

Recall Plan

Recall Team

Evaluation of Hazards

1. Assemble members of the Recall Team to assist in the evaluation. The team shall consist of the Owner, HACCP Coordinator and/or designee.
2. Answer the following questions:
 - a. Is there an undeclared allergen in the product?
 - b. Was product improperly cooked or processed?
 - c. Has the product tested positive for a pathogen?
 - d. Are there reports of illness or injury from the product?
 - e. Are there any potential health hazards associated with the product, other than those specified above (ex. potentially injurious foreign material, chemical contamination, supplier recalls, etc)?
3. Within 24 hours, contact FSIS to notify them of the issue leading to the recall.
4. As immediately as possible after notification of a potential recall, begin collecting the following information:
 - a. Has potentially hazardous product been produced?
 - b. Has potentially hazardous product been shipped?
 - c. If product has been shipped, where has the product been shipped to?
 - d. Is the potentially hazardous product in commerce?
 - e. Is the potentially hazardous product available to consumers?
 - f. How did the plant receive notification of the problem?
5. Based on the information collected so far and production records, determine the extent and nature of the health risk associated with the issue.
6. Assess the potential severity of the hazard to various segments of the population, with particular attention to high risk groups (ex. elderly, immunocompromised, children, and pregnant women).
7. Assess the likelihood of the hazard causing illness, injury, or death.
8. Determine the degree of seriousness (severity) of the health hazard.
9. Assess the consequences if the hazard were to occur.

Records

1. Gather the necessary records (production, sanitation, receiving, shipping, pathogen testing, etc.) to determine the following information:
 - a. The lot codes of all product(s) impacted (all product types and package sizes)
 - b. The production amount of each of the above products
 - c. The remaining inventory amounts of the identified products in the facility
 - d. Time range of the potential issue (when the issue began to when it was resolved or production ceased)

- e. The amount of potentially impacted product that has been sold
 - i. Where was it sold?
 - ii. When was it sold?
 - iii. Was it sold retail, wholesale, to distributors, or to food service (hotels, restaurants, etc)?
 - f. Lot numbers and suppliers of all ingredients used to make the identified products
 - g. Have products from other production lines, days, or HACCP plans used the same ingredients or processes which may make them potentially hazardous as well? If yes, gather the above information for all of these products as well.
2. All impacted product, as identified above, which remains in plant inventory/control should immediately be segregated and placed on hold. Employees should be informed of the situation as quickly as possible to prevent removal of segregated product from the area.
 3. Determine all microbial tests conducted on the product lots above.
 4. Determine if microbial tests were conducted for ingredients used in the above product lots.

Scope of Recall

1. The information gathered above will be used to determine the following information for all products impacted:
 - a. Lot codes
 - b. Production amounts
 - c. Processing information, parameters, and records
 - d. Labeling and packaging information
2. Evaluate other products for:
 - a. Possible sources of contamination
 - b. Same sources of raw materials, including meat and non-meat ingredients
 - c. Evaluate production period for possible contamination, for example from clean-up to clean-up

Depth of Recall

1. The depth of the recall depends on the severity of the hazard, the extent of distribution, and the level to which the recalled product was distributed. Levels of recall depth are categorized as:
 - a. Wholesale level: Product has been distributed to a warehouse or distribution center where it is not under the direct control of the producing company.
 - b. Retail level: Product has been received by retailers for sale to household consumers.
 - c. HRI level: Product has been received by hotels, restaurants, and institutional (food service) customers.
 - d. Consumer level: Product has been sold directly to consumers.

Recall Communication

1. Notice of the recall will be sent to all consignees via phone, email, letter or fax.
2. A written notice (and all recall communications) will be composed by the Recall Coordinator with the following information:
 - a. Prominent heading, such as "URGENT FOOD RECALL"
 - b. Reason for recall
 - c. Description of product(s), including product/brand name, product code, package size, package/case code date, lot number/expiration date
 - d. Explanation of risks involved if the product is consumed
 - e. Instructions for stopping further distribution or use of any remaining product
 - f. Request for official, written response
 - g. Instructions for consignee to report whether it has any implicated product remaining in inventory
 - h. Instruction for handling recalled product(s)
 - i. Contact information of the recalling firm
3. Implementation

- a. Consignees will be contacted using the following methods (in this order) until a point of contact receives and acknowledges the communication:
 - i. Phone
 - ii. Email
 - iii. Fax
 - b. In addition, all consignees or customers shall be contacted via special delivery letters marked, on the envelope, "URGENT FOOD RECALL." Follow up communication shall be sent to consignees and customers who fail to respond to initial recall communications within 24 hours.
4. All recall communications should be brief and to the point, while clearly explaining the points listed in part 2 of this section.
 5. A record of all communications should be kept by the Recall Coordinator. The Recall Notification Log can be used for this purpose and found at the end of this document.

Public Notice

1. The class of the recall, as determined by FSIS, will determine the distribution of public notification.
2. In addition to FSIS notifications to the public, the recall team will also determine if a public press release is necessary.
3. The Recall Team will work with FSIS on the press release.

Effectiveness Check

1. The Recall Team will record and verify that all distributors and retailers have received notification and that they responded to the notification.
2. If distributors and retailers have not responded to the notification, the Recall Team will continue to contact them until a response is obtained.
3. In addition, the Recall Team will verify the amount of product recovered, the amount of product destroyed, and the amount of product on hold at the distributor or retailer.

Returned Product Control and Disposition

1. The Recall Team will determine how recovered product is handled, including:
 - a. Segregated storage
 - b. Records of product lot numbers and amounts of recovered product
2. Disposition of the recovered product will be determined by the HACCP manager based upon the specific issue that occurred and resulting investigation. FSIS shall be notified of the product disposition actions prior to execution of the determined actions.
 - a. Potential dispositions are:
 - i. Relabel product
 - ii. Send the product to rendering
 - iii. Send the product to landfill
 - b. All products that will be sent to rendering or landfill will be denatured with a chemical denaturant as described in 9 CFR 314.3-Disposition of Condemned Products at Official Establishments Having No Tanking Facilities. This will be done by opening the packaging, breaking the product into smaller sections and applying the denaturant.
 - i. Control of impacted product must be maintained through the use of trailer seals if the product is leaving the establishment. Seal shall not be removed until arrival at the renderer or landfill.
 - c. Product disposition will be verified by the HACCP Manager or trained designee.
 - i. A log should be maintained of all product that has been relabeled.
 - ii. The renderer must supply records to show that product received lethality treatment. The renderer's documentation must be attached to the Recall Investigation Form.

- iii. If product is to be sent to the landfill, the landfill must provide documentation that product was properly disposed of. This documentation should be attached to the Recall Investigation Form.

Recall simulations

1. The Recall Coordinator and the Recall Team will determine when recall simulations are conducted.
 - a. Simulations will include recall procedures and actions for manufactured meat products that have been distributed
 - i. And the problem was identified in the product in the distribution chain
 - ii. And the problem was identified in the raw materials used to produce the product

Final Actions

1. When a recall is required, the Recall Team will notify the FSIS Denver District Office after completion of the recall. Notification should include:
 - a. The amount of product retrieved
 - b. Final disposition of the product
 - c. Amount of product destroyed
2. In addition, after the recall has been completed, the Recall Team will prepare a summary of recall activities and submit the report to the plant manager.
3. A reassessment of all impacted HACCP plans should occur to determine in any changes are needed.

Resources

1. The Small Plant Help Desk
 - a. 877-374-7435
 - b. Weekdays 8am to 4pm
2. USDA FSIS workbook "How to Develop A Recall Plan"

Supporting Documents

1. FSIS Directive 8080.1 Revision 8 – Recall of Meat and Poultry Products
2. USDA FSIS Guidebook – "How to Develop A Meat and Poultry Product Recall Plan" September 2015

RECALL INVESTIGATION FORM

Date ____/____/____

Date & Time Issue Began: _____ Date & Time Issue Resolved: _____

Description of Food Safety Issue:

List all impacted products in the table below:

Product Description	Production Date / Lot Code	Package Size	Code Date	Amount Produced

Attach copies of all applicable production, receiving, sanitation, and testing records.

Describe root cause of the issue: _____

Actions Taken to Prevent Reoccurrence: _____

RECALL INVESTIGATION FORM (continued)

List all returned products in the table below:

Date Received	Returned Product Description	Production Date / Lot Code	Package Size	Code Date	Amount Returned	Received By

Disposition of Impacted Product (circle one & complete the Product Disposition Form):

Rendering

Landfill

Investigation Performed By: _____ Date: _____

Verified By: _____ Date: _____

Rendering or Landfill Product Disposition Form

Establishment Number: _____

Chemical Denaturant Applied: YES NO Applied By (Signature): _____

Product Disposition to: RENDERING LANDFILL

Renderer: _____ Location: _____

Renderer USDA Establishment Number: _____

Landfill: _____ Location: _____

<u>Lot Number of Product</u>	<u>Product Description</u>	<u>Number of Units in Lot</u>	<u>Weight of Product in Lot</u>

Record Completed By (Signature): _____ Date: _____

Disposition Verification:

Disposition Documentation Received from Renderer or Landfill: YES NO

Product Disposed of Properly: YES NO

Product Disposition Form Complete: YES NO

Signature: _____ Date: _____

Example Letter to Customers

(All areas in yellow will be updated for the specific issue)

DATE

CUSTOMER NAME

CUSTOMER ADDRESS

ATTN: CONTACT PERSON NAME & TITLE

RE: RECALL OF TYPE OF PRODUCT

Dear Sir or Madam:

This letter is to confirm our telephone conversation that Husker Meats is recalling the following products because of specify recall reason and potential risks.

Describe all products, including name, brand, lot code, package size and type, establishment number

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, they we request you contact your customers and ask them to retrieve the product and return it to you.

Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for returned product.

We are undertaking this action in cooperation with the US Department of Agriculture, Food Safety and Inspection Service (FSIS). FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist us in this recall. If you have any questions, please do not hesitate to contact Recall Coordinator at xxx-xxx-xxxx.

Thank you for your cooperation.

Sincerely,

Recall Coordinator