

UN Programmes on Food Recall

at
**WS on the Development & Strengthening of
 Food Recall System for APEC Member
 Economies**

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Product Recalls - Some Recent Eggs

E.Coli contaminated spinach recall...
 Then it spread to lettuce

China Milk Recall

China Milk Recall - Some Details


Sanlu China
 Saturday, 2nd August 2008
BEIJING

- ↳ Suppliers are believed to have added melamine, a banned chemical normally used in plastics, to diluted milk to make it appear higher in protein.
- ↳ Melamine was first found in baby milk powder made by the Sanlu Group.
- ↳ In total, melamine has been found in products made by 22 companies.
- ↳ 13,000 babies in hospital
- ↳ 53, 000 people affected and milk recalled around the world.

Product Recalls - Some more recent eggs


Europe – Belgium- Coca Cola Recall

- 5 months to recover the sales
- 249 cases of illnesses in Belgium
- Recall of 15 million cans and bottles
- Crisis cost \$200 million in expenses and lost profit



EU – Sudan 1 Crisis (Red chillies)

- Led to ~600 food product recalls in UK
- Sudan I & IV classified as carcinogens by Int Agency for Research on Cancer
- Dye detected in chilli powder used to make Worcester sauce
- Imported from India in 2002 & recall issued in 2005



Data of Published Worldwide Food Product Recalls (US)

Year	Recalls	Year	Recalls
• 1999	279	• 2004	293
• 2000	384	• 2005	255
• 2001	393	• 2006	240
• 2002	396	• 2007	338
• 2003	266	• 2008	565

Food Institute Report, 2009

Recalled Food Products (565 products)

Product Categories Affected by Recalls-2008

Category	Count	Percentage
Bakery	60	11%
Beverages	12	2%
Confectionary and Snacks	43	8%
Dairy/Non Dairy	31	5%
Fish and Seafood	34	6%
Fruits and Vegetables	117	21%
Ingredients and Spices	24	4%
Meat and Poultry	52	9%
Pet Food	109	19%
Prepared Foods	67	12%
Sauces and Seasonings	16	3%

As compared to 2007, recalls due to:

- Salmonella, ↑ by 800%
- Listeria, ↑ by 20%
- E. Coli, ↓ by 22%
- Undeclared ingredients ↓ by 16%

Food Institute Report, 2009

Recall

- Recall means action taken to remove a marketed food product that may pose a health & safety hazards/ risk to consumers, from distribution, sale and consumption
- Recalls are undertaken to : (Objectives)
 - Minimize risk of injury to consumers (food safety)
 - Ensure compliance with legal requirements
 - Other quality related issues such as labelling, BB date
 - Protect company assets including brand reputation

Causes of Recall

- **Health & safety** concerns – which include
 - Residues & contaminants – pesticides, vet drugs, heavy metals, toxins, cleaning chemicals, food additives adulterants
 - Pathogens & spoilage micro-organisms
 - Zoonotic diseases
 - GMO issues
 - Irradiation issues
 - Physical contaminants – glass/ metallic pieces, grit, vermin fecal matter /body parts
 - Persistent organic pollutants – eg dioxins
 - Food allergens
 - Labelling & claims – incorrect, past BB date



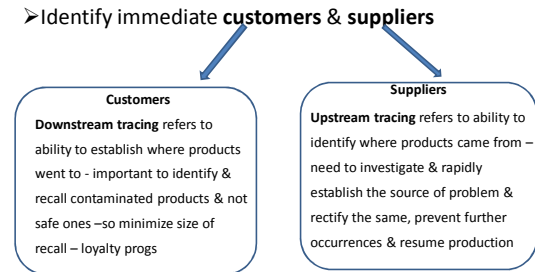
Pre-requisites to Operate a Recall

- Targeted and accurate information concerning the implicated product
 - Linking to the **origin** for a root cause & thereby decision on batches to be recalled
 - Product **location** or the customer (s)



Traceability - Important Concepts

- Traceability refers to “one step forward” & “one step backwards” approach to
 - Identify immediate **customers & suppliers**



Codex/FAO Work in area of Food Recall

Codex/FAO Work in area of Food Recall

- Recommended international Code of Practice – General principles of food hygiene
- Principles & guidelines for exchange of information in food safety emergency situations
- Principles for traceability/ product tracing as a tool within a food inspection & certification system
- Assuring food safety & quality: GL for strengthening national food control systems. FAO Food & Nutr Paper 76
- FAO Technical Guidelines for responsible fisheries - Aquaculture Devt – 1. Good Aquaculture feed m/f practices
- FAO/WHO Framework for Developing national food safety emergency response plans (recent document)
- Food Recall Guidelines –under preparation

1. Recommended International Code of Practice - General Principles of Food Hygiene

- Fourth revision (2003)
- **“5.8 Recall Procedures requires food businesses to have effective procedures in place to deal with any food safety hazards and to enable the complete, rapid recall of any implicated lot of the finished food from the market. “**
Where product withdrawn because of an immediate health hazard, **other products produced under similar conditions to be evaluated** & may need to be withdrawn
Recalled products to be **held under supervision till disposed off**, used for purposes other than human consumption, determined to be safe or reprocessed into a safe product

2. Principles & GL for Exchange of Information in Food Safety Emergency Situations

- CAC/GL 19-1995; rev 1 2004
- Purpose is to enable countries to assess & decide on their risk management/ communication strategies (recall would be part of strategy)
- Annex gives standard format for information exchange covers information on actions taken such as to recall food from markets (mandatory & voluntary)

3. Principles for Traceability/Product Tracing as a Tool within Food Inspection & Certification Systems

- CAC/GL 60-2006)
- **Definition** - Traceability/product tracing: the ability to follow the movement of a food through specified stage(s) of production, processing and distribution
- Traceability does not make a food safe but is a **risk mgmt tool** for use to **assist in containing a food safety problem**
- Traceability is meant to ensure that
 - ✓ **targeted & accurate** withdrawals or recalls are undertaken
 - ✓ appropriate **information** given to consumers & Food Business Operator,
 - ✓ **risk assessment** carried out by control authorities &
 - ✓ unnecessary **wider disruption of trade** avoided

4. Assuring Food Safety & Quality: GL for Strengthening National Food Control Systems

- FAO Food & Nutrition Paper 76
- Elements of a food control system under food laws & regulations requires ‘provision of tracing of food products and for recall in case of problems’
- ‘Principles of food control’ gives recall of products as an eg under establishing emergency procedures for dealing with particular hazards

5. FAO Technical Guidelines for Responsible Fisheries

- Aquaculture Development – 1. Good Aquaculture feed manufacturing practices – cl 14 deals with recalling defective or mislabelled products
 - Based on feed quality or labelling errors
 - Recall to be handled quickly, properly & be well documented
 - Detailed procedure at Annex 1

6. FAO/WHO Framework for Developing National Food Safety Emergency Response Plans

- Very recent (26/04/2010)
- Key elements - reinforcing preparedness & responding rapidly to emergencies
- Covers - incident identification, incident mgmt, post incident review & evaluation, communication
- **Under incident management** requires procedures for traceability, withdrawal & recall amongst others
- **Under communication strategy** covers recall/withdrawal notices

7. Food Recall Guidelines

- A guidance manual for introducing effective food recall systems into national food control programs (under preparation)

Some Important Points in a Food Recall - 1

- Legal basis – legislation applicable across food chain, authority & responsibility, disposals, communication, etc; covers recall by authorities/ business
- Implemented by govt, industry, jointly
- Recall by food business otherwise withdrawal
- Food business recall plan to be part of food safety control system (linkage with HACCP-based systems)
- Involvement of consumers in a recall – communication, public notice
- International involvement in a food recall – imports/ exports, INFOSAN networks
- Planning in advance – Risk basis, mock withdrawals/ recalls – to ensure system is effective

Some Important Points in a Food Recall 2

- **Plan** of recall - also relevant in an emergency, shared with all involved
- **Information** from various sources – food industry, consumer, labs, surveillance programmes, hospitals - INFOSAN
- **Level** of recall depends on distribution in food chain
- **Disposal** of products
- **Rectification** of problem or Corrective action
- **Communication** systems - (authorities/food businesses); website, mob phones, toll free phones
- Lot **identification & traceability** – only effected lots, reduced impact of lots
- **Data** system & flow of data

Procedure for a Product Recall (Feed)

- Potential product recalls to be quickly **reported & investigated** by a **responsible decision-maker** who has **authority** to assign the recall classification to the situation.
- When warranted, a Recall Committee to be appointed & quickly convened when a Class I, II, or III situation exists.
 - Class I Recall - A serious emergency recall situation involving product which may have an immediate or long range effect on the life or health of aquatic animals or human consumers.
 - Class II Recall - A priority situation involving product which may be a potential hazard to human or animal life or health.
 - Class III Recall - A situation involving product which does not pose a health threat, but which may have serious or wide-spread customer or public relations implications.

Procedure - 2

- When potential for a recall is evident, the production & QC manager to be informed immediately
- The QA manager to immediately investigate & determine if situation is a Class I, II, or III recall or is of lesser priority.
- If it is a Class I, II, or III recall, QC manager to immediately convene Recall C
- Chair then co-ordinates all recall activities, keeps C informed
- A lesser priority situation may be handled at plant level without committee being convened.
- The Recall C to include persons with expertise in: Regulatory, Production, Sales, QC, PR, Legal, Purchasing, Nutrition
- The Recall C to decide quickest & best overall procedure for handling recall

Procedure - 3

- As each situation is unique, following guidelines are useful:
 - Determine suspect product's identifi codes & dates of m/f
 - Determine entire product location
 - Immediately notify all locations. Mandate a "stop sale."
 - If product sold to consumers, procure customer details from distributors
 - Get Recall Committee input on handling all contacts outside company, eg consumers, agents, dealers, media
 - Decide if media to be notified. PR dept to handle.
 - Decide if govt agencies to be notified (may make matters worse if officials feel concealment attempted)

Procedure - 4

- Assign responsibility (production manager) for records of production, shipments & disposals. Also a record of recall actions with date & time (for legal protection).
- All samples secured to be properly identified & safeguarded;
- Refrigerate to prevent degradation . If analysis required, do expeditiously (retaining duplicates).
- Communication critical. Keep the Recall C, plant manager, any customers, & news media (if necessary) informed, so that no inaccurate information
- A 24-hour hotline ph no for any queries from consumers.
- Yearly review of recall policy & procedures

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Any Questions?

