Common Interests in Outbreak Identification, Correction and Prevention

PulseNet / OutbreakNet Meeting
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Any opinions expressed during this brief presentation are those of the author. They do not necessarily reflect the opinions of Yum! Brands, Inc.

Any similarity between hypotheticals discussed and actual events is purely coincidental.
PART I: SHORT PRESENTATION
What is Yum?

Major Brands: KFC, Pizza Hut and Taco Bell

Where We Serve: More than 38,000 restaurants in over 120 countries and territories worldwide

A leader in international retail development with 4 new restaurant openings each day!
Global Distribution of Suppliers

Over 2300 Suppliers Worldwide Across 18 Key Markets

High Level of Complexity

• Custom Manufacturing; Permanent or LTO
• Multi-national and individual management teams
• Global and Local Regulatory Standards
• Cross Border Commerce
• Capability in Growth Markets
• Audit Coverage/Auditor Competency

US/Canada: 400+  
Caribbean/ S. America: 200+  
Europe: 1100+  
Africa: 70+  
India: 30+  
Russia: 50+  
Asia: 400+  
Aus/NZ: 130+
Yum! Brands Quality Program

Three Primary Areas under One Common Umbrella...

Yum! Global Food Safety Standards

Supply
- Food Safety
- Product Quality
- Animal Welfare
- Code of Conduct
- Nutrition

Distribution
- Food Safety
- Facility Management
- Product Integrity
- Transportation
- Traceability

Restaurant
- Food Safety
- Training
- Incident Management
- Health Department Programs
- Pest Management
- Regulatory Affairs

Dynamic Risk-Assessment Programs Addressing Emerging Issues
Yum! Supply Quality Program

5 Customized Assessments for Evaluating Food Supplier Performance...

- Food Safety Audit
- Quality Systems Assessment
- Product Evaluations (Cuttings)
- Key Performance Indicators
- Quality Issues
Optional GFSI replaces Food Safety Audit

Used in conjunction with Quality Systems Assessments, Key Performance Indicators, Product Evaluations, Emerging Issues Programs, HACCP training, etc.

Eligibility requirements: Supplier must hold current certification from BRC Global Standard for Food Safety, Food Safety System Certification (FSSC) 22000, International Food Standard, Safe Quality Food (SQF) 2000 Level 2.
## Audit Gap Analysis

**Forgo Prescriptive Elements in favor of GFSI Risk-Based Approach**

<table>
<thead>
<tr>
<th>Section</th>
<th>Yum! Requirement not Specified in GFSI Schemes</th>
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<tbody>
<tr>
<td>Pest Control</td>
<td>Proof of Pest Control License</td>
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<tr>
<td></td>
<td>Label and Mix procedures on file</td>
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<td></td>
<td>Physical placement of traps (distance)</td>
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<td>Sanitation</td>
<td>Sanitizer concentration – batch recording</td>
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<td>Sanitation training</td>
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<tr>
<td>Operations and Facilities</td>
<td>Tool and part reconciliation procedure</td>
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<td></td>
<td>Monthly inspections</td>
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<td></td>
<td>18” inspection perimeter throughout storage areas</td>
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<td>Forklifts and batteries well maintained</td>
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<tr>
<td></td>
<td>Monthly GMP inspections</td>
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<td></td>
<td>Outer garment policy</td>
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<tr>
<td>Product Recovery</td>
<td>Yum!-specific HACCP review with CCP assessment</td>
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<td></td>
<td>Annual water testing with specific micro requirements</td>
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<td></td>
<td>Specific metal detection specifications</td>
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<tr>
<td></td>
<td>&lt;50F loading dock temperatures</td>
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<tr>
<td>Product Protection</td>
<td>Specific Yum! contacts identified; 2 hour time limit for notification</td>
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<tr>
<td>Quality Systems Assessment</td>
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**Keep Yum!-Critical Food Safety Elements**

- **Product Specific HACCP Review**
- **Product Recovery Plan**
- **Quality Systems Assessment**
Supplier Programs

- Mandatory HACCP programs for suppliers
- Semi-annual Food Safety & Quality Systems Audits
- Comply with FDA Bio-security regulations

Suppliers are accountable for:
- Specification compliance
- Monitoring and corrective action of CCPs
- Product sampling and retention
- Mock product recoveries through
  - Restaurants
  - Distribution
  - Suppliers/raw material sources

- Yum! does not own our suppliers, manufacturers or growers
- Yum! purchases product based upon our strict specifications
Emerging Issue vs. Crisis Program

Emerging Issues MAY or MAY NOT Lead to Crises

**Emerging Issues Program**  
*Proactive*
- Evolving
- Surfacing

**Crisis Management Program**  
*Reactive*
- Critical / Urgent attention needed
- Could activate Brand/YRI Crisis Core Team

- **RED** Notification
- **BLACK** Active Crisis
- **YELLOW** Crisis Closure
- **GREEN** Post Crisis Assessment

- **EMERGING ISSUES**
  - No current Yum impact
  - Yum not in media

- **CRISIS MANAGEMENT**
  - Direct Yum impact
  - Yum in media

- EMERGING ISSUES MAY or MAY NOT Lead to Crises
- No current Yum impact
- Yum not in media
- Direct Yum impact
- Yum in media
- Evolving
- Surfacing

- No Response
- Hold and Monitor
- React with:
  ✓ Notice
  ✓ Crisis
Improving Outbreak Detection and Response

- Most outbreaks result from issues at the supplier level.
- With more than 2,300 suppliers, it's a question of “WHEN” rather than “IF”.
- Emerging issues programs are designed to EDUCATE.
- Supplier, distributor, and restaurant programs are designed to PREVENT.
- Crisis management protocols are designed to CONTAIN.
- Each of the briefly-explained processes, protocols, and programs mentioned have improved over time.
- INDUSTRY IS DEPENDENT UPON PUBLIC HEALTH OFFICIALS TO IMPROVE OUTBREAK DETECTION AND RESPONSE
The Challenge

• **From a presentation in 2008:**

  – No uniform protocol used by the regulatory authorities during disease investigations/outbreaks

  – This impacts industry on many fronts:
    • Premature investigation conclusions
    • Inconsistency in case-control studies
    • No common food history questionnaire
    • Confusion during multi-state/jurisdictional investigations
    • No open sharing of information to assist the investigation

• **Are there improvements on the horizon?**
The Solution

• The “wish list” from a presentation in 2008:
  – Develop a uniform approach to disease investigation protocol...for consistency during investigation to determine key facts/source of disease outbreaks.
  – Establishing and maintaining partnerships with the regulatory community.
  – Assure disease/outbreak investigations are conducted fairly, accurately, consistently and are science based.

• The wish list remains intact.
### Common interests: Some obvious examples

<table>
<thead>
<tr>
<th>INDUSTRY</th>
<th>REGULATORS</th>
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<tbody>
<tr>
<td>✓ People</td>
<td>✓ People</td>
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<tr>
<td>✓ Food for our families</td>
<td>✓ Food for our families</td>
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<tr>
<td>✓ Economic and social value of good prevention strategies</td>
<td>✓ Political and social value of good prevention strategies</td>
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<tr>
<td>✓ Detection should be science-based</td>
<td>✓ Detection should be science-based</td>
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<tr>
<td>✓ Working through new regulations (e.g., FSMA)</td>
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<tr>
<td>✓ Safety of customer is paramount</td>
<td>✓ Safety of public is paramount</td>
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Interested Parties Include:

- Suppliers
- Distributors
- Purchasing Co-op
- Media
- Brands
- Local Health Dept.
- Franchisees
- State Health Dept.
- CDC
- FDA
PART II: DISCUSSION
1. How important is advanced crisis management training?
2. Who should be selected to manage the crisis?
3. Why are open and honest communications with the CDC so important?
4. What problems can arise when dealing with state or local health departments?
5. How should a recall be performed? What are the implications?
6. Where do franchisees fit within the crisis framework?
7. How does media attention impact the investigation? What about social media?
8. Why is industry insistent that sufficient reliable information exists before implicating a product?
Additional Thoughts

• Food Safety Modernization Act can help hold suppliers to higher standards of accountability.

• CDC’s Outbreak Response Team mission is to ensure rapid, coordinated detection and response to multistate outbreaks.

• New technologies help identify purchases (e.g., data mining of customer loyalty cards). [More reliable than questionnaires].

• CIFOR, GFSI, and other initiatives emphasize “farm to fork” product quality throughout the supply chain.

• Partnerships between industry and public health officials are key to addressing common interests and protecting consumers.