

Responding to a Food Recall

FOOD PROTECTION CONNECTION



FOOD RECALLS—WHILE RELATIVELY RARE—CAN HAPPEN AT ANY TIME. ARE YOU PREPARED WITH A PLAN?

Although we would like to think that we have a perfect food supply in the United States, we do not. Unforeseen circumstances are bound to happen that will lead to a product recall.

A recall is the purposeful removal of a potentially harmful product from commerce so it is not consumed. Recalls happen for various reasons and are not that uncommon. Contamination, adulteration, and misbranding are the main reasons for recalls. Some examples include:

- Contamination with a pathogen such as *E. coli*, *Listeria monocytogenes*, or *Salmonella*
- Foreign object contamination such as plastic, glass, or metal fragments

- Nutrient imbalance (often seen in recalls of pet food or infant formula)
- Undeclared allergens such as peanut, tree nut, milk, egg, soy, shellfish, etc.
- Undeclared sulfites

The U.S. Food and Drug Administration (FDA) is responsible for the regulation and safety standards of approximately 80 percent of the food supply in the U.S. The remaining 20 percent—primarily meat, poultry, and some egg products—is regulated by the U.S. Department of Agriculture (USDA) Food Safety and Inspection Service (FSIS).^{1,2} Local, State, and Tribal agencies regulate retail and wholesale facilities in their individual states as well,



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although most recalls go through the federal agencies rather than the state agencies, since most food crosses state jurisdictional lines.

FDA and USDA first hear about a problem product in several ways.^{1, 2}

- A company discovers a problem and contacts FDA or FSIS.
- FDA or FSIS inspects a facility and determines the need for a recall.
- FDA/FSIS receives reports of health problems through various reporting systems, including State, Local, and Tribal regulatory agencies.
- The Centers for Disease Control and Prevention (CDC) contacts FDA/FSIS if an illness has been associated with a food product.

Typically, recalls are voluntary and initiated by manufacturers and distributors, but thanks to the Food Safety Modernization Act (FSMA), FDA now has the authority to shut down operations at food production facilities if it deems that there is a significant threat to public health. In the event a company does not

respond to a FDA/FSIS request for a recall, legal action can be taken. The Federal Government's role is to oversee a company's approach and evaluate the adequacy of the recall. For a recall to be effective, all stakeholders—from production to consumer—need to take part.

Recalls are classified by their potential seriousness. Both FDA and FSIS classify recalls using this system:¹

- A **Class I** recall involves a health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death.
- A **Class II** recall involves a potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food.
- A **Class III** recall involves a situation in which eating the food will not cause adverse health consequences.

To find recall notices you can visit various websites:

- **FDA:** <http://www.fda.gov/Safety/Recalls/> is the FDA's recall page. It is updated

every day. FDA also has @FDArecalls on Twitter, if you use social media.

- **USDA FSIS:** [http://www.fsis.usda.gov/wps/portal/](http://www.fsis.usda.gov/wps/portal/fsis/topics/recalls-and-public-health-alerts/current-recalls-and-alerts) fsis.usda.gov/wps/portal/fsis/topics/recalls-and-public-health-alerts/current-recalls-and-alerts USDA FSIS has its own recall page for meat, poultry, and some egg product alerts. You can follow USDA on Twitter @USDAFoodSafety
- **FoodSafety.gov** is a great resource for food recalls and food safety alerts. You can sign up to receive alerts by email.

You're a retailer or a foodservice operation. You do not manufacture the food. Where does your responsibility start when a recall is issued? In most cases, retailer and foodservice operations are notified by their distributors, suppliers, and manufacturers if a recalled product was distributed to them.

What should you do when you get a notice of recall from your supplier? Do you have an action plan in place? To know if you

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have a recalled product in your facility, you need to know your suppliers and understand their recall procedures. How will they contact you should they have a recall? Ask your suppliers to discuss their recall procedures with your procurement and management staff.

You need to have your own plan in place that describes how the recall process will work within your facility operations. Know what should be included in your Recall Standard Operating Procedures (SOPs). SOPs always include who, what, where, when, why, and how. The best way to deal with recalls is to be prepared with clear and transparent policies and procedures that employees at all levels can use for any recall situation.

Provided at right by NFSMI (National Food Service Management Institute)³ and USDA is a sample SOP for a



YOU NEED TO HAVE YOUR OWN

PLAN in place that describes how the recall process will work within your facility operations.



school that could be used as a base to create your own personalized SOP for Recalls. Visit sop.nfsmi.org to view other sample food safety SOPs, like the one printed here. Customize the SOPs to meet the needs of your facility. ■

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REFERENCES

1. <http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm049070.htm>
2. Center for Food Safety, www.centerforfoodsafety.org
3. NFSMI, <http://www.nfsmi.org/ResourceOverview.aspx?ID=75>

PURPOSE:

To prevent foodborne illness in the event of a product recall.

SCOPE:

This procedure applies to foodservice employees who prepare or serve food.

KEYWORDS:

Food Recalls

Adapted from: National Food Service Management Institute, The University of Mississippi. Responding to a Food Recall (2002)

HANDLING A FOOD RECALL

(SAMPLE SOP)

INSTRUCTIONS

(Note: Specific job titles should be listed as to WHO will do the task)

1. Train foodservice employees on using the procedures in this SOP.
2. Follow State or local health department requirements (included in facility documents).
3. Review the food recall notice and specific instructions that have been identified in the notice.
4. Communicate the food recall notice to feeding sites.
5. Hold the recalled product using the following steps:
 - Physically segregate the product, including any open containers, leftover product, and food items in current production that contain the recalled product.
 - If an item is suspected to contain the recalled product, but label information is not available, follow the district's procedure for disposal.
6. Mark recalled product "Do Not Use" and "Do Not Discard." Inform the entire staff not to use the product.
7. Do not destroy any USDA commodity food without official written notification from the State Distributing Agency, USDA Food Safety Inspection Services, or State or local health department.
8. Inform the school district's public relations coordinator of the recalled product.
9. Identify and record whether any of the product was received in the district, locate the food recall product by feeding site, and verify that the food items bear the product identification code(s) and production date(s) listed in the recall notice.
10. Obtain accurate inventory counts of the recalled products from every feeding site, including the amount in inventory and amount used.
11. Account for all recalled product by verifying inventory counts against records of food received at the feeding site.

MONITORING

Foodservice employees and the foodservice manager will visually observe that school sites have segregated and secured all recalled products.

CORRECTIVE ACTION

1. Retrain any foodservice employee found not following the procedures in this SOP.
 2. Determine if the recalled product is to be returned and to whom, or destroyed and by whom.
 3. Notify feeding site staff of procedures, dates, and other specific directions to be followed for the collection or destruction of the recalled product.
 4. Consolidate the recall product as quickly as possible, but no later than 30 days after the recall notification.
 5. Conform to the recall notice using the following steps:
 - Report quantity and site where product is located to manufacturer, distributor, or State agency for collection. The quantity and location of the affected
- USDA commodity food must be submitted to the State Distributing Agency within 10 calendar days of the recall.
- Obtain the necessary documents from the State Distributing Agency for USDA commodity foods. Submit necessary documentation for reimbursement of food costs.
 - Complete and maintain all required documentation related to the recall including:
 - Recall notice
 - Records of how food product was returned or destroyed
 - Reimbursable costs
 - Public notice and media communications
 - Correspondence to and from the public health department and State agency

VERIFICATION AND RECORD KEEPING

Foodservice employees will record the name of the contaminated food, date, time, and the reason why the food was discarded on the Damaged or Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged or Discarded Product Log each day. Maintain the Damaged or Discarded Product Logs for a minimum of two years.

DATE IMPLEMENTED: _____ BY: _____

DATE REVIEWED: _____ BY: _____

DATE REVISED: _____ BY: _____

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Reading *Responding to a Food Recall* and successfully completing these questions online has been approved for 1 hour of Sanitation continuing education for CDM, CFPPs. CE credit is available ONLINE ONLY. To earn 1 SAN CE hour, purchase the online CE quiz in the ANFP Marketplace. Visit www.ANFPonline.org/market, select "**Publication**," then select "**CE article**" at left, then search the title "*Responding to a Food Recall*" and purchase the article.

1. FSIS deals with recalls of what type of foods?
 - A. Fish, meat, vegetables
 - B. Meat, poultry, and some egg products
 - C. Processed foods not containing meat
2. The best way to deal with recalls is to be prepared with clear and transparent ____ and ____ that employees at all levels can use for any recall situation.
 - A. Policies and procedures
 - B. Action items and procedures
 - C. SOPs and log sheets
3. A **Class I** recall involves:
 - A. A situation in which eating the food will not cause adverse health consequences
 - B. A potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food
 - C. A health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death
4. A **Class II** recall involves:
 - A. A situation in which eating the food will not cause adverse health consequences
 - B. A potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food
 - C. A health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death
5. A **Class III** recall involves:
 - A. A situation in which eating the food will not cause adverse health consequences
 - B. A potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food
 - C. A health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death
6. The Federal Government's role in a recall is to:
 - A. Oversee a company's approach and evaluate the adequacy of the recall
 - B. Oversee a company's policies and procedure to determine their adequacy
 - C. Oversee a company's approach and levy fines if the recall is not adequate
7. Thanks to this law, FDA now has the authority to shut down operations at food production facilities if it deems that there is a significant threat to public health:
 - A. Food Security Modernization Act
 - B. Food Insecurity Modernizing Act
 - C. Food Safety Modernization Act



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February 15, 2017.**

