

Implementing a Recall Program for Small Processors

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Introduction

What is a Recall? When would I have to conduct a recall? How do I initiate a recall? What affect will a recall have on my business? These, and many more, questions are currently being asked by small processors as they develop and implement their Hazard Analysis Critical Control Point (HACCP) programs in response to meat inspection reform. The 1996 Pathogen Reduction; Hazard Analysis Critical Control Point Final Rule dictated that all meat and poultry processors implement HACCP programs. One potential important facet of a HACCP program is a recall program in order that products may be removed from the marketplace as soon as possible. Although most companies shudder at the idea of a recall, it is vitally important to be prepared to retrieve product that might pose a health risk to consumers.

To that end, every processor should be able to trace back the raw materials involved in the production of a product, (this is a good idea, but not required by USDA) follow the distribution of that product and have in place a tested and proven means of securing the product. Although most processors probably have some idea of how this would be accomplished, many may not have a formalized written plan. This plan, often referred to as a “Crisis Management Plan” should identify the individual in charge and the procedures which will be followed to successfully complete a recall. It should assure that a product posing a suspected health hazard may be completely and rapidly recovered. Recalls, when warranted, are conducted by the processor in conjunction with the United States Department of Agriculture (USDA), Food Safety and Inspection Service (FSIS). Although FSIS has no legal authority to mandate a recall, they may request a recall if the processor has not began the process. In most cases, the processor initiates the recall and promptly notifies USDA.

How Do I Get Started?

To began, it is first useful to understand that a recall is a voluntary procedure by the company to remove adulterated products from the marketplace, which may pose health hazards to consumers. According to USDA recalls may be classified into one of the following three categories:

- **Class I.** Involves a health hazard situation where there is a reasonable probability that the use of the product will cause serious, adverse health consequences or death,
- **Class II.** Involves a potential health hazard situation where there is a remote probability of serious, adverse health consequences from the use of the product,
- **Class III.** Involves a situation where the use of the product is not likely to cause adverse health consequences.

This does not include products which pose no health hazards to consumers. In smaller plants it is often-times more difficult to develop recall programs due to the limited resources available. Although this is a hindrance, proper planning ahead may alleviate many headaches down the road. First, your plan should identify the person who will coordinate your recall program. This individual should have the authority to

call upon other employees as needed to address the issue at hand. Remember, this should be treated as a crisis situation and all available resources dedicated to finding the solution as soon as possible. It may be wise to establish a chain of command for the recall program (many times this is the normal chain of command in a plant; owner, manager, superintendent, etc.) to avoid being caught off guard with the lead person on vacation. These individuals should have their responsibilities clearly defined and their accessibility defined around the clock.

Second, the plan should have procedures clearly identified as to how the team will approach this task. The USDA requires notification within 24 hours of discovery of the problem. During this time period, the processor should determine the reason for the recall, type of product, the extent of distribution, and action to be taken. When unclear on certain aspects of the problem, seek advice from the regulators and trade association as to how to proceed. Also, records should be readily available explaining product coding, including lot and/or production date, and product distribution records. In addition, detailed methods of how the product will be retrieved should be outlined as well as the disposition of the product once it is under control of the establishment. These few suggestions will help to organize and formalize your recall plan to ensure that during a time of crisis you don't overlook any important factors.

What is the Best Lot Size for my Operation?

Another important factor in developing a successful recall program is to have an appropriate lot size and product-coding procedure to minimize the amount of product subjected to a recall. Product lots are determined by the time span from one sanitation period to the next, or in essence, one day's production. In many cases, lots or sublots, may be specified on an hourly or every other hour basis. Each plant's volume and type of production will dictate how far processors may go in subdividing product lot size. Some plants may even have the capability of coding products in real time or by the minute. The smaller the lot size the more manageable a recall becomes. Each processor must determine how much risk they are willing to assume according to lot size. In smaller plants, this may be difficult due to the small volume of numerous products which may be produced on any given day, but it is not impossible if approached in a systematic manner.

In addition, the issue of product overrun or rework must also be considered when terminating the end of a lot. Carryover product from one lot to the next can compound the traceability of a product and must be wisely considered. Many processors attempt to utilize all rework in a short period of time at the end of the day and assign this volume of production a unique lot number in order to assure trackability. Also, many processors avoid overlapping the use of various incoming raw materials in product lots to ease record keeping of materials used to manufacture specific products. In some cases of processors with low levels of rework, the product is discarded at the end of the day. No matter how you address the issue of rework, proper record keeping and documentation is the key to good traceability.

Also, the need for detailed sales records is paramount! Processors must be able to track the product in question to all final destinations. The need for this tracking ability is second to none when it comes to being able to recall products.

How can I be Assured That my Program will Work?

The only way to assure that you have a program which operates sufficiently under a crisis situation is to implement that program before the crisis occurs, in other words, perform mock recalls for a variety of products at different times of the year. These mock recalls, should mimic the real situation as much as possible to establish the true worth of your program. If deficiencies are determined in the recall program, correct those problems and retest the program at a latter date.

Summary

Your recall program should be an integral part of your food safety program, helping to protect the safety of your consumers while acting as an insurance policy to you against the unexpected. There are many variations that may be utilized to meet your specific need as long as the basic component of product traceability is established.

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