FAO/WHO Guide for developing and improving national food recall systems

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FAO/WHO Guide for developing and improving national food recall systems
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Acronyms

[To be completed by the technical editor]

1 Introduction

1.1 Background

FAO/WHO has identified capacity development in food safety emergency response preparedness and planning as a key element to preventing food safety emergencies and to mitigating their public health and socioeconomic impact. A framework for food safety emergency planning was developed to assist countries in the formulation and implementation of national food safety emergency response plans\(^1\). In doing so, it was recognized that further guidance was necessary to strengthen countries’ preparedness to address food safety emergencies. Consequently, FAO/WHO has developed a guide for the application of risk analysis principles and procedures during food safety emergencies\(^2\). The present document is an additional and essential guide on food recall to assist countries to establish and implement an effective national food recall system to be used during food safety emergencies.

Food recall is a fundamental tool to manage risks in responding to food safety incidents and emergencies. Some countries are still in need of effective recall systems based on robust legal basis, effective pre-established protocols and the necessary collaboration between competent authorities and food business operators. In addition, foods and ingredients in food products are increasingly grown, processed and consumed in different locations around the globe. This poses new challenges to conduct key activities associated with food recalls such as trace-forward and trace-back activities of a suspected or confirmed contaminated food. Even countries that have established the most advanced science-based national food control systems may also be challenged by the globalization of food markets.

1.2 Purpose of the document

The purpose of the document is to support countries in establishing and implementing an effective national food recall system to respond to food safety emergencies/incidents. By drawing on


demonstrated best practices, the elements for an effective national food recall system, and the process for establishing, reviewing and/or improving the national food recall system are described as an essential component of the national food control system.

1.3 Target audience

The primary target audience are competent authorities and all other national authorities working in the area of food safety. While developed mainly for government agencies, this document may also be useful for organizations engaging activities in the area of food safety, including ones in the private sector. Recognizing the importance of relying on effective national food control systems to apply food safety risk analysis during emergencies, the present document also addresses specific needs of countries that are in process of developing their national food control systems.

1.4 Scope of the document

The document outlines best practices for how to 1) develop and/or improve, 2) review and 3) implement effective national food recall systems as a key management option to respond to food safety emergencies/incidents.

This document should not be regarded as an additional standard nor a model for food recall, but rather as a guidance based on collection of examples of demonstrated good practices shared by experts from various parts the world.

1.5 How to use the document

[to be completed after all the chapters are finalized]

2 Terminology and typology relevant to food recall and traceability

2.1 Working definitions using the Codex terminology

In this document, some technical terms are used based on the terms that are generally used in the various Codex Alimentarius documents. However it has been recognized that there are various terminologies and definitions surrounding the issue of food recalls. They differ among countries and translations in various languages increase confusion on terminologies. In order to avoid such confusion, the following working definitions have been adopted for the purpose of this publication. The readers should note that they are not official FAO/WHO definitions but rather terminologies that were set to minimize any misunderstandings.

Food recall: For this publication, the term “food recall” is used for the “action to remove food from the market at any stages of the food chains, including consumers”. In this document, food recalls are discussed in relation to food safety issues.

Food recall plan: A food recall plan includes the procedures and arrangements that a food business operator may have in place to retrieve food products from the food chain if a problem arises.

National food recall system: In this document, the term “national food recall system” is used to indicate the system/framework that national government put in place for effective food recalls. The

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system/framework would include legislative framework, guidance, trainings, communication mechanisms, record-keeping, evaluations etc.

Food business operator: In this document, the term “food business operator” is used for “the person/company who undertakes, whether for profit or not, carrying out any activities related to any stage of food chain.”

Competent authority: In this document, “competent authority” indicates relevant government agency/ministry/authority/unit/group who is tasked to supervise food recalls. For example, the competent authority may regulate, enforce, inspect, audit and verify food recalls conducted by food business operators.

Traceability: In the food chain traceability/product tracing is defined by the Codex Alimentarius Commission as “the ability to follow the movement of a food through specified stage(s) of production, processing and distribution”.

2.2 Objectives of food recall

The major objective of food recall for competent authorities is to protect public health by:

- efficiently facilitating the rapid removal of unsafe food from all possible stages of the supply chain;
- effectively informing the consumers; and
- effectively retrieve, destroy or reprocess the recalled food.

In order to determine whether or not a food recall is necessary, the publication, “FAO/WHO guide for application of risk analysis principles and procedures during food safety emergencies” provides guidance on application of risk analysis with various the risk management options, including food recall.

2.3 Various practical types of recall

Several countries have categorized and classified various types of food recalls depending on their operational, legislative and/or organizational situations. When developing a national food recall system, different types and classifications of recall might be established, as necessary, to fit the country situations. However, the present guide does not have a scope to differentiate, compare or evaluate various types of food recalls, but to document effective options and possible selection criteria to guide countries in making the most appropriate choices in building or improving their national food recall system and implementing food recalls.

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5 FAO/WHO, 2011
6 Note on a specific and common terminologies such as “withdrawal”: The term “withdrawal” is used widely in relation to food recall, however the meaning of the term significantly vary among different countries and languages. For example, some countries use “withdrawal” to indicate the retrieval of a food item that did not reach consumers while some other countries use the same term “withdrawal” to indicate the retrieval of a food item due to non-safety (quality) reasons. Also some other countries use “withdrawal” to indicate the retrieval of a food item by food business operators to differentiate the one by national authorities. For this reason, any particular terminologies to indicate some types of food recall, such as “withdrawal”, are not used to avoid any confusions in this document.
3 Steps for developing and/or improving national food recall systems

Step 1. Understanding the importance of shared responsibilities

As the first step to develop/improve the current national food recall system, one must understand and stress the importance of shared responsibility of government and food industry to act decisively and rapidly to remove unsafe food from the market in the interest of protecting public health. Effective national food recall systems rely on the food business operators taking recall action under the guidance and oversight of the competent authority. The competent authority should consult with the food industry in the development of their national food recall system.

Specifically, food business operators are responsible for the removal of unsafe food from the market and cooperating with the competent authorities. The competent authority’s responsibilities are to: provide oversight; coordinate actions among all food business operators and collaborate with other national authorities involved in the recall; assist and guide the recalling food business operator; and communicate with stakeholders. The benefits of an effective national recall system with shared responsibilities is that public health is protected, minimal damage is done to the food business operator’s and the food sector’s reputation, while maintaining confidence in the food supply.

Step 2. Review of the current national food recall system

When developing/improving a national food recall system, it is important to consider whether the following key elements are included in the current system and to build on the current situation.

- A legal framework and powers of the competent authority
- Clearly assigned roles and responsibilities of implementing partners
- Guidance materials and trainings
- Effective information exchange mechanism for implementing partners
- Effective communication with media and consumers
- Accurate record-keeping
- Effective verification and evaluation mechanisms

It is critical for the competent authority to undertake the review with the partners who have knowledge and experience in the elements of food recall from both the public and private sectors.

The following items may be reviewed when assessing the current system:

- Food safety policy addressing food recall
- Legal framework, including legislation, regulations, standards, food recall provisions and roles and responsibilities for the competent authority (see the tip box below)
- Roles and responsibilities for various agencies at different levels of government
- Arrangements in place for the competent authority to work together with inter-agency partners (national, regional and international) during a recall that has an international dimension
- A competent authority contact point for food recalls
- Mechanism that enables central coordination during food recalls
- Arrangement in place for recall notification to regional and international networks (i.e. INFOSAN)
- Arrangement in place for risk communication (including media management and consumer advice)
- Knowledge and experience levels of the staff on the national food recall system and mechanism for training opportunities
- Mechanism and requirements of documentation for food recalls
- Mechanism in place to review the national food recall system on a regular basis
Useful tip: Questions to consider when reviewing legislation on food recall

When reviewing and/or developing legislation, the following could be considered:

- Does national legislation require food business operators to recall unsafe foods from the market?
- Are there requirements or exemptions for food business operators to have traceability systems?
- Does the legislation provide the power for competent authorities to enforce a food recall?
- Are there provisions for food business operators to have food recall plans in place?
- Are there provisions for food business operators to notify the competent authority when they have reason to believe that the food they have supplied is unsafe?
- Was the legislation developed with stakeholder consultation?

Step 3. Consideration of general issues

While a national food recall system could be established as an important part of an effective national food control system, the absence of a well-developed food control system does not prevent the development of a national recall system.

Before developing/improving a national food recall system, the following general issues could be considered:

- Having a multi-sectoral and inter-agency coordination mechanism at a national level is key for an effective national food recall system.
- Tiered approach is useful when a given country has the government structure with more than 2 levels (federal, national, provincial, local etc.). Clearly defined roles and responsibilities for all the partners at all the tiers are essential in this approach.
- Recall terminology may need to be clearly defined at a national level for the consistency and better understanding among stakeholders. It is also important for all the relevant staff to note that recall terminology and definitions vary among countries even with the same language.
- A food recall is one of the risk management options used by a competent authority and should be considered within the context of a risk-based national food control system.
- A national food recall system could be applied for various purposes and situations (i.e. food safety, non compliant, suitability, feed safety, etc)
- There is wide variation in complexity of the food chain (from a simple processing and marketing chain to lengthy and intricate) and its impact on a food recall would also vary.
- There are opportunities and challenges in collaboration between the stakeholders involved in a food recall, including competent authorities (domestic and international), food business operators, the media and consumers.
- Globalisation of the food supply creates the strong need for international collaboration and exchange of information at the international level.

Step 4. Consideration of country specific issues

National food recall systems should be developed/improved taking into consideration the government’s structure, organisation, capabilities and development of the sectors within the food chain. As such, the competent authority would need to consider what food recall system requirements should be mandatory and practical in their actual implementation.

An effective national food recall system includes food for both the domestic and international markets, therefore the competent authority would need to consider the country’s import/export situations to
match the relevant requirement. Considerations may also be given to Small and Less Developed Businesses (SLDBs), including street food vendors and market stalls, where some of the responsibilities may not be applicable or assisted by the competent authorities. Recognizing that it would be difficult to conduct a food recall for the informal sector, competent authorities may consider support measures to encourage the informal sector to move towards a more formalized sector.

Additionally, in order to facilitate resource allocation in the event of a recall, a competent authority may consider defining levels associated with the different types of food recalls. These determinations should be based on risk, and an example may be a risk classification system.

Some countries may face specific challenges including limited resources where implementation of a food recall may be difficult. The competent authority may also identify its need for capacity development to build a national food recall system or a national food control system as a whole. International Organizations such as FAO and WHO can be contacted for a capacity development support to establish/improve such systems.

4 National food recall systems

4.1 Elements of national food recall systems

National food recall systems provide a framework that national governments put in place to support competent authorities and the food business operators in ensuring a high level of public health and the effective removal of unsafe food from the market.

Principles to be taken into account when developing an effective national food recall system include 1) legal framework, 2) powers of the competent authority, 3) clearly defined roles and responsibilities, 4) effective communication and notification, 5) accurate record-keeping, 6) mechanisms for enforcement and verification, 7) guidance materials and trainings and 8) Periodical review of national food recall systems.

4.1.1 Legal framework

Under a national legal framework, competent authority should be able to require the food business operators to market safe food. This usually includes a provision that requires food business operators to recall unsafe food from the market.

The key components of a legal framework include:

- Provisions for food business operators to have food recall plans in place
- Provisions to empower the competent authority to enforce recall action, when required
- Provisions for food business operators to have traceability systems in place, with records of who they have purchased from, and sold to (one-step-back and one-step-forward principle).
- Provisions to exempt food business operators selling food directly to consumers from the requirement to maintain trace-forward records of who they have sold food to.
- Provisions for food business operators to notify the competent authority when they have reason to believe that the food they have supplied is unsafe.

The competent authority may need to notify the legal framework on to food recall to the relevant organizations at regional and/or international levels (e.g. WTO) to comply with obligations.

4.1.2 Powers of the competent authority

The competent authority should be able to supervise food business operators to conduct a food recall when they find or have reason to believe that they have placed unsafe food on the market. The legal
framework should empower the competent authority to enforce the provisions associated with food recall and traceability, as well as to exercise legal action against those in violation with these provisions, using regulatory tools such as seizure and/or prosecution. To undertake this function, the competent authority should be granted the power to inspect food businesses and to verify documentation associated with their recall plan and traceability system.

Additionally, under the legal framework, the competent authority should be empowered to compel a food business operator to undertake a recall.

### 4.1.3 Clearly defined roles and responsibilities

#### 4.1.3.1 Government/Competent Authority

The main responsibility of the competent authority is to protect consumers against health risks. Under a national food recall system, the responsibilities for coordinating and enforcing a recall may be spread across different agencies. Hence, it is important to have a national agreement of clearly defined roles and responsibilities in place to ensure efficient coordination among these agencies.

Key responsibilities of the competent authorities involved in the coordination and enforcement of food recalls include some of the following actions, depending on the nature of the recall:

- Initiate a recall of unsafe food as a result of an outbreak of foodborne illness or monitoring and surveillance programs and require food business operators to remove unsafe food from the market
- Engage with the food business operators to develop guidance on implementing food recall plans and traceability
- Provide advice to food business operators on assessment of risk and appropriate risk management actions
- Provide a system/mechanism for food business operators to notify the competent authority when they have reason to believe that the food they supply is unsafe
- Assist the recalling food business operator to undertake activities associated with the recall
- Verify the effectiveness of the recall activities
- Provide a system/mechanism for the food business operator to report on the progress of recall activities
- Coordinate with various agencies both at the national and international levels
- Conduct an ongoing food safety investigation, where necessary, of further possible implicated food
- Order and enforce a recall if the food business operator failed their legal obligation
- Seize and order destruction or re-process/re-conditioning of recalled food, where necessary

#### 4.1.3.2 Industry/Food Business Operators

Food business operators have the primary responsibility, once they have identified or been notified they have supplied unsafe food to the market, to recall such food in the interest of protecting public health.

Key responsibilities of the food business operator involved in the food recall may include the following actions:

- Remove unsafe food from the market
- Inform the consumer, if the food has reached them
- Notify and cooperate with the competent authority when undertaking recall activities
- Notify other relevant food business operators within the food chain

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7 FAO/WHO 2010 FSER doc
Establish and maintain a food recall plan with the associated operational documented procedures
- Train staff to execute the food recall plan
- Maintain records of who they have bought from and sold food to, as part of their food traceability system
- Communicate recall details and information to relevant parties and respond to media queries
- Undertake a regular evaluation of their food recall plan. As a result of this analysis it may be necessary to revise the recall plan, or take into consideration lessons learnt from previous recalls

4.1.3.3 International network (INFOSAN)

The International Food Safety Authorities Network (INFOSAN) is the global network managed by FAO/WHO to rapidly share information with competent authorities, therefore it would help both government and industry to recall contaminated food that has been distributed internationally. It provides an important platform for rapidly exchanging information in the case of an international food safety event and on emerging food safety issues.

If a food subjected to a recall has entered international trade, the competent authority needs to establish early contact with INFOSAN in order to facilitate the sharing of information with international counterparts.

4.1.4 Effective communication and notification

Competent authorities should provide a mechanism for food business operators to notify them when they have reason to believe that the food they supply is unsafe. A single point of contact has been found to be beneficial for the provision of consistent information and coordinating the activities of competent authorities and the food industry during a recall. The notification system should be robust and functional under the specific scenarios within the country or region. The mechanism for notification may be a web-based reporting system or simply established single contact point that may be reached at a phone number or email address. Once a mechanism is established, it is important the competent authority inform all food business operators of the process so that they would properly notify the competent authority of a recall in a uniform and timely manner (see chapter 5.2.2 for more information). During a food recall, the competent authorities would need to undertake inter-agency communication to optimize resources and ensure effective recall activities are in place.

During a food recall, effective communication by the recalling food business operator is critical to provide accurate, detailed and timely exchange of information about the food subjected to the recall to all stakeholders, including competent authorities, media, consumers and other relevant food business operators.

Risk communication, explaining the nature of the problem and its impact on consumer health; is often required by competent authorities during a food recall and is part of the broader risk communication plan during food safety incidents. The FAO/WHO guide for application of risk analysis principles and procedures during food safety emergencies provides additional communication principles which could be applied during recalls.

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8 Food business operators selling food directly to consumers are not required to keep records of who they have sold food to. However, they should cooperate to remove recalled food from the market and inform the consumer through appropriate communication means.

9 INFOSAN Secretary contact is infosan@who.int (primary) and infosan@fao.org.

10 FAO/WHO 2011
4.1.5 Accurate record keeping

Recall activities and correspondence should be accurately documented and maintained by both the competent authority and the food business operators. The competent authority may conduct an inspection to verify the documentation and associated records for the retrieval, tracing and disposal of the recalled food.

4.1.6 Mechanisms for enforcement and verification

An essential role of the competent authority is to ensure that the recall process is properly managed and enforcement action is taken if the food business operator has not conducted the recall effectively.

Verification activities conducted by the competent authority may include a joint evaluation of the food business recall plan. As a result of this analysis it may be necessary for the food business operator to revise the recall plan, or take into consideration lessons learnt from previous recalls to ensure that suitable corrective and/or preventive measures have been implemented.

4.1.7 Guidance materials and trainings

Competent authorities may wish to provide guidance materials and trainings for food business operators to conduct an effective food recall and to develop a food recall plan. The guide could include introduction and background, definitions, legal requirements, roles and responsibilities, the process of food recall, notification obligations and its process and effective communication with the media and consumers. Including contact details of the competent authority contact point would be also useful in the guide.

Example: The elements of the guide for food business operators

In a guidance material to food business operators on how to recall, the competent authority could recommend the recalling food business operators to:

- define roles and responsibilities during a recall and training of staff on plan
- have a documented one step forward-one step back traceability system
- have awareness of the legal requirements
- have a communication process to inform the competent authority
- have a communication process to inform other food business operators through their supply chain
- have a communication process to inform the consumer
- have a verification process for recall effectiveness & appropriate management of products being recalled

Example: Guidance on risk communication for food business operators

During a food recall, to ensure that communication reaches all target audiences, a range of vehicles should be considered through appropriate channels including telecommunication, in-store notices, newspapers, social media, TV and radio. If stakeholders are contacted by telephone, it is recommended that the time and date is recorded or is followed up with a written notification.

The communication vehicle and the way information is presented should be tailored to the needs of the audience, including targeting those at greatest risk and considering literacy and languages spoken.
If possible, the effectiveness of the communication should be monitored so that the approach can be changed if necessary.

Food recalls occur in a time-pressured environment and experience has shown that the use of templates can facilitate accuracy and consistency in communicating with stakeholders during this situation. It would be useful if the guide includes annexes with a decision tree to determine when to recall and templates/examples of: notification forms, letters to other food business operators, paid advertisement, press release, and post-recall reporting forms. The competent authority should encourage the use of the developed templates by food business operators when developing their food recall plan.

4.1.8 Periodical review of national food recall systems

A national food recall system should be reviewed on a regular basis by the competent authority. Contracting an independent party could facilitate this review process and provide an impartial judgement on the effectiveness of the system. Based on the results of the review and the lessons learnt; it may be necessary for the competent authority to revise the national recall system in place.

Useful tip: Possible questions to assist in reviewing and assessing the effectiveness of the national recall system

Questions may include:
- Is there a documented national recall system in place?
- Is there a legislative basis for the national recall system?
- Are the roles of the competent authority (-ies) sufficiently defined?
- Have relevant staff been trained to carry out their role in a recall?
- Is there a system to verify that food business operators have an effective food recall plan in place?

4.2 Tools for effective food recall

4.2.1 Traceability

A traceability system is an effective tool for food business operators to trace food throughout the food chain. The legal requirement is for food business operators to have documented one-step back one-step-forward traceability. This requirement applies to food business operators across the food chain. However, food business operators selling directly to consumers are exempt from maintaining trace forward records of consumers. Small food business operators with limited distribution may not require a fully documented traceability system to be in place and may rely solely on their purchasing and sale records to act as their traceability records.

In the context of a food recall, the objectives of traceability are to:
1. Uniquely identify a lot/batch/consignment of food in a way which allows tracing the physical flow of the food forwards through the food chain to the immediate customer and tracing of the physical flow of raw materials backwards to the immediate supplier
2. Create and maintain accurate traceability records that can be provided within a short time period at the demand of the competent authorities.
Important!: Key steps involved in establishing a traceability system:

**Step 1.** Define the scope of the traceability system

**Step 2.** Decide on size of the optimal production unit for tracing purposes (e.g. lot, batch, consignment etc) (tip: selecting larger such production unit can simplify tracing activities, however, it could mean that more food would have to be recalled should a food incident occurs)

**Step 3.** Identify the traceability information needed, including information on food ingredients, internal process and on food products

**Step 4.** Establish a system of record keeping and retrieval

**Step 5.** Establish procedures for review and testing of the traceability system

**Step 6.** Document the traceability system

If there is no traceability system in the country, it is necessary to develop a system. The system does not have to involve any IT-oriented sophisticated tools, but it needs to ensure effective record keeping process with the one-step-back and one-step-forward principle. In the initial stages of developing the system into the food chain, the competent authority may consider the option to implement traceability in a staged approach. The approach could be based on activities which are most relevant in terms of their country food safety risk categorization taking into consideration various risk factors (e.g. inherent food risk, distribution, complexity of handling, consumers at risk, level of compliance, data of foodborne illness registers). Refer to the FAO/WHO publication entitled Food safety risk analysis: A guide for national food safety authorities for more information about risk categorization and risk factors.11

---

**Example: Various types of traceability system in the fisheries sector**

<table>
<thead>
<tr>
<th>Basic traceability example 1</th>
<th>Basic traceability example 2</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="example1.jpg" alt="Basic traceability example 1" /></td>
<td><img src="example2.jpg" alt="Basic traceability example 2" /></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Advanced traceability example 1</th>
<th>Advanced traceability example 2</th>
</tr>
</thead>
<tbody>
<tr>
<td><img src="example3.jpg" alt="Advanced traceability example 1" /></td>
<td><img src="example4.jpg" alt="Advanced traceability example 2" /></td>
</tr>
</tbody>
</table>

11 [http://www.fao.org/docrep/012/a0822e/a0822e00.htm](http://www.fao.org/docrep/012/a0822e/a0822e00.htm).
4.2.2 Data collection/exchange system

The competent authority should establish a mechanism to collect food recall information. This information can then be analysed and exchanged with relevant parties. This mechanism may provide a platform for information sharing with other national and regional organizations and international networks (e.g. INFOSAN).

5 Setting up and operating a national food recall system

5.1 Actions prior to a food recall and initiation of recall

Prior to a food recall, the competent authority often needs to conduct some of the following activities in many different orders and combinations:

- Identify food safety events through many different sources and channels
- Initiate food safety incident or food borne disease outbreak investigations including epidemiological investigations and laboratory analyses
- Conduct rapid risk analysis
- Attribute the food safety incident or food borne disease outbreak to a food
- Decide what risk management option to take, and consequently decide if a recall has to be conducted as an option

As a pre-requisite to all the above activities, and during the events that occur throughout a food recall, it is imperative that the competent authority has knowledge and understanding of risk analysis principles and procedures and should be capable of applying these principles in decision making. For further information on application of risk analysis principles during food safety emergencies, refer to the FAO/WHO guide for application of risk analysis principles and procedures during food safety emergencies.12

In addition, the competent authority’s own procedures are a critical element in providing the necessary tools for government risk managers to effectively and efficiently execute a food recall. The Competent Authority also needs to consider developing a guidance document on a food recall protocol to provide to food business operators to assist them in developing their own food recall plan and procedures (see Chapter 4.1.7 for more information).

A decision to recall a food can be triggered by a number of events. Many times a recall is initiated by a food business operator, based on their knowledge or reason to believe that the food is unsafe. A recall may also be requested or ordered by the competent authority based on an assessment with information they receive from different sources, including other governments, inspection activities, or from the consumer. In any case, the way the competent authority manages a specific recall and what resources it assigns may be different according to the assessment of risks. For example the competent authority may determine the level of resources required to manage a recall based on the severity of risk and/or on the distribution of the product being recalled.

Useful tip: Resource allocation

In order to facilitate resource allocation in the event of a recall, it may be useful for the competent authority to pre-set risk categorizations based on risk. An example may be a classification system based on risk and that includes categories such as high, medium and low.

5.2 Example of recall action decision tree

**Generic Recall Decision Tree**

Suspicion of Health Risk

Determine if the food is unsafe, may include risk assessment

- **Health Risk**
  - No health risk & Not compliant
    - May take other risk management actions
  - No health risk & Compliant
    - No Action “Monitor” if needed

- **Food in the market**
  - Initiate a recall

- **Food not in market**
  - Hold product
  - Corrective actions or disposal

Note: This is a general illustration to show how a food recall process may occur. The actions in this diagram may be conducted by the competent authority, the food business operators or both.
6 Food recall management

6.1.1 Leading authority and Multi-agency approach

In the food recall management, it is important that the competent authority leads the coordination activities taking a multi-agency approach throughout the event. An aspect in the management of a food recall is an assessment of the distribution of the food subjected to the recall to determine if notification of other agencies is necessary. Notification of such is essential and serves as an alert about recalls.

Useful tip: Preparedness for multi-agency approach for notification

In facilitation of the steps to be taken for notification, procedures that will outline the notification process could be established. Such procedures include, but is not limited to:

- Identification of roles and responsibilities for communication and information sharing between governments and agencies
- Identification of stakeholders that should be notified. For example:
  - Internal partners in the government
  - Other government agencies (e.g., foreign, federal, state, province, local, as applicable)
  - International bodies (e.g., INFOSAN, WTO, IHR)

6.1.2 Interaction between the competent authority and the recalling food business operator

For a successful food recall, ensuring timely, continuous and effective communication between the competent authority and the recalling food business operator is key. Established procedures should outline the necessary steps for communication between the competent authority and the recalling food business operator so that appropriate monitoring would be conducted and appropriate measures taken to ensure the satisfactory progress and effectiveness of the recall.

Communication between the competent authority and the business operators during food recall is most effective when the arrangement is in place beforehand. Establishing contacts and agreeing on the arrangements during the non-emergency period would be beneficial. Refer to FAO/WHO guide for application of risk analysis principles and procedures during food safety emergencies\(^\text{13}\) (page 36) for more information.

Example: Effective communication by the recalling food business operator

The competent authority needs to receive detailed information from the recalling food business operators. The information may include:

- A list of the recalled products
- Physical description of the product/s including brand name, packaging description, date marking/batch sizes
- Producer/supplier details
- The nature of the health risk
- Advice to consumers, including what to do if the recalled food has been consumed, action taken in response to the recall (disposal or return of recalled food) and who to contact with enquiries about the recalled food.

\(^{13}\) FAO/WHO 2011
• List of premises where the recalled food had been available for sale
• Time the recalled food had been on the market
• Actions taken/to be taken by the recalling food business operator
• Actions required by other food business operators
• Contact details for the recalling food business operator’s recall coordinator

6.1.3 International dimension

The global distribution of food and the increasing complexity of the food chain require an efficient management system and effective communication among competent authorities at the international level to prevent and control food emergencies including recall-related information. For this, procedures for communicating recall-related information and distribution to all known affected and potentially affected foreign countries should be established. This procedure should include identified contact points and contact information of the competent authorities in relevant foreign countries.

Example: Specific information the competent authorities in other countries may need

When notifying the competent authorities in other countries, the information may include, but is not limited to:
• Product
• Codes (lot/batch/consignment code or number)
• Recalling food business operator’s name
• Food business operator’s recall plan
• Reason for recall
• Volume of product in market, quantity, recovered, and disposition
• Distribution (e.g., name of foreign consignee)
• Issuance of public notification, if necessary (e.g., press release)
• If applicable and in the case of import/export situations,
  o Exporter name and contact information
  o Importer name and contact information
  o Container and shipping details (including country of origin, port of entry and destination)
  o Food business operator’s receiving product and food business operator’s distributor information with contact information.

It should be recognized that recalls can be dynamic and information may change throughout the event as initial recall information may be incomplete. The competent authority would need to promptly communicate any new, additional, or updated information, as they become available, to all known affected and potentially affected foreign countries.

Important! Codex guideline on information exchange

As outlined in the relevant Codex guideline\textsuperscript{14}, each country should designate a primary official contact point for food safety emergency situations, which can act as the national focal point for information exchange during international food safety events. The INFOSAN Secretariat maintains a list of these national contacts. "INFOSAN Emergency Contact Points" are the national contacts who are designated

\textsuperscript{14} CAC/GL 19-1995, REV-1 2004
from the national agency responsible for national food safety emergency coordination. "INFOSAN Focal Points" are national contacts from other national agencies involved in food safety. The INFOSAN Secretariat can play a coordinating role during food safety events that involve a recalled food that has been shipped internationally, by helping to facilitate information exchange between INFOSAN Emergency Contact Points and Focal Points from different countries.

6.1.4 Communication to the public

Communication to the public is critical for food that poses serious and dangerous health risks and has reached the consumer. More information on consumer advice is outlined in chapter 6.2.5 and on risk communication to the general public in the larger context is outlined in the FAO/WHO guide for application of risk analysis principles and procedures during food safety emergencies15 (page 37).

6.1.5 Documentation of recall events and the related activities

Documentation of recall events and the related activities in the monitoring of these events is necessary. A system for recording recall information and activities should be considered for tracking the recall throughout the process, including:

- Recall initiation;
- Determining the health risk;
- Recall plan;
- Notifications and public warnings;
- Recall status updates or reports; and
- Records of monitoring and verification.

6.2 Example of a food recall workflow

6.2.1 Initial communication with relevant partners (government and industry)

The purpose of the initial communication is to define the food that has to be recalled and the reason for the recall in a simple and well-structured method. The competent authority should put in place procedures for the food business operators to share inform without delay when conducting a recall. These procedures should also contain directions to assure the competent authority receives all relevant information related to the recall.

Example: Relevant information for the initial communication

The competent authority would expect to receive:

1. **Identity of the food business operator** and person responsible for the recall (and/or contact point)
2. **Identification of the reason for the recall**
   - 2.1. Nature of problem (physical, chemical or biological hazard, undeclared allergen)
   - 2.2. Date and time the food business operator identified the problem (and when it probably occurred)
3. **Identification of the product**
   - 3.1. Product name
   - 3.2. Product description;
   - 3.3. Batch codes involved;

15 FAO/WHO 2011
3.4. Quantity of product implicated  
3.5. Country of origin / certificate by import products  
3.6. Production date  
3.7. Shelf life/expiration date  

4. Distribution details;  
4.1. How the product was distributed (e.g., wholesalers, distributors, retailers) and if they know if the product has reached the consumer level.  
4.2. Quantity and batch code of affected product sent to each FBO  
4.3. The name and address of all food business operators receiving the recalled product  

5. Other information  
5.1. Results of the test performed (samples and performed analyses)  
5.2. Assessment of the problem and measures taken (to be taken)  

The competent authority could also define the preferred way on how to receive this information. For effectiveness it may be appropriate to request information by phone, followed by writing confirmation via e-mail, letter, or internet application. See Annexes for a model template that the recalling food business operator provides to the competent authority.  

6.2.2 Initiation and implementation of a food recall across the food chain  

When a food recall is initiated, the first priority is to identify where the food has been distributed (trace-forward activities). This is to rapidly cease the use of, distribution and sale of the food to be recalled. Following the initiation of trace-forward activities, trace-back activities should occur in conjunction with the recall to identify any other implicated food.  

6.2.2.1 Trace-forward activities  

The purpose of a trace-forward is to identify the physical place of the affected product in the food chain. The outcome of the trace-forward is to obtain the most complete distribution list of all customers or entities that received the affected product and inform them about the recall and the actions that are expected to be done by them in order to remove the product from the market. The distribution list containing the details of the customers that received the food has to be provided to the competent authority (see chapter 5.3.1).  

**Important!: Trace-forward activity determines the communication strategy to consumers**  
A trace forward activity should be able to determine whether the affected product may have reach the consumer and the recall strategy must be adapted accordingly (see chapter 5.3.5).  

For the first level of distribution, the trace-forward activity should be done by the food business operator who is responsible for the recall action. In case no responsible food business operator can be identified or the food business operator does not have the capacity to do it, this task should be taken over by the competent authority. For subsequent distribution by other food business operators, they also will complete trace-forward activities.  

**Useful tip: The competent authority’s key activities during the trace-forward**  
- Monitor the recalling FBO distribution list (i.e., list of customers who received the recalled product)  
- Notify non-commercial stakeholders
6.2.2.2 Trace-back activities

The purpose of trace-back activities is to determine if there are other products in the market or the food supply chain that may have been affected by the same hazard as the food subjected to the recall. The competent authority should conduct a trace-back investigation to ensure that there is no other affected food in the market.

Useful tip: Importance of the information exchange during trace-back activities

When it was found that the contaminated food or an ingredient was provided from a supplier, the food business operator will inform the competent authority about the complete details of the supplier or the product (see chapter 5.3.1). This might lead to a new food recall for other food business operators and other products. Consequently it may be necessary to inform other stakeholders or competent authorities in other countries. For this exchange of information, international networks such as INFOSAN can be used.

6.2.3 Monitoring and documentation of the recall

The competent authority needs to monitor and document that the recall actions executed by the food business operators are effectively completed.

- Verification of trace-forward activities: this may include a confirmation that all the food business operators who have received the affected product have been informed and have acted as required. For example, the competent authority can select a percentage of affected food business operators from the distribution list for verification. This percentage should be determined as appropriate based on risk, level of concern and compliance by the affected food business operators.
- Verification that the affected product has been removed from the point of sale to the public. This may be completed by the competent authority through site inspection or by phone.
- Verification that the recall information/notification has been received and acted upon. This can be completed with telephone interviews, review of records and e-mail communication.

The competent authority should keep all relevant recall records and ensure food business operators keeps all relevant documentation related to the recall as well. Most countries state specific period in their legislations for maintaining such records and documents. The record keeping is required mainly because of the legal purposes, therefore the period is usually determined based on the local and national laws with the consideration of practical aspects of the issue (e.g., adding certain number of years to the expiry date of the food products). Some countries keep all the records since the electronic filing system has become available while other countries keep paper copies for certain years in the archives (e.g., 5 years, 10 years, etc). The period can be determined based on the country situations, and the competent authorities should clearly inform and require food business operators to keep the records accordingly.

6.2.4 Verification of retrieval, correction or disposal of affected food items

The competent authority should verify that the affected food has been removed from distribution and market. Verification processes for the effectiveness of the recall actions could include:

- Checks at food businesses through distribution channels, including point-of-sale
• Audits or inspections at the involved food businesses
• Telephone interviews, written questionnaires or e-mail communication
• On-site visits of the affected costumers
• Statistical sampling in the market
• Comparison of the audit conducted by the competent authority with the food business operator’s documentation

Monitoring of retrieval could include:
• Comparison of product distributed and returned
• Product disposal
• Approval and monitoring of re-labelling
• Approval and monitoring of reprocessing
• Return exporting to the producing country after acceptance by the competent authority of the country

6.2.5 Providing consumer advice (industry and government actions)

The primary purpose of risk communication with consumers by the competent authority is to protect public health and inform the public not to consume the affected product. Public advice should be clear, concise and directed to the appropriate target group(s).

Useful tip: Consumer advice

The communication to the public should be simple and factual and may include the followings:
- Why the recall takes place
- What has to be recalled including a written description and/or product photographs
- What consumers should do if the food has been consumed
- What to do with the affected food
- Contact for further information

Useful tip: Means of consumer advice

Communication to the public can be done by:
- General press releases to the media
- Internet announcement on the site of the competent authority
- Internet site or other social media used by the food business operator
- Public warning on television, radio, and in print newspapers
- Consumer advocacy organizations (e.g. allergen networks/associations)
- In-store point-of-sale notification

6.2.6 Monitoring corrective action to avoid repeat product failure and recall

The competent authority may verify the food business operator’s actions through inspection or audit. The food business operator should take adequate measures to avoid repeat product failure and new recalls in the future. The reason for product failure should be identified and corrective actions should be taken. Such corrective actions would include:
• Improving food safety management system (e.g. preventive controls, HACCP plan)
• Improved control or requirements for suppliers
• Improved sanitation/hygiene practices
• Adapted standards for products
• Review production process

The competent authority may also improve surveillance/survey programs and monitoring consumer complaints by:
• Audit
• Inspection
• Sampling program
• Reassess the food safety programs
• Increase surveillance programs
• Monitor consumer complaints

6.2.7 General Evaluation of the recall

The competent authority may evaluate the recall process after completion to improve its recall system and procedures. The purpose of the evaluation is to improve the national food recall system.

Example: Lesson learned exercise

For high profile recalls, it may be useful to conduct a lessons learned exercise including:
• Review of the issue
• What worked well
• What did not go well
• What could/should be improved
• Recommendations
• Assign responsibilities for follow-up recommendations

6.3 Example scenarios for different types of food recalls
6.3.1 Scenario 1: A simple recall scenario

Simple Recall Scenario

Trigger Event
(contaminated sample, processed product)

Investigation

Assessment
(Rapid, precedent based)

Risk Management Decision

Health Risk
Recall

No Health Risk
No recall
(Other action)

Product Removal

Warning
(communication)
6.3.2 Scenario 2: Trigger of the event is a pathogen in ingredient

**Trigger - Pathogen in ingredient**

- **Ingredient Contamination**
  - **Packaged product**
    - **Investigation**
    - **Assessment (Rapid, precedent based)**
    - **Risk Management Decision**
    - **Health Risk**
      - **Recall**
      - **Product Removal**
    - **No Health Risk**
      - **No recall (Other action)**
  - **Bulk (further processing)**
    - **Investigation**
    - **Assessment (Rapid, precedent based)**
    - **Risk Management Decision**
    - **Health Risk**
      - **Recall**
      - **1st Level in Supply Chain**
    - **No recall**
      - **No Health Risk**
      - **Warning (Communication)**
6.3.3 Scenario 3: Trigger of the event is an international event/source

Trigger - International Event/Source

International Event
↓
Receipt of Detailed Information
↓
Determine if product was imported
↓
Assessment (Rapid, precedent based)
↓
Risk Management Decision

Health Risk
↓
Recall
↓
Product Removal

No Health Risk
↓
No recall (Other action)
↓
Warning (communication)
6.3.4 Scenario 4: Trigger of the event is a foodborne illness outbreak

Trigger – Food Borne Illness Outbreak

- Epidemiological Investigation into illnesses
- Identify Potential Food Source
- Conduct Food Safety Investigation
  - Premise Inspection
  - Testing
  - Record Review
- Food Source Identified
- Assessment
  (Rapid, precedent based)
- Risk Management Decision
- Health Risk
  - Recall
- No Health Risk
  - No recall
    (Other action)

6.4 Example of useful tools
6.4.1 Example of recall activity flows

6.4.1.1 Generic food recall activity flow

Recall activity flow

- Recall Notification or Initiation of Recall
- Trace-back Trace-forward activities
- Identification of FBO (distribution)
- Communication
  - Consumer Advice
  - Other FBO have to be informed (other recall action may be needed)
  - Inform other CA in foreign countries, Int’s bodies (e.g. INFOSAN)
- Product retrieval

Competent Authority activities during a recall:
(See Figure 2)
6.4.1.2 Competent Authority’s activities during a food recall

Competent Authority Activities in a Recall

<table>
<thead>
<tr>
<th>Initiation</th>
<th>Form Recall team</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Notification of partners</td>
</tr>
<tr>
<td></td>
<td>Develop Recall Strategy</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recall Process</th>
<th>Trace-Back</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Trace Forward</td>
</tr>
<tr>
<td></td>
<td>Identification of affected product</td>
</tr>
<tr>
<td></td>
<td>On-going investigation</td>
</tr>
<tr>
<td></td>
<td>Communication</td>
</tr>
<tr>
<td></td>
<td>Documentation and monitoring</td>
</tr>
<tr>
<td></td>
<td>Verification</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recall Closure</th>
<th>Formal closure</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Notification of partners</td>
</tr>
</tbody>
</table>

Post recall evaluation - lessons learned and follow-up actions
6.4.2 Example checklists, questions and forms

6.4.2.1 Questions To Be Considered When Drafting Or Reviewing Food Legislation

1) Power to recall food
Does the power for food authorities to recall food exist? 2. Food business recalls Does the legislation recognize food business recalls being carried out to relevant authority requirements?

2) Scope
Does the legislation facilitate the recall of food in all parts of the food chain?

3) Speed of action
Does the legislation provide for speedy action when it is needed?

4) Inspectors powers
Does the legislation provide inspectors acceptable powers to carry out their functions? This can be considered in terms of powers of entry, examining products and labels, examining records, taking specimens and taking photographic images.

5) Public Statements
Does the legislation provide for the relevant authority the power to publish statements about food and its labeling to protect the public? Are such statements provided with the protection of privilege provided they are not made in bad faith or without reasonable care?

6) Recalled food
Does the legislation enable the relevant authority to take control of recalled food and its disposal?
### URGENT

**Food Recall (or withdrawal)**

| Company Name                  | _____________________________ |
|-------------------------------|______________________________|
| Food Name                     | _____________________________ |
| Food Details                  | _____________________________ |
| Batch/lot/unit Identification | _____________________________ |
| "use-by" or "best-before" date| _____________________________ |
| Reasons for the recall        | ______________________________|
|                               | ______________________________|
|                               | ______________________________|
| Actions Required              | ______________________________|
|                               | ______________________________|
|                               | ______________________________|

Contact Details  
__________________________

Alternative Contact Details  
__________________________
### 6.4.2.3 Example of an In-Store Notification or Paid Newspaper Advertisement

**WARNING**

**Food Recall**

Company name  
Food Name/description  
Pack size  
Batch/lot/unit identification

Food photograph or illustration

Details of what is wrong with the product

Actions the consumer should take

We apologize for any inconvenience

Company address and contact details
# 6.4.2.4 Food Recall Information Sheet

<table>
<thead>
<tr>
<th>Competent Authority Recall #:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Date:</td>
<td></td>
</tr>
</tbody>
</table>

## Reason for Recall
- **Reason for Recall:**
- **Description of the recall reason:**
- **Action Proposed:**
- **Method of Disposal:**
- **Recall detection:**
  - The recall is the result of xx
  - How was the problem detected?
- **Illness/injury:**
  - Insert if there were illness/injury reports.
  - If yes, insert how many.

## Company Information
- **Company Name:**
- **Company Address:**
- **Company Recall Coordinator:**
  - Name
  - Contact number
- **Public contact phone numbers:**
  - Hotline or Customer Service number

## Product Information
- **Food Type:**
- **Category:**
- **Product Name(s):**
  - Brand name and product name as it appears on the packaging
- **Package Details:**
  - Package description:
  - Package size:
- **Date Marking:**
  - Best Before Date, Use By Date, etc.
- **Batch/lot/unit Identification:**
  - Batch/lot/unit Code:
- **Country of Origin:**
- **Manufactured State/Territory:**

## Distribution Channels
- **Product Units Imported/Manufactured:**
- **Product Units remaining at Warehouse:**
- **Point of Sale description:**
  - Type of retail outlets in which State/Territory
- **Time product has been in market:**
  - Approximate time (including date if available)
- **Distribution to which States/Territories:**
- **Overseas Distribution:**
  - Country:
  - Units:

## Communication Plan
- **Recall information communicated to consumers via:**
  - Press advertisement, point of sale notification, company website etc in which State/Territory

## Other
- **Other Information:**
  - Any other information - detail supply chain information, detail specific recall information not covered in document
### 6.4.2.5 Food Recall Report

<table>
<thead>
<tr>
<th>Company Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact:</td>
</tr>
<tr>
<td>Company Name:</td>
</tr>
<tr>
<td>Address:</td>
</tr>
<tr>
<td>Mail Address:</td>
</tr>
<tr>
<td>Business after hours Phone Number:</td>
</tr>
<tr>
<td>Fax:</td>
</tr>
<tr>
<td>Email:</td>
</tr>
<tr>
<td>Contact email address</td>
</tr>
<tr>
<td>Head Office Location:</td>
</tr>
<tr>
<td>Manufactured State:</td>
</tr>
<tr>
<td>Has the food been manufactured in the Home State?</td>
</tr>
<tr>
<td>Contacted Health Department?:</td>
</tr>
<tr>
<td>Have you contacted your State/Territory/Provincial Health Department?</td>
</tr>
</tbody>
</table>

**Information Dissemination:**

The information discussed in this report will be used by the Competent Authority to officially notify state/territory/provincial health departments of the recall, who in turn may forward the information on to relevant agencies, such as local council, in their jurisdictions for further follow up action.

*Other government agencies, international agencies and industry organizations will also receive official notification of the recall.*

*It is the company's responsibility to notify all direct customers of the recall and provide affected product information.*

<table>
<thead>
<tr>
<th>Company Recall Coordination Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Name:</td>
</tr>
<tr>
<td>Contact Phone Number:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Consumer Enquiry Contact</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact name:</td>
</tr>
<tr>
<td>Contact Phone Number:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Brand Owner Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Is your company the BRAND owner of the product?</td>
</tr>
<tr>
<td>Brand Owner Name:</td>
</tr>
<tr>
<td>Brand Owner Phone Number:</td>
</tr>
<tr>
<td>Has the recall been discussed with the Brand owner?</td>
</tr>
<tr>
<td>Primary Responsibility</td>
</tr>
<tr>
<td>If you are not the brand owner, is your business taking primary responsibility of the product recall in the country.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Products being Recalled:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Product Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Name of the product including Brand Name</td>
</tr>
<tr>
<td>Food Type:</td>
</tr>
<tr>
<td>Category</td>
</tr>
<tr>
<td>Type of Date Marking:</td>
</tr>
<tr>
<td><strong>Appearance on packaging:</strong></td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td><strong>Batch/lot/unit/code No:</strong></td>
</tr>
<tr>
<td><strong>Dimensions:</strong></td>
</tr>
<tr>
<td><strong>Weight:</strong></td>
</tr>
<tr>
<td><strong>Packaging Description:</strong></td>
</tr>
</tbody>
</table>

**Importation Information:**

<table>
<thead>
<tr>
<th><strong>Imported:</strong></th>
<th><strong>Has the product been imported?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Country of Origin:</strong></td>
<td><strong>What Country has the product been imported from?</strong></td>
</tr>
<tr>
<td><strong>Date of Import:</strong></td>
<td><strong>Date the product was imported.</strong></td>
</tr>
<tr>
<td><strong>Customs Entry Number:</strong></td>
<td><strong>Entry number of the product obtained from Customs during import.</strong></td>
</tr>
</tbody>
</table>

**Importer Information**

<table>
<thead>
<tr>
<th><strong>Importer Name:</strong></th>
<th><strong>If the product was imported by an entity other than the sponsor, please provide the business name of the importer</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Importer Address:</strong></td>
<td></td>
</tr>
</tbody>
</table>

**Manufacturer Information**

<table>
<thead>
<tr>
<th><strong>Manufacturer Name</strong></th>
<th><strong>If you are not the manufacturer, what is the name of the product/s manufacturer?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Manufacturer address:</strong></td>
<td><strong>Product Manufacturers Address:</strong></td>
</tr>
</tbody>
</table>

**Supplier Information**

<table>
<thead>
<tr>
<th><strong>Supplier Name:</strong></th>
<th><strong>If you did not purchase the imported product from the manufacturer, what is the business name of the company you purchased the product from?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Supplier address:</strong></td>
<td><strong>Address of the product's supplier.</strong></td>
</tr>
</tbody>
</table>

**Product Distribution**

<table>
<thead>
<tr>
<th><strong>Distribution Method</strong></th>
<th><strong>How has the product been distributed?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Outlets/retailers</strong></td>
<td><strong>At what outlets are these products available for sale to the public (e.g. chain supermarkets, health food stores, corner stores, etc.)</strong></td>
</tr>
<tr>
<td><strong>Retailer/distributor notification</strong></td>
<td><strong>Have the Distributors been notified?</strong></td>
</tr>
<tr>
<td><strong>Manufactured Stock</strong></td>
<td><strong>How many units of the affected stock were manufactured/imported?</strong></td>
</tr>
<tr>
<td><strong>Warehoused Affected Stock</strong></td>
<td><strong>How many units of the affected stock remain in the warehouse i.e. were not distributed?</strong></td>
</tr>
<tr>
<td><strong>Time in Marketplace</strong></td>
<td><strong>How long as the affected product been in the marketplace?</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>In which states and territories has the affected product been distributed and the quantity?</strong></th>
<th></th>
</tr>
</thead>
</table>

**Exportation**

<table>
<thead>
<tr>
<th><strong>Exported:</strong></th>
<th><strong>Is the product exported outside of this country?</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Export Countries and Quantity:</strong></td>
<td><strong>Please enter the countries followed by the quantity:</strong></td>
</tr>
<tr>
<td>Country</td>
<td>Quantity</td>
</tr>
<tr>
<td>---------</td>
<td>----------</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Export notification

The company has a legal obligation to notify in writing to any overseas recipients of the affected goods, that the goods are subject to a recall. This notification needs to occur within a reasonable time.

### Recall Reason

<table>
<thead>
<tr>
<th>Recall Description</th>
<th>Description of the reason for recall</th>
</tr>
</thead>
<tbody>
<tr>
<td>Food Safety Hazard</td>
<td>What is the food safety hazard?</td>
</tr>
<tr>
<td>Advice to consumers</td>
<td>What is the advice to consumers?</td>
</tr>
<tr>
<td>Problem Detection</td>
<td>How was the problem detected?</td>
</tr>
</tbody>
</table>

Tests

Have any analytical tests been performed?

Test results

What are the results? E.g. levels of contamination

Results file:

Please provide a copy of the results, if available.

Pathogen Serotyped?

Has the pathogen been serotyped?

Serotype details:

Please provide further information on the pathogen identified.

Illness reports?

Have there been any reported cases of illness/injury associated with the recall?

Illness report details

Describe the incident of illness/injury

Recall Decision Responsible Party

Whose decision was it to recall the affected product?

Product Disposal

How is the product to be disposed of?

Please insert an acceptable method of product disposal or rectification of safety issue (re-labelling) for each of the stakeholders about.

Food which is subject to a recall must be separated from other food and clearly identified.

Options for recalled food include:

- Destruction or other use so that the food cannot be used for human consumption
- Further processing to ensure the safety and suitability of the food product

To meet post recall reporting requirements, you will need to provide evidence of the destruction or rectification of the unsafe product. If the product was not disposed of, please describe the manner in which the safety issue will be rectified and provide confirmation for the manner in which rectification occurred.
URGENT!

Food Recall Notification

Date: ______________

Our firm is recalling <<product name>> due to <<reason for recall>>. It may not meet company quality standards, and/or may represent a <<small/moderate/serious>> (CHOOSE one word) health or safety thread to people who use it.

Please follow these instructions to ensure a successful recall:

- Immediately discontinue selling or distributing your existing stock of <<brand, name, code of product, package size, etc.>>
- Inform us of the quantity of product you have on hand by completing the bottom portion of this form. Sign the form and return it by FAX to <<FAX number>> as soon as possible.
- DO NOT dispose of the product! Instead: (Choose one of the two options below)
  o Wait for further instructions from <<their sales representative>> OR
  o Return the recalled product to <<name of firm's contact person>> as soon as possible.

If you have distributed any of the recalled products, please immediately:

- Contact your consignees by telephone and in writing to advise them about the recall
- Instruct them to return their unused, undestroyed stock (recalling firm or supplier).
- Instruct them to also notify any of their consignees, which may have received the recalled product.

Thank you for your cooperation. If you have any questions regarding this recall, please feel free to contact <<firm's contact person>> at <<phone number>>.

Sincerely,

<<Recalling Firm Representative>>

---------------------------------------------------------------------------------------------------------------------

Customer Name: _______________________________
Quantity on hand: _______________________________ cases/cans/packages (circle 1)

Owner's Name - Please Print _______________________________  Owner's Signature _______________________________
6.4.2.7 Recall Effectiveness Check (Letter, On-Site Visit)

Letter Template
(Put on company letterhead)

Recall Effectiveness Check

Date: ___________________

To: Consignee name and address:___________________________________________
______________________________________________________________________

Ref: _____________________<<Recall product name, product code, date code, Competent
Authority recall number>>________________________________________

The following checklist has been sent to you as part of a <<name of competent authority>> -required recall effectiveness check. Please complete this checklist, sign and date it, and make or fax to:

- <<recalling company name>>
- <<Recalling company address, fax number>>

1) Did your company receive notification from <<recalling company>> that the above-listed product was being recalled?

___ YES   ___ NO

2) Did your firm receive shipments of the recalled product? (If NO, please sign this letter and return.)

___ YES   ___ NO

3) Do you have any of the recalled product in your current inventory?

___ YES   ___ NO

4) If the answer to #3 is YES, do you plan to return the recalled product as requested, to <<recalling company >>?

___ Yes Please list the quantities and expected return delivery date:

______________________________________________________________

___ NO Please explain your intentions:

______________________________________________________________

5) Have you received illness or injury reports related to the recalled product?

___ YES Please provide details:

______________________________________________________________
6) Did you ship the recalled product to other distributors, retailers, or consignees?

___ YES  ___ NO

7) If the Answer to #6 is YES, did you send the consignee a recall notice?

___YES  ___ NO

8) If the answer to #7 is YES, did the consignee have any product on hand?

___YES  ___NO  ___ Did not inquire

Thank you for your cooperation. Please sign and date your signature below.

_________________________  ________________________ 
Signature     Title

_________________________  _________________________
Date     Company

Sincerely,

________________________  _________________________
Signature and title    Date

<<recalling company name>>
6.4.2.8 Phone Call/Personal Visit Template/Worksheet

For each Recall telephone or personal contact, first be sure you talk with the right person - one who can personally deal with the recall, or has the authority to designate someone else to deal with it. Then log that person's name and contact information on this sheet. Keeping good records is critical.

| Date: _____________________ |
| Company Name: ____________________________ |
| Company Contact: __________________________ |
| Phone number: __________________ Fax number: __________________ |
| Email Address: __________________ Website address: __________________ |

Good morning/afternoon:

I am <<caller name>> from <<recalling company>>. I am calling/visiting in reference to our <<date>> product recall of <<brand, type, product code, date code>>.

I am calling/here today for a brief recall effectiveness check with your company, to make sure we are doing everything possible to meet government regulations. I will need to ask you several questions:

1) Did your company receive notification from <<recalling company>> that the above-listed product was being recalled?
   - YES   - NO

2) Did your firm receive shipments of the recalled product? (If NO, please sign this letter and return.)
   - YES   - NO

3) Do you have any of the recalled product in your current inventory?
   - YES   - NO

4) If the answer to #3 is YES, do you plan to return the recalled product as requested, to <<recalling company>>?
   - Yes  Can you tell me the quantities and the date we can expect to have them to be returned to the company?

   ________________________________________________________________
   - NO  Please explain your intentions:

   ________________________________________________________________

5) Have you received illness or injury reports related to the recalled product?
   - YES  Please provide details:

   ________________________________________________________________
6) Did you ship the recalled product to other distributors, retailers, or consignees?

___ YES    ___ NO

7) If the Answer to #6 is YES, did you send the consignee a recall notice?

___ YES    ___ NO

8) If the answer to #7 is YES, did the consignee have any product on hand?

___ YES    ___ NO    ___ Did not inquire

Thank you for your cooperation. (If in person, ask the consignee to sign and date the questionnaire).

_________________________________________    _________________________
Signature                                          Title

_________________________________________    _________________________
Date                                              Company

Sincerely,

_________________________________________    _________________________
Signature and title                                Date

<<recalling company name>>

6.4.2.9 Public warning template (Salmonella)

For immediate release

HEALTH HAZARD ALERT - <<PRODUCT>> MAY CONTAIN SALMONELLA BACTERIA

Audio clips available at <<website link>>

<<City>>, <<DATE>> The <<Competent Authority>> and <<Company Name>> are warning the public not to consume <<product>> because the product may be contaminated with Salmonella. <<Affected product(s) description (brand name, product name, size, UPC, lot number, other)>>. This/these product(s) have been distributed in <<area of distribution>>.
There have been no/# reported illnesses associated with the consumption of (this/these) product(s).

Food contaminated with *Salmonella* may not look or smell spoiled. Consumption of food contaminated with these bacteria may cause salmonellosis, a foodborne illness. In young children, the elderly and people with weakened immune systems, salmonellosis may cause serious and sometimes deadly infections. In otherwise healthy people, salmonellosis may cause short-term symptoms such as high fever, severe headache, vomiting, nausea, abdominal pain and diarrhea. Long-term complications may include severe arthritis.

The <<Manufacturer/ Importer/ Other>> is recalling the affected product(s) from the marketplace. The <<Competent Authority>> is monitoring the effectiveness of the recall.

For more information, consumers and industry can call the <<Competent Authority>> at <<Phone Number>> 8:00 a.m. to 8:00 p.m. Eastern time, Monday to Friday.

OR:

For more information, consumers and industry can call one of the following numbers:
<<Company name and phone number>>;

<<Competent Authority and phone number>> <<during specific times/days of the week>>.

For information on *Salmonella*, visit the following web page at: <<Weblink>>

For information on receiving recalls by e-mail, or for other food safety facts, visit our web site at <<Weblink>>.

Media enquiries:
<<Competent Authority Contact Detail Information>>

### 7 Conclusions

Food recall is an important risk management option during food safety emergencies/incidents. Effective national food recall systems require specific legal framework and coordination among relevant government agencies as well as effective cooperation with the private sector such as industry, retail, trade and food services. National food recall systems would be most effective when key preparedness activities are routinely conducted as parts of national food control systems.

Food recalls could be resource intensive both in the government agencies and in the food industry. It often requires long-term vision, efforts and investments. Assessing the needs of such investment, one should consider benefits of 1) maintaining product confidents, 2) keeping good reputation of the country’s food products and 3) future market access.

Traceability is a very useful tool for effective food recalls demonstrated in many countries. A traceability system could start with a very simple system with the one-step-back and one-step-forward principle. Food recalls would be very difficult if there is no traceability system put in place.

During a food safety emergency, having an effective food recall system would be extremely helpful in minimizing the impact of the event. When the event may have an international dimension, INFOSAN
can be contacted to facilitate communication between the competent authorities on international food recalls.

Resources

[to be formatted by the technical editor]

1. Abu Dhabi CODE OF PRACTICE No. 1/2010 FOOD TRACEABILITY AND RECALL, August 08, 2010
2. Abu Dhabi Regulation Number (3) of 2008 On the Traceability and Recall of Food
3. Argentina Manual de Procedimientos para el Retiro de Alimentos del Mercado, Manual for government and Industry
4. Australia CRISIS MANAGEMENT A GUIDE FOR THE FOOD INDUSTRY IN MANAGING CRISIS EVENTS THAT IMPACT ON PRODUCTS 2009
5. NSW Australia Section 12 – Food Recall Protocol Oct 20, 2011
6. NSW Australia PROTOCOL FOR ENFORCEMENT AGENCIES Urgent Food Safety Response Protocol for Emergencies
7. NSW Australia Recalls Jan 14 2011 Web guideline
8. Canada Canada Consumer Product Safety Act
9. Canada FOOD INVESTIGATION RESPONSE MANUAL 2011
10. Canada Food Recalls: Make a Plan and Action It! April 19 2007
11. Canada Meat Inspection Regulations 1990
12. Canada Canadian Food Inspection Agency Act
14. Codex PROCEDURAL MANUAL CODEX ALIMENTARIUS COMMISSION Twentieth edition ISSN 1020-8070
15. Codex REPORT OF THE FIFTH SESSION OF THE AD HOC INTERGOVERNMENTAL CODEX TASK FORCE ON ANIMAL FEEDING 17 -19 May 2004
16. Codex DISCUSSION PAPER ON DEVELOPMENT OF GUIDELINES FOR TRACEABILITY/PRODUCT TRACING IN THE CONTEXT OF FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS 24-28 November 2008 CX/FICS 08/17/7
17. Codex RECOMMENDED INTERNATIONAL CODE OF PRACTICE GENERAL PRINCIPLES OF FOOD HYGIENE Rev. 4-2003 CAC/RCP 1-1969 Rev.4- 2003
19. Codex REPORT OF THE ELEVENTH SESSION OF THE CODEX COMMITTEE ON MEAT HYGIENE 14 -17 February 2005 ALINORM 05/28/16
22. EU Food Traceability Fact Sheet
23. EC REGULATION (EC) No 178/2002 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety
24. EU REGULATION (EC) No 882/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL, on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules
25. EC WHITE PAPER ON FOOD SAFETY
26. EC GUIDANCE ON THE IMPLEMENTATION OF ARTICLES 11, 12, 14, 17, 18, 19 AND 20 OF REGULATION (EC) No 178/2002 ON GENERAL FOOD LAW 26 January 2010
27. EC THE KEY OBLIGATIONS OF FOOD AND FEED BUSINESS OPERATORS leaflet
28. EC COMMUNICATION FROM THE COMMISSION, on the precautionary principle 2.2.2000 Communication from the Commission to inform on the precautionary principle
31. The Netherlands Notification unsafe food/feed - decision tree 1st April 2008
32. The Netherlands Report form Animal Feed - Animal Byproducts 28-09-2011
33. FSANZ (Australia only) Food Safety Standards – Food recall systems for unsafe food
34. FSANZ Food Industry Recall Protocol 2008 Manual for government and Industry
35. FSANZ Recall Press Advertisement Template 2011
36. FSANZ Food Recall Information Sheet 2011
37. FSANZ Food Recall Report 2011
38. Ireland GUIDANCE NOTE: Product Recall and Traceability (Revision 2) 2010
39. Mexico EVALUACIÓN Y ADMINISTRACIÓN DEL RIESGO
40. New Zealand Recall Guidance Material
43. USA TITLE 21--FOOD AND DRUGS CHAPTER I--FOOD AND DRUG ADMINISTRATION DEPARTMENT OF HEALTH AND HUMAN SERVICES SUBCHAPTER A--GENERAL PART 7 ENFORCEMENT POLICY Revised as of April 1, 2011
44. USA Guidance for Industry: Product Recalls, Including Removals and Corrections
45. USA INVESTIGATIONS OPERATIONS MANUAL, CHAPTER 7 - RECALL ACTIVITIES, SUBCHAPTER 7.1 - RECALLS
46. USA PUBLIC LAW 111–353—JAN. 4, 2011, To amend the Federal Food, Drug, and Cosmetic Act with respect to the safety of the food supply 2011
47. USA Chapter 7 RECALL PROCEDURES 2011
48. USA The food recall Manual 2004