(Insert Company Name) Recall Policy
Plan Implementation Date:_____
Revision Date:_____

In the event that a food safety issue arises with our products, this company will protect public health by facilitating the efficient, rapid identification and removal of unsafe food from the distribution chain and, by informing consumers (where necessary) of the presence in the market of a potentially hazardous food.

There is a documented recall procedure in place and this will be periodically tested to ensure that it is comprehensive and fit for purpose in its ability to remove an unsafe product from consumers and/or the distribution chain.

Recall Procedure

Introduction

This procedure states the action/s (insert company name) will take to effectively manage the recall of a food which has been determined to be unsafe or unsuitable.

The following terminology is used to describe the situation when product is removed from the market.

A. Recall. A firm's removal of distributed (i.e., the product has left the firm's direct control) meat or poultry products from commerce when there is reason to believe that such products are adulterated or misbranded under the provisions of the Federal Meat Inspection Act (FMIA) or the Poultry Products Inspection Act (PPIA). "Recall" does not include a market withdrawal or a stock recovery.

B. Market Withdrawal. A firm's removal or correction, on its own initiative, of a distributed product that involves a minor company quality program or regulatory program infraction that would not cause the product to be adulterated or misbranded. For example, product does not meet company quality standards because of discoloration.

C. Stock Recovery. A firm's removal or correction of product that has not been marketed or that has not left the direct control of the firm. For example, product is located on the premises owned by the producing firm or under its control, and no portion of the lot has been released for sale or use.

D. Recall Classifications. FSIS assesses the public health concern or hazard presented by a product being recalled, or considered for recall, whether firm-initiated or requested by FSIS, and classifies the concern as one of the following:

1. Class I. This is a health-hazard situation where there is a reasonable probability that the use of the product will cause serious, adverse health consequences or death. Examples of a Class I recall include the presence of pathogens in ready-to-eat meat or poultry products, or the presence of *E. coli* 0157:H7 in raw ground beef.

2. Class II. This is a health-hazard situation where there is a remote probability of adverse health consequences from the use of the product. Examples of a Class II recall include the presence in a product of very small amounts of undeclared 3 allergens typically associated with milder human reactions, e.g., wheat or soy or small sized, non-sharp edged foreign material in a meat or poultry product.

3. Class III. This is a situation where the use of the product will not cause adverse health consequences. An example of a Class III recall is the presence of undeclared, generally-recognized as safe, non-allergenic substances, such as excess water in meat or poultry products.

An effective product recall will ensure that the unsafe or unsuitable food/s is contained and either destroyed or rendered safe.

Roles and Responsibilities

It is the responsibility of (insert company name) to effectively organize and manage the recall of food that has been demonstrated to be unsafe or unsuitable. The recall co-ordinator for the site is (insert name), who has been given authority from management to make recall decisions on behalf of (insert company name).

The Minnesota Department of Agriculture's Meat Inspection Program wishes to work with us in our recall action and thus be satisfied that we are taking all reasonable steps to protect consumers. When a recall is initiated, our actions in recalling the affected food/s needs to be co-ordinated with the Minnesota Department of Agriculture's Meat Inspection Program and any other local agency involved in the matter.

We shall notify Minnesota Department of Agriculture's Meat Inspection Program as soon as a recall is likely.

It is our responsibility to manage the recall by clarifying the food safety issue and the exposure (who and where risk exists), and to provide details on distribution and the method of recall.

The Recall Committee

The recall co-ordinator (insert name) will initiate the formation of a committee and will co-ordinate actions with Minnesota Department of Agriculture's Meat Inspection Program and our marketing and distribution agents.
Committee members may include personnel from across our company. Typically the committee would have a mix of knowledge across the following areas: (delete those that don't apply)

- production
- quality
- purchasing
- marketing
- sales
- legal services
- distribution & supply
- consumer affairs/public relations

The recall committee is responsible for the management of all recall activities and to adhere to this procedure. Duties of the recall committee are to:

- assess the overall problem;
- notify the relevant regulatory authority;
- evaluate the hazard in the food and the extent of contamination;
- determine a strategy to be followed;
- make decisions about product still in manufacture or in storage;
- decide who makes any press statements;
- notify insurers (must be done immediately);
- notify legal counsel (insurance may require involvement of lawyers due to potential claims).

Recall Actions & Documentation
The recall committee shall reference and follow the actions outlined in the *FSIS Directive 8080.1 Revision 6 (or most current revision)* when we become aware that a product may be unsafe or unsuitable. We will ensure that records of all actions and decisions and who was responsible are recorded and retained.

Decision to Recall
The decision on whether to recall or withdraw a product/s or not will be based on the identification of a hazard that makes a foodstuff unsafe and its likelihood of affecting public health. This will be determined by careful, considered risk assessment. The recall committee will conduct a risk assessment using the *Recall Hazard/Risk Analysis (Form A)* and we will include the appropriate regulatory authority in the process. We will refer to FSIS Directive 8080.1 on the roles of regulatory authorities in regards to a recall.

Scope of Recall
The scope of a recall is a very important part of the process; it ultimately ensures the effective identification of all affected product/s, ingredient/s and location/s. We will follow the requirements set out in FSIS Directive 8080.1 to ensure our plan incorporates the details mentioned.

Notification of a product recall
If the decision is taken to initiate a Withdrawal / Recall we will notify:

- Senior management of (insert company name), supply chain personnel
- (insert name of appropriate regulatory authority)
- Anyone that has received our product, including distributors, wholesalers, retailers and caterers.

We have an up to date contact list filed in the (insert list location here).

If we are engaged in a Withdrawal but find that for whatever reason that it is not possible to contact all relevant consumers then we will consider expanding the Withdrawal to a Recall.

If the decision is taken to initiate a Recall we will notify:

- All people mentioned under initiation of a withdrawal, outlined above and;
- Consumers, via the media contacts included on our contact list.

The contact list must contain the contact details for the following:

- The product recall committee and senior management and key company personnel.
- Suppliers of all ingredients.
- Distribution company and business customers.
- Sources of technical advice and support including laboratory facilities.
- Regulatory authorities.

Communication
Notification in respect to the recall needs to be done promptly and should cover the following areas:

1. **Regulatory Authority**
   We will notify the appropriate regulator at the earliest opportunity, after an incident is identified that may lead to a recall. We will supply as much information as possible, using the *Recall Hazard/Risk Analysis (Form A)* and the FSIS Directive 8080.1. The regulatory authority will be updated throughout the process.
2. **Distribution Chain**
   We will notify contacts by telephone and fax or email. A draft notification form is located in (insert location of document).
3. **Consumer**
   Communication to the consumer will be by the most effective method. It is anticipated that we will communicate with the consumer either by a media release or paid advertisement in newspapers, on radio or television. The form of media used will depend on the circumstances involved and advice received from the Regulatory Authority. We may also place notices at locations where the product has been sold. A sample of a paid

advertisement is located in (insert location of document), a sample of a media release is located in (insert location of document).

Regaining control of affected stock

If affected stock is directed to be returned to us then the recovered product/s will be stored in an area that is separated from any other food products. Accurate records will be kept of the amounts recovered and the codes of the product/s. If the recovered product/s is unfit for human consumption, it may be destroyed or denatured under the supervision of the company management and/or the regulatory authority where legally required.

If the food safety risk can be safely removed from the recovered product/s through relabeling or reprocessing this may be done once it is clear that public health will be protected.

Effectiveness of the Recall

To be effective, the product recall notification must reach as far as the product has been distributed. The effectiveness of the product recall is assessed on the basis of the amount of product returned as a proportion of the amount of product that left (insert company name), while taking into account time in the distribution chain and the retail turnover of the product.

Progress of the product recall must be reviewed so that its success can be monitored. If it is decided that there is now little risk to the public, the product recall can be judged to have been a success and brought to an end, however if there have been few returns and little response to a high risk problem the product recall procedure must be reassessed. The product recall may have to be repeated using different methods to reach the consumer.

Testing & Reviewing the Product Recall Plan

The recall committee will review this procedure every twelve months, and the contact list will be amended as required. The procedure will also be reviewed after any recall and changes will be made as necessary.

We will conduct a mock recall exercise within three months of the initial development of this procedure and additional mock recalls will be conducted on an annual basis. Records of these mock recalls will be documented and filed in the (insert file location here).

Once the mock recall is completed, a review must be carried out with the relevant recall committee members to correct and improve the process where necessary.

Recall Report

We will submit a recall report to the regulatory authorities within an agreed timeframe of the closure of the recall. The appropriate regulatory authority may conduction recall verification procedures to review compliance with current regulatory requirements.