



# *Special Report*

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8 / 28 / 1997

## PRODUCT RECALL DEVELOPMENT

*By Bernard Shire*

You need to have a recall plan set up as part of your HACCP plan. It should be drawn up and ready to operate right now, when you don't need it, rather than creating one when you do need it. You would put a recall plan into operation if it's determined that adulterated meat or poultry products have left your establishment and are in distribution, retail or consumers' homes. You want to design such a plan so that you can rapidly take control of suspect product to prevent any illness to consumers. Here are some guidelines that you can follow:

**Responsible individuals** – You need to designate the person or people in your company authorized to recall product. Their names and where they can be reached 24 hours a day, seven days a week, should be listed.

**Regulatory agencies to notify** – You must know who to notify at FSIS or your state inspection program. FSIS requires notice within 24 hours that adulterated product may be in the marketplace. You must tell the agency the reason for the recall, what the product is, where it's been distributed, and what you're doing to prevent contamination from happening again.

**Records, hazards, product codes** – You should be able to describe the hazard, in order to decide what must be done. For example, a labeling problem doesn't have the same urgency as under-processing. There should be an explanation of product coding during your manufacture on file. These codes should indicate lot or production date. The locations of the records with all this information must be available to you all the time, at least through the shelf life of the product.

**Your action plan** – You need to have a detailed action plan written and on file. Step-by-step procedures should be listed. You'd probably begin by gathering the information needed to confirm the type of contamination and end with how you get rid of the product when recalled.

**Your contact list** – You need to maintain and update a list of your contacts, including federal, state and local regulatory agencies, distributors, retailers, customers, laboratories, transportation

companies, media contacts and public relations people, legal counsel, and insurance adjusters. You'll also need their phone and fax numbers and e-mail addresses.

**Controlling returned product** – You need to know how you will dispose of returned product, and be prepared to make that information available to the regulatory agencies you are dealing with on the recall, including any reinspection or reworking guidelines, if they are appropriate.

**Checking your effectiveness** – Get someone from the outside to evaluate your plan, maybe an outside sales person or family member who doesn't work in the business.

**Other suggestions** – Maintain a complaint file for early warnings of possible recalls, and keep a complete record of any recalls you carry out. Last of all, once you've completed your recall plan, you should test the system to see if it works. Pick a time to set up a fake recall situation, to see if the recall plan actually works. If it does, terrific! If not, get back to the drawing board, you've got some more planning to do!

## **REWORKING PRODUCT**

USDA has made an issue about product that was reworked from day to day, where it is difficult to keep accurate lot records. Everyone reworks product to some degree. But taking product that was not used one day, but has been refrigerated safely, is not the same as taking product that should no longer be used and trying somehow, to clean it up. The reworking question should not create difficulties for your small meat or poultry processing plant, since you clean up at the end of the day and start a new shift the next.

It is more of a problem for large establishments, where shifts are continuous. It would be best to keep very accurate records of your reworked products. For small processors, it is more difficult to put lot numbers or code dates on product. It may be better to keep reworked product by itself, with a unique lot or batch number, rather than mixing it up with other products. That way, if there is any problem, it can be traced, rather than face a situation where there is potential inoculating with a pathogen every day because of carryover. Identify as best you can where your product is going. Identify your lot numbers from cleanup to cleanup.

## **MICRO-TESTING, KEEPING TRACK OF YOUR SUPPLIERS**

If you slaughter, you certainly want to maintain the records of the generic *E. coli* testing you're doing even if you are not getting very high numbers. If you process and do not slaughter, you should be maintaining an accurate record of the product you buy from your suppliers. You should be checking the incoming temperature of the product to make sure there are no problems as it comes into your plant. You can ask your suppliers what kind of tests they've done on the product, and ask for their test results, to see if the product is all right. You can also ask if they have a HACCP plan operating. If you buy from multiple suppliers, your records need to be even more extensive. You should record where product from a particular supplier is going.

Depending on what kind of products you make, you may want to think about some additional testing, just to get a better idea of how you're doing. You might want to test for *Salmonella*, *Listeria*, and that most common problem of all, *Staphylococcus*.

## CRISIS COMMUNICATION – PRODUCT RECALL TIPS

1. There needs to be one responsible individual at your company, and then a team. One person should be authorized to recall product, be company spokesman/woman/crisis manager, and speak to the media. You don't want 2 or 3 putting out conflicting information, or deciding different things. Know where this person can be reached 24 hours a day.
2. Notify FSIS. Recall is voluntary, not required by the Agency. In your case, the FSIS test found Listeria in the product, so you don't have to notify anyone else. But you have to start the recall.
3. Be careful working with Compliance. They may want to work with you as a "team." But remember, they are there to compile any evidence they can that you did something wrong, and enforce the regulation. So don't work too closely with them.
4. If you're having a Conference Call with USDA concerning the recall, AAMP would be glad to participate in the call with you.
5. Be very fast, transparent and open with the news media. This can shorten the crisis. The only thing you'll get by trying to hide anything is bad press. Don't ever refuse to talk to the media, or say "No comment." You're dead. Tell them exactly what's going on. Respond so your comments will be in the first story on TV and in the newspapers, rather than just in a follow up.
6. Put your customers first. Do whatever you can to help them, such as saying anyone with product from your facility, whether retail or final customer, should return it.
7. Say what you're going to do very quickly. By holding back, you create impression that you're just trying to protect your reputation.
8. Ask FSIS if you can see their press release before they release it, and if you can help write it. They probably won't let you, but you should try.
9. The news coverage will probably be local. But it may last awhile. So put as much positive information as you can into the information/press release you give to the local media.
10. Tell media and USDA how you've been doing final product testing for Listeria monocytogenes. This proves you're responsible, and that the safety of your product is very important to you.
11. Be sure to tell your customers and employees what's going on.
12. In the long run, establish good report with the TV news organizations and newspapers in your area. Be a source of good, constructive news coverage for the media in your area.

## The Most Recent Wake-up Call for the Meat Industry The Need for Strong Crisis Prevention/Management Capabilities

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The last three weeks should be a learning experience for all in the meat industry. Do not think that what happened to Hudson Foods could not have happened to any one in the food business. To not learn from this experience would be a tragic mistake. Just what did we learn?

- To not have an effective crisis management/recall capability can be disastrous
- Proper lotting procedures are ill-defined, and both industry and USDA should work together to agree on what works and what does not
- It is still not clear as to what is the role of microbiological testing in an effective HACCP system. End-product testing is socially and politically acceptable, but it is not accepted in the scientific community. Who is correct? This area needs resolution.
- What are the components of a good crisis prevention and crisis management system?

**CRISIS PREVENTION** An effective crisis prevention system requires good information and good evaluation of that information. To be most effective, this activity will likely be handled by a third party, and the information made available to the industry. An effective crisis prevention system will continuously look at the facts and make projections on what could happen. It is the industry's "early warning system." Potential issues or crises that have a high potential of occurring will have crisis management contingency plans developed. The plans will detail the step by step events that must occur when the crisis occurs – the "who, what, how and when."

**CRISIS MANAGEMENT** Effective crisis management evolves from the effective early warning systems described above. Any company that deals with food and the potential to have to recall that food due to a food safety crisis must have an effective system in place.

For example, let's assume that the crisis prevention system identified a particular biological hazard as especially likely to occur in meat product "x." The probability of a need to recall the product from the market place was estimated to be moderate to high. The company manufacturing that product would need to have a strong recall capability within the company, for example:

1. The company would need to have a crisis management recall team in place well in advance of any recall.
2. The team would have a leader (not CEO or President). This leader would have the authority to recall, deal with the government and the media delegated from top management.

3. The team would have expertise in the following area: HACCP/food safety – Record keeping – Microbiology – Regulatory-government – Legal – Public relations/media.
4. The team would develop a series of contingency plans for a crisis recall. These plans would detail who would talk to whom and when, who would interface with the government, the media, etc. The plan would name the person(s) responsible for the recall. It would detail how the recall would be conducted – step by step, hour by hour. Press release protocols and outlines would be drafted in advance.
5. The team would make certain that the company had effective systems in place regarding record keeping, source verification, recall, etc.
6. The team would conduct practice recalls at least twice each year....much the way any fire department would function. This would serve to make certain that the system actually works, and it would give your customer and the government confidence that you had the capability to handle a food safety crisis. What would have been the outcome of the United Airlines crash in Sioux City if the local crisis management teams had not had a dry run 30 days previously?
7. The individual responsible for dealing with the media would, if necessary, have effective media training. Without fail, all dealings with the media would go through this person.

**YOUR GOALS ARE TO:**

Do all that you can to avoid the crisis. Your total food safety program will give you the insurance that you will not have a crisis – **Prevention**.

If the crisis occurs, your goal is to do all that you can to protect the health and well being of the public – **Management**. It is not your goal to keep the recall costs at a minimum. You must be prepared to aggressively do all that is necessary to protect your customer. **That is good business!**