

Best Practices and Recall Management

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Topics

- How and what prompts a recall
- What happens on a recall call
- Recall classifications
- Notifying customers of the recall, some tips and suggestions

What prompts a recall?

Recall: A firm's removal of distributed meat or poultry products from commerce when there is reason to believe that such products are adulterated or misbranded under the provisions of the [FMIA or PPIA](#).

- Poisonous or deleterious materials
- Pesticide
- Additive
- Filthy, putrid, decomposed substance, unsound, unwholesome, unfit for human food.
- Packed handled and held under insanitary conditions
- Misbranding
- Undeclared Allergens
- Working without the benefit of inspection

**PRODUCT
RECALL**

How do recalls begin?

- In plant inspection personnel findings during routine inspection
- Findings during a food safety assessment
- Customer Complaint
- FSIS investigation or notification
- The company recognizes that they may have shipped adulterate or misbranded product.

Before the recall call...

- Typically the company will be communicating with a staff member from the District Office and supplying information related to the product in question.
- Recall worksheets are typically used to gather this information
- Once the district has all the information the information is provided to the recall committee to discuss whether the information provided should prompt a recall.

RECALL WORKSHEET
(Include attachments, additional pages, label copies and flowcharts as necessary)

TODAY'S DATE: _____

ESTABLISHMENT NUMBERS: EST. _____ P- _____

ESTABLISHMENT NAME: _____

ADDRESS: _____

COMPANY RECALL COORDINATOR (name, title, telephone) _____

COMPANY MEDIA CONTACT (name, title, telephone) _____

COMPANY CONSUMER CONTACT (name, title, telephone) _____

REASON FOR RECALL: _____

IDENTIFY RECALLED PRODUCTS SEPARATELY BY:

BRAND NAME			
PRODUCT NAME			
PACKAGE (Type & Size)			
PACKAGE CODE (Use By/Sell By)			
PACKAGING DATE			
CASE CODE (Identifying)			
COUNT/CASE			
PRODUCTION DATE			
AMOUNT (lbs./cases) PRODUCED			
AMOUNT HELD AT ESTABLISHMENT			
AMOUNT (lbs./cases) DISTRIBUTED			
DISTRIBUTION LEVEL (institutional/retail/etc.)			
DISTRIBUTION AREA			
EXPORTED TO (country)			
SCHOOL LUNCH (CN, AMS Contract)	(YES) (NO)	(YES) (NO)	(YES) (NO)
DEPT. OF DEFENSE (DSCP, Commissary, etc.)	(YES) (NO)	(YES) (NO)	(YES) (NO)
INTERNET OR CATALOG SALES	(YES) (NO)	(YES) (NO)	(YES) (NO)

The recall call...

- Conference call where the company and the recall committee discuss the whether or not a recall should be initiated.
 - Recall Committee: A number of FSIS employees from various sub offices that may be subject matter experts pertaining to the recall situation.
 - Policy staff
 - Office of field operations
 - Public health science
 - Public affairs
 - Compliance
 - Other federal or state agencies if applicable
 - Company representatives
 - *Make sure the people who know the facts are on the call



The recall call cont.

- The scenario based on the information provided to them from OFO will be presented to the company. This will include information about what happened, scope, and will also include recall classification.
- The agency will request you to recall product. They can't force you, its voluntary. But if you refuse the agency has other means to remove product off the market. They can detain the product.
- If you agree to the recall, a member of the committee will explain the next steps. It will include information on the press release. The agency writes up the press release and gives you an opportunity to review it.

What do the recall classifications mean?

- Class I: Reasonable probability that the use of the product will cause serious, adverse consequences or death.
 - Example: Pathogens present in finished product.
- Class II: Remote possibility of adverse health consequences.
 - Example: Undeclared wheat in very small amounts
 - Plastic
- Class III: Use of product will not cause adverse consequences.
 - Excess water not identified on label.
- Recall Release vs. Recall notification Report
- Distribution level
 - Retail
 - If distributed to retail level a recall a recall release is issued
 - Media is notified, posted on website
 - Wholesale and distribution
 - Generally if products are not in retail a recall notification report will be generated and media outlets wont be notified. Posted on website and email subscribers will be issued an email.

Recall has begun

- Notify customers
 - Phone Call
 - Email
 - Calling and following up with an email is ideal
 - Fax and follow up with a call and document that fax was received.
- FSIS Directive 8080.1 template



DATE

CUSTOMER FIRM NAME & ADDRESS

ATTN: CONTACT PERSON NAME & TITLE

Re: RECALL OF TYPE OF PRODUCT

Dear Sir or Madam:

This letter is to confirm our telephone conversation that Company Name is recalling the following product because Specify Recall Reason:

Describe the product, including name, brand, code, package size and type, establishment number,

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for product returned.

We are undertaking this action in cooperation with the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture. FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist Company Name in this action. If you have any questions, please do not hesitate to contact Company Recall Coordinator at Phone Number or e-mail address.

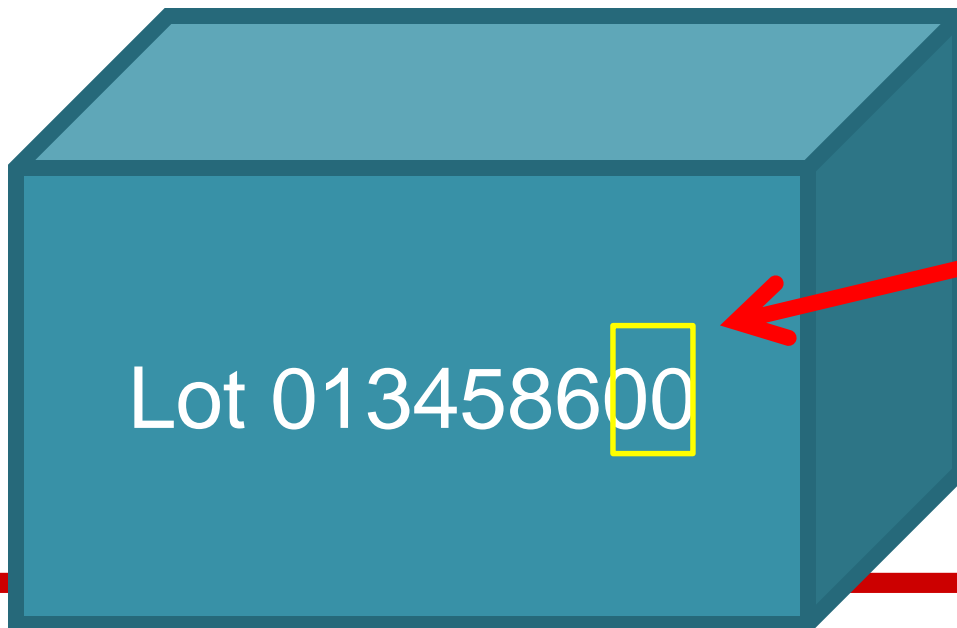
Thank you for your cooperation.

Sincerely,

Company Official Name and Title

Notifying customers

- Adding a picture of where to find the lot code might be helpful.
- Requesting confirmation that notification was received would demonstrate effective notification efforts.



Note: only products ending in 00 are subject to recall. All other products are NOT subject to recall. Lot number is found on the front of package. If there is any confusion please contact customer service.

Recall Effectiveness Checks

Information collection is estimated to average 15 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

U.S. DEPARTMENT OF AGRICULTURE
FOOD SAFETY AND INSPECTION SERVICE

**REPORT OF RECALL EFFECTIVENESS:
PART A - Effectiveness Check**

1. NAME AND ADDRESS OF CONSIGNEE/CUSTOMER	
2. RECALL CASE NO.	3. CLASS
4. NAME OF PRODUCT(S) RECEIVED	5. PRODUCT CODES/LOTS/SELL-BY DATE <i>(attach separate sheet if needed)</i>
6. NAME AND TITLE OF PERSON INTERVIEWED	7. DATE OF INTERVIEW
8. TIME OF INTERVIEW	
9. INTERVIEW CONDUCTED BY? <input type="checkbox"/> TELEPHONE <input type="checkbox"/> ON-SITE	
10. WAS RECALL NOTIFICATION RECEIVED? <input type="checkbox"/> NO <input type="checkbox"/> YES <i>(Date notified):</i> _____	11. HOW WAS NOTIFICATION RECEIVED? <input type="checkbox"/> MAIL <input type="checkbox"/> PHONE <input type="checkbox"/> FAX <input type="checkbox"/> E-MAIL <input type="checkbox"/> OTHER <i>(explain):</i> _____
12. AMOUNT OF RECALLED PRODUCT RECEIVED <i>(in lbs.)</i>	<i>If amount unknown, explain:</i> _____
13. HOW MUCH OF THE PRODUCT IN QUESTION 12 IS IDENTIFIED DURING EFFECTIVENESS CHECKS? <i>(Check all that applies, specifying amounts in lbs.)</i>	<i>If further distributed, obtain consignee list and give number of consignees:</i>
<input type="checkbox"/> On Hand _____ <input type="checkbox"/> Sold _____ <input type="checkbox"/> Consumed _____ <input type="checkbox"/> Destroyed _____ <input type="checkbox"/> Returned to recalling firm _____ <input type="checkbox"/> Further Distributed _____ <input type="checkbox"/> Other <i>(specify):</i> _____	_____
14. REMARKS:	

- EIAOs will conduct recall effectiveness checks
- FSIS Form 8400-4



- Notify customers that FSIS may be calling or visiting
- Customer service should be part of your recall team
- Recordkeeping is key!
 - SAP system
 - Excel

Thank you!

Links:

- [FSIS Directive 8080.1](#)
- [9 CFR 418.2-418.4](#)
- [FSIS 8400-4 recall effectiveness form](#)
- [How to develop a recall plan](#)