

CRISIS MANAGEMENT // NEWSLETTER // ASIA

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## Product Recall Monitor Asia

MAY 2021

Welcome to the May 2021 edition of the Liberty Specialty Markets (Liberty) Asia Product Recall Monitor.

In this edition, we will share:

- ▶ Recent recall incidents in Asia that have taken place from November 2020 to March 2021
- ▶ A short interview with Jenny Choi, Senior Underwriter at Liberty and a certified dog trainer
- ▶ Pet food recalls and regulations are explored in detail. Liberty supports pet food manufacturers and suppliers with product recall insurance, and we highlight the exposures.

TRENDING  
TOPICS

ASIA

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# Introduction

With food and consumer safety regulations tightening across Asia, exposure to food safety recalls is rising. Liberty's Crisis Management Asia team is well positioned to assist our broker partners and clients with insurance solutions and advice in the food safety and recall space.

- ▶ We have a dedicated and experienced recall team in Singapore, Hong Kong and Malaysia.
- ▶ We work very closely with our panel of professional consultancies – HACCP Australia and Security Exchange, both of which have a significant presence in Asia. They provide expertise in food safety and crisis response and together, we provide our clients not just an insurance policy but a comprehensive service that includes pre and post incident consulting.
- ▶ We have helped many clients handle safety and recall situations, and we know this is a growing area of interest for manufacturers, retailers, wholesalers and importers.



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# Recent food recalls across Asia

SFA = Singapore Food Agency    CFS = Centre for Food Safety (China, Hong Kong)

## Allergen related recalls

### 3 November 2020 – Recall of two Blue Frog ‘gluten-free’ cereal products

Reason: Presence of undeclared protein

The SFA issued a recall of two cereal products falsely labelled as gluten-free. Both products were imported into Singapore by Home and Health Distributors.

→ <https://www.straitstimes.com/singapore/sfa-directs-recall-of-2-gluten-free-cereal-products-for-containing-the-protein>

### 22 November 2020 – Recall of select Kwong Cheong Thye sauces and pastes

Reason: Potential presence of undeclared fish allergen

The SFA directed Kwong Cheong Thye to recall five of its cooking sauces and pastes after these products were found to potentially contain an undeclared fish allergen.

The CFS and Environmental Hygiene Department detected a fish allergen in a sample of Kwong Cheong Thye’s Sambal Belachan Chilli Paste manufactured in Singapore. The allergen was not declared on the product’s label.

→ <https://www.channelnewsasia.com/news/singapore/sfa-kwong-cheong-thye-sauces-pastes-recalled-fish-allergen-13609902>

### 30 December 2020 – Recall of Woolworths nut spread due to undeclared allergen

Reason: Presence of undeclared peanut allergen

The SFA ordered a recall of Woolworths’ Macro Almond, Brazil & Cashew Spread due to the presence of peanut as an undeclared allergen. This followed a recall by Food Standards Australia New Zealand. The importer, Ban Choon Marketing was directed to recall this product.

→ <https://www.channelnewsasia.com/news/singapore/sfa-recalls-woolworths-nut-spread-undeclared-allergen-peanut-13866870>

### 5 January 2021 – Pre-packaged date sample

Reason: Presence of undeclared sulphur dioxide and sorbic acid allergen

Subsequent to announcing earlier that a pre-packaged date sample from an online shop was detected with excessive preservative and in breach of the food labelling regulation. The CFS took another date sample from the same distributor from a shop in a shopping centre in West Kowloon for testing during follow up investigations. Although the levels of sorbic acid and sulphur dioxide are within the legal limits, the functional class and names of the two additives were not declared on the food label of the sample. The distributor concerned has initiated a recall on the affected batch of the product according to CFS’s instructions.

→ [https://www.cfs.gov.hk/english/whatsnew/whatsnew\\_fa/2021\\_416.html](https://www.cfs.gov.hk/english/whatsnew/whatsnew_fa/2021_416.html)

### 9 March 2021 – Recall of Wilton Rainbow Chip Crunch Sprinkles

Reason: Presence of undeclared milk allergen

The SFA has recalled Wilton Rainbow Chip Crunch Sprinkles because the packaging does not declare that the product contains an allergen - milk. As local baking supplies store, Phoon Huat Pte Ltd had imported the sprinkles, SFA directed the company to recall the product.

→ <https://www.channelnewsasia.com/news/singapore/wilton-rainbow-chip-crunch-sprinkles-recalled-over-undeclared-14368486>

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## Bacteria/Pathogen related

### 4 December 2020 – Recall of bottled drinking water imported from Malaysia

Reason: Contains pseudomonas aeruginosa

The SFA ordered Cold Storage Singapore (1983) Pte Ltd to recall bottled drinking water imported from Malaysia under the label, “Meadows”. The product was found to have a common environmental bacterium “Pseudomonas aeruginosa”, that is found in faeces, soil, water and sewage.

→ <https://www.nst.com.my/news/nation/2020/12/646671/singapore-recalls-msian-bottled-water-after-bacteria-found-faeces>

### 22 December 2020 – Recall of Crab Brand Black Pepper Seed

Reason: Excessive levels of bacterium detected

SFA directed the recall of the Crab Brand Black Pepper Seed product after it was found to contain excessive levels of a bacterium that causes food poisoning.

The product was imported from Indonesia by Siem Trading, which had been directed to recall all the implicated products.

The bacterium can be found in soil, vegetation and in the intestinal tracts of insects and animals. Consumption of food contaminated with bacillus cereus can result in abdominal pain, diarrhoea, nausea and vomiting.

→ <https://www.channelnewsasia.com/news/singapore/crab-brand-black-pepper-seed-sfa-recall-bacteria-13824832>

### 15 January 2021 – Recall of two dog food products from America

Reason: Contains high levels of aflatoxin

Two dog food products made by an American pet food company were recalled after they were found to contain high levels of a toxin. The local importer, Pets’ Station, initiated the withdrawal after Animal and Veterinary Service (AVS) informed them of the high toxin levels.

These products were found to have high levels of aflatoxin, produced by the mould Aspergillus flavus. The mould grows on corn and grains that are used as ingredients in pet food. At high levels, the toxin can cause pets to become ill or die, and it can still be present even if there is no visible mould.

→ <https://www.straitstimes.com/singapore/us-pet-food-company-recalls-2-sportmix-dog-food-products-here-found-to-have-high-aflatoxin>

### 14 March 2021 – Recall of eggs from Malaysia

Reason: Presence of salmonella

The SFA issued a recall for eggs from Lay Hong Berhad Layer Farm Jeram in Malaysia after discovering the presence of salmonella enteritidis (SE), which may cause illness if food is consumed raw or undercooked. The SFA directed several importers to recall these eggs. The farm was also suspended and SFA will lift the suspension only when the farm has rectified the SE contamination issue.

→ <https://www.straitstimes.com/singapore/singapore-recalls-eggs-from-malaysian-farm-over-salmonella-contamination>





### **Mar 19, 2021 – Second batch of eggs from Malaysia recalled**

Reason: Presence of salmonella

The SFA said that it had detected the presence of salmonella enteritidis in eggs imported from Linggi Agriculture in Malaysia. The agency has also directed four importers, An Hong Egg Supplies, Chuan Huat Poultry Farm, Dasoon and FE Supply to recall the product as a precautionary measure. Linggi Agriculture was suspended until it has rectified the contamination.

→ <https://www.straitstimes.com/singapore/second-batch-of-eggs-from-malaysia-recalled-after-salmonella-bacteria-detected>

### **Mar 19, 2021 – Recall of Sunflower peanut powder**

Reason: Excessive levels of aflatoxins

The SFA directed manufacturer Yiak Say Hang Food Industries to recall all batches of Sunflower Brand Peanut Powder after excessive levels of aflatoxins were found in the product. The product was made from a batch of peanut powder sourced from Li Kwong Agencies which SFA is investigating following other earlier recalls involving its products.

→ <https://www.channelnewsasia.com/news/singapore/sunflower-brand-peanut-powder-recalled-sfa-14446986>



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# Recent food recalls across Asia

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## Other causes

### 4 November 2020 – Recall of an organic pasta for infants

Reason: Excessive levels of arsenic

The SFA directed the importer of a popular baby food product to recall its organic brown rice pasta. This was after excessive levels of arsenic were found in the product.

The maximum limit is 0.1ppm. The arsenic detected was at levels ranging between 0.12ppm and 0.3ppm in samples of the product.

→ <https://www.straitstimes.com/singapore/brown-rice-baby-food-product-from-australia-recalled-for-excessive-levels-of-arsenic>

### 13 November 2020 – Voluntary recall of Ribena bottled fruit cordial

Reason: Voluntary recall after consumers reported changes in taste and appearance

Suntory Beverage & Food Singapore announced a voluntary withdrawal for 1L and 2L bottles of Ribena Blackcurrant Fruit Cordial after it received feedback about changes to the product's appearance and taste before stated expiry dates.

→ <https://www.channelnewsasia.com/news/singapore/ribena-cordial-bottles-withdrawn-singapore-13515844>

### 24 December 2020 – Recall of 7D Dried Mangos from the Philippines

Reason: Excessive levels of lead

The CFS collected a sample for testing under its routine Food Surveillance Program. The dried mango sample contained lead at levels that may have breached Food Adulteration (Metallic Contamination) Regulations. The retailer concerned initiated a recall according to CFS' instructions. CFS is also tracing the source of the affected product.

→ [https://www.cfs.gov.hk/english/whatsnew/whatsnew\\_fa/2020\\_415.html](https://www.cfs.gov.hk/english/whatsnew/whatsnew_fa/2020_415.html)

### 4 March 2021 – Recall of pre-packaged Levi rice cookies from Taiwan

Reason: Use of non-food grade nitrogen in the packaging

The CFS directed the importer Full Asia Enterprises Limited to initiate a recall of the affected products and the retailers concerned to stop sale of the affected products. The products are suspected to be filled with non-food grade nitrogen in the packaging.

If non-food grade nitrogen is used in manufacturing or packaging of food products, adverse health effects to consumers cannot be excluded.

→ <https://www.info.gov.hk/gia/general/202103/03/P2021030300638.htm>





# Technical topic – Pet food regulation and recalls

Pet food and pet treats have recently experienced high profile product recalls, including outbreaks of salmonellosis. The industry is facing daunting challenges.

Consumer demands are driving the pet food industry to formulate pet food products aimed at health and wellness. The Food Safety Modernization Act (FSMA) requirements are putting increasing pressure on pet food manufacturers to employ comprehensive preventive measures to protect consumer and pet health.

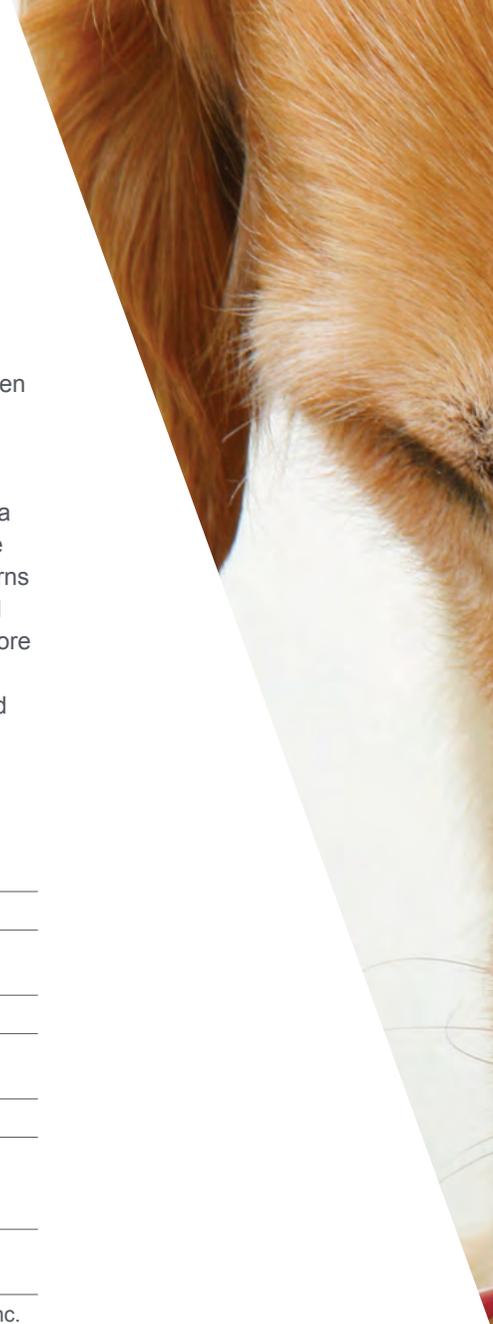
→ <https://conservancy.umn.edu/handle/11299/216770>

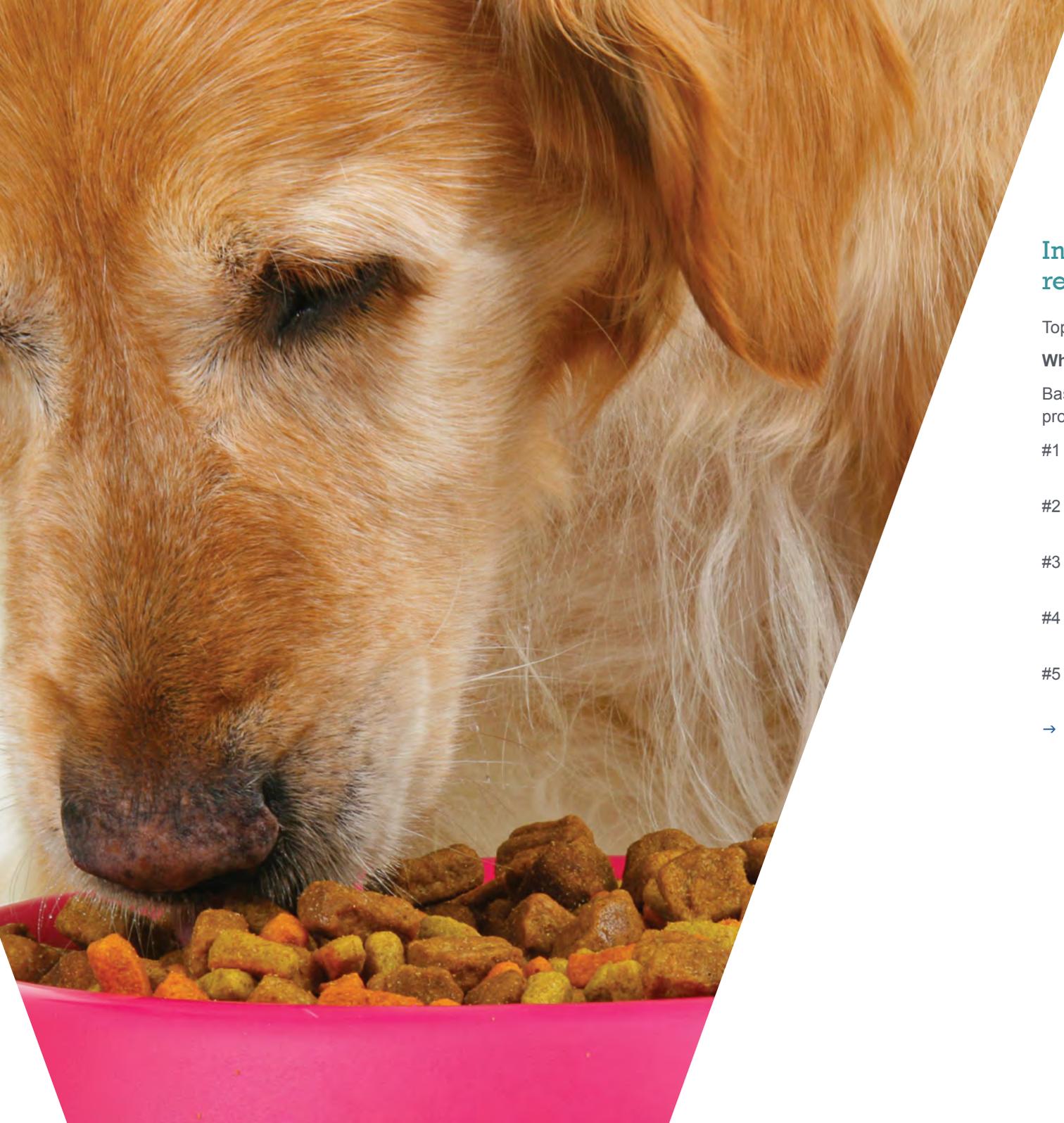
So far this year, the Food and Drug Administration (FDA) has announced seven pet food recalls. The largest recall so far was initiated by Midwestern Pet Foods Inc, for all pet foods containing corn and manufactured in the company's Oklahoma plant, with an expiration date on or before July 9 2022. The recall was due to concerns of very high levels of aflatoxins, produced by a type of mold. As of January 2021, more than 110 dogs have died and more than 210 were sick after eating certain pet food manufactured by Midwestern Pet Foods.

## FDA announced seven pet food recalls so far in 2021

Date	Brand Name(s)	Product Description	Recall Reason Description	Company Name
12/04/2021	Meow Mix®	Meow Mix® Original Choice Dry Cat Food	Potential Salmonella Contamination	J. M. Smucker Co.
27/03/2021	Multiple brands	Dog and Cat Food	Potential Salmonella Contamination	Midwestern Pet Foods
16/03/2021	Bravo Packing, Inc.	Pet food: Performance Dog, beef, green tripe, and bone	Due to Potential Salmonella and Listeria monocytogenes	Bravo Packing, Inc.
03/03/2021	Ridley Block Operations	CRYSTALYX Sheep-lyx	Elevated levels of copper	Ridley Block Operations
03/03/2021	Bravo Packing, Inc.	Ground Beef and Performance Dog, frozen raw pet food	Potential for Salmonella and Listeria monocytogenes	Bravo Packing, Inc.
01/03/2021	Vitakraft	Vita Smart Hedgehog Food	Potential to be contaminated with Salmonella	Vitakraft Sun Seed Inc.
11/01/2021	Sportmix, Nunn Better, ProPac, and Others	Dog and Cat Pet Food	Aflatoxin Levels Exceed Acceptable Levels	Midwestern Pet Foods Inc.

→ <https://www.fda.gov/animal-veterinary/safety-health/recalls-withdrawals>





## Interesting facts about pet food recalls:

Top 5 manufacturers of recalled pet food (since 2012)

### Which company has recalled the most pet food?

Based on pounds of pet food recalled taken from data provided in [FDA Enforcement Reports](#) (since 2012).

- #1 Smucker's pet foods with an estimated 92,102,195 pounds of canned cat and dog food.
- #2 Diamond Pet Food with an estimated 24,781,468 pounds of kibble.
- #3 Hill's Pet Food with an estimated 6,329,086 pounds of recalled can and kibble since 2012.
- #4 Nestle Purina Pet Food with an estimated 4,886,521 pounds of recalled can and kibble pet foods.
- #5 Mars Petcare with an estimated 1,812,803 pounds of recalled kibble and can pet foods.

→ <https://truthaboutpetfood.com/the-top-5-manufacturers-of-recalled-pet-food/>

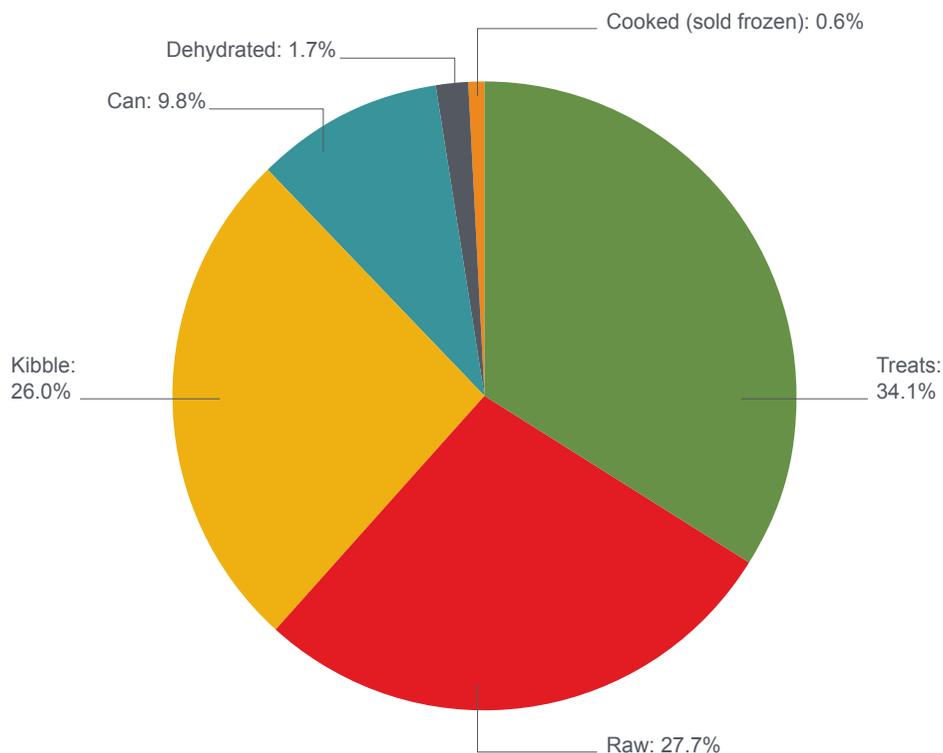
# Analysis of pet food recalls from 2009 to 2018

Over the past ten years (1 January 2009 to 4 November 2018) there has been 173 recalls publicly issued and posted on the [FDA website](#).

Based on recall data over the past 10 years – Treats are the most at risk pet product to be recalled and Cooked Pet Food (sold frozen) is the least likely pet product to be recalled.

## Let's take a closer look

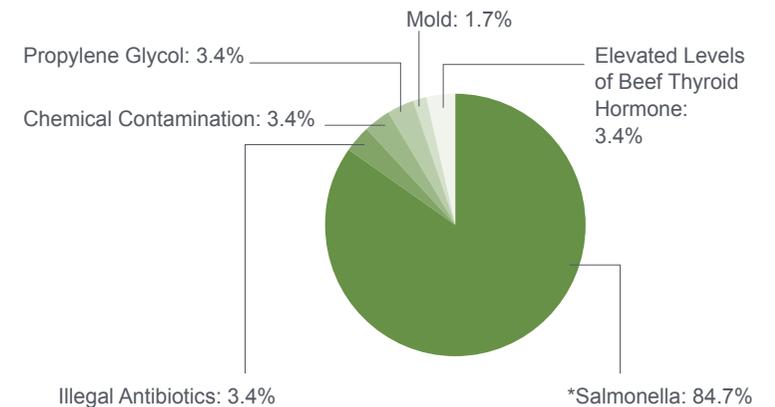
### The different types of pet food recalled over this period



For all treat recalls over the past 10 years, 85% were recalled for Salmonella and/or Listeria and/or E.coli.



### The main type of pet food recalled was treats, now let's take a look at the main causes for treat recalls

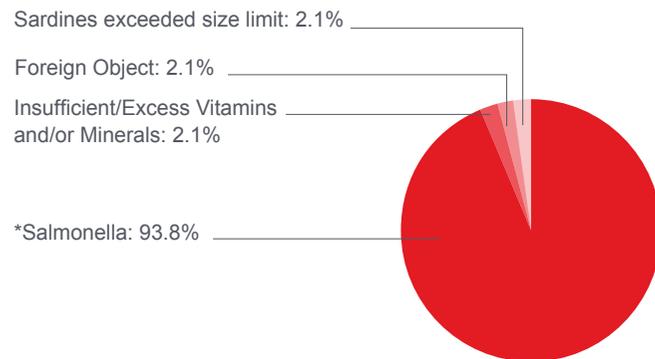


\*Salmonella category to also include Listeria and E.Coli contamination

Raw pet foods were almost exclusively recalled for Salmonella and/or Listeria and/or E.coli over the past ten years.



The second highest type of pet food recalled was raw pet food, now let's take a look at the main causes of raw pet food recalls

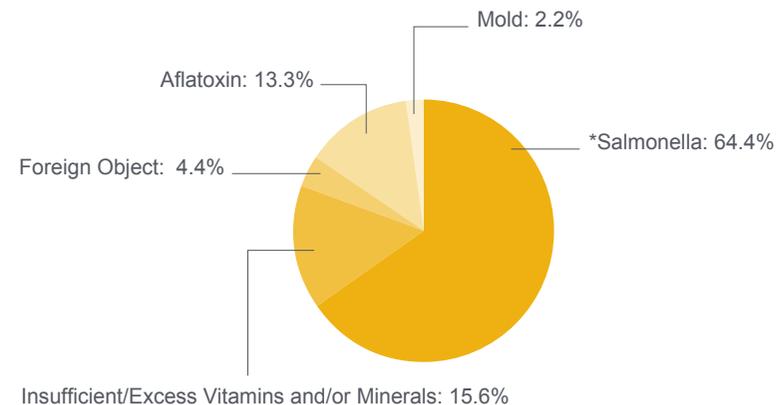


\*Salmonella category to also include Listeria and E.Coli contamination

The majority of Kibble recalls have been due to pathogenic contamination, but kibble was also recalled for a significant number of other serious health risk causes.



The third highest type of pet food recalled was kibble pet food, now let's take a look at the main causes of kibble pet food recalls



\*Salmonella category to also include Listeria and E.Coli contamination

By looking at the data for 10 years of recalls, we can see that Salmonella and/or Listeria and/or E.coli contaminations were the top cause of pet food recalls.

→ <https://truthaboutpetfood.com/10-years-of-pet-food-recalls/>





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# An interview with Jenny Choi

## Senior Underwriter at Liberty and a Certified Dog Trainer

Pet food regularly features on our list of product recalls. Liberty's Crisis Management Asia team recently sat down with Jenny Choi to discuss recent trends in the pet food industry and the importance of a good quality diet for our pets wellbeing.

Jenny Choi is a Senior Underwriter in Liberty's Casualty team based in the Hong Kong office and coincidentally she is also a Certified Dog Trainer. Jenny knows the importance of quality pet food for animals and she actively promotes dogs' wellbeing through her customised dog training programs.

### 1. What pet food brands do you normally purchase and what qualities of the pet food do you look out for?

Jenny: I personally prefer major brands that invest in their product development with veterinarians, food scientists and nutritionists. They have established trading history and research data and their production facilities are compliant with cGMP (Current Good Manufacturing Practice regulations) with Quality Control/Quality Assurance protocols. In my opinion, small manufacturers are more likely to spend on marketing.

The quality of raw materials is important. A concern is mercury contamination from some fish based pet foods. Mercury bioaccumulates in seafood and elevated mercury concentrations in dogs and cats on fish based diets have historically been reported.

There has been a lot of pet food recalls due to mixing or formulation errors and other chemical contaminations. Hypervitaminosis D (excessive Vitamin D) and thiamine (Vitamin B1) deficiency are common misformulation errors.

### 2. Have you noticed any recent new trends in pet food?

Jenny: The Pet Food Manufacturers' Association (PFMA) recognises that more pet owners are inclined to feed their pet a raw diet and this feeding regime has grown in popularity in the last few years. With a raw meat diet, bacterial pathogens and increased exposure to parasites are more of a concern.

I recommend purchasing pet food from a defra-registered raw food manufacturer which will significantly reduce the risk of pathogen contamination. Defra-registered raw food manufacturers must abide by strict governmental legislation

that covers raw dog food manufacturing, for example, a 'zero tolerance' policy towards salmonella in raw dog food products.

Other growing pet food products include supplements for joint care, GI and skin related conditions. Interestingly, Chinese herbal medicines are added to pet food or sold as food supplements. The companies selling these products would have consulted veterinarians who have completed IVAS Certification in Veterinary Chinese Herbal Medicine. I have also considered giving Chinese herbal products a try but I would first seek my vet's medical advice before giving it to my pet.

### 3. Can the food diet impact a pet's behavior?

Jenny: Diet is one of the factors that can affect pet's behaviour. For instance, cats are considered one of the most susceptible species to mercury toxicosis. Some of the clinical signs of mercury toxicosis in cats include ataxia, proprioceptive deficits, incoordination, and muscle weakness. A study has shown that cat diets containing 2ppm mercury for more than 9 weeks resulted in significant morbidity and mortality.

Another example is a high protein diet. Some dogs that are fed with high protein diets suffer from anxiety, aggression, restlessness, light sleep and depression. Too much protein in the diet can also exacerbate existing mental health and nervous system issues.

The Journal of the American Veterinary Medical Association published a [study\\*](#) indicating that territorial aggression was significantly reduced when dogs were fed a low or medium protein diet, compared with territorial aggression when fed a high protein diet.

On the other hand, a high carbohydrate diet, given in place of protein, may cause high level aggression and mood swings in certain dogs.

Chemicals and additives can cause hyperactivity and allergy reaction in animals, especially those with existing medical conditions or behavior issues.

Overall, food selection for dogs is a complex process and requires certain knowledge and understanding of the dog's breed, age, behaviour and activity level. If you're unsure about your own pet, always seek advice from a veterinary practitioner.

\*[https://www.researchgate.net/publication/14624508\\_Effect\\_of\\_dietary\\_protein\\_content\\_on\\_behavior\\_in\\_dogs](https://www.researchgate.net/publication/14624508_Effect_of_dietary_protein_content_on_behavior_in_dogs)

# Overview of pet food regulation

Pet food in some countries remains largely unregulated, unlike human food or feed for food producing animals. Pet foods are only subject to voluntary standards and codes of practice and there are no overarching

regulations. For example, in several countries pet food companies are not under any legal onus to initiate a recall based on food safety concerns or the regulator doesn't have the faculty to request a recall.

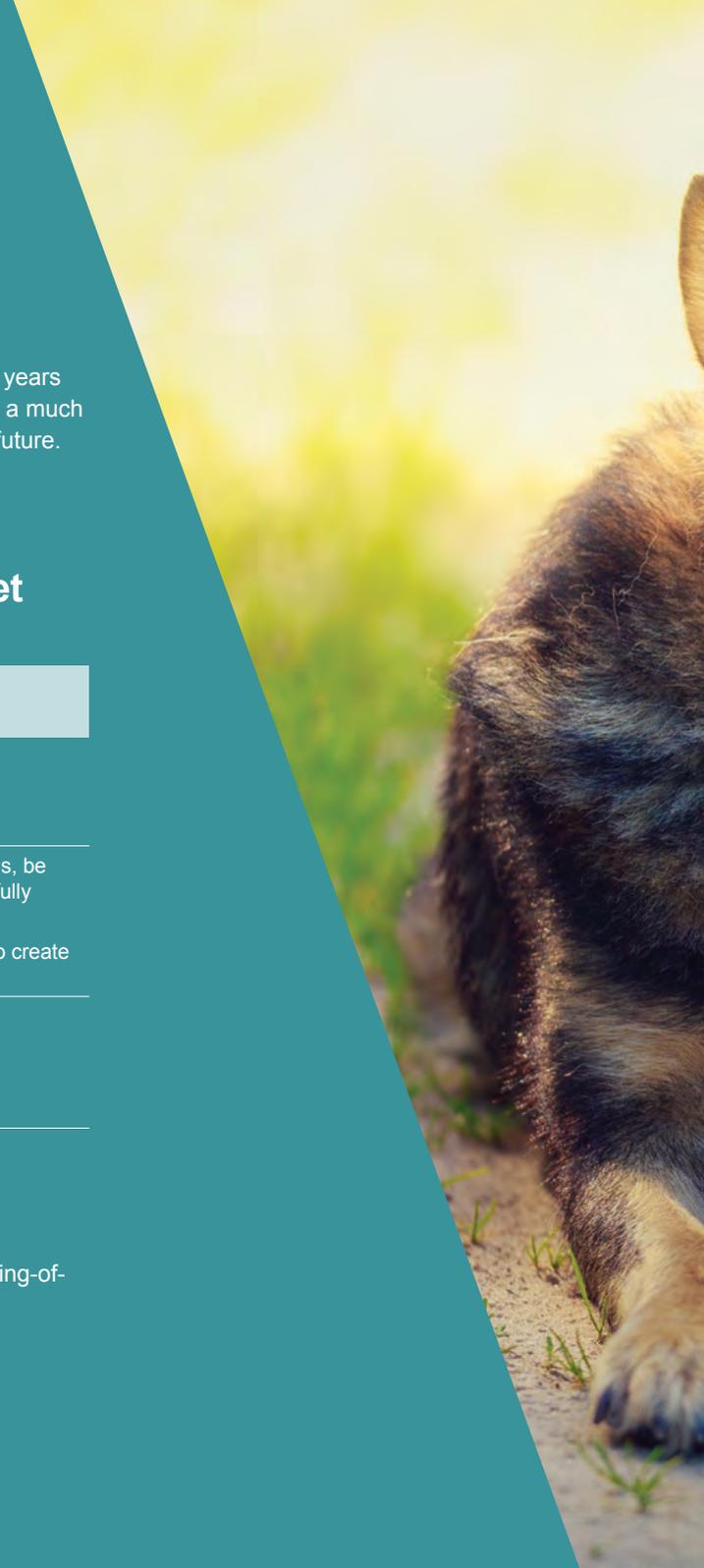
However, we have seen significant regulatory changes in the last 5 - 10 years and it is expected that it will become a much more regulated industry in the near future.

## Three regions/countries have implemented more stringent regulations on pet foods in recent years

Country/region	Regulatory body/Authorities	Main requirements
	Governments of each country and FEDIAF	<ul style="list-style-type: none"><li>Manufacturers must be registered or approved by applicable authorities</li><li>Facilities are inspected by the authority</li><li>Defined food safety protocols and hygiene practices (EC 183/2005)</li></ul>
	FDA & CVM	<ul style="list-style-type: none"><li>The Federal Food, Drug, and Cosmetic Act (FFDCA) requires that pet foods, like human foods, be safe to eat, produced under sanitary conditions, contain no harmful substances, and be truthfully labeled</li><li>The Food Safety Modernization Act (FSMA) is applicable and requires animal food facilities to create and implement a food safety plan</li></ul>
	AVS	<ul style="list-style-type: none"><li>All local commercial producers must get an AVS-issued licence</li><li>Inspection visits conducted by the regulator</li><li>All pet food must be packaged and labelled in English and contain the list of ingredients, manufacturing and expiry date, name of importer, etc.</li></ul>

### References

- 1 <https://fediaf.org/self-regulation/safety.html>
- 2 <https://www.fda.gov/animal-veterinary/animal-health-literacy/fdas-regulation-pet-food>
- 3 <https://www.nparks.gov.sg/avs/pets/bringing-animals-into-singapore-and-exporting/animal-feed/local-manufacturing-,-a-,-processing-of-animal-feed>





## Does Liberty insure product recalls or contamination in pet food products?

The Pet food industry around the world is not a well-regulated industry and there are many recalls due to the less stringent regulations on pet food suppliers and manufacturers.

At Liberty we are always keen to look at submissions for pet food suppliers and manufacturers. We assess the risk management practices and quality control protocols of a company before underwriting a policy, and part of our process is to ensure the pet food company is HACCP certified.

The Crisis Management Asia team at Liberty are constantly keeping track of the fast changes in this industry and providing the latest updates through our [Product Recall Monitor](#).

### Stay up to date

If you'd like to receive a copy each time Liberty's Product Recall Monitor for Asia is released, [let us know here](#) and we'll keep you up to date with the latest in product recalls across Asia.



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## Meet our Asia Crisis Management team members

### HONG KONG



**Joyce Cheng**  
Assistant Vice President  
Crisis Management, Asia  
T +852 3655 2685  
E [joyce.cheng@libertyglobalgroup.com](mailto:joyce.cheng@libertyglobalgroup.com)

### SINGAPORE



**Si Min Tay**  
Senior Underwriter  
Crisis Management, Asia  
T +65 6622 9191  
E [simin.tay@libertyglobalgroup.com](mailto:simin.tay@libertyglobalgroup.com)

### MALAYSIA



**Ken Tung**  
Underwriter  
Crisis Management  
T +603 2082 4007  
E [ken.tung@libertyglobalgroup.com](mailto:ken.tung@libertyglobalgroup.com)

 [View our office locations](#)

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