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 Federal Meat Inspection Act, Poultry Products Inspection Act or Egg Products Inspection Act.

Source: USDA
Initiation of a Recall

Key Triggers:

- Consumer complaints
- HACCP failure
- FSIS microbial sampling
- In-plant inspectors
- Outbreak investigations
Initiation of a Recall

Due to the detection of:

- Microbial agents (E. coli 0157:H7)
- Undeclared allergens (Peanuts)
- Chemical contamination (Ammonia)
- Foreign materials (Glass)
- Undercooking of product (ready to eat foods)
- Improper labeling (unlisted ingredient)
### USDA Recalls by Cause 2000-2003

<table>
<thead>
<tr>
<th>Cause/ Year</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
<th>2003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Listeria</td>
<td>35 (46%)</td>
<td>26 (28%)</td>
<td>42 (33%)</td>
<td>16 (23%)</td>
</tr>
<tr>
<td>E. coli O157:H7</td>
<td>20 (27%)</td>
<td>25 (27%)</td>
<td>35 (27%)</td>
<td>11 (15%)</td>
</tr>
<tr>
<td>Salmonella</td>
<td>4 (5%)</td>
<td>2 (2%)</td>
<td>4 (3%)</td>
<td>2 (3%)</td>
</tr>
<tr>
<td>Allergens</td>
<td>5 (7%)</td>
<td>11 (12%)</td>
<td>20 (16%)</td>
<td>14 (20%)</td>
</tr>
<tr>
<td>Other</td>
<td>11 (15%)</td>
<td>28 (31%)</td>
<td>27 (21%)</td>
<td>28 (39%)</td>
</tr>
</tbody>
</table>

Table 1: Other category contains recalls due to foreign materials, mislabeling, undercooking and chemical contamination.

Source: USDA
Recall Classification

**Class I:** Reasonable probability that consumption of product will cause serious health problem or death.
- Pathogen in ready-to-eat product
- E. coli O157:H7 in raw ground beef
- Undeclared class I allergen (peanuts, shellfish)

**Class II:** Remote probability of adverse health consequences from product.
- Undeclared Class II allergens (wheat, soft small pieces of plastic)

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

Source: USDA
## USDA Recalls by Classification 2000-2003

<table>
<thead>
<tr>
<th>Class/ Year</th>
<th>2000</th>
<th>2001</th>
<th>2002</th>
<th>2003</th>
</tr>
</thead>
<tbody>
<tr>
<td>Class I</td>
<td>64 (85%)</td>
<td>69 (75%)</td>
<td>89 (75%)</td>
<td>47 (66%)</td>
</tr>
<tr>
<td>Class II</td>
<td>8 (11%)</td>
<td>10 (11%)</td>
<td>13 (11%)</td>
<td>14 (20%)</td>
</tr>
<tr>
<td>Class III</td>
<td>3 (4%)</td>
<td>13 (14%)</td>
<td>16 (14%)</td>
<td>10 (14%)</td>
</tr>
</tbody>
</table>

Table 2

Source: USDA
Recall Process

Following problem identification, FSIS contacts the company and requests information as per recall worksheets.

**Recall Worksheet includes:**
- Production dates
- Product and names, package size and types
- Amount Produced / Distributed
- Distribution levels and location

**FSIS may also request:**
- Flow charts
- Lab reports
- HACCP/SSOP records
- Production records
- Distribution records

Source: USDA
Recall Process

Worksheets and Other information are distributed to the FSIS Recall Committee

Duties of the committee:

- Evaluate hazard and circumstances
- Review FSIS and plant data
- Recall Worksheet
- Classifies hazard
- Evaluates Scope
- Recommends recall
- Evaluates firm’s strategy

Source: USDA
Recall Process

Firm’s Recall Action:
- Notify each consignee about recall.
- Identify exact product; lots, codes, sizes.
- Explain reason for recall and the hazard involved.
- Explain how the product is to be returned.

Public Notification:
- Recall notification reports via FSIS website and distributed to public health officials.
- FSIS press releases for class I and II recalls targeted to press at distribution sites.

Source: USDA
Recall Process

**Effectiveness Checks:**

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.
Recall Process

Recalled Products Disposition Verification Checks:

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

Source: USDA
Recall Process

Recall termination:

- Company completes the recall.
- Compliance of amount recovered and disposition.
- Verification of effectiveness checks.
- Close out following reasonable efforts to return product.

Source: USDA
Recall Process

**Stock Recovery:**
- A firm’s removal of product that has not been marketed or that has not left the direct control of the firm.

**Market Withdrawal:**
- Firms removal or correction on its own of a distributed product that involves a minor infraction that does not warrant regulatory action.
- No health hazard.

Source: USDA
Recall Preparation

The matter in which a firm prepares and responds to a USDA recall can ultimately determine the extent of economic and consumer confidence loss.

A Recall Team is essential to effective crisis management. Members of this team should represent:

- Quality Assurance
- Operations/Production
- Accounting
- Shipping/Distribution
- Corporate Counsel

Non-corporate members:

- Public Relations
- Scientific Consultant
Recall Preparation

Responsibilities of the Recall Team:

- Assign designated team leader.
- Maintain updated contact information.
- Prevention and response measures (Recall Plan).
- Review of product production.
- Review of HAACP plans and records.
- Traceability of product within the facility and through distribution.
Recall Preparation

Components of the Recall Plan:

Up to date contact information
- Members of the recall team
- Corporate hierarchy
- Clients / Distributors
- Federal, State and local regulatory agencies.

Decision tree
- Predetermined logical answers or actions
- Prevention of ill-advised decisions made during a crisis

Traceability system
- Documents
- Product within the facility and in distribution

Action Log and checklist
- Documentation of actions and regulatory requirements completed
Recall Preparation

To validate the effectiveness of the recall plan a “Mock Recall” should be conducted.

- Test the framework of the plan.
- Mimic a real scenario as closely as possible.
- Provides insight as how quick to recall team can be assembled to respond to a real crisis.
The Rolling Recall
Worst Case Scenario

- Recall covers one production date July 18, 2005
- 4 products recalled.
- July 31, 2005 recall expanded to 93,000 lbs.
- All products produced during the month of July now included. Over 100 different products.
- Was company X prepared?
CDC data demonstrates a decrease in morbidity due to foodborne illnesses since 1996

- E. coli O157:H7 (-42%)
- Salmonella (-17%)
- Campylobacter (-28%)
- Yersinia (-49%)
USDA recalls have increased steadily over the past ten years from 38 in 1993 to 71 in 2003 with a peak of 128 in 2002 (Figure 1).
Figure 1: USDA Recalls per Year
1993 - 2003

Year
Recalls
38 48 36 25 27 45 62 64 92 128 71
Recalls and Their Affect on Public Health

- Over the last five years *Listeria monocytogenes* (Lm) has been the leading microbial cause of USDA recalls (table 1).

- Lm accounted for 42 (33%) of the (128) 2002 USDA recalls (table 1).

- CDC data demonstrates the annual number of Listeriosis cases have remained relatively constant over the last five years (figure 2).
Figure 2: Annual Listeria Cases U.S. 2000 - 2004
E. coli O157:H7 cases have decreased 42% since 1996. With a 36% decrease between years 2002 and 2003 (figure 3).

Second leading cause of USDA recalls due to microbial contamination with an average of 23 recalls per year (table1).
Figure 3: Number of E.coli O157:H7 cases U.S. 2000-2004
Recalls and Their Affect on Public Health

Reasons for increasing number of USDA recalls

- Increased sensitivity of pathogen test
- Heightened surveillance (Pulse Net)
- FSIS product sampling
Recall and Their affect on Public Health

In 2002 the USDA recalled 36 million pounds of meat and poultry products compared to 6 million in 1988

Problems with current recall system:

- Low recovery rate approximately 30%
- Short shelf life of fresh meat products
- Recalls are announced well after sell by date
Economic and Public Perception
Impact of Recalls

Meat and poultry recalls have a direct impact on the industry’s economic and public perception.

**Economic:**
- Cost of prevention and response to recall have increased cost of industry products.
- Direct negative effect on demand for meat products with a move toward non-meat products.

**Public Perception:**
- Increased media coverage.
- Recalls as an indicator of industries’ lax attitude toward food safety.
Economic and Public Perception

Impact of Recalls

In response to the increasing number of recalls industry has been forced to protect and indemnify their firms from bankruptcy and litigation.

Recall Insurance:

- Early 1990’s insurance companies begin to offer policies to cover cost of recalls.
- Recall insurance can save a company from bankruptcy due to a crisis.
- Recall can have a positive effect by promoting well developed food safety programs which reduce insurance premiums.

Sharing Product liability:

- Defective or poorly designed processing equipment.
I’ll pass on the E. coli patty... got any tofu burgers?
References

   [http://www.cdc.gov/pulsenet/what_is.htm](http://www.cdc.gov/pulsenet/what_is.htm)