

What Now? Investigation Problem Solving

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Why is this important?

Corrective action
regulations:
9 CFR 417.3 and 9
CFR 416.15



- Investigations are equally as important as the corrective action
- Without an adequate investigation, corrective action may be inappropriate.

Who am I?

- You are a food safety manager, working for a ready to eat processing facility that produces chicken salads for a local grocery store.



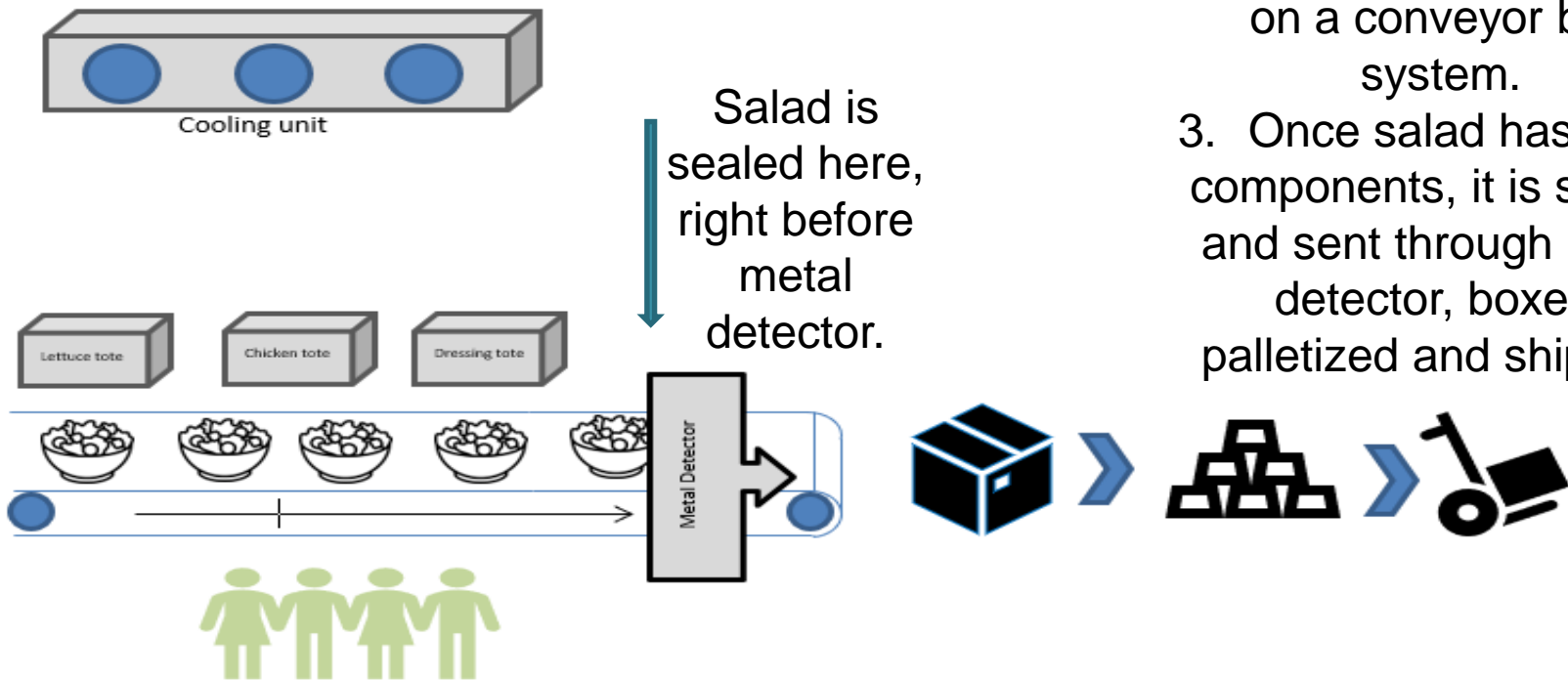
Salad Components



- Chicken
- Lettuce
- Pre-packaged Italian salad dressing packet

Process Flow

1. Salad Components are received from suppliers and inspected according to company programs.
2. Salads are assembled on a conveyor belt system.
3. Once salad has all components, it is sealed and sent through metal detector, boxed, palletized and shipped.



What happened?

- You receive an email on December 3, 2019. A customer bought one of your chicken salads and found a small screw in the salad while they were eating it. The customer contacted the grocery store and the grocery store notifies you through email.



Your mission

- You have 20 minutes to conduct an investigation.
- Assume this is a valid claim. Work with your team and determine root cause and generate corrective actions.



Discussion



What is the root cause?

A screw from the cooling unit above the conveyor line fell onto an exposed salad. The conveyor belt was completely full of salads and when the salad went through the metal detector, it alarmed, however the detector kicked out the wrong salad, thereby allowing the screw to pass through




Example of Corrective Action

- Company received a complaint from Grocery Store Land, on December 3, 2019. A screw was allegedly discovered inside salad, lot # 0119123.
- All production records for 12-3-19 were reviewed. It appears that there was an issue with the cooling unit above the line. Records show that a rattling noise was heard in the production room and maintenance was working on the line. After questioning maintenance, they notified QA that a screw was missing and installed a new one to the unit but didn't know where the missing screw had landed. QA then checked metal detection records to see if there were any findings. Metal detector verification checks were acceptable. Records indicate that there was a kickout, meaning that metal was found, however when the product was re-ran through the detector, it was acceptable. After discussing with the QA technician, they indicated that the line was backed up with salads. The team went to the floor and re-created the scenario with a metal detector test piece. The salads were allowed to back up, and once salad was seeded with the test piece. When seeded salad ran through the detector, the detector was unable to kick out the metal finding due to the pressure of the salads backed up on the line.
- Based on our investigation, the screw from the cooling unit fell onto the conveyor belt and due to the back up of salads, the detector pushed out the wrong salad. With this information, the company has modified its SOPs, to monitor the amount of salads that are on the belt, ensuring that adequate space between each salad is provided. Also the maintenance policy was updated to include QA notification when work is required as well as QA signoff when work is completed so QA is aware of any missing parts and subsequent added parts. No other production days or product is affected by this event since the screw was found in its entirety, therefore this is an isolated incident. Since the customer threw away the salad, the affected product was disposed. The updated procedures will prevent the recurrence of a similar event.

Corrective Action breakdown

- Company received a complaint from Grocery Store Land, on December 3, 2019. A screw was allegedly discovered inside salad, lot # 0119123.



What happened?
Pertinent dates,
lot codes,
affected product,
background
information etc.

Corrective Action breakdown cont.

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This sets up the following paragraph by providing a narrative. This helps the reader understand how the conclusion was drawn and gives context.

What did you do? How did you investigate? What did you look at?

Corrective Action breakdown cont.

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Root Cause

Corrective Action

Important statement unless you want the agency questioning other lots and other days of product.

Preventive measure