




# Steps To Follow in a Recall:


## How to Manage a recall

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- ◆ Regulatory investigation from CDC, FDA, FSIS, USDA, Minnesota Department of Agriculture and other state agencies were involved in *Salmonella* Typhimurium illnesses spreading across the U.S.




## Background Information

- ◆ The PCA initiated recalls have impacted to date:
- ◆ From FDA Website as of Feb 11<sup>th</sup>, 2009  
Stephan F. Sundlof (DVM, PhD )
  - 1000 Products
  - 16 Categories
  - 75 Companies
  - This number is growing daily!!




## What might a company have done in this situation?

- ◆ 1. Initial steps (identify all finished products and ingredients that contain peanut and/or peanut butter in your inventory). Consider placing all inventory on hold until information is attained
- ◆ 2. Are there internal test results indicating safety of your products and/or ingredients?
- ◆ 3. Letters and calls to all suppliers if they receive ingredients from supplier in this case PCA. Ask your suppliers to do same of their suppliers, this is critical!
- ◆ 4. Suppliers identified using suspect ingredients continue holding inventory of both FG and raw materials. Do not release remaining inventory of those suppliers not implicated!
  - Validate there is no potential cross contamination from run order first, do not release until both known for all runs!



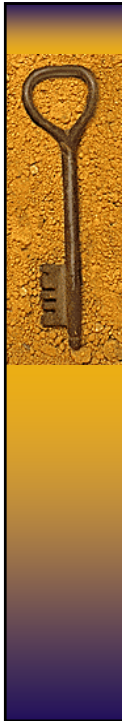
What might a company have done in this situation? (continued)

- ◆ 5. Run a recall report for every finished product that has peanut butter or peanuts to be prepared
- ◆ 6. Run an ingredient report for every peanut ingredient to know how much was used, where and when it was used. Link this to recall report
- ◆ 7. Pull in resources that are needed
- ◆ 8. Risk Assessment



## The Cause and Effect

- ◆ **In this scenario first peanut paste was implicated than later peanuts**
  - How many companies looked at all peanut ingredients from the supplier initially rather than just paste?
  - Cross contamination potential review? Did you ask your supplier to do the same?
  - Would you react differently next time?



**Recall Management:**  
Does your company have?

- ◆ A well written recall policy?
- ◆ Mock recalls?
- ◆ A single spokesperson?
- ◆ If you did a recall how well did it go for your company?
- ◆ What changes would you make to the recall policy?



**In addition to Executive Ownership and Management the Core Management Team for a recall could include:**


- ◆ Public relations
- ◆ Operations
- ◆ Information Technology
- ◆ Transportation
- ◆ Customer Service & Sales
- ◆ Quality Assurance
- ◆ Legal
- ◆ Finance
- ◆ Purchasing
- ◆ Other areas-TBD



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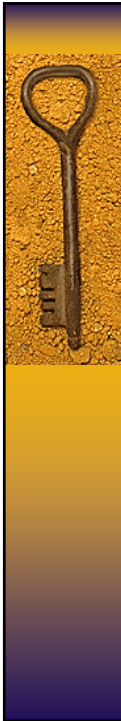
## Step into Action:

- ◆ **Initiate recall-make every effort to do this only once and do it well**
- ◆ **Communication plan-who needs to know what, when, where, how (refer to recall policy)**
- ◆ **Move Forward in a United Effort**




## Feedback: After the recall

- ◆ **What has this recall taught us?**
- ◆ **Food Safety**
- ◆ **Trust**



## Recall Key Understandings

- ◆ Documentation for insurance and legal purposes
- ◆ Understanding that insurance claims may result in litigation
- ◆ Lessons learned?
- ◆ How did we do? Ask your customers how you did?
  - Ask the internal departments impacted



## Questions

- ◆ For specific guidance: [Guidance for Industry: Product Recalls, Including Removals and Corrections](#)
- ◆ From FDA website