

How to Develop A Recall Plan

◊ Raw non-intact beef tests positive for E. coli O157:H7 or non-O157

STEC (both plant and FSIS test)

◊ Ready-to-eat product tests positive for any pathogen (both plant and FSIS test)

Scope of Recall.

Your plan should also outline how you will determine the identity and amount of product to be recalled. It will be your responsibility to define when the problem began, when it was resolved, and what products are affected. **Clean-up times do not necessarily define the scope of a recall.**

FSIS suggests that your plan specify how you will determine the amount of product affected by using various scenarios. Scenarios can include: the contamination of a vat of product with a foreign object, the use of an incorrect label, or the use of the same source of raw materials in other lots on other days of production.

When determining the amount of product affected, consider the following:

- ◊ Your coding of product;
- ◊ The pathogen of concern;
- ◊ The processing and packaging;
- ◊ The equipment;
- ◊ The Hazard Analysis and Critical Control Point (HACCP) monitoring and verification activities (including microbiological testing) that you perform;
- ◊ Your Sanitation Standard Operating Procedure (SSOP) records; and
- ◊ Whether some, or all, of the products controlled by the same or substantially similar HACCP plans have been affected.