

# FOOD SAFETY AND SANITATION

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## Customer Complaints

### Learning Objectives

- Use customer feedback to improve your company's performance
- Determine which customer complaint issues could pose harm to consumers
- Categorize complaints as quality or food safety issues
- Investigate customer complaints to identify the root cause and determine what program failure allowed the issue to occur
- Assign corrective action to deal with the immediate situation and preventive action to prevent similar issues from recurring
- Find commonalities among complaints (trend analysis) to show a common root cause among issues and identify whether or not preventive actions have been effective
- Review customer complaints and make adjustments to associated programs to address the issue

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## **What is a Customer Complaints Program?**

Every successful company takes proactive measures to ensure that customer expectations are met. Even with the best intentions, there is the opportunity for dissatisfaction to occur. The customer complaints program uses customer feedback to improve the company's performance.

Complaints may come from either customers or consumers. With a product in a grocery store or online, the customer and the consumer are typically one-in-the same. That is, the person who buys the product is intending to eat it. However, if you are making a product for industrial or food service purposes, complaints may come from a company that is buying your product and selling it to the person who is going to eat it. They may sell the product as is or they may change it in some way, such as buying a roll from you and then turning it into a sandwich for the consumer.

A strong customer complaints program will ensure that complaints are received by trained personnel who will investigate the issue, identify the cause, and determine corrective action to deal with the immediate situation and preventive action to prevent similar issues from recurring. This will go a long way in retaining customer trust. Facilities that do not have a strong customer complaints program are at risk for recurring issues, greater financial losses, loss of customers, and perhaps even legal action.

## **Program Components**

The components of a successful customer complaints program are:

- Assigned responsibilities
- Methods for handling complaints
- Complaint investigation
- Root cause identification
- Corrective and preventive action implementation
- Trend analysis
- Separation of complaints by type

## **Assigned Responsibility**

The first step in developing a customer complaints program is to identify the person who will be responsible for the overall program. This person may not be the primary point of contact for complaints,

but is typically involved in ensuring complaints are handled properly. This person is often responsible for maintaining the associated documentation and generating trend analyses.

Next, establish who will be responsible for receiving complaints. Any person receiving complaints must be trained to gather pertinent information, request samples when appropriate, not volunteer unnecessary information, and work toward gaining the trust of the complainant.

There must also be clear identification of who will be responsible for complaint categorization and investigation. This should be a person who is capable of distinguishing between quality and food safety issues, who is knowledgeable about the manufacturing process, and who has the authority to require department managers to participate in the investigation.

The investigation team will be responsible for determining root cause and recommending corrective and preventive action. Members of this team will likely vary depending on the type of complaint.

Finally, identify who will respond to the customer. This may be the person who received the complaint, the person who was responsible for investigating the complaint, or another company representative. It may depend on the complaint type. Some companies have different persons assigned to respond to customer complaints depending on the issue. For example, a complaint resulting in a recall will likely be handled differently than a simple account credit for a damaged bag.

As with most assigned responsibilities within the company, it is a good idea to identify backup personnel in the event that the primary person is unavailable.

## **Handling Complaints**

Once assigned personnel have been identified, the responsibilities of each of these individuals must be outlined. This outline essentially becomes the procedure for handling the complaint. It can be used as a reference for those that handle complaints, for the training of personnel with newly assigned complaint handling responsibilities, or for auditing the customer complaints program.

The first step in handling a complaint is receiving the following information from the complainant:

- Name and contact information
- Identification of product involved, including traceability codes
- The nature of the complaint and any effects of the issue, such as illness or injury
- The customer's expectations in response to the complaint

When there is a biological, physical, or chemical contamination complaint, or a report of illness or injury, a sample should be requested from the customer.

When documenting a complaint, the date that the complaint was received and the person who communicated with them should also be recorded. It is recommended to establish a customer complaint form that the person receiving the complaint can use as a prompt regarding which questions to ask. This form can also be used to document the investigation and follow up.

### **Complaint Investigation**

Once the complaint has been received and documented, it must then be forwarded to the person assigned responsibility for the investigation. The initial review of complaints should be given top priority, as a customer complaint may be the first sign that there is a product in the market that needs to be recalled. The initial review of the complaint should be performed to identify whether or not the issue could pose harm or has already caused harm to the consumer. Complaints of this nature should be categorized as food safety and require immediate attention. While all complaints require timely follow up, less critical complaints do occur and may not be treated with the same urgency. Less critical complaints may be related to service (such as late or short shipments) or to quality (such as product seeming less flavorful than it has in the past).

After a priority has been assigned to a complaint, the responsible person must identify the personnel at the plant who will be involved in investigating the complaint. In most instances, a team of individuals will be involved. The goal of the team should be to identify the root cause of any issue and to recommend corrective and preventive actions. As part of the team's investigation, samples may need to be sent out for evaluation. Forensic sciences are being used more often in food safety complaint investigations. The recommended corrective and preventive actions will likely go

through a final approval and implementation planning stage by a management committee or food safety team.

Once follow-up action has been determined, the assigned person responds to the complainant. This is a key component of the customer complaints program. Timely, sincere and effective follow-up to a complaint can gain the trust of a customer. On the other hand, poor follow up may result in the loss of a customer.

### **Root Cause Identification**

One of the most common mistakes in handling customer complaints is that the goal becomes satisfying the customer without looking at underlying reasons for the issue. For example, it is not uncommon for a consumer to receive coupons for free or discounted product from a company after filing a complaint. While this is an important part of doing business, this is not the primary objective of the customer complaints program.

The customer complaints program should be focused on determining why the non-compliance occurred, what must be done to correct the immediate situation, and what measures should be taken to prevent recurrence. These goals are achieved by first identifying the root cause. Root cause investigations typically involve a combination of physical inspection, records review, and employee interviews. The ultimate question being raised is **“What is it about our programs that allowed this issue to occur?”** Ideally, a root cause would be identified for every complaint, but there are some instances where the source of the issue cannot be found. In these cases, it is important to document what was investigated and to make key personnel aware of the issues so that they may continue to consider it in their daily activities.

There are several models available to help with root cause analysis, including Fishbone Diagrams, 5 Whys, or FMEA (Failure Mode and Effects Analysis).

### **Corrective and Preventive Action Implementation**

Once the root cause has been identified, corrective action is determined. Corrective action is the action taken to deal with the immediate situation. Some examples of corrective action include providing a credit to the customer, having the product returned for reconditioning, or initiating a recall.

Corrective action is based on whether or not the issue is isolated or likely to be found throughout the product or in other products. It will also be based on whether or not the product poses a health risk or is subject to legal action.

As indicated previously, the root cause evaluation asks the question, "What is it about our programs that allowed this issue to occur?" The answer to this question will guide the investigation and management teams toward identifying preventive action. Preventive action adjusts programs in an effort to avoid recurrence.

- Corrective actions are situation-oriented.
- Preventive actions are program-oriented.

Preventive action may require an adjustment to a policy or procedure or that improved training and education be provided on existing policies and procedures to ensure they are properly understood and executed. There may also need to be a follow up with suppliers, such as raw material vendors or carriers that may have contributed to the issue.

One of the common shortcomings of preventive actions is that they can be too short-sighted. For example, if a complaint of grease in product is traced back to a greased bearing in a production zone, the preventive action should address not only that bearing, but also aim to identify and correct other areas where lubricant contamination is possible. Preventive actions are the measures taken to prevent the issue from recurring. Preventive actions are imperative to the success of the customer complaints program and the organization.

### Trend Analysis

After complaints have been investigated, corrective and preventive actions implemented, and communication with the customer on the issue has concluded, there is still work to be done. A trend analysis must be maintained.

A good trend analysis has the ability to show a common root cause among issues that were perhaps viewed as unrelated. The trend analysis will also identify whether or not preventive actions have been effective. In other words, if a specific type of non-compliance continues to recur after implementation of preventive action, clearly the action is ineffective and a new or improved preventive action must be developed and implemented.

A trend analysis is designed to find commonalities among complaints. For example, an issue may tend to occur more frequently with a specific product, line, shift, ingredient, packaging, customer, carrier, time of production (such as during startup or changeovers), or season.

### **Separation of Complaints by Type**

As discussed previously, one of the first activities that must be done with the complaint is to determine if the issue could cause harm to the consumer. This information is not only important for determining the urgency in responding to the complaints, but it is also used for categorizing and organizing complaints. It is advised that food safety complaints be kept separate from all other complaints, such as quality or service complaints. A food safety complaint is one in which the issue could cause illness or injury to the consumer. Someone who is knowledgeable about recognizing food safety issues must hold this responsibility, as there is no all-encompassing criteria for categorizing food safety complaints. For example, a common error in categorization is classifying all foreign material complaints as food safety. This is not the case. While foreign material would be considered an adulterant, it is not necessarily an issue that will cause illness or injury, such as if there was a hair in a product. On the other hand, a sliver of glass in a product would certainly qualify as a food safety issue. Another common example of wrongly using a one-size fits all strategy for classifying complaints is odor evaluation. Unusual odors may be quality issues, such as rancidity, or they may indicate a food safety issue, such as a chemical odor.

Once complaints have been classified as food safety or other (quality, service, etc.) they should be maintained in separate files, either electronically or with hard copies. Under some regulations, regulators are permitted to view food safety complaints. It is advised that they be kept separate so that during a regulatory inspection or investigation, information that is not required to be divulged is not.

Furthermore, as part of HACCP validation, it is required that food safety complaints be reviewed as a measure of the effectiveness of the HACCP program and that adjustments are made to the HACCP program and/or associated prerequisite programs to address the issue. If complaints specific to food safety are maintained separately it will facilitate this process.

**Customer Complaints Reference Card**

Use this Customer Complaints Reference Card as you contribute to your company's customer complaints program. When you are ready, proceed to the workshops to apply what you have learned to real-life situations.

## Customer Complaints Reference Card

**Complaint** – Feedback (typically negative) from your customer

**Customer** – Person/Company who purchases the product

**Consumer** – Person who eats the product

### Food Safety Complaint –

Complaint about product where there is actual or potential illness or injury

### Program Goals

- Address immediate situation
- Prevent recurrence
- Retain customer trust

### Program Components

- Assigned responsibilities
- Methods for handling the complaint
- Root cause identification
- Corrective and preventive action implementation
- Trend analysis
- Separation of complaints by type

### Assigned Responsibility

- Overall responsibility for program
- Receiving complaints
- Classifying complaints
- Investigating and determining root cause
- Implementing corrective and preventive action
- Communicating with customers
- Retaining documentation
- Generating and reviewing trend analyses

### Corrective Action

- Remedy the immediate situation
- Situation oriented
- Examples: Recall product, fix broken equipment

### Preventive Action

- Prevent recurrence
- Program oriented
- Examples: Improve equipment design, modify training program

### Root Cause

- What about our programs allowed this issue to occur?
- Tools
  - Fish-bone, 5 Whys, FMEA

### Trend Analysis

- Identify commonalities
  - Product
  - Line
  - Shift
  - Ingredient
  - Changeovers
  - Startups

Use this Customer Complaints Reference Card as you contribute to your company's customer complaints program. When you are ready, proceed to the workshops to apply what you have learned to real-life situations.

# Classify the Complaint Workshop

## FOOD SAFETY AND SANITATION

Assign a priority to each of the following complaints using the Priority Classifications listed here.

<b>Priority 1</b>	Food Safety Complaint - possible or actual illness or injury
<b>Priority 2</b>	Adulteration or Legal - foreign material, but not related to illness or injury OR non-food safety legal issue, such as underweight or misbranding
<b>Priority 3</b>	Quality Issue - compliance to specification, etc.
<b>Priority 4</b>	Service Issue - not product related

	Priority
1	I purchased a bag of Sour Cream and Onion flavored chips and the product inside was Lightly Salted chips.
2	I purchased a bag of Lightly Salted chips and the product inside was Sour Cream and Onion flavored chips
3	My family and I had your product for dinner last night. We were all vomiting by midnight.
4	I bought a box of your macaroni and cheese and there was no cheese packet in it.
5	I bought a box of your macaroni and cheese, and it didn't seem as cheesy as it used to.
6	When I opened the package of your product, it had a horrible smell, like diesel.
7	Your product turned moldy before the expiration date.
8	I didn't like it and I want my money back.
9	We ordered 4 pallets of product for delivery by the 1st and only 3 were shipped. There was no prior communication about this shortage.
10	There was a piece of hard plastic in the product. Fortunately, my son didn't swallow it.
11	I love the pull tabs on your cans, but I recently had a few where the tabs broke off and I still had to use a can-opener.
12	There was a long black hair in the product.
13	There was a bug baked into the middle of my roll.
14	There was a piece of metal in my bag of product.
15	I purchased a can of peanuts, but when I opened it, it had mixed nuts inside.

Classify each of the following actions as either corrective or preventive.

Recall the product.	
Send replacement product to the customer.	
Provide improved training for employees.	
Replace the broken piece of equipment.	
Increase the maintenance and inspection frequency on the equipment.	
Put the rest of the lot that hasn't shipped yet on hold.	
Add label verification checks to the changeover checklist.	
Increase the frequency of scale verification to daily.	
Repair the leaky roof.	
Increase the rinse time after sanitizer application to 10 minutes.	

Root cause is the reason why a non-compliance occurred, resulting in a customer complaint. You have to ask “**What is it about our programs that allowed this issue to occur?**”

Remember, root cause isn’t asking what happened, but rather why it happened. They are program-oriented.

Identify which of the following explanations could be a root cause.

Root Cause?
The equipment broke.
Employees were not following procedures.
Training program does not address the various languages spoken in the plant.
Pest control program was not specific to our type of product and environment.
Line was not cleaned properly at changeover.
The scale was out of calibration.
No one is assigned responsibility for ensuring cleaning tasks are assigned only to people trained on the specific task.
The supplier sent us the wrong ingredient.
No one reported the broken light cover.
The frequency of preventive maintenance tasks is not based on risk.