FOOD SAFETY SUPPORT

Alberta Agriculture and Food has a team of food safety specialists available to assist you to assess and improve your food safety programs.

www.agriculture.alberta.ca/aha

Contact 780-427-4054
or toll free 310-0000.

Improving food safety programs is a good business decision as doing so can enhance food safety, quality and consumer confidence; reduce waste and recalls; and open doors to additional markets.

Alberta

Alberta

Alberta Agriculture
and Rural Development
Food Safety Division

O.S. Longman Building
6909 116 Street
Edmonton, AB T6H 4P2
T. 780-427-4054
F. 780-427-1437

aha@gov.ab.ca
www.agriculture.alberta.ca/aha

8. Recall Procedures
Every recall plan should contain a step-by-step explanation of what to do when a product needs to be recalled. Following this plan will help food processors ensure that important steps are not overlooked during this time of crisis. Recall procedures should be readily available and should explain product coding, product traceability, and production and distribution records. Develop all necessary forms to be used in case of a recall, as well as a media release form if necessary.

The steps in any recall are similar for all products. For each recall, the processor should:

- Identify the concern
- Assemble the recall team
- Notify RSD and CFIA
- Identify all products to be recalled
- Segregate (put on hold) affected products that are in your control
- Prepare a distribution list
- Prepare a press release (if necessary)
- Notify customers (informing them what to do with the recall products)
- Control recalled products and decide what to do with them
- Dispose of recalled products
- Fix the cause of the recall

9. Recall Effectiveness
A company recalling a product is responsible for notifying all customers who bought the affected products. They should also verify that all customers have stopped the distribution of the affected products, and that all recalled products have been returned to the processor's control or other designated area as instructed in the recall notification.

10. Testing the Recall Program
Mock recalls test a company's ability to recall products without actually recalling them. The CFIA strongly recommends doing mock recalls every six months, or at least annually. The goal is to be able to identify every affected lot, know exactly where it is at any point in the process, and know who to contact to bring it back. A mock recall can be an eye-opener: some processors discover that they are not as prepared as they thought.

Mock recalls should test both product-tracking and ingredient-tracking systems.

Results of the practice must show that the plant is able to handle a recall situation (a 95-100% efficiency rating). If deficiencies are identified, correct the problems and retest the program with another mock recall.

Food Safety Sentinel is now available on-line by visiting the Alberta HACCP Advantage (AHA) website at www.agriculture.alberta.ca/aha and clicking on the link to the Food Safety Sentinel newsletter.

References:

The Canadian Food Inspection Agency – *Food Recalls: Make a Plan and Action it! Manufacturers' Guide*: http://www.inspection.gc.ca/english/fssa/recarapp/rap/mgguide.shtml

Benjy Mikel, University of Kentucky – *Implementing a Recall Program for Small Processors*: http://www.pork.org/pig/NEWfactSheets/13-01-06g.pdf

This newsletter is made possible with funding from Agriculture and Agri-Food Canada, through the Canadian Food Safety and Quality Program's Food Safety Initiative, under the Agricultural Policy Framework.

FOOD SAFETY SENTINEL

February 2009

IN THIS ISSUE

RECALL FOR PROVINCIAL MEAT AND POULTRY PROCESSORS

What is a Food Recall?

Food producers use many controls to ensure the safety of their products. Despite their best efforts, however, sometimes unsafe food products, or those that do not meet legislative requirements, make their way into the marketplace. When an unsafe or violative food product has left the control of the manufacturer, it must be removed from the market. This process of removing the product is called a recall.

Any food recall has the following aims:

- Stopping the delivery and sale of the product in question;
- Informing the appropriate regulatory agencies; and
- Proper and timely removal from the marketplace of the product in question.

What is a Recall Program?

The ability to remove products from the market quickly and effectively is vital to every food producer. A recall program is a written action plan that is carefully constructed, tested and evaluated to ensure efficiency. It is the safety net that can prevent consumers from buying or eating a potentially harmful food product.

Having an efficient recall program may reduce a company's liability, while a non-existent or poor recall program can have serious economic and legal consequences. For a small processor, a recall can be a very traumatic experience. Being properly prepared for a recall can make the difference between a recall being a learning experience or a nightmare.

Parts of a Recall Program

According to the "Manufacturer's Guide" developed by the CFIA (the Canadian Food Safety Agency), a recall program should include **10 parts**. Each part plays a specific role and gives a different benefit to your company. These parts are often linked to other food safety programs that may be in place.

1. Recall Team
Identifying recall team members and assigning recall duties enables the recall procedures to be conducted quickly and smoothly. The recall program should also identify the person who will coordinate the recall. The recall coordinator should have the authority to call upon other recall team members as needed to address the issues at hand. Because many recalls happen outside of regular working hours, after-hours contact information should be included in any recall team list.

Canada

The Agricultural Policy Framework (APF)
A FEDERAL · PROVINCIAL · TERRITORIAL INITIATIVE

Alberta

WHICH GOVERNMENT AGENCIES DEAL WITH RECALLS?

Under the Food and Drug Act and Regulations, the Canadian Food Inspection Agency (CFIA), with help from Health Canada (which provides health-risk assessments), deals with product recalls for all food processors in Canada. The CFIA may take the lead role in investigating and coordinating food recalls, or just require that the processor ensure the CFIA is kept informed.

In Alberta, the Regulatory Services Division (RSD) of Alberta Agriculture and Rural Development and the Alberta Health Services Board may also take part in the recall process depending upon the situation. All of these regulatory agencies are also available to help with investigations and recall activities.

RECALL DECISION

Recalls are usually initiated by the manufacturer or distributor of the unsafe product, sometimes at the request of the CFIA. These are called voluntary recalls because they are initiated and carried out by the manufacturer without a ministerial order.

If a processor refuses or chooses not to conduct a recall, the federal Minister of Agriculture may order the processor to conduct the recall under Section 19 of the Canadian Food Inspection Agency Act. In this case the recall is called mandatory and the CFIA has the authority to detain or seize the affected products.

2. Complaint File
When a complaint is received, it is important to record the details and start an investigation. This will allow the identification of potentially unsafe products and the correction of problems. A complaint file should have three parts:

- **Recording of the complaint information** – this should include information about the person who made the complaint, product information (lot code or production date), the problem with the product, and details of illness or injuries that may have occurred.
- **Investigating the complaint and recording the findings** – ensure that all products that may have been affected are investigated.
- **Taking action based on investigation findings** – once all findings are in place, contact the appropriate government agencies.

3. Recall Contact List
If potential for a food safety hazard exists, it is the duty of the processor to contact the provincial regulatory agency (RSD). The processor must also contact the CFIA, even if the processor is a non-federally registered facility, as the CFIA can assist with the investigation and the collection of information to help make the right decision. A recall program should contain a contact list with the names, phone and fax numbers of the appropriate regulatory agencies.

4. Traceability
Traceability involves record-keeping procedures that show the route a raw material took from the supplier through production to the final product, and then on to customers.

Being able to determine which products need to be recalled allows a processor to limit the scope of a recall. If the specific affected products cannot be identified, a processor will need to broaden the scope of the recall, often recalling more products than necessary, which results in more financial losses. If the products are incorrectly identified, another recall will be necessary.

To develop a traceability system:

- **Lot code finished products**: All products manufactured should be coded. This information will be used to inform customers what products are associated with any recall activities. Product lots can be determined by one day's production or by the time span from one sanitation period to the next. Each plant's volume and type of production will dictate how far processors may go in subdividing product lot size. The smaller the lot size, the more manageable the recall becomes. It is important to document the definition of a "lot" in your recall program.
- **Link all ingredient lot codes to finished product codes**: If a raw material has caused a food safety issue, being able to trace it back to the supplier will increase the chances of correcting the problem and avoiding it happening again. When an ingredient enters production, record its lot number and link it to a formula or production information.
- If you use rework, **link the ingredients of the rework to the finished products**. Carryover product from one lot to another can compound the traceability of a product. All rework should be assigned a lot number to be later linked to the final product it goes into.
- **Link finished product codes to customers**: This can be achieved by including the lot codes sold to each customer on distribution records.

Each manufacturer should develop its own traceability policies. The more key information products can carry with them, the better the chances of finding and removing them swiftly from the marketplace.

5. Production Amounts
In case of a recall, a company must ensure that as much of the affected product as possible is removed from the marketplace. Having an accurate record of how much product has been sold, and how much is still on the premises, helps ensure that all customers are notified of the recall. This means documenting the amount of each lot of each product manufactured.

6. Shipping and Sales Records
Maintaining accurate shipping and/or sales records is crucial because they can enable a company to limit the recall to only the customers who received the affected products.

Shipping and sales information should include:

- **Customer name and contact information**. In the case of a wholesale customer, the name of the person to contact and the contact information (e.g., telephone and fax numbers, email address) are needed. Some food processors sell their products from retail areas on their premises; it can be difficult to keep track of customers in this kind of operation. Should a recall be necessary in this event, a local media announcement would be considered.
- **Product name and lot code**.
- **Amount of product shipped to each customer**. If products are sold through a retail area, it is not necessary to know the amount sold to each individual customer. However, it is the plant's responsibility to know the amount of product sold through the retail system.

The operator must keep all production, traceability and distribution records for at least one year after the expiry (best-before) date on the label or container. Check with your regulatory agency to ensure that you are maintaining your records for the correct period of time.

7. Recalled Product Records
It is beneficial to develop recall product records to ensure that recalled products are controlled and do not get into the hands of customers. Such records should include the name of the product being recalled, the amount, the date the product has been recalled and the corrective action taken for each product.

RECALL CLASSIFICATION

There are three levels of food product recalls. The type of recall is categorized by the CFIA (Office of Food Safety and Recall) and indicates the relative degree of health risk posed by the product being recalled:

Class I – a situation where serious adverse health consequences (possibly even fatal) may result if the product is consumed. A public alert is usually issued.

Example: Ready-to-eat meat (e.g., luncheon meat) is contaminated with pathogenic bacteria, such as Listeria monocytogenes.

Class II - a situation where a health hazard might exist but the probability is remote. A public alert may be issued.

Example: Milk powder, a priority allergen, is an ingredient in sausage without being listed on the label.

Class III - a situation where the consumption of the product is not likely to cause health problems. A public alert is not usually issued.

Example: Improperly labelled processed meat where water is added but not listed on the label as required by labelling regulation.