow Brand was dogged with further problems. Once Japan's top dairy firm, one of its subsidiaries was also hit with a meat-labeling scandal and the company was left struggling to survive in the face of lost consumer confidence that began at the outset when the company tried to cover up the original problem.

Many of its employees lost their jobs as factories were closed, parts of the business were disposed of and it was not until the 2003 results were posted that, for the first time in five years, the company had finally returned to profitability. Even so, its sales were less than a quarter of what they used to be before it was swept up in the scandal. To survive, Snow Brand even sold its mainstay milk business because it had become tainted beyond redemption. In its 2003 financial results, it claimed to hold the top domestic market share in butter, cheese, and margarine.

17.5 The crisis that was described as a wake-up call for meat industry

Product recall procedures in the United States were changed following the country's biggest-ever meat product recall. Five revisions were made in the wake of the voluntary recall of 27.4 million pounds of fresh and frozen cooked sandwich meat after an outbreak of listeriosis.

On October 12, 2002, the Pilgrim's Pride Corporation facility in Franconia, Pennsylvania, initiated a voluntary recall following the discovery by the US

Food Safety and Inspection Service (FSIS) of a strain of *Listeria monocytogenes* determined to be responsible for the outbreak in Northeast America. The outbreak led to the deaths of seven people and many more became ill.

Looking back, Dr Barbara J. Masters, acting administrator of the Service, said: "In an effort to determine the cause of this outbreak, more than 50 FSIS investigators and scientists launched a joint investigation with the Centres for Disease Control (CDC) in September 2002. This unprecedented epidemiological investigation conducted by the CDC and FSIS was a model of inter-agency cooperation. In the course of the investigation, FSIS investigated multiple processing facilities and analyzed more than 1000 product and environmental samples. In addition to discovering the outbreak strain in environmental samples taken at the Pilgrim's Pride facility, FSIS found the strain in product samples from Jack Lambersky Poultry Products, Inc, in New Jersey.

"The five recommendations... related to incomplete documentation of the recall, which was closed in June 2003. FSIS has made substantial changes to its recall process, strengthened verification activities and established clearer lines of authority to increase the possibility that contaminated products are removed from commerce and that consumers receive information promptly."

Directive 8080.1 Recall of Meat and Poultry Products enhances instructions and guidance to agency personnel responsible for verifying the effectiveness of a recall. To improve speed and efficiency, the revised directive enables the collection of product distribution information at the plant to begin prior to microbiological testing results becoming final. The agency has also increased the number of effectiveness checks it carries out during Class I recalls, those posing the greatest potential threat to public health, in the event of illnesses or when product has been distributed to schools or at-risk populations.

The revised directive also includes timeframes for reporting verification activities with FSIS and provisions for locating products at the point of sale and ensuring the proper disposition of recalled products. The Service was continuing to review the issue to determine appropriate ways to further strengthen the recall process.

Following the development and publication of a risk assessment for *Listeria monocytogenes* in ready-to-eat meat and poultry products, the Food Safety and Inspection Service published a rule in June 2003 to further drive down the rate of the pathogen. The rule related to all establishments producing ready-to-eat products that are exposed to the environment after cooking. It requires them to develop written programs to control this particular strain of listeriosis and to verify the effectiveness of those programs through testing.

The rule also encouraged plants to install new technologies that eliminated or suppressed the growth of *L. monocytogenes*. Establishments are now required to share testing data and plant generated information relevant to their controls with the FSIS. Plants producing high- and medium-risk products and plants that relied on sanitation procedures alone to control this particular bacteria now receive most intense agency regulatory scrutiny.

Following the introduction of the new rule, a survey showed that plants had strengthened and intensified their programs to control listeriosis. Plant testing



The outbreak of food and mouth disease in the United Kingdom was unique in terms of size and geographical extent.

had been greatly expanded and the use of new technologies for eliminating this pathogen were becoming widespread.

The FSIS's administrator, Gary McKee, described the crisis as a wake-up call for the industry.

Pilgrim's Pride Corporation is the United States's second-largest poultry producer. The nation-wide recall covered deli meat sold under the corporation's Wampler Foods brand. The chicken and turkey meats were sold in retail groceries, in delicatessens and by food service distributors.

Pilgrim's Pride originally recalled 295 000 pounds of turkey and chicken products but expanded that three days later and stopped production at the plant when *Listeria* was found in samples taken from floor drains.

Consumer and environmental groups blamed the Bush administration for the recall, saying the administration had failed to set adequate safety standards for the meat industry, though officials at the Agriculture Department denied the accusations. The protesters claimed that the administration had failed to adopt new regulations covering inspections for the pathogen that were initiated by President Bill Clinton in the months before he left office. They said adoption of these tighter standards would have helped prevent both the outbreak and the record breaking recall.

They also questioned safety standards throughout the industry now that animals and poultry were raised on huge feedlots and plants, and were processed in giant slaughterhouses. They contended that the chances of contamination had risen with the development of these enormous meat-processing operations while inspection standards had loosened.

The crisis inspired an editorial in the *New York Times* on December 11, 2002. Entitled *Dangerous Chickens*, it joined in the claims that the recall might have been avoided if the Bush administration had instituted rules designed to protect consumers from the dangerous bacteria. It urged the Agricultural Department to treat the matter with greater urgency and move forward with new rules. It also called for an end to misleading labeling practices. "Packaged deli and luncheon meats now labeled 'cooked' and 'ready-to-eat' can have dire consequences for pregnant women, the elderly and immune-suppressed people who eat them without reheating; the labels should say so."

Executives at Pilgrim's Pride insisted that the Franconia plant was safe and that any problems were quickly fixed. Government and Wampler officials said that none of the meat returned under the recall had tested positive for the same rare strain of *Listeria* that caused the outbreak. They also said there was no proof anyone had been sickened by Wampler's turkey deli meats and other ready-to-eat products. Identical bacteria had been found in turkey processed by an unrelated company and health officials said it remained unclear how most of the victims became ill.

Pilgrim's Pride hit the headlines again in July 2004 following allegations of cruel and improper treatment of chickens at its slaughterhouse in Moorefield, West Virginia. The Corporation dismissed 11 employees, including a superintendent, a supervisor and a plant foreman following the release of an undercover video showing plant workers stomping on live chickens and throwing them against walls.

- The largest previous meat recall in the United States was in 1997, when Hudson Foods recalled 25 million pounds of ground beef after 15 people in Colorado fell ill from *E. coli* after eating hamburgers from its plant in Columbus, Nebraska. The Wampler recall came three months after ConAgra Beef recalled nearly 19 million pounds of ground beef because of *E. coli* contamination at its plant in Greeley, Colorado.

Interesting case histories

No crisis is ever exactly the same as any other. There are always variations and different factors to be taken into consideration, even in incidents which appear to be identical. But much can be learned from case histories. The details of those which follow have been culled from published information or personal experience. Some have been selected as interesting examples of how a problem has been tackled or even exploited. Others have been chosen because, in the view of the author, they have been watersheds in establishing guiding principles in the way in which crises should be handled. Some of the content may even be hearsay, but this is felt to be important to convey the atmosphere at the time.

Most crises arise unexpectedly. That is their nature. If it were not, the problem probably would never have become a crisis. However, a small proportion can be anticipated sufficiently in advance for preliminary preparations to be made.

18.1 The crisis that brought down a government

In Europe, a food crisis brought down a government. It happened in 1999 and is described in one of the regular articles the author contributed to Food Safety & Security, a specialized subscription newsletter produced in the United Kingdom which has an international circulation. He wrote:

“Few situations have so dramatically underlined the vulnerability of the food industry and the problems of dealing with a major crisis, its ramifications and consequences than the discovery of dioxins in animal feed from several producers who had used fats from a supplier near Ghent, in Belgium.

“Overnight Belgians, renowned as a nation of food lovers, were forced to become vegetarians as stores cleared their shelves of poultry, eggs, beef, pork, and related products. *Les Belges* could not even buy a few of their country’s delicious chocolates to console themselves because they were suspect as well.

“There were allegations the government had known of the problem for several weeks. Two ministers resigned and, a fortnight later, their center-left government was swept aside in parliamentary elections, leading to Prime Minister Jean-Luc Dehane, Europe’s longest serving premier, resigning as leader of the Christian Democrats.

"Two executives of the company implicated in the scandal were arrested and accused of tampering with the fat that was supplied to the animal feed mills—various oils and fats have been mentioned but one of my sources suggests the dioxins came from used engine sump oil. A Dutch minister also resigned after criticisms of the way he handled the situation.

"In a typically confused situation, everyone was suddenly trying desperately to be seen to be putting the interests of the consumer first, from the European Commission and members of the European Parliament to ministers in bordering countries. The Belgian government—in a "spirit of openness"—even added a special section to its web site (<http://belgium.fgov.be>) to provide its version of events. It was an enlightened move and was probably the first time in Europe that the Internet had been used for such a purpose.

"Governments in countries as diverse as Finland, Russia, Saudi-Arabia, South Korea, Ghana, Australia, and the United States announced import bans and issued warnings as the extent of Belgium's export trade emerged. Some even banned all food imports from the European Union.

"The situation developed into the most serious food crisis since mad cow disease (BSE), attracting predictable headlines like Mad Chickens and Chickengate. It is also the first time, to the author's knowledge that a food crisis has toppled a government.

"At the risk of sounding cynical, the real trick of crisis management is to be perceived to have handled the situation well even if that is not strictly correct! Nevertheless, if people feel that you have acted promptly and put their best interests first you will win sympathy and support.

"In Belgium there has been little sympathy or support since a television station first ran the story that chickens and eggs were contaminated with dioxins from feed containing this highly toxic chemical which is linked to cancer.

"The media claimed the crisis had shattered public confidence in the government, which had been covering up the scandal for some weeks because of impending elections. As the crisis escalated, even mayonnaise, pastries, cakes, and ice-cream were implicated as well as pork, beef, and those famous chocolates.

"Some reports said that the dioxins traced in the contaminated chickens were at levels up to 1500 times the normal. The problem came to light when hens from which day-old chicks were reared and birds for roasting became so ill one farmer asked his insurers to investigate.

"It gradually emerged that 416 poultry farms in Belgium—out of a total of 3266—used the feed over the risk period. During that time 458 million eggs and four million fowls were exported to France and other countries, including Britain, in spite of the fact the contamination had been known officially for at least a month. The contaminated fat was eventually traced to having been supplied to ten animal feed mills in Belgium as well as one in France and another in Holland.

"Those figures graphically indicate the scale of the dilemma, which faced the government as it contemplated the huge financial and human consequences of any action.

"Sadly, the resulting implications are even more serious. The cost is being estimated in millions of dollars—\$767 million at the latest count—and there

has not yet been any mention of the jobs that will be lost or the businesses which inevitably will collapse in the wake of the bans which were imposed and the impact of the adverse publicity. However, perhaps the cost and the consequences would have been less if someone had taken action sooner and in such a way that they were perceived as the People's Champion.

"After the conservatives were swept into dominance in the Belgium parliament for the first time in more than a century, Guy Verhofstadt, the party chairman, remarked: 'We have to change the way we govern. We have to learn to act before problems arise.'

"This can be a difficult position to take, even when the financial implications are not so enormous and especially when you find yourself actively seeking adverse publicity for the products which you normally promote with such pride. But somehow you must suddenly look at the situation from the perspective of worried consumers and take the actions and give the assurances which will win their support. Achieve the right tone and your consumers might even thank you for bringing the problem to their attention.

"Such a response might sound far-fetched but can and does happen if the media statements and recall advertisements are couched in the right terms and you have cultivated a loyal customer base over the course of many years.

"The other major issue that this and every crisis raises is the importance of being able to trace every batch of product. The slaughter, sale, and export of suspect flocks and products were banned but it is the author's understanding that the chickens and eggs from a variety of farms were being used in such huge volumes by some processors and manufacturers that it proved extremely difficult to pinpoint those birds which had consumed the contaminated feed or in which products their meat or eggs may have been used. In this instance, there were complications because of the absence of a definitive list of farms and animal feed manufacturers which had used the contaminated fats.

"This underlines the importance of traceability. Every business faced with a food problem must be able to trace suspect batches rapidly so that if people have already begun to buy the products they can be publicly recalled. On the other hand, if they can be removed from the distribution chain before there is any risk to the consumer, a public recall can be avoided. In such circumstances it is also essential to be able to advise customers who have not received a suspect batch that their supplies are safe and wholesome. That can be as important as the recall of the contaminated batch or batches. Otherwise you will find your 'good' products being removed from the shelves as quickly as the 'bad' ones!

"Of course, eating one contaminated chicken or piece of chicken is unlikely to make anyone ill but that is hardly a palatable argument. Nevertheless, the Belgian government and a French minister made a point of stating that there were no reports of anyone becoming ill as a result of eating any of the suspect food. Hopefully only a few consumers realized how flawed this argument was because, like smoking, the effect of consuming dioxins is cumulative and not immediate!

"If anyone is unfortunate enough to develop cancer in later life it will be impossible to prove it resulted from eating some of these contaminated products. Once again, those who used this argument should have viewed the remark

from the point of view of the consumer. The British government was more circumspect, advising that consumption 'would not be expected to cause harmful effects . . . due to the relatively short period of exposure'."

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Subsequently, the European Commission threatened legal action against Belgium for concealing information about the contamination for a month after ministers knew about it as well as for failing to carry out measures that the commission's scientific advisers required for food to be guaranteed safe for export. Many critics believed several factors helped to make the crisis worse than it might have been. Belgium's political system is complex and has so many rulers that the country ends up being inefficiently governed. It has a federal government; three regional governments in Flanders, Wallonia, and Brussels; separate cultural administrations for French, Dutch, and German speakers; plus 19 different councils. Food safety is the responsibility of three different ministries—agriculture, public health and economy—and they were not communicating with each other.

Since that outbreak, the European Commission has introduced a rapid alert system for food and animal feed. It was considered to have worked well following the discovery in the Netherlands of dioxin-contaminated potato by-products.

The scare started at the beginning of November 2004 when the Dutch farm ministry began sealing off livestock farms after cancer-causing dioxin was found in animal feed that had also been exported to neighboring Germany and Belgium. A total of 162 Dutch cattle, pig, sheep and goat farms as well as eight Belgian and three German farms had bought feed based on waste potato peelings that were found to be contaminated. It came from a Dutch unit of McCain Foods Limited, the world's largest manufacturer of frozen French fries or chips, said the Dutch ministry.

McCain and ministry officials said the reason for the contamination was marl clay imported from Germany—dioxins are known to occur naturally in some clays. The clay from Germany was used as part of a new potato-grading process. It was added to a water bath to adjust its density so that lower-density, lower-quality potatoes could be sorted from the good ones. McCain Holland launched a broader investigation and stopped feed sales from its three Dutch factories.

However, within a few days, tests showed the contamination did not pose a threat to human health. The French fries and potato wedge products intended for human consumption did not contain unacceptable levels of dioxins. Most of the contamination was associated with the discarded peelings.

John Byrne, European Commissioner for Health and Consumer Protection, expressed confidence in both the new system and the food chain. The dioxin levels in meat samples were found to be well below the stipulated threshold.

Byrne said the scare emphasized the importance of traceability and the progress made in reducing the risks in the food production industry.

He added: "So far, our system of traceability and alert notifications is working well. It is vital that the confidence of the consumer in our food chain is maintained."

The new European Union (EU) regulation, which came into force in January 2005, requires traceability for all stages in the value-adding chain. To comply, companies are having to set up systems enabling them to rapidly and exhaustively trace products through the supply chain if they do not already have them in existence. In April 2004, the European Commission introduced the Trade Control and Export System (TRACES) aimed at improving the management of animal movements both from outside and within the EU.

It is interesting that, when shopping in a major French supermarket in November 2004, the author found that packs of some vegetables like potatoes and Brussels sprouts carried details of the origin of the product, even down to the name of the individual farm together with its address, phone and fax numbers. It was interesting to see companies beginning to act ahead of legislation.

18.2 The crisis that ravaged the Far East

An outbreak of avian flu that rampaged through 10 Asian countries at the end of 2003 and the beginning of 2004 led to the deaths of 22 people, the slaughter of over 100 million birds and had devastating effects on the economies of the countries involved as well as hundreds of businesses, from small farmers to major processors employing thousands of people.

The outbreak and its economic impact were unprecedented. Chicken is eaten in virtually every country. Governments and industry were thrust into the world spotlight. The crisis could not be ignored, particularly when it emerged that some of the countries involved were major exporters of poultry. The outbreak hit headlines and was top of the news agendas of TV and radio stations worldwide.

Grim photographs and footage showed the widespread culling of flocks in different countries, even footage of birds being buried alive. The media and the Internet followed the daily spread of the virus with a profusion of news stories and background information.

There were two fears. Firstly, the highly contagious virus might spread among people rather than remain a disease that only affected those in close proximity to the birds. The virus usually spreads where there are poor veterinary standards and lax hygiene at markets where live fowl are sold and slaughtered, especially in 'wet' markets. Horrifying television reports showed just how poor those standards were in some of the countries affected.

Secondly, concern grew that the outbreak could develop into a worldwide pandemic because animals such as chickens, pigs or even cows have played a role in creating deadly new strains of influenza viruses for which people have no immunity. This concern was fuelled by the fact that flu outbreaks have killed tens of millions of people over the past century. Thankfully, those fears did not materialize but they added even greater alarm to an already serious situation.

The first outbreak was confirmed by South Korea in December 2003. Within weeks it had spread throughout the Far East, affecting China, Cambodia, Indonesia, Japan, Laos, South Korea, Thailand, and Vietnam. A less virulent strain of the virus was reported in Pakistan, Taiwan, the United States, and

Canada. Millions of birds were slaughtered and countless farms were placed in quarantine as people died and became ill.

As a precaution Singapore ordered a practice cull of 5000 'spent hens' as an emergency measure to ensure everyone was ready in case of an outbreak and to test its contingency plans.

The deadly H5N1 strain of the influenza virus was also detected in a leopard, a tiger and two domestic cats in Thailand. It was the first time in the world that bird flu has been found in cats and tigers.

As the death toll rose, countries banned the import of poultry, poultry meat, eggs, and even day-old chicks from the infected areas.

Inevitably, as the epidemic spread and more people died or became ill the recriminations started. Governments were accused of covering up the outbreak. After weeks of speculation, Thailand's prime minister admitted that his government had suspected an outbreak of bird flu—the British Poultry Council even alleged the country had been covering up the outbreak since November 2003. Vietnam and Indonesia along with Thailand were criticized for attempting to cover up outbreaks in an attempt to protect their agriculture and tourism industries.

Governments and interest groups began expressing doubts about the World Health Organization's prescribed method of stopping the spread by livestock culls and import freezes and that these measures were hurting poultry industries unnecessarily. Thailand was also warned that it might be lifting restrictions in affected areas too quickly.

While one can argue that the various governments should have revealed the outbreaks more quickly, one can understand the dilemma that faced them because of the disastrous effect the announcements would have on their country's prosperity. Agriculture and tourism would be badly hit.

However, by the end of January 2004, the nations concerned joined forces to fight the outbreak and held crisis talks in Bangkok, Thailand's capital. The delegates agreed to implement disease-control measures recommended by the World Health Organization, the Food and Agricultural Organization (FAO) and the World Organization on Animal Health and to jointly research diagnostic tools, vaccines, and antiviral drugs. The authorities were urged to be open and transparent, pointing to the lessons learned in tackling problems that had arisen over attempts to cover up the scale of the SARS (severe acute respiratory syndrome) outbreak that had hit China and Canada earlier in 2003 and killed a total of 774 people and made a further 8098 ill, the majority in Asia.

As with any crisis, of course, the dilemma is to rapidly establish the scale of the problem and marshal all relevant facts before going public with the information. This was particularly difficult because the disease was unknown when it first emerged. In addition, as far as China was concerned, tackling the outbreak involved a vast operation educating more than 60 000 health-care workers in how to manage SARS, how to use personal protective equipment and how to assess suspected victims. Possible patients were clustered together into one ward of a hospital and eventually confined to 16 hospitals that were dedicated to managing the outbreak. High-risk people such as family members

were also placed in quarantine. In Canada, researchers set up a dedicated SARS laboratory and bought the necessary equipment during the course of one weekend, such was the urgency of the situation.

Research now needs to be put into place to find suitable drugs to treat victims of bird flu and to have sufficient stocks available or a ready source of their manufacture so that future outbreaks can be controlled more quickly. Plans should be prepared to tackle future outbreaks which, based on past experience, would seem inevitable from time to time.

The previous year, in March 2003, the Dutch poultry industry was brought to a standstill by fowl pest, a different but equally infectious and fatal viral disease. Slaughterhouses were closed and the government put in place a transport and export ban. Tens of thousands of birds were killed within a one kilometer radius of the infected farms to prevent the virus spreading further.

It was Holland's first outbreak of the virus in 35 years and hit the heart of the country's poultry farming industry. Poultry breeders said the measures were too little and too late. They believed birds within a three kilometer radius should have been slaughtered. They also criticized the government for not acting more quickly and so allowing the disease to spread to further areas.

Holland is Europe's largest exporter of poultry, principally to Britain and Germany. The industry is vulnerable to infectious diseases because of the high intensity of farming methods.

In November 2004, the World Health Organization warned that domestic ducks could pose a new avian flu threat. It said that three international agencies warned that the birds could be "acting as a silent reservoir for the H5N1 avian influenza virus, which is highly pathogenic in chickens, and may thus have acquired an important new role in the transmission of the virus to other poultry and, possibly, to humans as well".

The announcement continued: "The concern is greatest in rural areas of affected countries, where traditional free-ranging ducks, chickens, and wildlife mingle, frequently sharing the same source of water, according to a joint statement by the United Nations Food and Agricultural Organization (FAO), the World Health Organization (WHO) and the Office of International Epizootics (OIE).

"Findings pointing to an altered role for domestic ducks join other recent evidence that the H5N1 virus circulating in parts of Asia has increased its virulence in chickens and mice (a laboratory model for mammals) and has expanded its host range to include mammals, such as certain members of the felidae family, e.g., cats and tigers, not previously considered susceptible to infection.

"A new laboratory study of domestic ducks infected with several H5N1 viruses isolated in 2004 shows that, when compared with infections caused by viruses from 2003, domestic ducks are shedding more virus for longer periods and as before, are doing so without showing signs of illness.

"The study found that the quantities of virus excreted by healthy-looking ducks could approach those excreted by visibly diseased chickens, the agencies said. It was of public health concern that ducks might be infected and shed virus for long periods, yet give no warning signal in the form of visible signs and symptoms that alert officials and the public to take precautions.

"WHO, FAO and OIE said affected countries should be encouraged to include possible exposure to apparently healthy domestic ducks when assessing the risk of infection to humans and to issue appropriate advice for people living in infected areas. Such advice should cover the handling of domestic ducks, particularly at slaughter (e.g., scalding ducks prior to plucking), and avoiding use of water that had been in contact with ducks for human consumption without being treated."

The agencies said that the discovery of the altered role of domestic ducks in the transmission cycle of the virus needed to be addressed soon as it might complicate efforts to control the disease in poultry and to prevent further human cases. The three agencies, therefore, called for urgent animal surveillance research to establish how widespread the incidence of infection in ducks without symptoms has become. They also called for research on the effectiveness of current vaccines on duck populations.

In connection with this announcement, it is interesting that in October 2004 it was reported that 23 tigers had died from bird flu at a private zoo in Thailand. They had been fed carcasses of chickens infected with the disease, said a government official. The tigers had been dying at the Sriracha Tiger Zoo in central Chonburi province since September 14, said Charal Trinvuthipong, director of the Bird Flu Prevention and Elimination Center. The animal park was forced to close its doors to the public while authorities investigated.

Trinvuthipong said another 30 tigers were sick and it was believed they had all contracted the virus because they had eaten chicken carcasses that were believed to be infected. Veterinarians were checking for the disease at chicken farms in the province where the zoo obtained the birds that were fed to the tigers.

Apparently, more than 400 tigers at the zoo were regularly fed raw chicken.

During the first wave of bird flu in Thailand in 2004, a clouded leopard and a white tiger died at another zoo in the same province.

News of the latest tiger deaths came as the government prepared to cull ducks, which were thought to play a major role in spreading the deadly virus which had killed 31 people in Thailand and Vietnam and forced the cull of tens of millions of chickens during the year.

In September 2004, a 26-year-old Thai woman who died of acute pneumonia was described as a 'probable case of human-to-human transmission' of the virus. Thailand's Ministry of Public Health stressed that the probable cause of human-to-human transmission followed prolonged, close contact between the woman and her sick daughter, who also died from bird flu. Unlike human flu, the virus did not show an ability to spread easily. However, research on the virus's recent evolution shows it has become steadily better at replicating in mammals in the past few years and may now be learning to spread between them.

18.3 The crisis that took the fizz out of a soft-drinks giant

When Coca-Cola, the world's largest soft-drinks giant, launched its new bottled water Dasani in the United Kingdom in March 2004, it was intended as the

prelude to rolling it out in Europe. Already, Dasani was the second-biggest selling water brand in America and a \$15 million advertising blitz was lined up to launch it in Britain. The company's worldwide bottled water sales had grown by more than 50% in each of the past three years, so ambitions were high.

But within a few days the accident-prone company, once so sure-footed, had to call off the launch and rethink its plans for Europe.

It is unclear how the media discovered the source of the water in the distinctive blue bottles labeled Dasani but the news leaked out that it came from the same mains that supplied Sidcup, in south-east London, the suburb in which its bottling plant was located. Journalists had a field day with the story and water board officials defended the quality of the water the factory used, which also supplied the rest of Sidcup. Dasani sold in some shops for 95p (\$1.5) for 500 ml, whereas Thames Water, the local water supplier, provided it for around 0.06p (a few cents) a liter, twice the amount.

To be fair, Coke never claimed it was mineral water. The company had never claimed it came from a bubbling mountain stream or from a spring amidst a remote landscape. Its advertising made much of the reverse osmosis technology it used to purify the product. It was purified water not the mineral variety and was billed 'as pure as water gets'.

But two weeks into the launch, tests found more than double the legal standard level of bromate, a chemical that can increase the risk of cancer. The phrase 'cancer water' crept into damaging headlines. Coca-Cola said the withdrawal was a precaution and that there was no immediate health or safety issue. It blamed calcium added to the water as part of the purification process for the bromate.

What went wrong? Critics claimed that Coca-Cola was 'arrogant' and assumed that what worked for them in the United States would be successful elsewhere. Perhaps, it did not take into account likely people's attitudes in a different country and research the market sufficiently. Perhaps, no one was astute enough to think of the likely implications if it was discovered the water came from the regular mains supply and a sufficiently robust defense was not prepared in advance. Whatever went wrong, it was an expensive debacle.

Later the same year, in November 2004, Coca-Cola again found itself in hot water and making headlines in the British press. This time its mineral water bottling plant in the picturesque Malvern Hills, on the Herefordshire–Worcestershire border, was the focus. The company had submitted a planning application to Herefordshire county council to run a 1.7-mile pipeline through an Area of Outstanding Natural Beauty to increase its supply of water from a second natural spring.

If successful, this would enable Coca-Cola to increase production of its bottled water from this area from 2.6 million gallons a year to 11.3 million. The present supply comes from Pewtress spring, which feeds directly into the bottling plant.

However, conservation groups in the area are opposed to the application. They say the second spring supports a fragile wet woodland environment and that extracting such a large amount of water could deprive rare flora and fauna of much-needed water.

The Malvern Spa Association, which preserves 20 wells in the hills, has pointed out that the level of water talked about is 'massive'. They are worried whether extracting this additional quantity of water would bleed the area dry.

The quality of the water from the area is so highly regarded that people make special journeys to the wells to collect it and take it home for their own use.

To add to the company's general woes, there was been an interesting spin-off from Operation Iraqi Freedom, the war in Iraq in 2003. As well as a threat a crisis can be an opportunity and Muslim businessmen realized Coca-Cola was a symbol of America, the main country that launched the bid to free Iraq from Saddam Hussein, its dictator.

Three rival brands of cola were launched: Mecca-Cola, Quibla-Cola and Zamzam-Cola. The aim was to provide thirst-quenching fizzy drinks for Muslims and anyone wanting to boycott American drinks. Zamzam-Cola sold 10 million bottles in four scorching months. Orders for Mecca-Cola poured in from around the world, including Britain, Belgium and Germany. To encourage sales, Quibla-Cola gives 10% of profits to developing nations and plans to support projects in countries where its soft-drinks are sold. It has launched a range of four other drinks: Quibla 5, Quibla Water, Quibla Fantasy and Quibla Mango. In the United Arab Emirates, a regional drink, Star Cola, has proved extremely popular.

18.4 The fiasco that humiliated a government

Another interesting example of how important it is never to assume that what suits one country will work in another without researching local opinion is the mixed reception that has greeted genetically modified (GM) crops and foods. While they have been accepted in some parts of the world they have been the subject of protests in others, even where malnutrition is rife. They have also led to a humiliating experience for the UK government.

The lessons emerging from the GM crops fiasco in Europe are that public opinion can be blind to scientific fact and that people become suspicious if they feel they are being forced into accepting something against their will.

Originally, transgenic crops were launched in the United States. It was a textbook launch supported by leading scientists and various authorities. The development and advantages of such crops were trailed for some years before their introduction, including the fact they could help the poorer nations of the world in their battle against hunger. The new crops appeared to be readily accepted by many farmers but gradually reservations crept in, fuelled by suspicions raised in the United Kingdom, Europe and other parts of the world, especially by environmental pressure groups.

Fertile minds called the products 'frankenstein foods' and branded the crops 'frankencrops'—wonderful material for the media, especially the red top tabloid newspapers who reveled in the colorful headlines. Pressure groups staged elaborate media events, uprooting trial crops and being arrested for their trouble... in full view of the assembled media. Among those arrested was Lord Melchett, then head of Greenpeace in the United Kingdom. He

subsequently joined the Soil Association as policy director, another pressure group that campaigned particularly vigorously against the new crops.

The UK government launched a public debate—GM Nation with a budget of £500 000 (\$750 000)—as well as a review of the science behind the issues and a study into the overall costs and benefits associated with the growing of such crops.

People emphatically rejected the idea of growing and eating GM food. They expressed their views in 1200 letters and more than 600 public meetings attended by at least 8000 inhabitants. However, there are strong suggestions that the results were skewed by the actions of pressure groups opposed to the crops. They swamped meetings with their members and encouraged floods of critical letters.

In October 2003, the results of the farm-scale evaluation trials were announced to an audience of some 100 journalists, 10 TV camera crews and 200 representatives of NGOs (non-governmental organizations) as well as farmers and other interested parties.

The results of the largest trial of GM crops ever conducted in the world showed that oilseed rape and sugar beet had a worse impact on farmland wildlife than conventional crops. The third crop tested, GM maize, proved better for wildlife than its conventional counterpart. The evaluations took place on 280 fields through the country.

However, the authors of the report made the point that their findings did not relate to the fact that the GM herbicide tolerant crops were genetically modified but to the differing herbicides and herbicide management systems that accompanied them and the conventional control crops.

In Europe, most governments delayed making any decisions because they were aware that many of their citizens had little enthusiasm for such crops and food. The EU imposed a moratorium on the approval of new crops though some varieties had already been given the green light—for example, they are grown extensively in Spain. The EU's move came under pressure from the World Trade Organization after the Bush administration filed a complaint against their action, so the EU replaced it with a requirement that any foods with over 0.9% GM content had to be labeled as such. Given most people's hostility towards such commodities, it was much the same as an import ban. Because of consumer reaction, retailers have avoided stocking products containing them and so manufacturers have not included them in their formulations.

However, despite overwhelming opposition from many members of Parliament, the United Kingdom government surprisingly gave approval for the growing of GM maize. The decision turned into a major embarrassment when the leading biotechnology company, Bayer CropScience, said it was giving up plans to grow the maize commercially in Britain. The government had placed a number of constraints on the initial conditional approval for the growing of its Chardon LL maize which affected the viability of project.

Then, in May 2004, the European Commission bowed to pressure from the United States and lifted its six-year moratorium by approving the import and sale of canned and frozen GM sweet corn provided it was clearly labeled as

such. The decision, however, sidestepped the issue of GM crop cultivation where there is a risk of cross-contamination.

Ironically, there is much to support in relation to the development of transgenic crops. In an information statement for the guidance of members and others who log onto its award-winning site (www.ifst.org), the United Kingdom's Institute of Food Science and Technology (IFST) says: "Genetic modification has the potential to offer very significant improvements in the quality, quantity, and acceptability of the world's food supply. Food scientists and technologists can support the responsible introduction of GM techniques provided that issues of product safety, environmental concern, information and ethics are satisfactorily addressed. The IFST considers they are being addressed and need even more intensively to continue to be so addressed. Only in this way may the benefits that this technology can confer become available, not least to help feed the world's escalating population in the coming decades."

In fact, GM crops are being grown throughout the world with the largest quantities being produced in the United States, Argentina, Canada, and China. Globally, nearly 12 million hectares of GM maize were grown in 2002. In the United States, around 25% of the maize crop is genetically modified.

18.5 A crisis that found a government wanting

Few people could have been unaware of the major crisis that devastated the United Kingdom's agricultural industry in the last decade: bovine spongiform encephalopathy (BSE).

The enduring image of BSE was that of huge funeral pyres and dense clouds of smoke rising into the sky as the bodies of thousands of dead cattle were incinerated. Today, BSE or 'mad cow disease' as it was dubbed by the media, is a problem that is still affecting many countries. It is a slowly progressive and ultimately fatal nervous disease in cattle. It first appeared in the United Kingdom in 1985 and, by 1990, was appearing at the rate of over 1000 new cases a month. It has been generally accepted that it was caused by the organism which causes scrapie, a brain disease of sheep and goats, crossing the species barrier to cause a similar disease in cattle.

The hypothesis of a Government-appointed committee of enquiry, the Southwood Committee, was that the contamination arose because modern rendering practices failed to destroy the scrapie agent in bone meal derived from sheep products that were being used in cattle feed. The committee's contention was that continuous processing of meat and bone as well as a reduction of solvents used to remove excess fats from the material resulted in the loss of the high-temperature regime which, previously, was believed to have destroyed scrapie.

Public concern centered on the fact that, pathologically, BSE resembles Creutzfeldt-Jacob disease (C-JD), a human condition which causes slow degeneration of the brain and dementia. A human form of BSE, new variant C-JD (vC-JD) was identified and, at one stage, it was feared many people could be facing the prospect of a lingering death in later years through eating beef products. There are now some suggestions that the number of eventual victims may

not be as high as originally anticipated but estimates vary widely because it is not known how many people could be harboring the disease. Some calculations vary between 1300 and 16 000 and there are suggestions that the current number of victims could be the first wave of a bigger epidemic. Successive government health ministers are blamed for not urgently commissioning studies to end the uncertainty.

Because animal feeds contain a proportion of protein that could originally be from various unspecified sources it seemed farmers had been unwittingly feeding their cattle with rations which contained contaminated meat and bone meal. Consequently, stringent measures were taken to avoid the possibility of such transmission. Under the BSE Order 1988, slaughter of all cattle suspected of having the disease became compulsory and compensation was paid to farmers though some claims are still being disputed. To contain the disease, carcasses had to be incinerated or buried, and any milk had to be destroyed.

Transmission studies were inaugurated to establish whether the disease spread naturally from cow to cow, or cow to calf and an inquiry came to the belief it was transmitted to ruminants in concentrated rations containing material from sheep.

This practice had prevailed in the United Kingdom and in Europe for over a century, but was stopped in July 1988. It was hoped that this measure and the slaughtering of infected cattle would eradicate BSE within 10 years but cases continue to crop up. If it is proved that the disease is transmitted vertically, that is from cow to calf, it could take several more years to eradicate BSE from the national herd. With this possibility in mind, in 1990 the House of Commons Agriculture Committee recommended a comprehensive scheme to identify and trace all such cattle. Farmers were also discouraged from breeding from the offspring of cows with BSE.

In 1989, the use of offals such as brain, spinal cord, tonsil, thymus, spleen and intestines was banned in human food to remove any perceived risk to people. However, due to poor practices in abattoirs, particularly in some European countries, some of these banned materials are still found in meat and carcasses from time to time.

In 1993, when a case was reported of a farmer who had contracted C-JD, it was suggested he had eaten meat and drunk milk from his dairy herd. In 1994, when a young girl contracted C-JD, her fondness for beef burgers was blamed. Some other cases are believed to have originated in the same way but, tragically, other people have been infected and sentenced to an unpleasant death from blood transfusions that were meant to help or save their lives. At the time, it was not realized that the blood was infected.

The epidemiology of BSE and other encephalopathies is extremely complex. Therefore, in 1990, a three-year project costing £12 million was launched to identify the causative organism, methods for its detection and diagnostic tests in live animals.

There is much to be learned from the way the media in the United Kingdom handled the story. Originally, the agricultural correspondent of the *Daily Telegraph* heard of a strange disease that seemed to have affected a small number of cattle. He went to see for himself and immediately called it 'mad cow disease'.

The description stuck but it only began to attract major attention when the disease was reported in a cat. Apparently, it had been transmitted from pet food containing offal from infected cattle or sheep. Then the story took wings. The media knew they were catering to a nation of animal lovers.

Headline writers, especially those working for the red top tabloids, have to devise short, eye-catching headings that fit the column widths available. It was hard enough to pronounce bovine spongiform encephalopathy let alone fit these words across six columns in large type! Newscasters and commentators, who usually have to cover their subjects with even fewer words than print journalists, found equal difficulty in pronouncing such a complicated medical name. The term 'mad cow disease' stuck. Also, that is why encephalopathies in people became 'human mad cow disease'. It is all part of the quest to make complicated technical matters comprehensible to the bulk of the population.

Remarked food consultant Professor Keith Anderson: "We have had to live with a term which is a misnomer and belies the truth of the condition. Perhaps the veterinary profession, the farmers and the food industry should have tried to come up with a simple term to pre-empt the use of this tag. Even bovine brain disease would have been better because the cows are not 'mad' in the accepted sense of the word, but are suffering from a degeneration of the brain which affects other parts of the body and noticeable muscle control. However, even that does not have the right tabloid ring about it."

In a leaflet distributed by leading supermarkets to put into perspective the problems and risks associated with BSE, Professor Sir Richard Southwood pointed out that, with existing precautions, there was more reason to be concerned about being struck by lightning than catching BSE from eating beef and other products from cattle. Sir Richard was chairman of the working party set up by the Department of Health and the then Ministry of Agriculture, Fisheries and Food in 1989 to investigate the whole issue of BSE. Nevertheless, the issue has remained on news agendas because of continued but smaller outbreaks around the world.

Dealing with such an issue is always a prolonged exercise in damage limitation. The story keeps on taking new twists and turns. The situation has to be constantly monitored and trade bodies play a vital part in keeping their members informed of developments. Within companies, it is important that everyone with a need to know is kept up-to-date by the regular revising and re-issuing of contingency statements or 'backgrounders'. These should provide objective technical background as well as suggested or approved responses to media enquiries.

For a company using meat from countries where the disease was unknown, the matter was simple: "We only use meat from cattle born, bred and raised in countries where BSE is unknown" was all that needed to be said. For other companies, the response was not as simple. They had to be positive and reassuring while further research was still being urgently carried out to discover more about the disease. They had to use more careful language like: "We do not use any of the offals implicated in BSE in any of our products. We obtain our meat only from particularly reliable suppliers known to us over a long

period of time. There has never been any evidence that we have ever been supplied with meat from BSE infected cattle. The slaughterhouses from which we obtain our meat are all operated under veterinary supervision."

There were many puzzling aspects about the emergence of vC-JD. Many thought it came from eating meat products infected with BSE. However, the 1993 annual report of the Creutzfeldt-Jakob Disease Surveillance Group said the group could find no connection between dietary factors and the disease. One individual who developed the disease, for instance, was a strict vegetarian for 20 years prior to death. The report also made the point that preliminary analysis of the intake of various types of meat showed no statistical difference between cases and controls.

Formal analysis had been carried out in the first 54 cases of C-JD with comparable controls with respect to lifetime history of eating certain meat products. The report concluded: "We have found no convincing evidence that the eating of a range of meat products is associated with an increased risk of C-JD."

Since the report was produced, cases of C-JD have been identified in countries where BSE was unknown, which is another interesting development.

There are other interesting aspects to the outbreak. Commenting in 1999 in the aftermath of the peak of the outbreak and the lessons that were emerging, the author wrote in *Food Safety & Security*:

It is always difficult to deal with uncertainty, and it is not easy for companies or governments to decide how best to act in the face of incomplete information, or how to communicate risks that are not easy to quantify to the public in an appropriate way. A major aim of the recently published Phillips report on the UK's BSE crisis was to learn from past mistakes, and provide recommendations for the future handling of such issues.

The difficulties of dealing with uncertainty and the communication of risk were discussed with hundreds of witnesses and commented on at length in the long-awaited report on the UK government's handling of the emerging BSE (or 'mad cow disease') crisis. The general outcome was a call for greater openness, so that an atmosphere of trust and credibility could be established in such circumstances.

Of course, this is correct. However, one cannot help but wonder what the outcome of such a policy would have been in the 1980s, when the first indications were appearing of a mysterious new cattle disease which might—or might not—affect human health, and which would certainly have a devastating effect on Britain's farming industry.

At that time in the United Kingdom, the media were giving extensive coverage to food safety issues. Indeed, one national daily newspaper had a policy of 'splashing' any potential food problem across its front pages, because it boosted circulation figures.

People have to eat and drink. When there is a problem, not unnaturally, they want instant answers and immediate reassurance that what they are consuming is safe and wholesome. But sometimes this is impossible. It may take several years before scientists can provide definitive answers.

The BSE crisis provided a classic example of this. It is now believed that the first cattle became infected in the early 1970s. Today, some 30 years later, the

experts still do not have all the answers. Indeed, some questions may never be answered.

In 1988, the news of increasing contamination of UK eggs with *Salmonella* had a devastating effect on the poultry industry, while costing the government's then Junior Health Minister, Edwina Currie, her job for purportedly overstating the risks.

So what would have been the reaction in the 1980s if there had been more transparency over BSE? A media frenzy would almost certainly have occurred. Without a doubt, at least some of the huge impact that BSE has had on the United Kingdom's cattle-farming industry would have occurred sooner rather than later.

Even today, with the lapse of time and widespread awareness of BSE and its ramifications, we are currently seeing a parallel crisis developing in France over increased findings of BSE in French cattle and reports that two people in France have contracted vC-JD (believed to be the human form of BSE). Farmers and other businesses are being affected. Sooner or later, we are likely to see similar concerns and reactions in other European countries, because many experts are convinced that BSE is more widespread than is being reported.

Media frenzies and the possibility of consumer panic are always likely to be the outcome until people come to the realization that it is not always possible to provide immediate answers and reassurances when a potential problem is found. However, such a dramatic change in outlook will only begin to emerge when people feel that their interests and well-being are being put ahead of the commercial interests and profits of the parties involved, such as farmers and food companies—as well as the political interests of government factions.

The three 'golden rules' of crisis management—tell the truth, admit responsibility if you are to blame and say you are sorry—were not really established until 1982, when pharmaceuticals giant Johnson & Johnson dealt so brilliantly with extortion and contamination threats concerning its Tylenol pain-relief capsules. Though the problem was not caused by the company, Johnson & Johnson took responsibility for warning the medical community and consumers of the contamination and, throughout the crisis, was perceived to be putting the well-being of its customers before profits.

At that time, as is still often true today, many companies were reluctant to accept responsibility or to be particularly informative. 'No soundly based scientific evidence' was a useful phrase indeed! However, when dealing with uncertainty it can be far too easy to hide behind such a comforting phrase. The caveat 'absence of solid evidence is not the same as solid evidence of absence' needs to be borne in mind. Despite growing scientific evidence that BSE probably could spread to species other than cattle, for a long time UK government ministers kept their heads firmly buried in the sand, steadfastly denying even the possibility of a link between BSE in cattle and any threat to human health.

Without doubt, governments and the food industry must make a major effort to win the confidence and credibility of consumers. However, this will take many years, because of the mistakes which continue to occur—almost every

issue of *Food Safety & Security* included examples—and because most people are not knowledgeable about how scientific understanding develops, or the need for theories and research findings to be challenged and debated.

If the food industry is to win consumer confidence, it will also have to answer many other questions, such as: How can it be right to give ruminants rations containing material from their own kind? How can it be right to put chicken droppings into animal feed? How can the industry be trusted to remove specified risk materials from carcasses, when some of its members have been prepared to sell meat condemned as unsuitable for human consumption?

Practices such as these seem highly questionable to the lay person. How can people be expected to trust an industry which engages in such practices, apparently solely for greater profit? How can the public trust experts serving on special committees, if they may be funded by companies with potentially vested interests?

In the 1980s, how would the general population have reacted to announcements that a possible problem had been detected in beef, that it would take years before scientists could identify the cause or the risks to general health but that, in the meantime, the general view among scientists was that beef was probably safe to eat?

Such statements could perhaps have led to the release of further information, earlier calls and support for more research (e.g. perhaps the earlier development of cattle-screening tests or of experiments to examine the possibility of BSE occurring in sheep), and the development of general discussion as scientists progressed with their investigations and research. There would still have been widespread concern—and, undoubtedly, widespread media coverage—but perhaps the public's reaction would have been more controlled and less outraged.

Sir Robert May, the chief scientific adviser to the UK government, told the Phillips inquiry: "You can see the temptation . . . to hold the facts close so that you can have international discussion and the formation of a consensus so that a simple message can be taken out into the market place. My view is strongly that that temptation must be resisted, and that the full messy process whereby scientific understanding is arrived at with all its problems has to be spilled out into the open."

The report goes on to say: "Our experience over this lengthy Inquiry has led us to the firm conclusion that a policy of openness is the correct approach. When responding to public or media demand for advice, the government must resist the temptation of attempting to appear to have all the answers in a situation of uncertainty. We believe that food scares . . . thrive on the belief that the government is withholding information.

"If doubts are openly and publicly explored, the public are capable of responding rationally and are more likely to accept reassurance and advice if and when it comes. We note, by way of example, that the Spongiform Encephalopathy Advisory Committee (SEAC) and the Ministry of Agriculture, Fisheries and Food (MAFF) have made public the fact that an investigation is being carried out into the question of whether BSE has passed into sheep. We do not understand that this has led to a boycott of lamb."

It is indeed interesting there has not been a decrease in the sales of lamb, though I do wonder what the media would have made of this investigation if it had been announced earlier on in the BSE crisis.

The following general lessons from the BSE crisis are listed in the Phillips report:

- To establish credibility it is necessary to generate trust;
- Trust can only be generated by openness;
- Openness requires recognition of uncertainty, where it exists;
- The importance of precautionary measures should not be played down on the grounds that the risk is unproved;
- Scientific investigation of risk should be open and transparent;
- The advice and reasoning of advisory committees should be made public;
- The trust that the public has in chief medical officers (CMOs) is precious and should not be put at risk; and
- Any advice given by a CMO or advisory committee should be, and be seen to be, objective and independent of government.

Obviously, these comments are relevant to the future handling of any crisis, whether or not it relates to food. It is encouraging that when, soon after the appearance of the report, there was a train crash in the United Kingdom, in which four people died, the company responsible for the condition of the track quickly admitted responsibility.

This was also the case when the first fatal crash in the history of Singapore Airlines occurred in Taiwan. Though the company was criticized for the insensitive way in which it dealt with the relatives of those on board—no doubt complacency had overtaken preparation and crisis rehearsals—it rapidly identified the cause of the accident, and even released a transcript of the cockpit conversation immediately preceding the crash.

The train accident resulted from a disturbing lack of timely maintenance work, and the aircraft crash was apparently caused by serious human error. But at least the two companies concerned were quick to admit responsibility and to express their regrets.

No company, industry or government can hope to gain the public's trust until it is consistently seen both to anticipate, and take responsibility for the potential consequences of its actions and decisions.

It is ironic that even with the benefit of the lessons learned from the BSE crisis, a parallel crisis developed in France over increased findings of BSE in French cattle and reports that two people had contracted vC-JD. The government appeared to be handling the situation no better than the United Kingdom did. In the process, it was considered to have lost public confidence.

The tragedy is that people are dying from vC-JD, some as a result of receiving a transfusion of contaminated blood. In June 2004, a 25-year-old British woman died in the United States from vC-JD. She is thought to have contracted it from beef she ate in the United Kingdom before her family emigrated to America 13 years ago. She was the only person in the United States diagnosed with the disease and had been fighting the condition for two years.

In September 2004, thousands of patients in the United Kingdom received letters warning them that they could be at risk of developing the human form of mad cow disease. Health Secretary John Reid said about 4000 people might be at a 'very small risk' of developing the human form of mad cow disease because of exposure through blood plasma products. The warnings came after the first possible case of a person dying after contracting vC-JD through a blood transfusion. It led to a ban on people who had received a blood transfusion since January 1980 donating blood. It later emerged that another person who received a blood transfusion was carrying the vC-JD agent though they died of unrelated causes.

In a further development in Brussels on October 28, 2004, the European Commission announced that it had submitted French research findings on TSE (Transmissible Spongiform Encephalopathy) in a goat to an expert panel.

In a cautiously worded press release,¹ the Commission stated: "Following the findings by a research group in France that they suspect the presence of a TSE infection in a goat's brain which tests cannot distinguish from BSE, the European Commission has submitted the data received from the French authorities to the Community Reference Laboratory (CRL) for TSEs based in Weybridge, England, for an evaluation by an expert panel.

"TSEs are transmissible spongiform encephalopathies, namely BSE affecting cattle, and scrapie affecting goats and sheep. The expert panel will evaluate, over the next two weeks or so, the scientific evidence to see if it indicates the presence of BSE in the goat.

"This isolated incident does not present a risk to public health as the goat and its herd did not enter the food chain."

Bovine spongiform encephalopathy has never been found under natural circumstances in ruminants other than cattle. Its presence in goats or other ruminants has been viewed as theoretically possible but has never been detected. Nevertheless, for many years safety measures have been applied in respect of all farmed ruminants (cattle, goats and sheep) to offer maximum public health protection.

"These safety measures include the prohibition on feeding animal proteins in the form of meat-and-bone meal, the removal of specified risk materials (i.e. the removal of tissues such as brain, spinal cord, part of the intestines) from the food and feed chain, the slaughtering of herds affected by scrapie (a disease in goats and sheep similar to BSE but not infectious to humans) and a TSE surveillance/monitoring programme in all member states.

"The goat was detected as part of the EU wide surveillance programme designed to detect suspicious TSE strains in small ruminants. Over 140 000 goats have been tested since April 2002."

Arising from this EU testing programme, a healthy goat slaughtered in 2002 in France was tested at random for TSEs. On the basis of the initial positive finding of a TSE which differed from the normal scrapie strains, further scientific study has been carried out on the suspected brain (the necessary assays take

¹ <http://europa.eu.int/rapid/pressReleasesAction.do?reference=IP/o4/1324&format=HTML&aged=O&la>

two years) leading to the conclusion by the French experts that they believe the brain could be BSE-positive.

"If confirmed, this would be the first ever such finding in a goat. This goat was the only animal in the flock affected. All goats in the flock, including the affected one, were destroyed and tests on all 300 adults in the flock were negative for all TSEs."

In a series of questions and answers on its web site dealing with food and feed safety, the Commission pointed out that goats can suffer from scrapie, which has been known for centuries and that, until now, there has been no evidence of the existence of BSE in the EU's sheep and goat population 'under natural conditions'. The extensive tests of the goat included a mouse bioassay which takes two years to complete. The TSE was detected in a healthy goat as part of normal surveillance measures that had been in place in the Union for many years. As a precautionary measure milk and meat from herds affected by a TSE case cannot be used. Therefore, people could continue to consume milk, cheese and meat from goats.

- There is some background information about BSE on the web site of the Institute of Food Science and Technology (UK).

18.6 The crisis that was unique

The epidemic of foot and mouth disease (FMD) in the United Kingdom originated in 2001. An inquiry by the Department for Environment, Food and Rural Affairs into the origins of the outbreak described it as unique in terms of its size and geographical extent. This could have been due to a combination of facts, including

- A delay in reporting suspicion of disease in pigs at the first premises to be infected with FMD (the index case);
- Airborne infection of sheep on premises near this case;
- Movement of infected sheep through markets before the first case was diagnosed;
- The fact these events took place at a time of year when the climate favored virus survival and when large numbers of sheep were being marketed and moved around the country;
- The nature of the disease in sheep and the absence of distinctive signs, compared with other classes of livestock;
- Structural changes in the sheep industry which over a period of years had resulted in an increase in the size of the national flock coupled with a reduction in the farm labor force and greater reliance on shared or contracted labor together with the fact that up to 50% of livestock holdings had sheep on them at some time during the year;
- The fact that sheep are regularly gathered throughout the year for management purposes, creating opportunities for disease to spread; and
- The majority of the veterinarians in the United Kingdom would never have encountered the disease.

In terms of the spread of the disease, even before it was first discovered the epidemic was already the world's largest with 10 times as many cases being recorded at the start than in 1967 when Britain's last major outbreak occurred. After the initial outbreak on February 2001, the disease took just two weeks to spread across Britain.

There were widespread and desperate measures taken to halt its spread. All dairy, meat and livestock exports were suspended and in the end some 2000 animals were slaughtered. Animal movements were banned, rural footpaths closed and some national parks were closed.

At one stage more than 1200 vets and 600 military personnel were involved in the struggle to contain the outbreak. The number of vets rose from 421 during the first week of the crisis to 1269 six weeks later and the government was still appealing for more. They included 90 foreign vets—23 from other EU countries and 67 from countries outside the Union. The vets were involved in inspecting animals on farms, confirming cases, supervising the slaughter and disposal of animals, and taking samples for testing. Also, more than 600 soldiers assisted the culling operation, Army butchers assisted civilian slaughterers in one area and, in another, soldiers advised on the construction of burial pits. The Royal Air Force was also called in to help.

New Zealand has the most advanced information system in the world for handling FMD and other epidemic diseases and a four-man team from that country jetted in to provide specialist skills to help manage the outbreak.

As soon as its first case was confirmed, France immediately banned livestock exports for 15 days and stopped all livestock movements inside the country. Some 20 000 sheep imported from Britain and 30 000 French sheep that had been in contact with the British animals were culled. Spain banned livestock imports from Britain and France.

In Scandinavia, Norway imposed a two-week ban on imports of all meat and dairy products from most of Europe. Sweden banned the import of livestock, raw meat and dairy products. The government also imposed a ban on feeding pigs with leftover food containing remains or products from animals that were at risk.

The Netherlands, Belgium, Italy, Germany, Switzerland, Poland, the Czech Republic, Estonia, Latvia, the United States, Canada, the United Arab Emirates, Japan, Australia, New Zealand, South Korea, Honduras, and Argentina took various measures, ranging from various types of bans to vaccination of herds.

At some airports, visitors from Britain had to walk over mats impregnated with disinfectant. Some countries made vehicles drive through disinfectant baths at various points.

As the epidemic died down questions were raised about the need for such widespread culling compared with vaccination. It was claimed vaccinating animals against foot and mouth would have been cheaper than the slaughter policy. It was also claimed vaccination would have slowed the spread of the disease, thus allowing more time in which to get it under control. Opponents, however, said vaccination could not keep pace with the rapid spread of the disease and the issue of vaccination as opposed to slaughter still remains unresolved.

Other arguments against vaccination were that countries which had FMD or vaccinated against it could not export meat and dairy produce to major markets, that susceptible livestock have to be vaccinated regularly and that vaccinated animals can still become infected and remain carriers without showing symptoms.

Subsequently, the government ordered three separate inquiries into the lessons to be learned from the outbreak. One concluded that genetic analysis of the FMD viruses responsible for the outbreaks in the United Kingdom and an earlier one in South Africa indicates the 'most likely explanation' is that they had a common origin in the Far East. A detailed analysis of potential routes of entry into Great Britain indicated the source of the 2001 epidemic was most probably infected or contaminated meat or meat products.

These inquiries, however, failed to quench criticism of the way the government had handled the crisis. It was claimed the government should have put in place an immediate ban on the movement of animals and that compensation should have been paid to farmers not only for culled livestock but also where they were unable to send animals to market because of movement bans.

18.7 A crisis delayed by circumstances

In 1986, a man in the United States died after consuming cyanide-laced chicken noodle Cup-A-Soup marketed by Thomas J. Lipton, a Unilever subsidiary. However, the company was not notified until two days after his death and this highlights one of the problems that can occur in any instance of product tampering.

In this case, doctors initially attributed the man's death to natural causes because he had been recovering from *Salmonella* poisoning. However, an autopsy and blood tests as well as examination of the soup pack subsequently revealed the presence of cyanide.

The soup container was in the possession of the authorities. It was held as a vital piece of evidence. The company was prevented from carrying out its own investigation. This is a common experience despite that fact that many food companies and contract laboratories have the facilities to carry out tests to determine the presence of poisons or microbiological pathogens much more quickly than forensic laboratories which might well have different pressures and priorities.

However, as soon as the company was notified, it became proactive. Among its objectives was to avoid being perceived to have delayed taking any action during the two days during which it was unaware of the incident.

Its first move was to withdraw all remaining product from the vicinity of the area in which the man lived. It also kept the soup off the shelves of all stores and outlets within a 50 mile radius for two weeks to try to prevent any copycat incidents.

A total of 30 000 cartons were returned from 152 stores. The Food and Drug Administration tested some 5000 packs without finding any trace of the poison. The company ran tests on a further 3235 samples selected at random with similar results before destroying all remaining stock.

Within a few hours of learning of the incident, the company held a press conference in conjunction with the local county prosecutor's office to explain what had happened and the steps that were being taken to investigate the matter. Two days later, it was able to announce that its investigation had shown the tampering did not occur during the manufacturing process.

At the time, the company's vice president of quality control said that because the facts were given quickly in a non-sensational manner, the media coverage accurately portrayed the company's position. The company had also tried to give brief, factual answers to fit into the broadcast practice of short sound bites.

He added that, because its image was at stake, it was essential during a product tampering threat or incident to emphasize that the company was trying to act in the public interest. To get good results from crisis coverage, he said, often required that management was trained to effectively speak with reporters.

The delay Lipton experienced in being notified about a tampering threat or incident is not uncommon. However, such a delay makes it difficult for a company to investigate within 24–48 hours, perhaps creating the perception among consumers and the media that it was not acting with suitable concern. To overcome this situation, a company has to explain the assessment process and give journalists what facts it has at the time and refer other enquiries to the police. In such circumstances, it is important to ensure that such information is consistent and the company's side is not presented in a manner that could cause friction between the two parties.

In this particular case, there were a variety of reasons for the two-day delay and it is understandable that the contaminated pack had to be retained by the authorities. However, until the company became aware of the type of threat facing consumers, it was unable to offer advice on what symptoms to look out for and what actions consumers should take. Such a situation always puts the company at a disadvantage in being able to determine the extent and nature of the threat as well as the geographical area and level of product withdrawal required. Even when the results of the forensic examination of the tampered product became known, there could be valid reasons why the government agency would not immediately release the results to a company, making crisis planning and media relations difficult.

18.8 Red alert (see also Chapter 19)

In Europe in 2003 and throughout 2004, many in the food industry and enforcement authorities saw red in the form of a dye called Sudan 1. It is used for coloring solvents, oils, waxes and petrol as well as for shoe and floor polishes. It was also found to be appearing illegally in a range of imported food products.

The dye is illegal in foods because it has been shown to cause cancer in laboratory animals and may contribute to the development of cancer in people. It is classified as a carcinogen by the International Agency for Research on Cancer. Therefore, products containing any Sudan red dye is not considered to be safe to eat at any level. Nevertheless, that did not stop the substance being

found in scores of products from pesto sauce to curry powders and chicken tikka masala.

The first warning came in June 2003. France alerted the European Commission that it had found traces of Sudan 1 in chilli and chilli products like curry powders. There was a Europe-wide clampdown on food products containing the Sudan red dye and only chilli and chilli powders accompanied by analytical proof that they were free of these potentially harmful ingredients were allowed to be imported. However, that did not prevent contaminated products appearing on many supermarket shelves, including a number of relishes, chutneys, pickles, sauces and seasonings as well as palm oil.

In the United Kingdom alone, over 200 products were recalled for destruction and all member states of the EU were warned to be on the alert even though the risk to health is small if a contaminated product is eaten only occasionally. However, frequent consumption of such products would increase the risk.

In response to the EU's attempts to prevent the importation of such products, in March 2004 Reading Scientific Services Limited (RSSL) announced that it had developed a screening method to identify the banned dye.

Melindee Hastie, who works in RSSL's authenticity laboratories, said: "There is now a huge demand for all imports to be tested and cleared. We have developed a screening method that will give a reliable yes/no answer for the presence of Sudan Red I to IV, allowing importers to reject problem batches if necessary and to be confident of the imports they accept."

In a special *Newsnight* investigation in November 2004, one of the BBC's flagship magazine television programmes, the reporter said that the illegal traces of the cancer-causing dye had triggered one of the most protracted and complicated food recalls ever known. The programme declared that the United Kingdom food chain had become so complex that recalling contaminated products had become a slow process that could put the health and security of the nation at risk.

In a summary of the programme's contents, the BBC said that Sudan 1 dye 'entered the food chain in India where it was used to spice up lacklustre chillies'. The modern taste for spicy foods had meant that adulterated chillies had spread along the food chain 'a little like wildfire'.

It reported that at its peak some 225 chilli-based foods and 78 different brands were involved in the recall. Traceability was made more difficult because many of the products were sold by small, independent retailers who bought their goods from larger wholesalers and cash-and-carries.

Palm oils imported from Africa had also been contaminated by a related dye, Sudan 4. A product alert notice issued by the United Kingdom's Food Standards Agency (FSA) revealed that some of these oils were routinely sold 'from the back of a van'.

18.9 A lesson in protection

As experts investigated a baffling outbreak of an infectious disease on Martha's Vineyard, an island off the coast of Massachusetts, United States, they hoped the cases might offer lessons for the protection of the country from bioterrorism.

For the fifth summer in a row, people were falling ill with a rare pneumonic form of tularaemia, or 'rabbit fever', which is one of the six diseases considered to be most likely to be spread by terrorists.

Tularaemia was first identified as a disease found among rodents and other small animals in 1911. The illness is spread through bites from ticks, deerflies and other insects. It can also be caused by handling the carcasses of infected animals, consuming contaminated food and drinking infected water. The bacterium can also be inhaled but it is not known to spread from one person to another.

If not treated with antibiotics, tularaemia can be fatal but the death rate in the United States is less than 2% of victims. Symptoms can include sudden fever, chills, headache, diarrhoea, aches in muscles and pains in joints, a dry cough, an increasing feeling of weakness, ulcers of the mouth or skin as well as swollen and painful lymph glands and eyes.

Each year, about 120 cases are reported in the United States. They are usually caused by tick bites or handling dead rabbits. But apparently what is known about the disease does not explain the outbreaks on Martha's Vineyard.

In 2000, there were 15 cases, of which 11 contracted the pneumonic version. One died. Four cases occurred the following year, three of which were pneumonic. At least two similar cases were diagnosed in 2002 and four in 2003.

Most at risk were those who spend much of their time mowing lawns, cutting brush and using power blowers, especially professional landscapers and gardeners. They have been advised to check lawns and other areas for carcasses or excreta and to dispose of them properly before starting work. They have also been advised to wear respiratory protection because exposure is most likely to occur by inhaling aerosols of contaminated dust, soil or grass.

Experts are continuing to puzzle over the cause of the outbreaks. One theory is that skunks and raccoons could be responsible for spreading the pathogen to humans because the island does not support a large population of rabbits.

The Center of Infectious Disease Research & Policy (CIDRAP) at the University of Minnesota has estimated that in 1997 the total cost to society of an *F. tularensis* aerosol attack would be \$5.4 billion for every 100 000 people exposed. Two years later, in 1969, a World Health Organization expert committee estimated that dispersing 50 kg of aerosolized *F. tularensis* over a metropolitan area with 5 million residents would lead to 19 000 deaths and 250 000 incapacitating casualties.

Because of concerns about bioterrorism, tularaemia surveillance has increased throughout the United States in recent years. Now many states require cases to be reported within 24 hours. Defining the disease as a potential bioterrorism threat has led to better training to recognize the illness, said Lisa Rotz, acting director of CIDRAP's bioterrorism preparedness and response programme.

18.10 The Spanish cooking oil scandal

A 10-year scandal that affected Spanish cooking oil in the 1980s resulted in the deaths of several hundred people—estimates ranged from 350 to 600

dead—and over 25 000 were made ill. It remains one of the worst food poisoning incidents on record anywhere in the world and led to the trial of 38 Spanish oil merchants in 1987 though 27 appealed against their sentences in 1992.

Olive oil has always been part of the Spanish diet but when prices escalated at the beginning of the 1980s many found it difficult to afford to buy it. Therefore, when door-to-door salespeople began selling cheap ‘olive oil’ many were quick to buy it.

What they did not realize was that much of it was rape-seed oil which had been denatured with aniline, a highly poisonous coal tar dye, so it could be imported into Spain for industrial use. The import of pure rape-seed oil was forbidden to protect the home market in olive oil.

First, a young boy died in a Madrid hospital from a fever and a pneumonia-like illness. Then, during the next few months, more people died or became ill with similar symptoms.

After many theories, the cheap ‘olive oil’ was identified as the common link between those who died or were taken ill. It then emerged that unscrupulous businesses had been marketing such industrial oil for many years without the wave of deaths and illnesses that occurred in 1981. Doctors were baffled about the real cause of the illnesses and how to treat the unfortunate people who were still being poisoned through 1982 and 1983.

A further consequence of the scandal was that Spain’s exports of genuine olive oil plunged by more than 60% for several months.

18.11 Ye powers of entry

In January 2002, the United Kingdom’s Food Standards Agency (FSA) for the first time exercised its statutory powers to enter food premises to obtain information and inspect company records. It followed the recall of canned hotdog sausages. The previous month, in December 2001, canned hotdogs under various brand names and imported by Ye Olde Oak Foods Ltd had been found to have suffered spoilage and had been variously described as fizzing, exploding and foul smelling on opening.

In response, the FSA asked the two United Kingdom retailers who sold the brands to issue a recall notice—it was unclear whether the problems were a result of faulty canning or composition of the hotdogs. The Agency then became aware of a similar problem affecting one of the importer’s own brand of hotdogs.

However, the FSA was not satisfied that the full picture had emerged, so used its powers of entry to authorize officials to enter the importer’s premises to check records and secure further information.

Reporting its actions in *FSA News*, the FSA said: “While it is usual for the Agency to attempt to resolve issues such as this with the voluntary cooperation of industry, the Agency will, if necessary, not hesitate to use the legal powers available to it. The Agency did not foresee the need to take any further steps in this particular case.”

Events that will shape the future

The world of crisis management changes by the day and even by the hour. In the few weeks between the completion of the manuscript for this book and its setting in type, several significant events have occurred. They reflect the ever-increasing power of the Internet and particularly that of web loggers or 'bloggers and the new breed of podcasters who use the system to broadcast their own radio-style shows, the remorseless technological progress of television news channels and developments that take two of the case histories mentioned in Chapter 18 to a new level of concern. The two case histories concerned, those relating to a red dye called Sudan 1 and bird flu, have been left in their original form because the information provides relevant background.

19.1 World's biggest food recall? (see also Section 18.8)

The shockwaves of the biggest product recall ever experienced in the United Kingdom (UK) resulted in the most widespread ramifications the world has ever seen. Its repercussions led to South Africa also becoming embroiled in the largest recall in its history. Subsequently, the country's Consumer Goods Council, which represents South Africa's multi-million dollar consumer goods industry, resolved to improve food safety by creating a unified body similar to that of the European Union. The aim would be to coordinate activities on food safety by the private sector, government, academic institutions and consumers. The scandal also triggered a major shake-up of food safety in China, where the State Administration for Quality Supervision, Inspection and Quarantine banned imports of any foods containing the carcinogenic substance and began screening foods coming from the European Union (EU). China also found 58 kg of contaminated raw material containing the banned dye but also discovered its presence in some medicines.

There were also recalls in many other countries, including the US, Canada, Ireland, France, Italy, Greece, the Netherlands, the Caribbean, Belgium, Austria, Switzerland, Cyprus, Malta and Korea. Prompted by so much media attention, the authorities in Singapore, Australia and New Zealand issued assurances about the safety of products imported into their countries.

The UK recall was caused by the discovery of traces of Sudan 1, an illegal dye, in a consignment of chilli powder used in a table sauce and a wide variety of prepared and ready meals as well as other products in which the sauce was an ingredient. It led to suggestions that the food market was 'awash with the illegal dye'.

19.1.1 Facts behind illegal dye

The Food Standards Agency (FSA) said there was 80 mg/kg of Sudan 1 in the chilli powder and 3 mg/kg in the Worcester sauce but could not cite the levels in the other products that were recalled.

In Germany, the country's Federal Institute for Risk Assessment (BfR) stated that, in the case of an assumed high dye level (3500 mg/kg) and a large consumption amount of chilli powder (up to 500 mg/day), 1750 µg Sudan 1 could be taken in per day in the worst case scenario. This corresponded to 29.2 µg/kg bodyweight (at a bodyweight of 60 kg). This amount was below the dose of 30 mg/kg bodyweight by a factor of 1×10^3 at which a statistically significant increase in the incidence of neoplastic liver nodules was observed in animal experiments in rats after chronic administration of Sudan 1 in feed.

It continued: "In other words, the difference between the amount of Sudan 1 which can be taken in based on these assumptions in the worst case scenario per day (29.2 µg/kg bodyweight) and the amount at which a statistically significant increase in the incidence of neoplastic liver nodules was observed in animal experiments (30 mg/kg bodyweight) amounts to three orders of magnitude."

In another example involving a lower dye level and a large consumption of chilli powder, the BfR said that the difference between the quantity of dye that could be consumed and the amount at which a statistically significant increase in the incidence of neoplastic liver nodules amounted to six orders of magnitude.

In terms that the ordinary person could understand, this could be translated to: "A person would have eat three to six times the excessive quantities of Sudan 1 fed to laboratory animals over a prolonged period before there was likely to be any risk of cancer."

A highly respected toxicologist in the UK put matters even more simply. He said that the risk was the equivalent of a person smoking one cigarette during their lifetime contracting lung cancer. However, he believed that the FSA was right in recalling the products because the dye was illegal and should never be present in any food.

Despite the fact that the bright red dye should never have been present in either the chilli powder or any of the other products that were affected, the repercussions of the recall in the UK led to criticisms of the FSA for requiring it as well as the food industry in general for manufacturing products of such a poor standard that the taste and flavour had to be 'improved' by the addition of ingredients such as sauce. There was also criticism of the delay between the time the Agency was originally advised of the problem and the date on which the first official announcement was made.

The FSA also found itself under fire from Britain's top three supermarket groups, who were reported to have accused it of sloppy management of the incident. One of the multiples was quoted as saying that it told the Agency the dye did not pose any immediate threat to health and that it should not rush out a statement until the scale of the problem was established.

The effectiveness of checks on imported spices and herbs entering the UK to ensure that they were free from the dye was also challenged. Food standards officials were reported to have found 'significant deficiencies' in the existing systems. According to *Scotland on Sunday*, the FSA carried out audits of 25 local authorities responsible for checking food as it entered the UK at 24 ports and airports. Port inspection authorities found that two seaports and two airports did not have adequate arrangements in place to identify the arrival of potentially contaminated foods. At one port, Dover, the local authority's records showed that only ten consignments had been examined out of 100 000 arriving at the port but some of the responsibilities were disputed.

There were allegations that the recall had 'descended into chaos' in at least one county with some officials urging the need for the recall while others said that there was nothing for consumers to worry about.

The event also prompted a group of influential members of the UK's House of Commons, the Food and Rural Affairs Select Committee, to demand an official inquiry into the saga but it is not expected to take place for some months.

Sudan 1 is a bright red dye that should never be present in any food, but unscrupulous businessmen make huge profits by using it to retain the colour of chilli powders, which tend to turn brown. Adding it to a batch of powder can more than double the value of the consignment. However, trials with laboratory animals have shown it to be carcinogenic and there are suggestions it could harm DNA. The Sudan range of azo dyes—Sudan 1, 2, 3 and 4—have various industrial applications and are classified as carcinogens by the International Agency for Research on Cancer, part of the World Health Organisation. Sudan 1 is used to colour leather, waxes, oils, petrol and floor polishes.

The dye was banned in the United States in 1918. In the UK, its presence has never been legal in any food and this position was reinforced in the 1995 Food Act.

The crisis arose in March 2005 and the FSA recalled nearly 600 different brands. Millions of packs, bottles and jars were removed from the shelves of virtually every food outlet in the UK, from major supermarkets to corner shops, after traces of Sudan 1 were found in Crosse & Blackwell Worcester Sauce and other products made by Premier Foods as well as a wide variety of products made by over 200 other manufacturers and caterers. They had used the same batch of sauce in their formulations.

Agency staff, environmental health officers and trading standards officers—a total running into several thousand people—were involved in the recall as well as hundreds of others in the companies involved. In all, it is estimated that the exercise cost Britain's food industry as much as £143 million. Yet, a test costing about £100 would have detected the dye! At the time of writing this additional chapter, a Google search of the Internet indicated the recall had attracted some 50 000 media references worldwide.

The revelation that the substance was so widely used in everything from cottage pies and pizzas to pot noodles and tuna mayonnaise called into question the general quality of the country's food, especially prepared and ready meals.

Apparently, a 5-tonne batch of adulterated chilli powder arrived in the UK from India in 2002. It was supplied by a company that subsequently had its license removed by the Indian authorities for selling adulterated chilli powder to traders in Europe. After passing through several hands in Britain, the powder was supplied to Premier Foods. However, in 2003, before the powder had been used, the French authorities found traces of Sudan 1 in some entirely different products and advised the European Union. The EU issued an alert and then published regulations banning all chilli powders and hot chilli products containing Sudan 1. It required all such imports into the Union to be accompanied by analytical evidence that they did not contain the dye.

In view of the legislation, when they were about to use the batch, Premier Foods asked for and were provided with written assurances by the supplier, a respected UK trader in herbs and spices, that the consignment did not contain Sudan 1. Therefore, it was used in a batch of Cross & Blackwell Worcester Sauce, in which it was a minor ingredient. As part of the manufacturing process, the sauce is matured for 12–18 months before being released for sale and so it came into the marketplace some time after the EU regulations were introduced.

Subsequently, a sample of the sauce was exported to Italy and tests in that country showed traces of the dye. The Italian company told Premier Foods who advised the FSA of the discovery and said they would conduct further tests. When those tests showed minute traces of the dye, it was decided that all the foods in which this particular batch of Worcester sauce had been used should be recalled and destroyed.

Accordingly, as was its standard practice, the Agency issued a press release. There had been similar announcements previously when a total of some 250 other foodstuffs had been recalled for the same reason. Few of those recalls had attracted media attention.

However, on this occasion, the Press Association, Britain's national press agency that supplies stories and photographs to the country's national, regional and Sunday newspapers as well as television channels and radio stations, issued a 'Snap'. This is an alert to advise subscribers that an important news story is breaking. Immediately, the story went to the top of every news agenda in the UK and it was still making headlines two months later.

As the drama rolled on, the media showed their flair for regularly breathing new life into a story. First, the original supplier in India was tracked down and duly 'named and shamed'. Then, the scandal was exposed that products containing the illegal dye were still on sale in shops and were even being supplied to schools and hospitals. Reporters scoured the shelves and checked product codes and dates. Some loaded their shopping baskets and trolleys with packs, jars and bottles of various foods and took them to contract laboratories for testing so that they could expose the fact contaminated products were still on sale.

The European Union gave the story further 'legs' by holding a two-day emergency meeting to discuss the issue. One of its commissioners was severely

critical that Sudan 1 was still being found in the food chain. Markos Kyprianou, Commissioner for health and consumer protection, issued an edict to food companies to dispose of old stocks of the contaminated powder. He also demanded that member states force companies to comply with the order to remove contaminated products from the shelf.

In a series of bizarre twists, the Indian government declared that the FSA had never provided them with documentary proof that the suspect consignment came from their country, but the UK media had found and named the supplier in the sub-continent several weeks previously! The Spices Board of India (slogan 'Indian Spices—all the purity of Mother Nature'), declared: The exporters have been issued circulars suggesting that the Board will have to be informed at least 48 hours before any chilli consignment is exported from anywhere in the country. The Board would then inspect consignments and samples." Strong evidence suggested that the country was taking the requirements seriously. The licences of five exporters were suspended. They were all based in Mumbai, formerly Bombay, and the same city from which the original contaminated batch was traced.

Outraged at the slur on its country's name, the Sudanese government demanded to know why the dye was named Sudan 1.

The delay between the date on which the FSA received the initial indication there was a problem and that on which the first announcement was made calls into question how seriously the UK food companies were prepared to meet the requirements of the European Commission on the traceability of food and animal feed. The EC legislation states that such information should be available 'on demand', but it does not specify an actual timeframe. In the United States, the law is clearer. The Public Health, Security and Bioterrorism Act gives a manufacturer four hours in which to produce traceability information during normal daytime office hours and otherwise eight hours.

In an interesting spin-off from the saga, China reported that recent scandals concerning a number of major foreign companies had led to crises of confidence among consumers. The China Research Institute reported that 21% of respondents in a survey said that they would not buy products from the companies involved. Their products ranged from food to cosmetics and baby lotion.

London's *Financial Times* reported a sharp rise in recalls of dangerous or faulty products. They had risen by 175% in a year following the introduction of a European Union product safety directive, according to a professional services company (PwC). Toys, skincare products, food-making equipment and garden sheds were among the items withdrawn in EU states during the year to February 2005. Recalls occurred at the rate of 11 a week in February 2005 compared with four in the same month the previous year. More products were 'pulled' on regulators' orders in member states rather than recalled by companies.

In March 2005, in the wake of the crisis, the EU published a guidance document to help those in the food chain to better understand the new traceability regulations. The 30-page document is available in ten languages and can be downloaded from: <http://europa.eu.int/comm./food/food/foodlaw/guidance/>

On April 4, 2005, it was announced that the random tests for Sudan 1 were being extended by the EU to foods containing palm oil and turmeric. They too must be certified as safe from Sudan 1, 2, 3 and Scarlet Red/Sudan 4 before they can be imported into the European Union. Controls carried out in the EU countries had revealed that consignments of curcuma and virgin palm oil were contaminated with Sudan dyes, though the quantity was thought to be low. Palm oil is widely used for frying food and is also found in biscuits and crisps. Curcuma, or turmeric, is used to flavour sauces and curries.

19.1.2 Sudan 1 timeline

May 9, 2003: France informs the European Commission (EC) that it has detected illegal dye Sudan 1 in hot chilli products originating from India. Food alert issued then regulations passed requiring all such products imported from India into the EC countries to be certified free from dye.

July 30, 2003: UK implementation of EC emergency measures comes into force. Henceforth, all such consignments must be accompanied by certificate showing tested and free from Sudan 1. Consignments without certificates to be tested at the port of entry to EU. Member states to carry out random sampling and analysis of both imported consignments and products already on market.

July 31, 2003: UK's FSA issues first food hazard warning. Sudan 1 found in 25 products containing hot chilli. Local authorities asked to ensure products removed from sale.

September 15, 2003: FSA issues guidance to industry; companies to withdraw and recall contaminated products as soon as identified. Agency also asks manufacturers using chilli powder or chilli products to ensure consignments not contaminated if imported from India and supplied before July 30, 2003. FSA adds: "These companies should consider sampling relevant batches to ensure that their [own] products are not contaminated. The FSA would like to be notified of all results whether they are positive or negative, in order to obtain as much information as possible about the distribution of contaminated chilli products."

February 18, 2004: FSA updates guidance, asking companies to withdraw and recall contaminated products as soon as identified. Also asks manufacturers using chilli powder or chilli products imported from India and supplied before January 27, 2004, to check not contaminated with Sudan dyes. Companies to sample relevant batches to ensure not contaminated and to notify the Agency of all results.

July 31, 2003–January 31, 2005: In 18 months since FSA was first aware of adulteration of chilli products with Sudan dyes, 56 food hazard warnings or food alerts issued involving more than 200 products.

February 7, 2005: Premier Foods informs the FSA sample of Crosse & Blackwell Worcester Sauce tests positive for Sudan 1 in Italy. Company advises Agency that it will double-check results.

February 9, 2005: Premier Foods advises FSA five products could be affected.

February 10, 2005: FSA told both Worcester sauce and a 2002 batch of chilli powder test positive for Sudan 1.

February 11, 2005: Premier Foods informs FSA that it is compiling a list of customers for the five products.

February 14, 2005: FSA provided with list of over 160 customers in the UK. Hundreds of products could be affected.

February 15, 2005: FSA meets representatives of food industry and requires full disclosure of affected products, their removal from sale and appropriate publicity to inform consumers.

February 16, 2005: FSA meets again with food industry representatives, repeats demand for detailed product information.

February 17, 2005: That evening British Retail Consortium provides bulk of information about affected products.

February 18, 2005: Further information continues to arrive. FSA issues press release. List of some 360 products placed on Agency's website at 1.30 pm.

February 21, 2005: Sixty products added to list, second press release issued, further meeting with retailers, deadline of February 24 set for the removal from sale of all contaminated products.

February 22, 2005: Nine more products added to the list.

February 24, 2005: Agency announces over past week it has coordinated with local authorities further inspections of companies and factories allegedly involved in supply of contaminated foods. Investigation largest of kind ever undertaken in the UK. Information will form part of FSA's wider investigation to establish how failure in industry's legal duty to provide safe and fit food happened. Agency advises local authorities that they will need to consider enforcement action on the basis of evidence they collect.

February 24, 2005: FSA adds 146 more products to list, taking total to 474. Agency says vast majority of products contaminated with Sudan 1 have been removed from sale.

At the point when the crisis seemed to be subsiding traces of more illegal dyes were discovered. They were Para Red (paranitraniline red), Rhodamine B and Orange 11.

In a move that threatened to throw the catering industry into chaos, this led the Food Standards Agency to declare that all imports of spices, including chilli powder, paprika, cayenne pepper and turmeric would be subjected to rigorous new tests.

At the same time, controls carried out in EU countries revealed that consignments of curcuma and virgin palm oil were contaminated with Sudan dyes, though the quantity was thought to be low. The illegal dyes were also found in various spice mixtures in the Russian Federation and Germany.

Following an emergency meeting on May 10, 2005 the European authorities set strict limits for the banned dyes in spicy foods. Detection limits were set at between 0.5 and 1.0 milligrammes per kilogram but the aim was to lower this level. and any products containing higher amounts were required to be withdrawn from the market.

The UK, Holland, France and Spain agreed to work together to further develop analytical methods for the detection of Para Red, to extend the method to other similar dyes in food and to improve the consistency of such results. Germany said it was considering collaborating in the work.

The activities were coordinated by the United Kingdom, who also called for suggestions for other dyes that should be covered by the exercise. The aim

was to obtain an overview of the extent of the adulteration of spices and other foods and the level of exposure experienced by consumers.

The commission issued a seven-point leaflet outlining the food industry's obligations on food safety. It was aimed at giving the industry an "at-a-glance reminder of their obligations" and a means of informing consumers what they can expect from food operators. EU health and consumer protection commissioner Markos Kyprianou declared: "One of the lessons we have learned from the recent Sudan 1 contamination is that we need to extend controls for Sudan to products other than chilli to ensure the highest possible levels of protection for European consumers. I would urge all food operators and member state authorities to ensure products containing these dyes do not enter the EU market—this is their responsibility."

In a shrewd move to restore confidence in the herbs and spices industry, the Seasoning and Spice Association, which is part of the UK's Food and Drink Federation, indicated its willingness to cooperate fully with the Food Standards Agency in a survey of non-permitted colours in spices. It gave an open invitation to FSA representatives and environmental health officers to visit the offices and plants of every member company to study quality assurance and traceability systems and provide better insights into the way the industry operates. The Association also offered to provide a central point for access for consumer information.

A few days later, as contaminated products continued to be found in the UK food chain, the FSA declared that it was creating a task force to reduce the risk of contamination to supplies and improve risk management when recalls occurred. The aim of the new task force, which would probably include trade and consumer bodies, will be to slash high and medium risk incidents by 25%. Said the Agency's acting chair, Julia Unwin: "In the light of recent Sudan 1 and Para Red food withdrawals, we need to find practical ways of reducing the number of incidents of food contamination. When they do occur, we need quick, effective and appropriate action from those involved."

Key actions for the new task force will include finding practical ways of reducing the likelihood of food contamination incidents occurring and identifying ways of deciding "on the proportionality of any response" should they occur.

The problem affecting Crosse & Blackwell Worcester Sauce also affected sales of Lea & Perrins Worcester Sauce though there was never any question that latter contained any traces of Sudan 1. The company was forced to mount a vigorous campaign to clear the name of its product.

19.2 New bird flu outbreaks spark fears of pandemic (see also Section 18.2)

Just when Asian countries were hoping that the outbreaks of bird flu in 2004 had been satisfactorily dealt with, the deadly disease broke out again in 2005. As vaccines were being prepared for use in any serious future outbreaks, the virus began to emerge once more and fuelled fears of a global pandemic.

As many Vietnamese prepared to welcome the lunar new year with feasts of chicken or duck, the reappearance of the H5N1 strain caused the death of or required the culling of nearly a million chickens as well as all the ducks in Ho Chi Minh City, the nation's largest city, and many hundred thousand quail. On February 11, 2005, Vietnam officials ordered a nationwide ban on duck and goose farming in a bid to head off the mounting epidemic that had claimed 13 lives since late December the previous year. Duck and geese are regarded as a main reservoir of the virus because they carry it without becoming ill.

By February 19, 2005, Vietnam's animal health authorities were reporting bird flu outbreaks in 19 sites within six provinces. Five were in the Mekong Delta region where more than 7500 fowl were culled. The heaviest loss was in Hai Duong northern province where 1100 ducks and 500 chickens were destroyed. The disease also emerged again in Long An province, which suffered the heaviest losses in the 2004 outbreak, resulting in the slaughter of some 1500 birds.

Against this background, a few days later, on February 23, 2005, United Nations officials warned that the world was overdue an influenza epidemic and needed to act quickly to prevent one being triggered by the bird flu epidemic in parts of Asia where it had killed 46 people. The world usually had a flu pandemic every 20 or 30 years, but it had been 40 years since the last one, they warned.

Speaking in Ho Chi Minh City at a conference on the crisis, Shigeru Omi, head of the World Health Organisation in Asia, said: "The world is now in the gravest possible danger of a pandemic." He believed it was 'highly likely' the avian flu virus that swept through large parts of Asia from the end of 2003 would be the source of the next one, unless concerted action was taken.

By April 2005, the latest outbreak had led to the deaths of some 13 people. Like earlier victims, all appeared to have contracted the virus through direct contact with sick birds. Yet previously, at a bird flu summit in Bangkok, Thailand's capital, in 2004, experts were confident of eradicating the virus. However, they now began to say that it could take many years to eliminate it and that a huge effort was required just to contain the virus. Omi pointed out that news that Japanese researchers had found flies infected with bird flu showed the virus was 'versatile and resilient'.

A central issue at the conference was how to overhaul age-old methods of farming in Asia, where families live in close proximity with chickens and ducks that roam freely in farmyards, spreading the virus. Public awareness campaigns are taking place in several of the affected countries but traditional practices, such as drinking fresh duck's blood, continue. Remarked Omi: "It is a rural disease and people have diehard traditions that are difficult to change."

While the conference was taking place in Vietnam, Dr Julie Gerberding, Director of America's Centre for Disease Control, added her voice to the world-wide concern when she told a meeting of the American Association for the Advancement of Science: "This is a very ominous situation for the globe. We are expecting more human cases over the next few weeks because this is high season for avian influenza in that part of the world." Though cases of human-to-human transmission were rare "our assessment is that this is a very high

threat—you may see the emergence of a new strain to which the human population has no immunity.” The H5N1 strain has a mortality rate of 76%—“it is very frightening to see such a high case fatality rate,” she added.

Health experts are reported to be worried about H5N1 because, like previous pandemic strains, it carries a new combination of two molecules—haemagglutinin (H) and neuramidase (N). They are the surface proteins of the virus and the most important proteins as far as the host immune system is concerned. The fear is that, if a person is exposed to H5N1 and is also co-infected with a human flu, components of both could produce a virus that could be transmissible from person to person and capable of spreading widely and very rapidly throughout the world, killing millions of people.

In a further development, on March 19, 2005, it was reported that Japanese researchers had retested samples from 30 Vietnamese patients whose laboratory samples had not revealed any traces of the disease. They discovered that seven had actually been infected and this raised the issue of whether any other cases had been missed. Other doctors and researchers began to suggest that some of the victims were displaying symptoms other than those up to that point considered to be classic indications of infection, like pneumonia-like signs such as coughing, lung damage and often death.

Others blamed wild birds for spreading the virus and it was also suggested that duck, chicken and turkey feathers that were still being exported could carry the disease. They were used in the making of pillows and could be contaminated with faecal material. In the United States, 11 states were put on the lookout for boneless chicken feet, an Asian delicacy that had been smuggled into the country. Hundreds of Asian restaurants and markets were visited to explain the health risks.

Disturbingly, at the beginning of April 5, 2005, it was revealed that the H7 strain of bird flu had been found in North Korea. Previously, this particular strain had been undetected in Asia but, following its discovery, thousands of chickens were culled. Hans Wagner, a senior official with the United Nations Food & Agricultural Organisation, said: “We don’t know where the virus came from; so we have to trace it back.” Apart from H5N1, H7 is one of the two other avian strains that can cause illness in people, but the outbreaks are not as severe as those caused by H5N1.

At the same time, the Vietnamese Government launched a nationwide cleanup of poultry farms in a further attempt to halt the spread of the virus. The Ministry of Health announced that both large commercial operations and small local farms in every village would be disinfected.

Tragically for the countries concerned, outbreaks have continued to occur even after experts thought the disease was under control. Controversy has raged over whether there was a genuine risk of a pandemic and experts have continued to disagree. Countries began developing and testing vaccines while the culling of thousands of chickens and other birds continued. In April 2005, Indonesian scientists found the H5N1 virus in a pig on densely populated Java Island. This led them and other scientists to express fears that pigs could act as a ‘mixing vessel’ in which a human pandemic strain could evolve. Their concern arose because pigs can harbour both human and avian flu viruses even

though such hybridisation has never been proven. However, it is thought that the animals might not be able to transmit this particular type of flu to one another.

Subsequently, the scientists tested pigs in several regions but only West Java showed positive results for avian flu in three other pigs. However, because it is a Muslim country, pigs are regarded as unclean animals so their farming is not widespread. Indonesia is the fourth most populous country in southeast Asia.

Meanwhile, Thailand's Ministry of Agriculture and Cooperatives confirmed that, while it had been carefully monitoring for instances of the disease in pigs, it had not found any cases. The Ministry pointed out there were strict measures in place to ensure the virus did not spread from poultry to other animals.

In a worrying development, towards the end of May the World Health Organization warned that the deadly H5N1 strain appeared to be evolving in a way that might signal a greater threat of a human pandemic. A report based on a consultation meeting of experts in Manila, Philippines, on May 6 and 7, 2005, expressed the fear that bird flu could hybridise with human flu or evolve to create a deadly and easily transmissible pandemic strain that could sweep across the world and kill millions of people.

Said the report on influenza A/H5N1 in humans in Asia: "While the implications of these epidemiological and virological findings are not fully clear, they demonstrate that the viruses are continuing to evolve and pose a continuing and potentially growing pandemic threat."

Towards the end of May the Chinese government sealed off nature reserves and rushed three million doses of vaccine to a remote western province after 178 wild geese found dead on the shores of Lake Quinghai, a breeding ground on the Tibetan plateau, were confirmed as having died from the H5N1 virus. However, there were no reports of the virus spreading to people or domestic poultry flocks.

Meanwhile, in a thoughtful gesture, US poultry producers donated nearly 100 000 lb of chicken meat worth some \$50 000 to Vietnam to fund a bird flu education programme and generally help farmers badly hit by the crisis. The meat was auctioned in Hanoi and Ho Chin Min City and the proceeds donated to the Vietnam Poultry Association.

19.3 Disaster in which the Internet and people's initiative were supreme (see also Chapter 4)

The massive earthquake off the coast of Indonesia on December 26, 2005, and the subsequent tsunami which ravaged several countries in southeast Asia, killing thousands of people as well as destroying villages and towns, will have a lasting effect on future crises, especially as they affect the food industry.

The implications of the event were described by the author in the following article in *Food Safety & Security*¹, March 2005, written in the wake of the

¹ This international newsletter ceased publication in June 2005.

deadliest earthquake the world has experienced in five centuries and reproduced with the permission of the publisher.

There are lessons to be learned from every crisis. The food industry can expect future crises to be influenced by two significant aspects of the recent terrifying tsunami in southeast Asia. Like all crises, there were similarities in many aspects of the event but in other ways it was different and had its own characteristics, just as the long-established mantra says.

In particular, the tragedy has demonstrated the enormous influence of the media, especially television. It has also been a defining moment for the Internet in the way it has been used by governments, aid agencies and individuals to inform people, enlist their help, raise funds to help victims of the tidal wave, and even to offer advice and comfort to grieving friends and relatives.

Thanks to the speed of air travel and technological resources, it was only a matter of a few hours before journalists from distant countries were reporting live from Thailand, Sri Lanka, India and Indonesia where the earthquake occurred. But even before they had landed, photographs and video footage were available from holiday-makers and others who had e-mail facilities and could feed them to news organizations.

People craving instant information about the impact of the tsunami found the first eyewitness accounts of death and survival were on the Internet. Showing greater initiative than the authorities, people in many different parts of the world used the Internet and text messages on mobile phones to warn families and friends of the approaching threat to their lives.

Television coverage was impressive. News programmes were anchored from Patong Beach's devastated main road on Phuket island in Thailand, the wastelands of Ache province in Indonesia, the ravaged beaches of India, or the shattered remains of fishing villages in Sri Lanka. Coverage switched seamlessly from one area to another as well as to studios thousands of miles away in a remarkable demonstration of the relentless progress of technology.

More and more dramatic amateur footage began to emerge of tidal waves sweeping people away, destroying buildings, tossing cars and lorries about like toys and carrying torrents of debris with them as they surged up beaches and thundered inland.

Of course, the food industry has already experienced disgruntled holiday makers using their cameras to expose appalling conditions in the kitchens of hotels and cruise ships. Now we can expect all and sundry to make even greater use of these popular digital devices and their familiarity with the Internet. Television channels like BBC News, Sky News, the UK's Channel 4 News and many consumer programmes constantly urge viewers to e-mail them pictures, stories and complaints. People will be doing this with increasing confidence in the future.

Anyone taking a laptop computer on holiday for work purposes or to download and review images from their digital camera can also easily e-mail their complaint to the tour operator or selected media before they have returned home. All their laptop needs is a phone card or a link to a satellite phone—facilities extensively used by news and sports photographers. Also, journalists have shown that

perfectly usable TV reports can be sent by video phone from virtually anywhere in the world. Every day it is becoming increasingly difficult to isolate problems and prevent them becoming public.

The TV coverage in many parts of the world was extensive and ran with little interruption for many days. It was a predictable decision. Christmas is frequently a dull news time. The countries devastated by the tsunami are popular holiday destinations, particularly for people from Scandinavia, the USA, the UK, Australia and Japan. Many were spending Christmas in these "romantic and idyllic" destinations, so there were many victims on whom to focus.

Influenced by the pictures they had seen, people who had been unwrapping presents the previous day and enjoying festive meals in the comfort of their homes began making such generous donations to aid agencies and relief organizations that *Médecins sans Frontières* even had to go to the unprecedented length of announcing they had more money than they needed to deal with this particular disaster.

Frustrated at the time it was taking aid agencies and relief organizations to reach the victims in many of the stricken areas, ordinary people loaded up cars and lorries with food and water and took it to the homeless and starving victims. By showing these efforts, the media no doubt shamed governments and aid agencies into rushing more help to some areas and to act more quickly—there are times when journalists can be a force for good, no matter what the cynics might claim.

Many of the media also recognized the desperate need of relatives and friends to know if their loved ones were still alive. They began to devote the news crawls at the bottom of their TV newscasts to messages from those who were safe. Others began publishing similar messages and appeals for information on their web sites. Tens of thousands of e-mails from anxious friends and relatives were received by the site of BBC News.

In its eternal quest for new angles to retain the interest of readers, listeners and viewers, coverage ranged from reporting the initial effects of the tidal wave to the efforts of local people to help victims, the stories of relatives and friends searching for survivors, the exposure of governments and relief agencies for not reaching or ignoring certain affected areas and so on including—seven weeks later—the scandal of delays in identifying bodies.

Amid the chaos some remarkably practical minds got to work. The Internet became an invaluable source of information. Within days of the disaster, one major hospital in Phuket had published the names of 1,760 people it had treated for various injuries. Other hospitals did the same. Thailand's major newspapers published similar information on their web sites as well as details of how to make donations to various relief organizations.

Quick information was available on www.onethailand.com, which provided links to the latest news stories about the tsunami as well to lists of the dead, injured and survivors. It also provided links to photographs of unidentified bodies in various areas and advice for people coming to Thailand to search for relatives. Other information included details of foreign embassies and consulates, blood donation centres and addresses to which desperately needed donations of food, drinking water and medical supplies could be taken. Considerable useful

information was also published on the site of the Tourism Authority of Thailand (www.tatnews.org/crisis/2381.asp) and that of the official disaster centre.

A web log created in Mumbai (formerly Bombay), one of India's major cities, to help tsunami survivors reported 1.1 million hits within ten days of its launch, a remarkable feat in a country where 'blogging' is still in its infancy. The South-East Asia Earthquake and Tsunami Blog (www.tsunamihelp.blogspot.com) was created with the aim of helping people reunite with their families. It rapidly developed into a resource centre for relief operations and information, becoming the tenth most visited humanitarian site on the Internet.

Web logs provided such an extraordinary insight into the experiences of survivors that search engine Yahoo! even began publishing a roundup of tsunami blogs (story.news.yahoo.com/news?tmpl=s&u=/asiatsunami.blog/static). Introducing the site, Yahoo! stated: "Internet web logs are offering a different view into the greatest natural disaster of our times. The immediacy with which blogs can deliver and disseminate personal accounts, information and news about the tsunami disaster is an essential component to Yahoo! News' in-depth coverage of this historic event."

By using the Internet, relief and aid agencies suddenly found themselves provided with the most immediate and effective means of raising funds they had ever experienced. They found that they had an instant source of money—contributions made by credit card. The lesson has changed the face of future fund-raising. The same organizations used the Internet to demonstrate their transparency by reporting on the use to which the donations were being put.

The disaster has been a defining moment for the Internet. Its potential has been demonstrated as never before. People around the world have shown that they are comfortable with computers and Internet providers. They have discovered that they have a voice and power never previously appreciated, as well as showing extraordinary humanity and the ability to act with more speed than governments and relief agencies. They will be a force to be reckoned with in many future crises. As one pundit put it: "Welcome to the new age of globally empowered citizens."

19.4 Unique laws force mercury warning (see Section 13.2)

In April 2005, the Californian lawsuit filed against the United State's three largest tuna canners was still in its early stages. Under the state's unique laws, the court was asked to prohibit the companies from selling their tuna in the state without providing a warning to consumers that albacore and light tuna contained mercury, as required by Proposition 65.

In a similar lawsuit on January 17, 2005, Attorney General Bill Lockyer moved to force five grocery chains to warn customers that tuna, swordfish and shark sold in their markets contained mercury, which was known by the state to cause cancer and reproductive harm. That action was also continuing.

However, on February 4, 2005, San Francisco Superior Court Judge Richard Kramer approved the settlement of a lawsuit against major restaurant chains under which hundreds of restaurants state-wide would be required to post warnings for patrons about mercury in fish. Lockyer said: "We are not trying

to discourage people from eating fish, which is an important source of protein and an important part of a balanced, healthy diet. But people have a right to know when they are being exposed to substances that can cause cancer, birth defects or reproductive harm, and businesses have a legal duty to provide that notice. This settlement achieves these significant public health objectives.”

A few days later, on February, 2005, a Congressional Review affirmed that the health benefits of consuming seafood far outweighed any risk due to the trace amounts of mercury in some fish. The Tuna Foundation ‘applauded’ the findings, which were the product of a lengthy Congressional review of the mercury issue dating back to 1990. The report concluded that, based on all available science, there was no basis for the claim by environmental activists that unborn children could be at risk if their mothers ate fish during pregnancy. It added that the amount of mercury in the most commonly consumed seafood, such as canned tuna, was well below the trace amounts allowed by the Food and Drug Administration and ‘far removed from any level of concern’.

19.5 End for GM crops in the UK? (see also Section 18.4)

Further doubt was cast on the viability of GM crops in the UK on March 21, 2005, when the results of the final trial of a four-year series of experiments found, once more, that genetically modified crops could be harmful to wildlife. The trial showed that the ultra-powerful weedkillers the crops are engineered to tolerate would bring about further damage to a countryside already devastated by intensive farming.

Only one of the four farm-scale trials that have taken place since the early 2000s showed that growing GM crops might be less harmful to birds, flowers and insects than the non-GM equivalent and even that finding was attacked as flawed. This was because the weedkiller required by the conventional crop was so destructive that it was about to be banned by the European Union.

The results make it unlikely that any other major player in the GM crop industry is likely to want to face both public opposition and the requirement for such extensive trials in the UK.

19.6 New phenomenon appears on Internet (see also Chapter 4)

Free receiving software is now enabling people to pick up ‘podcasts’—radio-style shows—from online directories, download them to any MP3 player such as an Apple iPod, which is where the name has originated, and listen to them at their leisure.

In just over the six months since the technology became available in August 2004, some 4000 podcasts have hit the ‘airwaves’. They are devoted to a wide variety of topics from the teachings of Swami Prabhupada, the founder of the Hare Krishna movement, to sports like kite surfing and even how to clean a septic tank!

London, May 2005

Appendix A

Typical crisis plan

*It should be appreciated that no plan can ever suit every business. This is an example of a typical document. It is a combination of several different plans.

ABC Foods Ltd—Crisis Management Plan

Objective

This plan has two objectives. The first is to set down guidelines for the handling of any serious problem facing the company, especially if it is likely to result in risks to public safety and/or undesirable and damaging publicity. The second is to ensure that ABC Foods and its brands suffer the minimum possible damage from such an incident. With this in mind, whenever possible, an incident will be focused on the actual brand concerned and references to the company will be avoided as much as possible.

Protocol

The company has a Crisis Management Team to deal with any serious incident affecting ABC Foods or its brands. The Crisis Team has authority to make all necessary decisions in connection with a particular incident, including ordering a public recall of an entire product or a particular production batch, authorizing all necessary media statements and advertisements, and calling in the police or enforcement authorities as necessary.

The Team comprises:

- Marketing director,
- Sales/commercial director,
- Production/technical/distribution director; and
- Corporate affairs/public relations manager.

Other members of staff will be co-opted as appropriate for any particular incident.

The chairman of the Team shall be the marketing director. The corporate affairs/public relations manager shall be the coordinator, or central channel, through which information is fed initially to the Committee.

Each team member will nominate at least one deputy but preferably two in case the member and his or her first deputy are out of contact at the same time.

Indication of a problem

The indications of a serious problem are most likely to arise from:

- Internal control systems;
- A complaint from a consumer, sales customer or enforcement authority;
- An enquiry from the media;
- Evidence of accidental or malicious contamination;
- An extortion threat;
- A telephone call from the police; or
- The actions of a pressure group.

Immediate action

At the first indication of a possible problem, the Committee coordinator (or deputy) should be informed without delay. The coordinator should then inform members of the Committee as appropriate.

Upon the available information, the chairman of the Committee will decide whether it is appropriate to call a meeting. If an extortion threat is involved the police should be informed immediately.

Procedures

A diary shall be maintained detailing the exact times at which relevant information is received and at which decisions are taken. All media enquiries shall be logged, together with details of the journalist's name, publication and telephone number as well as the nature of the enquiry and the action taken. Relevant complaints from consumers should be fed into the existing system. The Committee shall be advised immediately of any potential difficulties which could arise from specific calls.

If it is necessary to order a product recall, the company's existing recall arrangements should be followed.

At the end of any incident the Committee shall produce a report which should be objective and include recommendations for improvements to existing plans and procedures, if any are deemed necessary.

Objectives

In any crisis, the aims of the Committee should be:

- To minimize or eliminate any danger or risk to consumers, employees or other individuals;

- To minimize or eliminate any risk or damage to the brand concerned;
- To minimize or eliminate any harmful or undesirable publicity to the company or its other brands; and
- To avoid or minimize any risk, damage or adverse publicity to the food industry.

Facilities

To enable the remainder of the business to operate normally, meetings of the crisis team should take place in the incident room established for this purpose. On the instructions of the coordinator or other suitable member of the team, it should be adapted to provide the following facilities:

- Internal and direct external telephone lines;
- Ex-directory telephone lines for incoming and outgoing calls;
- Fax machine, photocopier, document and film transparency scanner, radio and television sets (including satellite channels) or easy access to them;
- Tape recorder and VCR or DVD recorder;
- All relevant telephone directories, both internal and external as well as media lists, retailer emergency contacts, police contact numbers, etc., as well as e-mail addresses where available;
- Home telephone numbers of key staff;
- Telephone numbers of all relevant authorities and external advisors such as environmental health and trading standards offices, legal advisors, back-up technical facilities such as independent laboratories, etc., as well as their e-mail addresses;
- Administration and support resources;
- Access to 'quiet areas' or 'quiet rooms' for separate discussions;
- Access to kitchen facilities;
- Additional contact names, telephone numbers and e-mail addresses of the nominated public relations consultancy specializing in crisis management should additional resources be required, security advisors, etc; and
- On instructions from a suitable member of the Committee, the telephone 'hot-line' for consumer calls should be put into operation.

Audiences

The priority audiences for the company's messages shall be:

- The media;
- Consumers;
- Trade customers;
- Regulatory and enforcement authorities;
- Employees;
- Trade associations and, if appropriate, other companies in the industry; and
- Any other relevant individuals, opinion formers, experts, etc.

Appendix B

Typical crisis checklist

THE ALERT

- Customer complaint
- Media coverage or enquiry
- 'Copy cat' complaint
- Enforcement authority
- Extortion threat or extremist action



FIRST STAGE

- Assemble crisis team
- Begin diary of events and actions taken
- Alert crisis consultant or agency, insurers and lawyers
- Gather facts: does problem represent serious risk to health?
- Decide action: is product recall required, can stock be isolated before distribution?
- Should production be stopped, factory closed and investigated?
- Can loss be minimized by alternative use of withdrawn product?
- Is there a need to advise enforcement authority or police?
- Advise switchboard where to channel media and consumer enquiries



SECOND STAGE

- Establish distribution of suspect batch
- Draft press release, Question and Answer Sheet, background information
- Prepare brief for sales executives and consumer relations officers
- Prepare company web site
- Prepare recall advertisement
- Draft employee announcement
- Consider withdrawing press and TV advertisements
- Consider advising competitors and trade association
- Consider need to enlist support of independent experts



THIRD STAGE

Crisis team to meet and agree action
Approve material for media, recall advertisement, sales, consumer relations,
employees, enforcement authority, etc.
Reinforce advise to switchboard where to channel media and consumer
enquiries



FOURTH STAGE

Activate consumer free 'hot line'
Advise trade customers, including those not receiving suspect batch
Inform media, enforcement authority and employees
Consider advising shareholders if problem is serious
Activate revised company web site
Monitor media coverage and pattern of consumer complaints
Check Internet (on-line editions of newspapers and magazines as well as
consumer news groups, etc.)
Consider employing clipping service to monitor Internet chatter and
references



FIFTH STAGE

Recovery phase, monitor consumer reaction and perceptions

Appendix C

Typical press release and Question and Answer Sheet

(This press release and Q&A Sheet are based on the recall of a batch of product because glass was found in a number of jars.)

GLASS IN 500 g JARS OF BRAND X

Brand X tonight asked consumers to check whether they had any 500 g jars of (name variety) in their homes with the production code ABC 1234X on the lid.

A Brand X spokesman said, "We do not want to cause alarm but we are asking people to take this precaution because glass has been found in a small number of jars from this particular production batch.

"We are aware that five jars out of a batch run of 135 000 have been affected. We believe the contents of all the others are safe to eat but we never take any chances. That is why we are issuing this warning.

"Stocks of these particular jars are being removed from the shelves of all major stores and also many smaller outlets. We have also isolated the jars still in our factories and depots.

"All other jar sizes (750g and 1kg) as well as other varieties of Brand X are safe and wholesome to eat. This problem affects only jars coded ABC 1234X."

"It would seem there were a few teething difficulties while a production line was being set up to produce this particular batch.

"It was thought all the jars that could have been affected during the setting up of the line had been removed and destroyed, as is our established procedure."

Brand X is asking consumers with 500 g jars of (name variety) carrying this particular production code to post the lid back to them for a full refund of their purchase and postage costs. Consumers should safely dispose of the jar and its contents.

The address to which the lids should be returned is:

Brand X Recall,
PO Box 123,
Sometown,
Somecounty, 1X 2YY.

Anyone seeking further advice can talk to Brand X on 0800 000000 between 8 am and 9 pm, including weekends.

For further information:

(Give contact name, or names with home, day and night phone numbers plus company web site and individual e-mail addresses).

Background information

1. Brand X leads the UK with 67% of a £347 million market. It has dominated the market since X was launched in 1953.
2. Brand X comes in 12 varieties and three sizes of jar. Only the . . . gram size of is affected. No other varieties or sizes of jar are affected.
3. Sabotage is NOT (repeat NOT) suspected. This problem arose when machinery was being adjusted to pack a new size of jar. Several hundred jars shattered. In accordance with established practice, the production line was shut down while the glass and any jars in the vicinity of the incident were destroyed. It would seem that not all the affected jars were destroyed.

QUESTION AND ANSWER SHEET

■Information should be extracted from this document as appropriate to respond to questions from the media, consumers, customers, enforcement authority, etc.

Q1 *This must be a serious matter if you are issuing a public warning. Just how serious is it?*

A1 We don't want to be alarmist; neither do we want to take any risks. We believe this teething-problem, which occurred briefly when a production line was being set up, affected only a very small number of jars. We are making this announcement as a precaution.

Q2 *How long have you been aware of this problem?*

A2 The jars have just begun to go on-shelf. We only became aware there might be a problem earlier today after an investigation we initiated yesterday evening. At that stage we were aware there had been a few teething-difficulties while the production line was being set up but we understood all the jars that could possibly have been affected were destroyed.

With modern production lines handling glass at high speeds, break-ages occur from time to time. In such situations, any jars in the vicinity are removed and destroyed. It would seem that, in this particular instance, not all the affected jars were destroyed. (It is similar to starting up a printing press. You have to make adjustments to get the machine running perfectly and you throw away any printed copies that are unsatisfactory).

Q3 *How many jars are involved?*

A3 We have found glass in five 500 g jars out of a batch of 135 000. The affected jars have the code number ABC 1234X on the lid.

Q4 *How many jars were destroyed?*

A4 When the difficulty was identified 2000 of these particular jars were isolated and destroyed in accordance with our normal procedures.

Q5 *What should people do if they have any such jars?*

A5 To be on the safe side, they should safely dispose of the jar and its contents and post the lid to us for a cash refund. However, we would stress that only the 500 g size of (name variety) bearing the production code ABC 1234X is affected. All other jars and varieties of Brand X are safe and wholesome to eat.

Q6 *How did glass get into the jars? Do you suspect sabotage?*

A6 We do not suspect sabotage. This was a production start-up incident.

Q7 *Has anyone been hurt eating the glass?*

A7 No. The pieces of glass which have been found are quite large for the size of jar. Therefore, fortunately, people have seen them when they have been emptying the jar.

Q8 *What should anyone do if they think they have eaten glass?*

A8 If the jar has this particular code number on the lid, ABC 1234X, they should seek medical advice.

Q9 *Where is Brand X packed?*

A9 By a supplier/sister company/our factory at

Q10 *Tell me about Brand X?*

A10 The brand was launched four years ago, in (month and year). The product accounts for over ...million meals a year and is the Number One brand in a £347 million market with a share of 33 per cent.

Q11 *How can people contact Brand X if they are worried or have a complaint?*

A11 A special phone line has been set up. They should ring 0800 000000.

Appendix D

Typical press advertisement

Depending on the extent of the problem, it can be necessary to place display advertisements in the media most likely to be read by consumers of the affected product. It is recommended that a sans font is used for all the headings and text and that the advertisement is placed within a bold rule box (at least 2 point)—see separate examples showing the impact of different type faces. The advertisement on Page 246 is set in Times New Roman and that on Page 247 is in Arial.

MANUFACTURER'S ANNOUNCEMENT

Brand X (name variety) in (state size) jars

Due to a production problem, it is possible a small number (state size) jars of (name variety) with the code ABC 1234X on the lid may contain glass.

Please check whether you have any such jars in your home. If so, please safely dispose of the jar and its contents then post the lid to us for a full refund.

NO OTHER VARIETY OR SIZE OF JAR OF BRAND X IS AFFECTED BY THIS PROBLEM. ALL OTHER SIZES AND VARIETIES ARE PERFECTLY SAFE AND WHOLESOME TO EAT.

The address to send the lid to is:

Brand X Recall,
PO Box 1234,
Sometown,
Somecounty, 1X 2YY.

You can also speak to us if you require any additional information. The telephone number is: 0800 000000. Full details about the problem and illustrations of the production code on the affected jars can be seen on the company's web site: www.abcfoods.com/productrecall.

The company greatly regrets any inconvenience caused to you or your family and apologies for the fact this particular batch does not meet our normally stringent standards.

MANUFACTURER'S ANNOUNCEMENT

**BRAND X (name variety)
in (state size) jars**

Due to a production problem, it is possible a small number of (state size) jars of (name variety) with the code ABC 1234X on the lid may contain glass.

Please check whether you have any of these jars in your home. If so, after you have safely disposed of the jar and its contents, please post the lid to us for a full refund.

**NO OTHER VARIETY OR SIZE OF JAR OF BRAND X IS
AFFECTED BY THIS PROBLEM. ALL OTHER SIZES AND
VARIETIES ARE SAFE AND WHOLESOME TO EAT.**

The address to send the lid(s) to is:

**Brand X recall,
PO Box 1234,
Sometown,
Somecounty, 1X 2YY.**

**You can also speak to us if you require any additional information.
The telephone number is: 0800 000000.**

**Full details about the problem and an illustration of the product code
on the affected jars can be seen on the company's web site:
www.abcfoods.com/productrecall**

**The company greatly regrets any inconvenience caused to you or
your family and apologizes for the fact this particular production
batch does not meet our normally stringent standards.**

MANUFACTURER'S ANNOUNCEMENT

**BRAND X (name variety)
in (state size) jars**

Due to a production problem, it is possible a small number of (state size) jars of (name variety) with the code ABC 1234X on the lid may contain glass.

Please check whether you have any of these jars in your home. If so, after you have safely disposed of the jar and its contents, please post the lid to us for a full refund.

**NO OTHER VARIETY OR SIZE OF JAR OF BRAND X IS
AFFECTED BY THIS PROBLEM. ALL OTHER SIZES AND
VARIETIES ARE SAFE AND WHOLESOME TO EAT.**

The address to send the lids to is:

Brand X recall,
PO Box 1234,
Sometown,
Somecounty, 1X 2YY.

You can also speak to us if you require any additional information. The telephone number is: 0800 000000. Full details about the problem and an illustration of the product code of the affected jars can be seen on the company's web site:

www.abcfoods.com/productrecall

The company greatly regrets any inconvenience caused to you or your family and apologizes for the fact this particular production batch does not meet our normally stringent standards.

Appendix E

Model announcement to employees

PUBLIC RECALL OF 500 g JARS OF BRAND X

Today the company publicly recalled 500 g jars of Brand X bearing the production code ABC 1234X on the lid. Relevant food and health authorities, the media and our trade customers have been informed. Display advertisements have been placed in the majority of the UK's national newspapers.

For your information, a copy of the press release and advertisement are attached.

Last night management began to suspect there might be a problem with this particular batch of Brand X and began an immediate investigation. Five jars out of 135 000 were found to contain glass. As soon as this information came to light, the decision was taken to immediately recall this entire production batch.

The company would emphasize that no other variety or size of Brand X is affected by this particular problem, which occurred when the production line was being set up. As a precaution, some 2000 jars were destroyed in accordance with our normal practice but it would seem a small additional number of jars were also contaminated.

(Attach press release and copy of recall advertisement).

Appendix F

Threatening phone call: checklist

DETAILS OF THREATENING PHONE CALL

If you receive a threatening telephone call, keep calm and try to keep the caller talking. Try to ask and obtain clear answers to the following questions:

- What have you done?
- Where did you do this?
- When did you do it?
- What product (if any) is involved?
- What have you done to it?
- How many packs are involved?
- Where are they?
- How can we identify them (the danger)?
- What do you want?
- Who are you?
- What is your message?
- Why are you doing this?
- How can we contact you?

Time of call Date

SIGNED

IMPORTANT—DO NOT DISPLAY IN ANY WAY Please turn over ➡

Threatening phone call checklist (continued)						
MALE OR FEMALE?			LONG DISTANCE OR LOCAL CALL?			
DESCRIBE VOICE	Loud		Soft		High	Deep
DESCRIBE SPEECH	Fast		Slow		Distorted	Clear
	Stutter		Nasal		Lisp	Drunk
DESCRIBE MANNER	Calm		Excited		Articulate	Angry
	Indignant		Irrational		Uneducated	Amused
DID THE CALLER HAVE AN ACCENT?						
DESCRIBE ANY BACKGROUND NOISE(S)						
ANY MORE OBSERVATIONS						

Appendix G

Sources of information and assistance

The first edition of this book contained extensive lists of useful sources of information and various services such as press cuttings agencies, television and radio monitoring services and professional bodies. Because of the greatly expanded content of the second edition and the fact it is much more international in nature, this is no longer practical. Requirements vary from one country to another and information becomes out of date. Therefore, it is more practical for readers to seek out such sources of information and assistance within their own country. Accordingly, while details are included of a number of particularly useful professional bodies and other organizations, in the main suggestions are given for suitable keywords to use when searching the Internet for this information.

Government web sites

US Food and Drug Administration: <http://www.fda.gov>

Gateway to US government food safety information:

<http://www.FoodSafety.gov>

Canadian Food Inspection Agency, Food Safety Inspectorate:

<http://www.inspection.gc.ca/>

Health Canada: <http://www.hc-ca/>

European Food Safety Authority (EFSA): <http://europa.eu.int/>

Professional bodies

The web sites of professional bodies and universities can be a rich source of information and also provide links to many other useful organizations.

The award-winning site of the UK's Institute of Food Science and Technology (<http://www.ifst.org>) contains many useful background statements on food issues in general as well as ingredients and other matters relevant to the industry. It also provides links to the sites of a host of other professional

bodies concerned with food science and technology as well as universities, governments and enforcement authorities throughout the world.

In America, useful sites include: Institute of Food Technologists, <http://www.ift.org>; and National Food Processors Association (being renamed Food Products Association during 2005): <http://www.safefood.org>.

Public relations agencies and crisis management consultants

It is particularly important to find an agency or a consultant suited to your own requirements, which may be for product promotion or crisis management within your own country or on a global basis. In addition to the advice given in Chapter 8, suitable agencies or consultants can be found by searching the Internet using relevant keywords like 'UK public relations agencies', 'Europe crisis management' or 'USA public relations agencies international'. In addition, some trade or professional bodies list public relations agencies that have experience of helping member companies when such services are required.

The quickest source for finding such bodies in Africa, the Americas, Asia and Europe is to log onto the site of the Global Alliance for Public Relations and Communication Management (<http://globalpr.corpex.com>). The Alliance was formally established in Chicago, Illinois, USA, in October 2000 after a public relations world congress sponsored by the Public Relations Society of America and the International Public Relations Association. More than 20 national and international associations were involved in the founding the Alliance. By July 2003 there was a membership of 40 national and international associations representing well over 100 000 practitioners around the world.

Alternatively, a web search relevant to your own country or examination of local telephone directories is the quickest way to find results. In the United States, the site of the Public Relations Society of America (PRSA) is: <http://www.prsa.org/>. Among other activities, the PRSA organizes seminars about crisis communication and publishes a variety of books. The site of the Canadian Public Relations Society is: <http://www.cprs.ca> and that of the UK's Institute of Public Relations is: <http://www.ipr.org.uk>. The Public Relations Institute of New Zealand can be found at: <http://www.prinz.org.nz>. An extensive list of PR-related links compiled by Kirk Hallahan at Colorado State University can also be found at: <http://lamar.colostate.edu/~hallahan/j13pr.htm>.

Press cuttings and media monitoring agencies

Search using keywords such as 'press cuttings agencies', 'press clippings agencies' and 'media monitoring agencies' for your own country.

Media training

Both public relations agencies and specialized companies offer media training. Search within your own country under 'media training'. Many of these businesses also produce video news releases. Usually, their web sites are

particularly informative. They list not only their areas of specialization but also the qualifications of their consultants and advisors as well as lists of clients and testimonials from them. Some professional and trade bodies also organize such courses for their members.

Professional bodies for consumer relations officers and consumer affairs officers

The author is only aware of two bodies for consumer relations and consumer care professionals. In the United Kingdom, membership of the ICCA Association is open to food and drink manufacturers, distributors and their associated companies. The Association was founded in 1994 to facilitate contact and the exchange of information between consumer care managers in the food and drinks industry. The organization's aim is to be proactive and improve the service given to consumers contacting consumer care departments by the exchange of information, ideas and expertise (<http://icca.org.uk>). Its site lists law firms, consultancies and software companies whose services are relevant to consumer relations.

In North America, the Society of Consumer Affairs Professionals in Business (SOCAP) is particularly active. It was created in 1973 and today has some 2700 members representing more than 1500 companies, ranging from large national or multinational businesses as well as small to mid-sized companies throughout the United States and Canada. Its site is: <http://www.socap.org>.

Reference books

Today there is a wide variety of books available dealing with public relations and crisis management. The majority are relevant to the circumstances and practices of a particular country. They can be found by conducting searches using keywords such as 'public relations UK' or 'crisis management USA', etc. Many of the professional bodies for PR practitioners listed above also produce books relevant to their own country or recommend titles written by their members. They are a good source of titles relevant to your own areas of operation.

In addition to the books mentioned in chapter footnotes, the following titles are worthy of consideration:

When it Hits the Fan: turning crisis into opportunity by Michael Bland, a Knowledge Nugget Guide by Centre Publishing, ISBN 1-901534-07-3. The information in this highly readable paperback is applicable generally to any country or organization. Bland tackles crisis management from a psychology-based planning and handling approach rather than the more cumbersome, procedural approaches still practiced in many organizations. There is much to learn from this title.

Hitting the Headlines in Europe by Cathie Burton and Alun Drake, Kogan Page, ISBN 0-7494-4226-3. For anyone involved or likely to be involved in dealing with the media in Europe this is a particularly useful book. It is written by practicing PR professionals working at the heart of Europe and one of a series

of titles produced by the Institute of Public Relations. It provides a snapshot of the media scene in 43 European countries, where neighboring countries can have a different style. Greece, for instance, has 157 television channels, 10 of which broadcast nationally. It also unravels the mysteries of the European Union and the European Commission as well as giving practical advice on the best strategies for approaching reporters, placing press releases and generally dealing with both the print and electronic media.

Another title published by the Institute of Public Relations is entitled *Managing Activism—a guide to dealing with activists and pressure groups*. Written by Denise Deegan, it is one of the few books dealing with this specific subject. It also provides references for obtaining additional information on the issue. For anyone who is likely to be involved with pressure groups or protesters of any type, this title is well worth reading. The author writes from actual practicing experience of dealing with these particular groups.

Detecting Foreign Bodies in Food Mike Edwards, Campden and Chorleywood Food Research Association (UK), Woodhead Publishing Limited, 2004, ISBN 1 85573 729 9.

Foreign Body Prevention, Detection and Control – a practical approach, P. Wallin and P. Haycock, Blackie Academic & Professional, ISBN 0 7514 04160.

Consumer Complaints and Compensation, Lisa Carson, research associate at the Centre for Business Relationships, Accountability, Sustainability and Society (BRASS), was being published by Leatherhead Food International during 2004.

Dancing with the Devil—Crisis Management published by Leatherhead Food International, telephone +44(0)1372-376761 or refer to details on Leatherhead's web site <http://www.lfra.co.uk/lfi/sunmenu.asp?item+1507&subsection+50>. A practical work, the book covers a range of issues to help prepare company managers to respond to crises or serious threats. The work contains a number of practical exercises and the information is presented in an easily readable format, allowing purchasers to identify opportunities to improve crisis management and, therefore, benefit their businesses. It also includes discussions on product recalls as well as protecting a business against criminal activity.

Media resources

The majority of daily and Sunday newspapers now have their own web sites as do many television channels and radio stations as well as many highly respected scientific magazines and journals. Searching the Internet with keywords such as 'UK daily newspapers', 'Far East national media' or 'Media scientific journals' will help you to rapidly track down the publications you are seeking. Most not only carry the latest news relevant to their readers but also have useful archives, many of which can be searched without fee but there may be charges for downloading the full text of some articles.

Relevant reading

Books which the author has found interesting include:

Airframe (1997) Arrow Books ISBN 0 09955631 6. This Michael Crichton book gives a fascinating account of an air crash, the crisis management and

investigation procedures of the company concerned, and the surprising outcome. Compelling reading for anyone interested in crisis management.

Deadline Sunday (1991), Brian MacArthur, Hodder & Stoughton ISBN 0 340 50990 2. This is the story of a week in the life of the *Sunday Times*, one of the UK's leading broadsheet newspapers. Recommended for anyone interested in learning more about the pressures under which journalists operate and under which newspapers are produced.

SALAM PAX the Baghdad Blog (2003) by Atlantic Books on behalf of Guardian Newspapers Limited, ISBN 1 84354 262 5, the web diary written by a young Iraqi living in suburban Baghdad during Operation Iraqi Freedom (see Chapter 4).

Crisis management software

An Internet search using the keywords 'software crisis management' produces matches with a large number of companies. The majority of the 'hits' do not relate specifically to the communications aspects of crisis management. The software programs are more concerned with IT problems, disaster recovery and insurance issues but they might well be relevant to some businesses.

Crisis Commander is a business continuity planning and incident management package designed by a Swedish company, Svensk Krisledning AB.¹ It was launched in Europe during 2002 and extended to the USA the following year. The network of agents continues to be extended throughout the remainder of the world. It is aimed particularly at small and medium sized businesses but can be adapted to suit larger organizations.

The system runs on the Internet, and features an intuitive user interface, stand-alone e-mail and text messaging (SMS) systems, a crisis web site, template contingency and mobilization plans for various scenarios, an automatic log function, room to store support documents critical for crisis management and recovery, and automatic update features to help ensure that contingency plans and support documents are regularly updated.

In essence, all the information a company needs to deal with and recover from a crisis is stored in heavily protected databases. US customers use the system's American databases, Scandinavian customers connect to databases in Scandinavia and customers in continental Europe, including those in the UK, access databases in Europe.

Approved members of a company can log on to Crisis Commander from anywhere in the world provided they have an Internet connection. The system ensures that sufficient information exists for a company to continue operating even if its own head office and computer systems are destroyed or out of action.

¹ Web site: www.krisledning.se, e-mail: info@krisledning.se; UK agent, Secure IT Environments Limited (Tel: 01983-885182; fax: 01983-885183; e-mail: sales@siteltd.co.uk); US reseller, Crisis Management Software LLC, Tel: +1-802-388-7379; fax: +1-802-610-1037; e-mail: info@crisismanagementsoftware.com; German agent, Avantgarde Consulting GmbH & Co KG, Tel: +49-089-435716-80; e-mail: <http://avantgarde-consulting.de/>; Danish reseller, Infoova I/S, Tel: +45-76-43-22-60; e-mail: info@infoova.dk; Norwegian agent, Norsk Informasjonssikkerhet AS, Tel: +47-35-57-26-30.

Depending on the information a company chooses to feed into Crisis Commander, it can contain support documents and action reminders concerning the handling of a serious computer virus attack, an IT disaster, a serious accident involving employees or a media crisis. It can also contain a shadow web site that can be activated quickly to provide consumers and the media with information concerning a product recall or similar problem.

The media information in the databases contains details of appropriate daily and regional newspapers, periodicals, radio stations, television stations and news agencies. The information can be expanded to cover areas relevant to any client.

Other software and case histories outlining the use of particular programs can be found among the list of sponsoring companies on the web site of the UK's ICCA Association (<http://icca.org.uk>).

Glossary of frequently used abbreviations

ALF	Animal Liberation Front
BMMA	British Meat Manufacturers' Association
BMI	Body Mass Index
BRC	British Retail Consortium
BSE	Bovine spongiform encephalopathy
CDC	Centres for Disease Control (US)
CIEH	Chartered Institute for Environmental Health
C-JD	Creutzfeldt-Jacob Disease
CMO	Chief Medical Officer
CRL	Centre for Research Libraries
EC	European Community
EHO	Environmental health officer (UK)
EPA	Environmental Protection Agency
EU	European Union
FAO	Food & Agricultural Organization of the United Nations
FASNET	Foundation for American Communications
FBI	Federal Bureau of Investigation (US)
FDA	America's Food and Drug Administration
FDF	Food & Drink Federation (UK)
FMD	Foot and mouth disease
FPA	Food Processors Association
FSA	Food Standards Agency (UK)
FSANZ	Food Standards Australia New Zealand
FSIS	Food Safety & Inspection Service (US)
GAP	Good Analytical Practice
GMP	Good Manufacturing Practice
HACCP	Hazard Analysis Critical Control Point
HLS	Huntindon Life Sciences
HSA	Hunt Saboteurs Association
ICCA	UK body for consumer relations and consumer care officers
IFST	Institute of Food Science and Technology (UK)

Inserm	Institute of Health and Medical Research (France)
IASO	International Association for the Study of Obesity
IOTF	International Obesity Task Force
LFI	Leatherhead Food International Research Association
MPA	Medroxyprogesterone acetate
NFPA	National Food Processors Association (principal scientific trade association representing US food processing industry)
NIAD	National Institute of Allergy and Infectious Diseases
NGO	Non-governmental organization
NHS	National Health Service (UK)
OIE	Office of International Epizootics
PETA	People for the Ethical Treatment of Animals
RSPCA	Royal Society for the Prevention of Cruelty to Animals
RSSL	Reading Scientific Services Limited
SARS	Severe Acute Respiratory Syndrome
SEM	Semicarbazide (a veterinary drug)
SfN	Society for Neurosciences
SHAC	Stop Huntingdon Animal Cruelty
SOCAP	Society of Consumer Care Professionals (US)
TSE	Transmissible Spongiform encephalopathy
UKAS	United Kingdom Accreditation Service
UNEP	United Nations Environmental Program
VNR	Video News Release
VARE	Victims of Animal Rights Extremists
vC-JD	New variant Creutzfeldt-Jacob Disease (believed to be the human form of 'mad cow disease')
VHF	Viral Hemorrhagic Fever
WHO	World Health Organization

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