Meat and Poultry Recalls

USDA, FSIS

Hany Sidrak, DVM Director, Recall Management Staff

NTF Leadership Conference 2005

Recall Defined

A firm's voluntary removal of distributed meat, poultry, or egg products from commerce when there is reason to believe they are adulterated or misbranded under the FMIA, PPIA or EPIA

Why Recall?

Recall is a fast and effective method of removing distributed products, particularly when many lots of product have been widely distributed.

Who Recalls?

- Manufacturers and distributors
- FSIS does not have, and is not seeking, mandatory recall authority

However

FSIS may initiate the recall process by informing a firm that adulterated product in commerce has been identified

Recall Process

>Problem Identification:

•Consumer complaints (CCMS)

•The plant itself

•FSIS microbiological sampling

•In-plant inspectors

•Outbreak investigations

Recall Process

Following problem identification, FSIS contacts the company and requests information as per recall work sheets

It is up to the company to provide information in any other format

Recall Worksheet

- > Production Dates
- Product and Names Package Sizes and Types (Vac Pak, Cartons)
- > Amount Produced / Distributed
- > Distribution Level and Locations

FSIS May Also Request

- > Flow Charts
- > Lab Reports
- > HACCP/SSOP Records
- > **Production Records**
- > Distribution Records

FSIS Recall Committee

Work sheets and other information Are distributed to the FSIS Recall Committee

FSIS Recall Committee

- > Chaired by the Recall Management Staff
- > Includes various staffs
 - District Office
 - Microbiology/Toxicology/Human Health
 - Compliance
 - Press Office
 - Other

FSIS Recall Committee

- > Evaluates Hazard and Circumstances
- > Reviews FSIS and Plant Data
- > Recall Worksheet
- > Classifies Hazard
- Evaluates Scope (product lots involved)
- > Recommends Recall
- > Evaluates Firm's Recall Strategy

Recall Classification (Health Risk)

- Class I: <u>Reasonable</u> probability that consumption of product will cause serious health problem or death
- > Examples:
 - Pathogen in ready-to-eat product
 - E. coli O157:H7 in Raw ground Beef
 - Undeclared class I allergen (e.g. peanuts, shellfish, eggs, milk)

Recall Classification (Health Risk)

- Class II: <u>Remote</u> probability of adverse health consequences from product
- Examples: Undeclared Class II allergens such as wheat and soybean. Soft small pieces of plastic.

Recall Classification (Health Risk)

- Class III: Use of product will not cause adverse health consequences
- Example: Undeclared, non-allergenic, G.R.A.S. ingredient such as excess added water

Firm Recall Coordinator

• The plant recall coordinator is contacted by the DO to assemble recall data and later by the recall committee and advised of the recommendations

• Questions from both FSIS and the plant are discussed

Firm's Recall Action

- > Promptly Notify Each Consignee about Recall
 - Telephone followed by Fax or Letter
- > Identify Exact Product, Lot(s) Codes, Sizes
- Explain Reason for Recall and the Hazard Involved
- > Explain how product is to be returned

Public Notification

- Recall Notification Reports FSIS Website and Distributed to Public Health Officials – possibly change to issue with class III only
- FSIS Press Release usually classes I & II but possible with some class III recalls -Targeted to Press at Distribution Sites
- If MOU with a state share distribution records

Effectiveness Checks

Definition:

Effectiveness checks comprise a process in which FSIS inspection personnel verify the recalling firm communication to its consignees by contacting them regarding the recalled product status

Recalled Products Disposition Verification Checks

Definition:

Disposition checks comprise a process in which FSIS inspection personnel verify that recalled products has undergone proper disposition in accordance with regulations.

They are conducted on a subset of consignees. The same tables used to determine the number of recall effectiveness checks are also used to determine the number of products disposition checks.

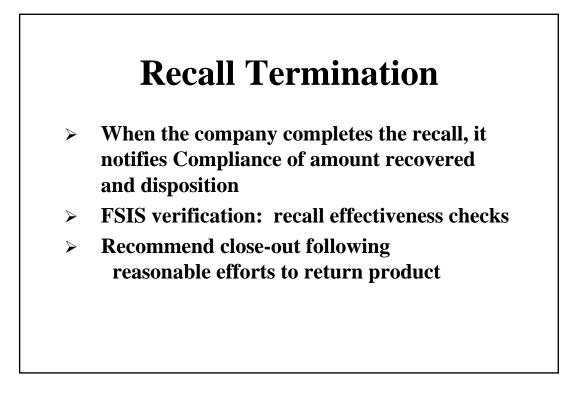
Verification Process Recommended time frames Table 1.			
Recall classification	FSIS verification activities begin as soon as possible but in no case later than:	FSIS verification activities should be substantially completed within:	
Class I	3 Days	10 Days	
Class II	5 Days	12 Days	
Class III	10 Days	17 Days	

Verification Process Table 2 - Class I recalls with an illness, outbreak, or school lunch implications				
Number of Consignees	Number of Effectiveness Checks to Make	Recall is considered ineffective if the Number of Consignees at which Product was available to Consumers Exceeds:		
1 to 200	100%	0		
201 to 1000	200	0		
1001 to 35,000	800	1		
35,001 to 500,000	800	1		
500,001 and over	1250	2		

Verification Process Table 3 - Class I recalls with no illness, outbreak, or school lunch implications				
1 to 20	100%	0		
21 to 150	20	0		
151 to 1200	80	1		
1201 to 2300	125	2		
2301 to 10,000	200	3		

,	Table 4 - Class I	II recalls
Number of Consignees	Number of Effectiveness Checks to Make	Recall is considered ineffective i the Number of Consignees at which Product was available to Consumers Exceeds:
1 to 5	100%	0
6 to 25	5	0
26 to 150	20	1
151 to 280	32	2
281 to 500	50	3

Table 5 - Effectiveness checks to conduct and criticallimits for Class III recalls				
1 to 8	100%	1		
9 to 50	8	1		
51 to 90	13	2		
91 to 150	20	3		
151 to 280	32	5		



Market Withdrawal

- A firms removal or correction by its own volition of a distributed product that involves a minor infraction that would not warrant legal action by FSIS, or
- > No violation of FMIA or PPIA
- > No Health Hazard

Stock Recovery

- A firms removal or correction of violate product that has not been marketed or that has not left the direct control of the firm.
- Example: Product is located at company warehouse and no portion of the lot has been released for sale.

