



FSIS-OFO Recall Management Staff

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Epidemiologists Meeting
Miami, Florida
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Recall Terminology Defined

- Recall: A firm's **voluntary** removal of distributed meat, poultry, or egg products from commerce when there is reason to believe they are adulterated or misbranded under the FMIA, PPIA or EPIA.
- Market Withdrawal: A firm's withdrawal or correction on its own volition of a distributed product that involves a minor infraction not warranting legal action by FSIS and constitutes no health hazard.
- Stock Recovery: A firm's removal or correction of product that has not been marketed or has not left the direct control of the firm.



The Recall Process

Problem Identification:

- The company finds the problem
- FSIS microbial sampling
- Information from in-plant inspection program personnel
- Epidemiological data gathered by Federal or State Agencies
- Consumer complaints



The Recall Process

Preliminary investigation (recall worksheets):

- Production records; dates and amounts
- Product label information; product name, package sizes, identifying codes, sell-by dates
- Picture of labels
- Distribution level and locations
- Other, i.e. flow charts, lab reports, etc.



The Recall Process

FSIS Recall Committee:

- Includes FSIS scientists, policy and technical experts, field inspection staff, enforcement personnel and communications specialists
- Receives worksheets and other information
- May receive additional information or clarification from recalling firm
- Determines the depth (level of product distribution) and scope (amount and kind of product) involved
- Makes a preliminary recall evaluation



The Recall Process

FSIS Recall Committee:

There are precedents for determining the significance of most health hazards. IF a hazard has an unusual nature, then the Health Hazard Evaluation Board may be convened. HHEB considers the nature of defect, the occurrence of injury or illness, the likelihood that injury or illness may result and the type of illness/injury.



The Recall Process

FSIS Recall Committee:

- Seeks to determine if there is reason to believe that product is adulterated or misbranded; that product remains in commerce; and if FSIS is prepared to detain or move to seize product in question
- Recommends a recall to the company if the above answers are all “yes”
- Classifies the recall as Class I, Class II, or Class III based on the health hazard.



The Recall Process

Public Notification:

- Press Release or Recall Notification Report
- Published on FSIS Recall Website and sent to wire and media services in areas of product distribution
- Information sent to public health officials, food inspection agencies, and constituent listserves
- Subscription service—

www.fsis.usda.gov/News_&_Events/Newsletters/index.asp
or

http://www.govdocs.com/service/multi_subscribe.html?code=USFSIS



Reasons for recall

- Lab results indicate presence of pathogen (*Lm* in RTE product, *E. coli* O157:H7)
- Foreign material (glass, plastic, chemical)
- Undeclared allergen (the Big 8)
- Processing defect
- Outbreaks and illnesses



Outbreaks and illnesses

- Infrequent cause of recalls; 6 of 101 recalls in 2004-2005
- Challenge to identify source of illness
- Is suspect product available for testing?
- Is packaging intact?
- Is other product likely to have same contaminant/adulterant?
- Can product be traced back to manufacturer, production date and/or lot?