

Guidance on crisis management concerning the COVID-19 crisis



VERSION 2

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ENGLISH



IFS strives to maintain high service levels to our stakeholder groups by offering solutions for questions relating to our standards & programs as well as sharing technical information and news features. We feel this service is even more important in these challenging times we all face due to the COVID-19 crisis. As part of our support, IFS is sharing this supportive guidance document for a crisis management concept concerning COVID-19 with our network.

Currently, there is no evidence of virus transmission via food or food packaging, but there is evidence that it can remain viable on some surfaces for longer. Well-known food handling procedures should be sufficient to combat COVID-19, so long as social distancing and other measures are followed.

This list of examples concerning crisis management in regards to COVID-19 might be of help for IFS certified and assessed companies. Please consider the mentioned points as examples only. Further measures and actions may be required.

One of the most important steps right now is the activation and deployment of a crisis management protocol to enforce a business continuity strategy and assist product supply, since this is currently the main priority. To avoid Coronavirus contamination and spread, it is fundamental to activate, review, and maintain the crisis management protocol, along with a strategy to protect the staff through enforcing hygiene procedures, controls on personnel health, and other factors.

Adhering to rules & requirements of Product/Food Safety and Quality Management Systems **shall** result in consistently high levels of operational controls to maintain the production of safe quality products according to customer agreements.

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Now is the time to reassess Quality and Food Safety Systems mitigate potential new and increased risks and to reinforce compliance with IFS requirements. Please remember that the protocol shall be reviewed continuously according to potentially increased risks, updated crisis information and data.

All new relevant, legal and governmental COVID-19 crisis statements need to be taken into consideration; including retailers, industry and client requirements. In return, keeping your stakeholders updated on all relevant information that affects your Product/Food Safety and Quality Management Systems will maintain ongoing operations and business continuity.



This help follows the approach to

1. Have a set frame to manage the situation effectively and efficiently

Setting of frameworks, information management, knowledge and awareness

2. Identify and evaluate potential risky processes for the company

Determine the potential risk to the company's processes

3. Define and implement processes to mitigate and control the identified risk

Developing and implementing an action plan

4. Check, evaluate, and review the set processes

Test and review your plan

What is an incident?

“A situation that might be, or could lead to, a disruption, loss, emergency or crisis” (ISO 31000)

An unexpected, internal or external event, which concerns the product safety. In case of non-control of the event, a product safety risk can occur. (IFS Logistics v2.2)

A situation within the supply chain where there is a possible and/or confirmed risk associated with product integrity; or any force majeure event (e.g. critical resources/services disruption, natural disasters, loss, emergency situations, crisis, etc.) with a direct impact on the delivery of trusted products.

What is the management of incidents?

The identification / analysis of possible incidents / situations, which might lead to incidents and the development of strategies for planning and control (e.g. emergency plan, preventative actions). (IFS Logistics v2.2)

Examples of disruption, loss, emergency, or crisis situations in companies that could affect production and / or products:

- Emergency situations → e.g.: fires, building collapse, chemical spills
- Natural events → e.g.: earthquakes, hurricanes, floods
- Supplies shortage → e.g.: raw materials, critical machinery spare parts, cleaning and disinfection chemicals, others
- Personnel absenteeism → e.g.: significant health issue, strikes
- Service disruptions → e.g.: water, electricity or other sources of energy, internet connection, transport, other services
- Internal disruption → e.g.: security violations, equipment breakdowns, product/food defense incidents
- Data security issues → e.g.: malware attacks, software failure, loss of confidential / critical information
- Political unrest → e.g.: economic instability, war, internal armed conflicts
- Product contamination → e.g.: raw materials, semi-finished products, finished products, packaging material

The company should consider the impact for consumers and customers, and the impact in the relationship with other stakeholders, such as reputation, confidence gained, corporate image, and business continuity.

What are the key elements to consider in a system to manage incidents?

Setting of frameworks, information management, knowledge and awareness

What to consider:

- Have you defined a crisis team?
- Have you considered external resources (e.g. lawyer)?
- Who belongs to the crisis team?
- Are the members of the crisis team trained in topics relating to risk and incident management? <training records>
- Who is the person responsible to initiate the incident management process? Is this person permanently available? How are potential absences covered (vacations, sick leave, etc.)?
- How can the incidents and emergency situations be detected by the company?
- What are the sources of information to be aware/alert of new potential emergencies/incidents?
- Is there an information system to keep the crisis team up-to-date as basis for decisions?
- Is there a set infrastructure to enable regular meetings between members of the crisis team?
- Who are responsible persons (representatives) communicating what to whom in the company internally/ externally? Are all employees instructed regarding their obligations (e.g. discretion with regard to the press) in a crisis situation?

Examples of COVID-19 crisis:

Product/Food Safety and Quality Management System

The company **shall** be aware of the hazards triggering the crisis and the resulting potential risk to ensure optimal preparation and implement measures to mitigate the risk of being effected. To do so, there shall be a professional and up-to date procedure implemented to receive current information on COVID-19 relevant developments as a base for further evaluation and decision making within the Management, HACCP and crisis team. The system **shall** include employee health and pre-cautionary personnel hygiene measures.

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The hazard analysis and risk assessment **shall** be incorporated into the HACCP plan as adjustments to the existing prerequisite programs and production might be necessary.

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The HACCP team needs to be involved in product and process related measures so that risks linked to those are considered, understood and managed properly. This includes especially training of responsible staff and their deputies relating to CCP monitoring and recording under the new and maybe extreme work situation.

Incidents Management

- keep the crisis team clearly defined and up to date also in case of organizational changes
- take care that all important positions are included (HR and IT to manage the home office related issues; purchasing staff responsible for the supply of personnel protection utensils such as masks, glasses, gloves; company`s medical doctor for consultancy, etc.).
- take care that the members of the crisis team or person with the authority to initiate the incident management process are/is available (and not in vacation, sick leave, etc.) when needed, make sure there are effective arrangements in place to cover potential absences.
- take care that the members of the crisis team are informed/trained in topics related to virus pandemic or epidemic.
- emergency contact details need to be up-to-date for part-time and internal/external members of the crisis team
 - make sure that the required IT infrastructure is available to allow frequent meetings between the members of the crisis team
 - consider the necessity of adjusting the frequency of meetings
 - meetings may consider:
- Daily governmental news and restrictions, customer requirements, availability of resources (staff, service provider, supply chain), feedback on and review of already taken measures.

Determine the potential risk to the company's processes

What to consider:

- What are the incidents and emergency situations identified by the company?
- What are the identified critical processes and resources to support them?
- What is the level of risk of those incidents and emergency situations defined regarding operational and financial aspects?
- What is the level of risk of those incidents and emergency situations defined in products and processes regarding quality, legal and safety aspects?
- Who is allowed to report what kind of information to whom, and in what time? <communication plan>
- Who is informed when an incident occurs?
- How are incidents managed? <crisis management procedures>

Examples of COVID-19 crisis:

Make sure that virus pandemic or epidemic was evaluated as possible emergency situation and is described in the procedure for management of incidents.

Consider the following topics within the evaluation of critical processes:

- Infrastructure, personnel resources and deputation, framework for crisis situations to receive information, internal/external communication, training, staff responsibilities
- Review of internal Product/Food Safety and Quality Management System
- Changes in supply chain/purchasing of products and services and production processes
- Possible changes in specifications, formulas, recipes and customer agreements. Related communication and agreement procedures.
- Personal hygiene, infectious disease and sanitary/staff facilities
- Measures regarding hygiene and disinfection protocols
- Plant layout, equipment, workplace assessments
- Product and personal flows, social behavior
- Product/Food Fraud assessment and mitigation plans
- Product analysis / frequency of checks and controls
- Site security and visitor policy

Developing and implementing an action plan

What to consider:

- What are the actions defined to recover, resume and restore in case of emergency/incidents described by the company?
- Are potential external business corporations considered to ensure customer supply continuity?
- Are the responsibilities clearly defined within the defined actions? <incident management procedures>
- Does the company have a communication plan?
- Definition of the internal and external communication (in case of incidents, product withdrawal, product recall): who, what, how, timelines, etc.
- What kind of surveillance activities will be implemented by the company to detect potential incidents and emergency situations?
- Has the company implemented a recall and withdrawal procedure?

Examples of COVID-19 crisis:

Corporate policy and – structure, human resources management

- make sure that sources of information used in the company`s risk management are updated frequently and as needed according to the COVID-19 crisis. Make sure it includes employee health and pre-cautionary personnel hygiene measures.
- make sure that the crisis team has decided on immediate measures in case an employee is tested positive for COVID-19. Prompt actions can avoid quarantine of a large group of employees.
 - plan the situation of worker absence and consider alternatives
- make sure that the crisis team responds to COVID-19 information and is able to decide on the risk to the product as well to initiate timely and relevant measures. Related procedures need to be communicated and applied by responsible staff:
 - E.g. adjust sickness reporting procedures to COVID-19 symptoms
 - E.g. an employee with COVID-19 symptoms was sent for COVID-19 testing. Be informed and prepared about how to handle surfaces, packaging material etc. the employee might have been in contact with.

- E.g. by being well informed, the company might have sufficient choice purchasing an adequate amount of face masks, disposable gloves and suitable cleaning, disinfection material, etc.
- make sure that there is IT infrastructure that allows safe access to company data and ensures data protection procedures in case company staff is asked to work from home
- make sure that IT infrastructure is adequate in case staff working remotely require training (i.e. virtual meetings / presentations)
- make sure that there is a process to prove the effectiveness of training (online test, quiz, etc.) in case of remote staff training in form of webinars.

Training and instructions, plant layout and process flow, constructional requirements, foreign material, equipment

Keeping staff healthy is essential:

- make sure that defined actions and procedures are communicated and understood by the people in charge (i.e. management and group leaders) as well as by the people that **shall** follow the new rules and measures. | changed
- make sure new staff is trained according to the new rules (including verification of understanding) in the event additional labour is necessary
- arrange identification (marking) of working areas, staff flow and staff facilities and provide fulfillment instructions (floor marks, changed staff flows, etc.) so that the required physical distance between staff within the working areas as well as social areas is possible.
 - E.g. schedule the use of the canteen and remove/replace tables and chairs in the canteen to limit the total number of staff in it to keep the required distance.
 - E.g. set timeslots for the changing rooms so that less people change their clothes at the same time or provide additional space to change clothes.
- In case facilities / working areas and personal flows are modified to enable physical distancing, modifications have to be considered within the risk assessment not to compromise the product/food safety and quality (included in the cleaning plan, considerations of potential foreign body sources, consider pest control, maintenance and repair).
- **In case air ventilation systems are in place, the risk of transmission via this route shall be considered in the risk assessment. If a transmission of pathogens to employees is possible, appropriate measures (special filter systems, UV treatment of the air, etc.) shall be taken to minimise the risk of infection.** | added

Personnel hygiene, protective clothing, cleaning and disinfection, sanitary facilities

- make sure that cleaning instructions have been updated to cover modified work areas as well as areas with high risk of coronavirus spread (handles, shared tools as pens, calculators, equipment control panels, door handles, etc.)

- make sure that access and hygiene policies are reviewed, modified and communicated with employees, service providers and visitors in advance and that they are followed and accepted
- Suitable hand washing facilities as well as detergents and hand disinfectants shall be available and checked regularly
- make sure that staff, service provider and visitors are aware and trained when/how to use face masks and disposable gloves as temporary measure
- make sure that effective cleaning instructions are available and known for face mask, if applicable and other temporary protective utensils
- make sure that implementation of specific cleaning measures in time of COVID-19 crisis is checked during the internal inspections (related training, checklists updated)
- make sure that the proper use of masks, hand washing and disinfection, use of gloves is checked in appropriate frequency to ensure full implementation of temporary measures

Contract agreement, Specifications and Formulas, Purchasing, Product packaging, Product/Food Fraud, Product analyses

- Monitor the raw material supply chain, being in constant contact with suppliers and observe supplier markets and countries of supply/origin.
- In the event that there is a lack of supply of services (transport, laboratory services), products, packaging material due to supplier issues or transport availability, make sure there is an emergency supply defined and approved. (Consider more than one approved supplier per purchased item). The normal approval procedure needs to be followed carefully.
- monitor the likelihood of product/food fraud (shortages, prices, current cases) for raw materials and products
- consider alternative supplier approval and monitoring, as travel restrictions and crisis situation may not allow audits (e.g. certification status, delivery after positive sample delivery, increased analyses and testing, etc.)
- In case of shortages of cleaning and disinfectant equipment a new supplier might be needed. Appropriate evaluation and approval is necessary if the product is fit for the intended use. Instructions might need to be updated and staff trained accordingly.
- make sure shortages in supply and disruptions are communicated to your customer as soon as possible.
- changes in raw materials or any other component or product compromising customer agreements need to be communicated to the customer in advance and needs to be agreed and documented between both parties.
- label changes that are necessary due to COVID-19 crisis have to follow clear procedures, instructions and approval and need to be documented and communicated to all relevant stakeholders.

- internal analysis activities might need to be increased due to changes in the supply chain and possible restrictions to use external laboratory due to increased workload

Sub-contractors

- sub-contractors for maintenance, pest control, cleaning, transport etc. need to be aware of and follow the new rules relating to COVID-19. Adherence to the new rules need to be checked. In the event that on-site visits are not possible, additional monitoring and controls and specialist advice and actions should be considered

Site Inspections and Internal audits

- if it is possible to conduct them, focus on HACCP, site and personal hygiene is recommended
- optional they could be postponed due to staff availability or internal audits can be conducted partly remote due to work place and travel restrictions, via exchange of documents using online technology including interviews. The company **shall** conduct a risk assessment to allocate which parts can be conducted remotely and which parts require presence on-site

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Site, Personnel and visitor security

- in case of increased usage of temporary staff or changed external service providers, the site policies and access controls need to be carefully communicated

Test and review your plan

What to consider:

- How does the company evaluate that the plan is implemented, adequate and effective?
- Are corrective actions taken in case the procedure is not effective? <exercises and tests>

Examples of COVID-19 crisis:

Management review and corrective actions

- use the chance to evaluate the emergency procedures in case there is an employee tested positive for COVID-19 (even when in doubt consider proper separation of potentially infected person, evaluation of the areas / surfaces requiring cleaning and disinfection, etc. and initiate corrective actions as needed).
- make sure that a review of the crisis procedure is conducted, even if the company was not seriously affected during the COVID-19 crisis
- make sure there is a system to get relevant information during the crisis and that the information list made before / during the crisis is updated.
- make sure no relevant functions are missing in the crisis team (updated the crisis team and emergency after the crisis).
- make sure to discuss COVID-19 crisis measures taken within the management review after the crisis
- make sure that deficiencies identified during the COVID-19 crisis by the crisis team (e.g. lack of hand washing facilities) are followed up by corrective actions within the next months