

# **New Recall Protocol**

## **2008 Food Safety and Defense Symposium**

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Food Protection Program**

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**Do you feel like it is piling on?**



# Trying to dig out?



**This is the view from Dan Gala's office!**



# **Recalls are Everywhere!!**

- **Peanut butter, spinach, pot pies**
- **Chili, green and garbanzo beans**
- **Ground beef and school lunch beef**
- **Pizzas, cookies, cantaloupe**
- **Baby food, pet food, heating pads**
- **And on and on and on.....**

# Recalls Everywhere

- **2007 recall statistics:**
  - **167 notices received by ISDH**
  - **70 recall notices sent**
  - **21 advisory notices sent**
  - **ISDH -157 complaints on peanut butter**
  - **FDA - 10,000 complaints about melamine contaminated pet food**
  - **2000+ effectiveness checks on botulism recall by state and LHDs**

# Recalling Company Statistics

- **Topp's – 22 million lbs. – out of business**
- **Castleberry - \$45 million lost**
- **Hallmark/Westland Meat Company**
  - 143 million lbs. under recall
  - 15.2 million lbs. of meat destroyed – possible closure
- **New Era – possible closure**

# Recall Causes

- **Illnesses linked to a food product**
- **Contamination found in a food product**
- **Under processing of a food product**
- **Undeclared ingredient**
- **Mislabeling issue**
- **Food allergen issue**
- **Imported food products**

# **Recall Secondary Causes**

- **Reduction in federal budgets**
  - **Reduced human assets**
- **Fewer human assets available**
  - **Less regulatory oversight**
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  - **Leads to sloppy manufacturing practices that go unchecked in some companies**

# Recall Fatigue?

- **Too many recall notices occurring**
- **Notices received almost daily from FDA, USDA or other state authority**
- **Difficult to remain objective to the seriousness of the notice**
- **Problem to keep them organized and to coordinate follow-up activity**

# Recall Problems

- **Class system used by the feds is not adequate**
- **Class 1 recalls are the most serious, but:**
  - **Can mean illness has been linked to food**
  - **Can mean no illness, but contamination found**
  - **Can mean only the potential of a problem**
  - **All class 1's are not equal**

# Recall Problems

- **Does not appear to be any relief for the near future**
- **Imports are increasing exponentially every year**
- **Recalls create a drain on resources that could otherwise be used more effectively elsewhere**
- **Distribution lists are not always available or not provided timely to the states and LHD**

# Recall Problems

- **Public assumes recalled products are removed from sale in all cases**
- **Some distributors may not have an adequate system in place**
- **Media sees food as a news target if it involves milk, schools, children or the elderly or an issue during “sweeps” months of February, May and November**

# Recall Solutions

- **ISDH hosted a one day training seminar entitled “Recall Strategies Day” for Indiana manufacturers and distributors last November**
- **Brought in expert trainers on how to conduct recalls and trace backs**
- **Working closely with the major food bank distributors and salvage food operations on recalls**

# Recall Solutions

- **State and federal regulators continue to work with the industry to prevent the causes of recalls**
- **Develop an effective system of tracking all distributed products – traceability**
- **Develop the means to immediately notify their customers if they are affected by a recall**
- **GFS is a shining example of this**

# Recall Solutions

- **ISDH has developed new criteria to address the recall load**
- **New matrix that provides a means of determining when and how to allocate human assets**
- **Incorporates the use of alternative effective notification of food establishments**

# Recall Matrix

- **Categorizes the most common Class 1 recalls into subcategories**
- **Provides action items for each of the subcategories**
- **Provides alternative options in most cases**
- **Provides a guideline from which future program work plans can utilize for allocation of human asset resources**

# **New Audit Form**

- **Based on the FDA form**
- **Reformatted and some categories eliminated**
- **More user friendly**
- **When audit form is to be used, the ISDH will populate key boxes in advance**
- **UPC codes will not to be used!!**

# Terms in the Audit Form

- **Recalling firm**
  - Usually the manufacturer, but could be an import distributor
- **Direct account**
  - Distributor of goods from the manufacturer
- **Sub-account**
  - Distributor of goods obtained from another distributor

# Final Recall Issues

- **Most recalls are not serious enough to initiate emergency protocols**
- **Class 1 recalls with illness and toxin/pathogen tied to a product do warrant some level of immediate action**
- **Anything less for this type of recall is not allocating enough public health resources for your jurisdiction**

# Final Recall Issues

- **State law does not stipulate the number of routine food inspections to be done by regulators in a given time period**
- **Routine inspections and other activities must be set aside to deal with these serious Class 1 recalls**
- **They are a pain for all regulators and the only solution is to prevent them from happening initially!**

**Questions?**