

Chapter 16:

Recall

Learning Objectives

After completing this chapter, you will be able to:

- Relate the importance of product traceability and recalls to limiting the scope of a foodborne illness
- Develop a product identification system
- Identify crucial records that must be maintained for the security and sustainability of your business
- Develop a food safety plan for your recall program including standard operating procedures and record templates

Chapter 16: Recall



Pam and Liane Develop a Tracking System

Pam and Liane are a little anxious after a vendor at their market had to recall a batch of mouldy jelly. They decide to review their jam processing procedures before moving into the new facility. Currently they have no method of identifying what products are sold on a particular date at each market. Pam and Liane decide to incorporate a product identification process.

Using a small sticky label, they identify each jar with product type, production date and lot number for each batch. For example ST 05-001 represents strawberry jam (ST), the year (05) and batch number (001). They will record the batches sold each market day to allow them to track the market location and sale date.

Liane and Pam keep a customer database so they can let their customers know when they'll be at the market and the products available. They realize their database can help them contact customers in the event of a product recall.



A food recall includes any corrective action by a business to protect consumers from potentially adverse effects of a contaminated, adulterated or mislabeled product.

Food Recalls

Despite your best efforts to ensure the safety of your food products, mistakes can and do happen. In 2004, the Canadian Food Inspection Agency (CFIA) issued 90 food product recalls and alerts. These numbers don't include the recalls on a more local level issued by the various provincial agencies. Some of these recalls were for products produced by farm direct marketers and sold at farmers' markets, farm stores and directly to restaurants.

Most recalls are voluntary. However, CFIA does have the power to make a recall mandatory. Failure to comply with a recall can result in fines and imprisonment.

What is a Recall?

Occasionally a food product sold represents a health hazard. The food may make some people ill, injure them or be in violation of legislation. When a product is identified as unsafe, it must be removed from the market quickly. The process of removing the product is called a "recall".

Although a food safety program reduces the risk of a recall, mistakes can happen. If you are unable to effectively recall a product, it can result in:

- Harm to consumers
- Damage to the image of your business or loss of the business
- Damage to the farm direct marketing industry as a whole

Recall – process of removing food products from sale that do not meet safety or company standards.

What Can Prompt a Recall?

There are a number of situations that can result in a recall. Some of the more common reasons include:

- Allergens – a product containing an unlabelled ingredient that may cause an allergic reaction in humans
- Bacterial contamination – contamination by harmful bacteria that may result in foodborne illness or even death. Contamination generally occurs because of poor production practices
- Chemical contamination – contamination of food by unapproved pesticides or animal drugs or residues in excess of allowable limits, excessive use of sanitizers, cleaners, solvents, etc.
- Foreign objects – presence of foreign objects such as glass, plastic or metal fragments that have been introduced with ingredients or poor production practices
- Undeclared ingredients – a product that contains ingredients (often allergens) not listed on the label

A recall can be triggered by the presence of allergens, bacterial or chemical contaminants, foreign objects, or undeclared ingredients in a food product.



Recall Situations

Take a moment to think about your products. What situations might prompt a recall of one of your products?

CFIA has identified three classes of recalls based on the severity of the problem.

According to the CFIA, recalls are classified as follows.

Type of Recall	Situation
Class I	A situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious adverse health consequences or death
Class II	A situation in which the use of, or exposure to, a violative product may cause temporary adverse health consequences or where the probability of serious adverse health consequences is remote
Class III	A situation in which the use of, or exposure to, a violative product is not likely to cause adverse health consequences

Depending on the nature of the problem, once the product is removed from circulation, it may be subject to testing, corrective action to ensure compliance or destruction.

Make a Recall Plan

Recalling a product should be a planned action; therefore it is essential that you be prepared. Your plan should include:

- Identification of your recall team
- Complaint file
- Notification information
- Implementation procedures
- Corrective actions

Recall Team

Identify who in your business has what role during a recall. It should be clear who has the authority to make decisions. Identify who will be the liaison with the enforcement agency involved. Remember to identify who will be the media contact. Have your legal counsel as a member of your recall team.

Since many recalls happen after regular work hours, be prepared to contact people outside of business hours. Make sure the information on your list of people on your recall team is always current.

Violative – tending to act against the requirements of the law; offend against.



Recall Team

Make a list of who should be on your recall team. Include contact information and a description of their roles.

Complaint File

A recall is often triggered by a consumer complaint. When you receive a serious complaint and you suspect that your product may be recalled, record the following details in your complaint file.

- Complainant details – name, address, telephone numbers
- Description of the problem with the product – chemical taste, allergic reaction, illness, foreign object, etc.
- Product details – product name, package type and size (if applicable). Does the complainant have a sample of the product?
- How the product was stored and handled after purchase
- Illness and injury details
 - When was the product consumed
 - How much product was consumed
 - Number of people who consumed it
 - Number of persons ill
 - Symptoms of illness or injury

In your complaint file, record the name of the person who took the complaint and date.

Upon receiving a serious consumer complaint about one of your food products, you should immediately begin a Complaint File and record the necessary information.

If a serious complaint has been made about your food, you must contact CFIA and your public health inspector as soon as possible.

Notification Information

Once you have gathered the information, you **must** contact the authorities immediately.

Step 1 Call the Alberta CFIA Recall Coordinator at (403) 661-7505. Since this number may change, it is your responsibility to periodically review and ensure that you have the correct contact number. The information is available on the CFIA website at www.inspection.gc.ca/english/fssa/recarapp/recarappe.shtml.

Step 2 Contact the public health inspector who has jurisdiction where the product is produced.

The CFIA Recall Coordinator will help you contact the CFIA staff that will assist you with the investigation. You will need to provide them with the following information.

Information Needed by CFIA

- Detailed description of the nature of the problem
- Name, brand, size, lot code(s) of affected product
- Details of complaints received and any reported illnesses or injuries
- Distribution of the product
- When the product was distributed (specific dates)
- Label(s) of the product(s) which may be recalled
- Total quantity of product distributed
- Name and telephone number(s) of the individual within your business who will be the contact for the CFIA

Implementation Procedures

A regulatory authority leads the investigation. The CFIA and/or your public health inspector will work with you on how to proceed with a recall and make sure that all the hazardous products are removed from the marketplace. Inspectors gather pertinent information and determine the extent of the recall based on the degree of danger associated with the product and the extent of the distribution.

It is your responsibility to ensure that all products that need to be recalled are identified. If products have been sold or distributed to other venues besides directly to customers, it is your responsibility to notify other buyers and inform them of what is to be done with your product.

Corrective Actions

All the affected products that are still in your possession must be identified and separated from other products. They must not be sold or distributed in any way. The authorities **must** approve your recommendations for what is to be done with the recalled product (e.g., reworked or destroyed). It is also your responsibility to ensure that all reasonable steps are taken to prevent a similar situation occurring again.

For your own protection, record the following information.

Product Recall Information

- Description of product recalled: product name, size and identifying codes
- Amount of product recalled
- Date of recall
- Amount of product returned, if applicable
- Corrective action taken

In cases where there is a serious health hazard, it may be necessary to issue a public warning via the news media. It is your responsibility to issue the press release, but the authorities will help you.

The CFIA and/or your public health inspector will work with you on how to proceed with a recall and make sure that all the hazardous products are removed from the marketplace.

All recalled product must be destroyed or reworked. Document your actions.



For more information and examples of press releases in the event of a recall visit the CFIA website at www.inspection.gc.ca/english/fssa/recarapp/recarappe.shtml#rp

Traceability is the ability to trace the history, application or location of a product by means of recorded information. This enables you to track a food item forwards or backwards through the food supply chain.

Lot number or batch number is a distinct code for each product on each container. The code can be a distinctive combination of letters, numbers or both assigned to a specific, identifiable batch of production.

Product Traceability

Being able to identify which products have to be recalled is very important to the future of your business. If you can't identify specific products, you may have to recall and destroy more product than is necessary. To implement a recall effectively, you must be able to trace your raw ingredients and packaging materials and track finished products.

Tracking is the ability to follow the path of an item as it moves through the food supply chain from point of production to point of consumption. Tracing is the ability to identify the origin of an item or group of items, through records, back through the food supply chain.

Lot identification helps you rotate product in storage and improve business efficiencies. Lot numbers linked to sales information may enable you to make better business decisions. Recent events in Alberta have shown the importance of traceability in limiting the scope of food safety problems which helped to reduce consumers concerns and maintain consumer confidence.

Product Identification

Some businesses have developed computerized bar codes systems that are very elaborate and detailed. Others have simple hand written documentation with box codes. To identify your production, assign the date on the package for all product processed on a particular day. If several batches are processed on the same day, consider coding each batch separately.

For example: Betty's Gourmet Barbecue Spice Blend, packed on May 30, 2005 could be coded as BS053005A where

BS = Barbecue Spice

053005 = month, day, year

A = batch, where A is the first batch made that day

The product code could be a small label that is handwritten or computer generated and adhered to each spice bottle.

If you pre-mix ingredients and store them for use at another time, you must be able to link the ingredients in the pre-mix to the finished product codes. For example, if Betty's Gourmet Barbecue Spice Blend included a percentage of her Cajun Spice Blend that was mixed on May 20, 2005 and stored, the code could now read BS053005A#2. The additional #2 could be linked to the information recorded for the Cajun Spice Blend.

Codes can also be assigned for product harvested on a particular day from a specific field and bagged. Coding becomes a problem for items sold by bulk weight such as some fresh fruits and vegetables. You may need to code the harvesting containers and record what containers were sold at which markets on a particular date.

If you fail to record how much of the coded product was produced, where it was sold and how much was sold at that particular venue on a particular day, your traceability system falls apart. In the event of a recall, you may be required to recall or destroy more product than was necessary.

“At the Old Strathcona Farmers’ Market vendors must have a system to identify their products and which ones are sold at the market.”

Jim O’Neill, Old Strathcona Farmers’ Market



For more information on product coding and examples of record templates for recalls see Appendix F: Record Template Examples.



Traceability Program

Take this time to think about the products your produce. If you don't have a traceability system in place, develop a product identification system that will work for you.

Lot number, batch number – a distinct code for each product on each container; a distinctive combination of letters, numbers or both assigned to a specific, identifiable batch of production.

Traceability – ability to trace the history, application or location of a product by means of recorded information; ability to track a food item forwards or backwards through the food supply chain.

Tracking – ability to follow the path of an item as it moves through the food supply chain from point of production to point of consumption.

Tracing – ability to identify the origin of an item or group of items, through records, back through the food supply chain.

Your record keeping system is crucial if you are faced with a recall. Accurate records help limit the scope of the recall and prevent you from recalling more product than is necessary.

Keeping Records

Your records are crucial to your ability to trace your product and limit the scope of a recall. The ability to more efficiently manage the storage and retrieval of information is becoming a business requirement.

The records that must be kept include:

- Significant complaints with the appropriate information
- Distribution records
- Production records
- Corrective actions
- Product codes
- Recall records

The product codes **must** be linked to the other records. Remember, the poorer the records, the broader the recall.

In the event of a recall, you should also maintain records of contacts made, date of contact, nature of contact, decisions made and actions taken.

Staff Training

You **must** stress the importance of maintaining records to your staff. Staff must understand what records to keep and how. Your employees must also know who has what role during a recall and understand their roles.

All staff who receive consumer complaints **must** be able to assess the seriousness of the complaint and determine how to handle the complaint. They are your first link in the recall process. If all the complainant information isn't fully captured, it could hamper the speed of a recall and result in a greater number of foodborne illnesses.

Your employees must be familiar with your product coding system, especially those who may be responsible for overseeing production. They must be able to generate the appropriate code for a particular product and ensure that the products are properly labelled.



Food Safety Plan – Recall

Develop a detailed written recall plan. When a crisis hits, it's too late to work on a recall plan. Preplanning is vital to effectively manage a crisis.

Your plan must describe, step by step, the procedures to follow in case of a product recall, specifically:

- How to implement a recall
- How to determine the extent of the recall
- How to notify affected customers
- Control measures for securing the returned product

The plan should also identify:

- Responsible individuals and their contact information
- Alternates in case of absence
- Roles and responsibilities of each person
- Channels and means of communication
- Information to be captured in the Complaints File
- Product coding system
- Location of production and distribution records
- Current CFIA and regional health authority contact information.

Preplanning is vital to effectively manage a crisis. Develop a detailed written recall plan. When a crisis hits, it's too late to work on a recall plan.



Take the time to continue developing your food safety plan. Create a section in your binder for Recall. Use the points above to build the product identification and recall component of your food safety plan.

A survey in Alberta indicated that consumers believe that producers and processors were the most important links for ensuring safety in the food supply chain.

The goals of a recall plan are to protect consumer health, comply with existing legislation, keep costs to a minimum and maintain the reputation of your business.

Summary

A recent survey of Alberta consumers indicated that they believe that producers and processors were the most important links for ensuring safety in the food supply chain. How prepared are you in the event that a problem with your products occur?

A food recall includes any corrective action by a business to protect consumers from potentially adverse effects of a contaminated, adulterated or mislabelled product. A recall plan enables you to more effectively respond to a problem.

Goals of a Recall Plan

- Protect consumer health
- Comply with existing legislation
- Minimize the cost of a recall
- Regain and improve the reputation of the business

An effective recall program includes:

- Tracking, analysis, actions taken, records of product complaints
- Persons responsible
- Methods to identify, locate and control recalled program
- Procedures for monitoring effectiveness of recall.

It is your responsibility to ensure that as much of the affected product as possible is removed from the market. In the event of a recall you will need to know how much product is in the marketplace.

A traceability system for your production will make it easier to track how much product is out there. Each package/container should have a permanent, legible code or lot number. The code identifies the product, day, month and year in which the food product was produced. Records of the amount of each lot code for each product produced must be kept.

Keeping distribution records allows you to limit your recall to specific amounts. You should have a record of which product codes were sold on which dates and the locations if sold at venues other than your own farm gate or farm store.

Preplanning and practicing what to do in the event of a recall is essential.



Resources

If you need more information or have food safety questions about this chapter contact:

Safe Food Systems
Agri-Food Systems Branch, Food Safety Division
Alberta Agriculture, Food & Rural Development
Phone: (780) 427-4054. Dial 310-0000 first for toll free access.

What's Next

A food safety plan is an important part of your business strategy. If you didn't create your plan as you worked your way through the chapters, now is the time to start. Review each chapter to remind yourself of the components of a plan. See Appendix E for help in writing the standard operating procedures (SOPs) that are the basic elements of your plan.

Each section of your plan will have a staff training component. Upon completing your plan, compile these sections into your staff training manual. Use it to train your staff at the beginning of your season. Remind them throughout the season about critical actions to keep food safe.

As for what's next? A plan sitting on the shelf has no benefit to you. Implement your plan and apply your knowledge to market your food safely.



Chapter Review

Match the correct letter with the appropriate term on the left.

<input type="checkbox"/> Tracking	A. A distinct code that allows the product to be identified by batch
<input type="checkbox"/> Tracing	B. Following a product from “farm to fork”, as it travels within the supply chain from production to consumption
<input type="checkbox"/> Recall	C. A specific sequence of letters and numbers that represents information about a food product, for example, date of production and lot number
<input type="checkbox"/> Lot number	D. Identifying the origin of a product by working back through the supply chain
<input type="checkbox"/> Coding	E. Changes made when a problem occurs, to help ensure that the problem does not happen again
<input type="checkbox"/> Corrective action	F. The return of a product to its producer; usually for safety concerns
<input type="checkbox"/> Allergen	G. A substance that causes an abnormal immune response to an ordinarily harmless substance.
<input type="checkbox"/> Traceability	H. Characteristic of a product, including records such as product code, that allows the origin of a product to be determined

Answers to Chapter Review

B (Tracking)

D (Tracing)

F (Recall)

A (Lot number)

C (Coding)

E (Corrective action)

G (Allergen)

H (Traceability)

