Crumbl Cookies E. coli Outbreak Crisis Plan



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Summary

About Us

Crumbl has grown to 1,000+ bakeries, becoming the fastest-growing U.S. cookie company. We proudly support our franchise partners, managers, and bakers while bringing families and friends together over a box of the best cookies in the world—a mission that remains unchanged (Our Story, 2024).

The Problem

In November 2024, Crumbl Cookies faced a significant food safety crisis when over 50 customers across 5 states reported severe gastrointestinal symptoms linked to E. coli contamination. Among those affected, 20 were hospitalized, including five children.

Initial investigations by the CDC and FDA traced the outbreak to a batch of raw chocolate chip cookie dough contaminated with E. coli, distributed to multiple locations nationwide. The crisis received widespread media coverage, raising public health concerns and prompting a full-scale recall of the product.

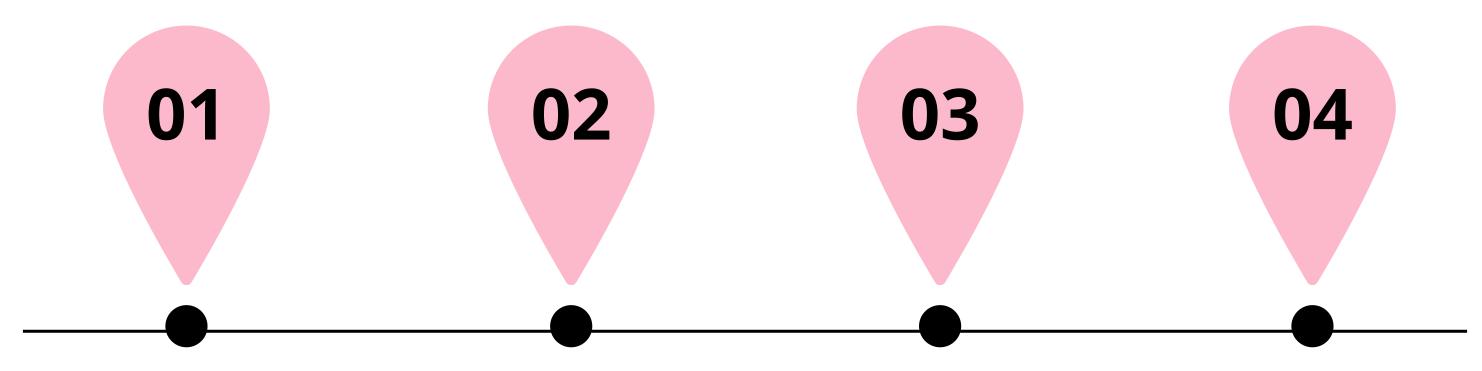


Crisis-Related Case Studies

- Johnson & Johnson Tylenol Crisis (Carroll, 2009)
- Chipotle E. coli Outbreak (Dulaney & Gunn, 2018)
- Cadburry Salmonella Recall (Coombs, 2015; Deshpande & Telang, 2016)
- Maple Leaf Foods (Dulaney & Gunn, 2018)
- **Dow Corning Crisis** (LaPlant, 1999)
- McDonalds Meat Crisis (Deshpande & Telang, 2016)
- Tetra Pak, Nestlé, and ITX (Coombs, 2015)



Objectives



Ensure

Ensure the health and safety of all customers and employees by taking immediate corrective actions.

Maintain

Maintain transparency and open communication with stakeholders, including the public, regulatory authorities, and employees.

Protect

Protect Crumbl Cookies' reputation by demonstrating accountability and decisive action.

Prevent

Prevent future crises through enhanced safety measures and industry-leading practices.

Crisis Management Team

Crisis Communication Lead (CCL)

The *Senior Director of Public Relations* will be the CCL. Their role is to communicate to board members, executives and key management updates. Oversee crisis strategy execution, message consistency, and director of information on all brand channels.

Assistant Crisis Communications Lead (ACCL)

Under the supervision of the CCL, the *Media Relations Specialist* will serve as ACCL, craft press releases, develop talking points, provide media training to spokespeople, manage interviews, and coordinate with news outlets.

PR Spokesperson

The CEO is the face of the organization and should serve as the primary spokesperson for press conferences, media interviews, and other external communications.

Communications Coordinator

Facilitate internal communication, provide regular updates, and manage customer outreach, including compensation and assistance, ensuring consistent messaging across all channels.

Social Media Manager

Monitor social media activity, address customer concerns, dispel misinformation, provide real-time updates, post approved content from CCL, engage with followers, and track sentiment to inform the crisis response strategy.

Regulatory Liason

The *Chief Operating Officer* (COO) will serve as the regulatory liason and will work closely with the CDC, FDA, and local health departments to ensure compliance and share findings.

Operations Coordinator

Under the supervision of the COO, the *Operations Coordinator* will supervise temporary closures and inspections of affected locations that claim to have the outbreak.

Legal Representation

Review and approve media inquiries, statements, and responses for legal compliance, address legal concerns with internal and external audiences, and coordinate with the CCL and ACCL to ensure regulatory alignment.

Crisis Response



- Transparent Communication
- Leadership Accountability
- Preventative Measures
- Product Recall

Immediate Actions



- Health Authority Partnership
- Compliance & Transparency

Collaboration



- Support Channels
- Customer Assistance
- Community Outreach

Customer Support

Publics involved: Customers, Media, Regulatory Authorities, Employees, Suppliers and Business Partners, Investors/Shareholders

Crisis Communication Policy

Transparency

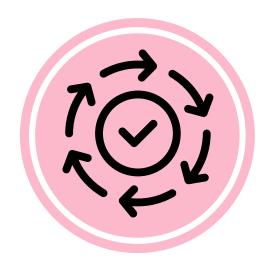
Provide honest, clear updates about the situation and actions being taken.

Avoid jargon and proactively share new information.



Timeliness

Respond quickly to developments and inquiries; share real-time updates to minimize speculation.





Empathy

Show genuine concern for affected individuals through compassionate, human-centered messaging.



Consistency

Ensure unified, accurate messaging across all platforms, representatives, and communications to build trust and prevent confusion.

Crisis Communications Checklist

Immediate Response (Within 3-24 Hours)

Ί.	Assemble Crisis Management Team (CCL):
	• Convene key personnel to form the crisis management team (within 4 hours of receiving credible reports).
	o Establish internal communication protocols and delegate responsibilities.
2.	Acknowledge the Crisis (ACCL):
	o Draft and release an initial public statement acknowledging the crisis and expressing concern (within 24 hours of confirmation)
3.	Notify Regulatory Agencies (COO):
	o Contact the CDC, FDA, and local health authorities to report updates and begin collaboration (within 6 hours of confirmation).
4.	Temporary Closures and Inspections (Operations Coordinator):
	 Close affected locations temporarily and notify staff (within 12 hours of confirmation).
	o Begin inspections of implicated locations.

Crisis Comms Checklist Pt. 2

Short-Term Response (Within 24-72 Hours)

1. F	Recall Products (COO):
	• Announce a recall for all suspected products in coordination with regulatory agencies (within 24 hours).
2. \$	Set Up Support Systems (Communications Coordinator):
	• Launch a customer support hotline and create a dedicated crisis webpage with updates and resources (within 24 hours).
3. I	ssue an Apology (CEO):
	• Release an official apology from the CEO (within 48 hours of initial public acknowledgment).
	o Schedule and conduct media interviews to address public concerns.
4. \$	Share Initial Findings (ACCL):
	• Communicate preliminary findings from investigations to the public and media (within 48 hours).

Crisis Comms Checklist Pt. 3

Ongoing Response (Within 72 Hours - 2 Months)

Contact affected customers directly to ensure they feel supported.

• Provide compensation and cover medical expenses throughout the crisis.

	1.Recovery and Prevention Plan (CCL):
	\square \circ Develop and release a detailed recovery and prevention plan to stakeholders (within 5 days).
	2. Periodic Updates (Social Media Manager and ACCL):
	\square \circ Provide updates to the public and stakeholders every 72 hours , including progress on investigations and corrective measures.
	3. Company-Wide Safety Audit (Operations Coordinator):
	□ ∘ Conduct a company-wide safety audit (within 3 weeks).
	□ ∘ Publish audit results and updated safety protocols.
C	ustomer Care and Post-Crisis (Ongoing)
	1. Follow-Up with Affected Customers (Communications Coordinator & Legal Representation):

Crisis Comms Checklist Pt. 4

Important Role Assignments

- Assemble Crisis Management Team: CCL
- Establish Communication Protocols: CCL
- Draft Initial Public Statement: CCL & ACCL
- Notify Regulatory Agencies: COO
- Temporary Closures and Inspections: Operations Coord.
- Issue Product Recall: COO
- Set Up Support Systems: Communications Coord.
- Release CEO Apology and Media Scheduling: CEO (ACCL)
- Provide Initial Findings: ACCL
- Develop Recovery Plan: CCL
- Issue Periodic Updates: Social Media Manager (ACCL & CCL)
- Safety Audit: Operations Coord.
- Customer Follow-Up: Communications Coord. (Legal)

The Rules That Haven't Changed

Pre-Crisis

- Develop crisis plan
- · Train, with simulated crisis situations
- Create relationships with potential allies and adversaries
- Build/enhance corporate reputation

Crisis

- · Identify problem. Set up target group feedback
- Control the process and message
- Work the plan
- · Respond: quickly, honestly, people-to-people
- · Communicate continually: confirmed facts only

Post-Crisis

- Continue:
 - maintaining relationships
 - proactive communications
 - reputation building

This checklist draws inspiration from the previously mentioned case studies and incorporates insights from **Birch's (1994)** *The Rules That Haven't Changed* chart.

Emergency Contacts

Name	Title (for Crisis)	Phone	Email
Jasmine Mendez (Primary)	Crisis Communication Lead (CCL)	(555) XXX-XXXX	cco@crumbl.com j.mendez@crumbl.com
Maria Zapata (Alternative)	Assistant CCL / Media Inquiries	(555) XXX-XXXX	media@crumbl.com m.zapata@crumbl.com
Jason McGowan	CEO/Spokesperson	(555) XXX-XXXX	ceo@crumbl.com
Tim Williams	Internal Comms & Customer Support	(555) XXX-XXXX	customersupport@crumbl.com t.walsh@crumbl.com
Alejandro Flores	Regulatory Liaison	(555) XXX-XXXX	coo@crumbl.com a.flores@crumbl.com
Bill Smith	Operations Coordinator	(555) XXX-XXXX	b.smith@crumbl.com
Smith & Partners Law Firm (Karelys Roque)	Legal Representation	(555) XXX-XXXX	k.roque@smithandpartners.com

Other Contacts

- Corporate Headquarters: Crumbl Corporate, (555) 654-3210
- Customer Service Hotline: (555) 657-3219
- Health Authorities Contact: CDC Regional Office, (800) 232-4636

As Seeger et al. (2023) notes, "Crisis communicators would do well to devote more attention to listening to and adapting messages for their stakeholders... responding to stakeholder concerns is far more important than producing prefabricated messages based on what the organization feels its stakeholders need to hear" (p. 13).

Risk communication is essential for effective crisis management (Spradley, 2017, p. 3). Defined by the National Research Council (NRC), it involves exchanging information between those facing risk and those who can mitigate it (Seeger et al., 2023, p. 181).



Key Messaging

Messages

- "At Crumbl Cookies, the health and safety of our customers and employees is our highest priority. We are deeply sorry for this incident and are taking immediate action to resolve it."
- "We are working closely with health authorities to trace and eliminate the source of contamination. Affected customers will receive our full support, including medical expense coverage."
- "Moving forward, we are implementing enhanced food safety protocols to prevent such incidents from happening again."

Media (Recorded Message To Be Posted)

Internal Communication:

• Employees will receive regular email updates, virtual Q&A sessions, and access to training on updated safety procedures.

External Communication:

• Updates will be shared via press releases, social media posts, and a dedicated page on Crumbl's website.

Statistics and information from the FDA and other food agencies will be updated as necessary.

Communication Tools

Press Releases

Address the public promptly, take responsibility, and announce immediate actions to resolve the issue, ensuring ongoing updates across digital channels (--).

Media Outlets

CEO to conduct interviews with major news outlets, starting with an apology, providing reassurance and explaining the steps being taken to protect public health

Press Conference

CEO to hold a press briefing with the help of CCO, outline corrective measures, and address media questions with clear, transparent information.

Dedicated Crisis Webpage

Create a central hub for updates, safety information, and FAQs, ensuring easy access to real-time developments for the public.

Social Media

Use official channels to provide timely updates, engage with concerned customers, and reinforce key messages with transparency and empathy.

Customer Outreach

Directly communicate with impacted customers via email or phone to provide support, offer refunds, and outline actions being taken.

Internal Channels

Keep employees informed with clear, consistent updates through emails, internal memos, and team meetings, ensuring alignment across all levels.

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