

9.3.10. Reporting of Significant Spillage

Standard

Is any significant spillage reported to the mill site and the customer, and the spilt feed disposed of?
Procedures need to be linked to customer complaint management system.

Purpose

To ensure significant spillages are recorded via the complaint management system, investigated, and disposed of correctly.

Reason

Spillages are a feed safety risk and potential economic loss and production disruption to both parties. Significant spillages can harbor pests, lead to cross-contamination and act as fomite transfer between delivery vehicles especially when not disposed of correctly.

The purpose of linking the reporting of spillages to the customer complaint management system is to ensure the spillage is risk assessed and appropriate follow up action is conducted.

What is Acceptable?

A reporting system shall be used to capture information that will dispose and clean spillages as appropriate. The customer complaint management system (Fact Sheet 10.1.1) is linked to a corrective actions procedure (Fact Sheet 10.2.1). If the investigation found an underlying issue, the corrective actions procedures will prevent any future spillages.

The following headings follow the same process as a customer complaint procedure, with minor variations to account for spillages. Where an organisation has adopted a SFMCA customer complaint procedure (Fact Sheet 10.1.1), ensure the changes below are accounted for when reporting spillages.

Reporting of Complaint

As per customer complaints procedure, the following information must be recorded:

1. Date, time and person receiving complaint.
2. Name and contact details of customer raising complaint.
3. Nature of complaint.
 - a. This section shall report 'Significant spillage on site X or roadway'.
4. Results of tests or other investigations (including photos).
 - a. Include photos of spillages, truck and truck compartments.
 - b. Where possible estimate amount spilled.
5. Details of product (Batch, Product Name, date of manufacture, etc).
 - a. Record the feed/formula.
 - b. Raise as urgent if product contains RAM or medicated material.
6. Any other relevant factors.

Assessment of Complaint

A full assessment of spillage shall be conducted. The type of information captured, includes:

1. What is the cause of the concern?
 - a. Factors to consider, production disruption, economical concern, cross contamination (RAM and medicated feeds).
2. Have there been other similar complaints?
 - a. Previous cases of spillages?

- b. Identify trends.
 - c. Overriding control points – inspection and condition of truck?
3. Are any other batches or customer affected?
 - a. Notify relevant interested parties immediately if there is animal or human health at risk.
4. What is the impact on the safety of the bulk feed?
 - a. Where a spillage has occurred in a sensitive, biosecurity area, the safety of feeds around shall be assessed.
 - b. Where the spillage contains RAM or medicated feeds, the safety of surrounding feeds shall be considered.
5. Is a recall required?
 - a. Are surrounding feeds at risk and require a recall?
6. Does an insurance claim need to be raised?
 - a. Are there any major economic losses that require an insurance claim?
7. Do the quality systems need to be revised?
 - a. Driver delivery training can be strengthened to include practical unloading training.
8. Is there a corrective action to be raised?
 - a. Effective and sustainable corrective actions is the goal.
 - b. If the assessment has identified a trend in spillages from the same transport company or driver, corrective action is necessary to prevent any future damages or losses.
 - c. If the assessment concludes the spillage is accidental what was the cause? For example, if the compartments were not completely shut by previous transport driver, or driver intentionally overrides a control point of sealing truck at the end of shift and cross-checking, leading to an accidental spillage on the following load.
9. Has the concern been resolved with the customer?
 - a. Resolve any immediate feed safety risks.

Follow up of Complaint

When finalising the complaint of a spillage, the following information shall be captured in report/form:

1. Copy of response letter to customer (if appropriate).
2. Circumstances leading to the complaint.
 - a. A short description of spillage.
3. Actions taken both immediate and corrective action for prevention of recurrence.
 - a. A summary of corrective actions and plan to rectify the problem.
 - b. This section may also include how the operator will prevent any future spillages.
4. Results of investigation.
5. Classification of severity of complaint (e.g. quality related minor, or feed safety moderate, or non-reportable).
6. Date/time of complaint along with date/time of closeout.

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