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PROGRAM OF ACTIVITIES

Time	Day 1 (Tuesday)	Day 2 (Wednesday)	Day 3 (Thursday)
Morning Session			
9:00 – 9:30am	<p>Opening Program</p> <p>Welcome Address – Asec. Preceles H. Manzo, Department of Agriculture</p> <p>Message – Dr. Soe Nyunt-U, WHO Representative, Philippines</p> <p>Message – Ms Emiko Purdy, Agricultural Counselor, USDA, Philippines</p> <p>Photo Session</p>	<p>USFDA Food Recall Policies</p> <p>Dr Aurora Saulo – University of Hawaii at Manoa</p>	<p>Member Economy Experiences on Food Recall (cont.)</p> <p>Russia</p> <p>Thailand</p>
9:30 – 10:30am	<p>Introduction of speakers/participants</p> <p>Mechanics of the Seminar-Workshop – Mr Israel Q. Dela Cruz, Project Manager and Over-all Project Coordinator</p> <p>Food Recall Overview – Dr Sonia Y de Leon, Project Consultant</p>	<p>USFDA Recall Case Study</p> <p>Dr Aurora Saulo – University of Hawaii at Manoa</p> <p>Outbreak to a Recall, A Case Study – Overview of Food Safety Inspection Service (FSIS/USDA) Recall Process</p> <p>Dir. Elizabeth Volk, USDA-FSIS</p>	<p>Member Economy Experiences on Food Recall (cont.)</p> <p>Viet Nam</p> <p>Overview of Risk Communication in Australia during Food Emergencies</p> <p>Dr Barbara Butow - FSANZ</p>
Coffee Break			
10:45 – 11:45am	<p>Food Recalls Australia</p> <p>Dr Barbara Butow – FSANZ</p>	<p>Case Studies:</p> <p>Australia Experience on Food Recall</p> <p>Mr Elliot Hill - FSANZ</p>	<p>Workshop Mechanics – Dr. Sonia Y. de Leon, Project Consultant</p> <p>Workshop Groupings:</p> <p>Group A (USA Moderators): Brunei, Indonesia, Chile, Malaysia, Papua New Guinea, Republic of Korea, Mexico</p> <p>Group B (Australia Moderators)</p> <p>Peru, Philippines, Chinese Taipei, Russia, Viet Nam, Thailand</p>
11:45 – 12:00nn	Open Forum		
Lunch			
1:30 – 3:30 pm	<p>UN Programs on Food Recall</p> <p>Food and Agriculture Organization – Ms Sashi Sareen</p> <p>World Health Organization – Ms Jennifer Bishop</p> <p>Awarding of Certificate of Appreciation – Project Overseer</p> <p>Food Incident Management – the Australian Experience</p> <p>Dr Barbara Butow – FSANZ</p>	<p>Member Economy Experiences on Food Recall (cont.)</p> <p>Brunei Darussalam</p> <p>Chile</p> <p>Chinese Taipei</p> <p>Indonesia</p> <p>Malaysia</p> <p>Mexico</p> <p>Papua New Guinea</p> <p>Peru</p>	<p>Participants presentation of workshop outputs and plan of action</p> <p>Synthesis Project Consultant</p> <p>Closing Ceremonies</p> <p>Awarding of Certificates – Project Overseer</p> <p>Reminders – Project Manager and Over-all Coordinator</p>
Coffee Break			
3:45 – 4:45pm	<p>Meat and Poultry Recalls – Dr Elizabeth Volk, USDA-FSIS</p>	<p>Member Economy Experiences on Food Recall (cont.)</p> <p>Philippines</p> <p>Republic of Korea</p>	
4:45 – 5:00pm	Open Forum		
6:00 – 8:00pm	Welcome Dinner		

KEYNOTE SPEECH**PRECELES H. MANZO**

Assistant Secretary, Office of Policy and Planning
Department of Agriculture
Republic of the Philippines

**Seminar-Workshop on the Development and Strengthening of Food Recall System for APEC
Member Economies
May 4-6, 2010**

It is my pleasure and distinct honor to welcome you all in the Philippines on behalf of Her Excellency Gloria Macapagal-Arroyo and the men and women of the Department of Agriculture headed by Atty. Bernie G. Fondevilla to this three day Seminar-Workshop on the Development and Strengthening of Food Recall System for APEC Member Economies.

We, at the Philippine Department of Agriculture – through the Bureau of Agriculture and Fisheries Product Standards (BAFPS) – extend our sincerest gratitude to APEC for favorably considering our proposal to serve as host of this important activity.

In time with different current events happening left and right around the globe, food safety concerns somehow manage to be a headliner. Despite its increasing popularity, majority of the world's population are still unaware, if not, are still on the stage of being nonchalant on the issues, not grasping the importance and gravity of its effect on one's life. With growing concerns on this predicament come along different campaigns regarding health awareness. These are being offered on the market by government and non-government organizations hoping to minimize if not totally address the problem.

Recently, several dramatic incidences of food accidents and outbreaks, like Melamine tainted milk and peanut butter contaminated by *Salmonella*, were observed which led to raise concerns about effectiveness of current food control systems in protecting consumers and sparked increasing attention to the regulatory frameworks that govern food safety and food trade. These discomfort over microbiological and chemical contaminant of food chain as well as heightened consumer interest in diet-related health issues, have contributed to the augmentation of the profile of food safety control systems.

In return, such occurrences led to improvement and strengthening of risk management actions requiring constant vigilance from the government bodies as well as different industries and consumers.

In relation to this, sharing the fame of food safety concern and considered part of food control system, is the food recall which presently being carried out to remove from the market the food that poses risk to public health and safety. This action should be given importance as this offers significant impact in trade, locally and internationally, requiring effective implementation.

With this three-day seminar workshop, it is aimed to give focus on the issue, help improve one's awareness on the topic and develop a competent strategy on implementation of food recall.

It is a challenging job indeed, but as what they say, challenges make life interesting, overcoming them makes life meaningful. Again, a warm welcome to all you. I wish you all a good stay in the country, and may you have a productive seminar ahead of you. Thank you for this privilege Mabuhay!

MESSAGE**Dr Soe Nyunt-U**

WHO Representative to the Philippines

Colleagues, magandang umaga po and welcome to the Philippines. Thank you to the organisers for inviting WHO to be part of this important seminar.

Improvements in food and transportation technologies, together with the globalization of the marketplace, and changes in work expectations and hours, have led to an increase in consumer demand for readily accessible and easily prepared processed food. Associated with this is an increase in the international distribution of raw materials, food ingredients, food additives and food products. While international distribution adds to the diversity of food available to consumers, it also has the potential to result in the cross-border distribution of food that is not safe. Every week, new outbreaks of foodborne disease are reported in the media. With the increase in international trade and travel, outbreaks which were once limited to local communities, can now affect several countries.

WHO estimates that foodborne and waterborne diarrhoeal diseases kill about 2.2 million people annually; 1.9 million of them are children. The World Health Assembly, the highest governing body of the WHO, adopted a resolution in 2000 to recognize food safety as a significant public health concern. This resolution is as important today, as it was a decade ago, with significant public health, economic and societal impacts associated with foodborne disease evident in both developed and developing countries.

WHO aims to work with Member States to develop their national food control programmes with the overall goal of improving public health through the reduction in foodborne disease. This is an enormous ongoing task and working in partnership with other UN organizations such as FAO and UNICEF, and other forums such as APEC and ASEAN, is important for success. Developed countries also have a vital role in sharing information, experiences and expertise with developing countries. Only through these partnerships will we see improvement in national food control systems.

As the saying goes, 'an ounce of prevention is worth a pound of cure', and this is true in food safety. Effective food safety programmes, based on Good Hygienic Practices and Hazard Analysis Critical Control Point System (HACCP) and risk-based imported food programmes are important preventive features of national food control systems to avert foodborne disease caused by unsafe food. However, it is acknowledged that from time to time, such systems do fail. Therefore, it is of the utmost importance to have effective food recall systems in place, to ensure the removal of unsafe food from sale, and to also inform consumers of the risk so that appropriate preventative action can be undertaken.

The 2000 resolution also encouraged Member States to develop and implement systematic and sustainable preventive measures aimed at significantly reducing the occurrence of foodborne disease. The development and implementation of food recall systems is considered sustainable and preventive in reducing foodborne disease.

I wish you a fruitful seminar on this important topic and thank you all for the partnership approach displayed in this seminar.

Maraming salamat po.

MESSAGE

Ms Emiko Purdy

Agricultural Counselor

United States Department of Agriculture in the Philippines

Magandang umaga sa inyong lahat. Good morning everybody and welcome to Manila.

There have been recent and growing programs established to strengthen different national food safety systems among APEC member economies.

This seminar-workshop in Manila on the Development and Strengthening of the Food Recall System for APEC Member Economies is another step forward.

During the November 2008 APEC Ministerial Meeting in Lima, Peru, a joint statement was issued which expressed support for the APEC Food Safety Cooperation Forum (FSCF).

The statement likewise gave recognition to the efforts and commitment of APEC member to pursue more cooperation in relation to product safety.

And during the succeeding 6th APEC Economic Leaders' Meeting held also in Peru, we further "reaffirmed our commitment to improve food and product safety standards and practices to facilitate trade and ensure the health and safety of our populations."

As we all know, instituting the appropriate food recall process goes hand-in-hand with any food safety program.

Today's exercise will help us individually and as a group in developing recall protocols for a food industry that is widely perceived to be very diverse, unique and sometimes even exotic.

The sharing of experiences by the more advanced economies with established and effective recall systems will be useful in streamlining existing and established food recall processes.

This will save us time, effort and resources.

More importantly, it is a means to a more open trade regime that will promote and ensure food safety.

With your enthusiasm and active support, this seminar-workshop in Manila will help us get there.

Mabuhay kayong lahat!



SEMINAR-WORKSHOP DETAILS & MECHANICS



Description of the Workshop

- **APEC Food Safety Cooperation Forum (FSCF)** under APEC SCSC and APEC CTI
- This project also complements the works of Codex Alimentarius Commission particularly on implementation of Principles and Guidelines for the Exchange of Information in Food Safety Emergency Situations (CAC GL 19-1995) and Codex Code of Ethics for International Trade in Food (CAC RCP 20-1979, revised 1985).



Description of the Workshop

- **Project Objectives:**
 - (1) To explore the current situation on Food Recall Systems in place among APEC Member Economies;
 - (2) To develop and/or update recall standards among participating regulatory agencies and private enterprises in APEC Member economies;
 - (3) To assist participants from APEC Member economies in the development of recall procedures for food industry stakeholders (e.g. importers, distributors, retailers and manufacturers)



Seminar Workshop Components

- **Lectures**
- **Member Economy Experiences**
- **Workshop**



Deliverables

- Information detailing current recall practices, recall programs/regulation, experiences from the member APEC economies
- Workshop output – SWOT
- Recommendations for APEC (Project Design)



Summary of Schedule

Day 1 (Tuesday)




Morning Session

- Overview of Food Recall
- Food Recalls Australia

Afternoon Session

- United Nations Program on Food Recall – FAO & WHO
- Food Incident Management – the Australian Experience
- Outbreak to a Recall, A Case Study –
- Overview of Food Safety Inspection Service (FSIS/USDA) Recall Process

Day 2 (Wednesday)



Morning Session

- USFDA Food Recall Policies
- Meat and Poultry Recalls
- Case Studies:
 - Australia Experience on Food Recall
 - Member Economy Presentation: Brunei, Chile

Afternoon Session

- Member Economy Presentation: Chinese Taipei, Indonesia, Malaysia, Mexico, PNG, Peru, Philippines & Korea

Day 3 (Thursday)



Morning Session

- Member Economy Presentation: Russia, Thailand, Viet Nam
- Overview of Risk Communication in Australia during Food Emergencies
- Workshop

Afternoon Session

- Group Presentation
- Consultant Synthesis
- Evaluation
- Closing Program

Workshop

Workshop

APEC Member Economies will be grouped into two. Group A is composed of Brunei, Indonesia, Chile, Malaysia, Papua New Guinea, Republic of Korea, Mexico and the United States. Group B will be composed of Peru, Philippines, Chinese Taipei, Russia, Viet Nam, Thailand and Australia. Based on the lectures and experiences of each member economies, each group shall identify and enumerate *common* Strengths, Weaknesses Opportunities Threats (SWOT) among their recall protocols.

Workshop

Recommendations:


- What's next to be done after the seminar-workshop? What are the possible follow up APEC projects to sustain the initial seminar workshop?

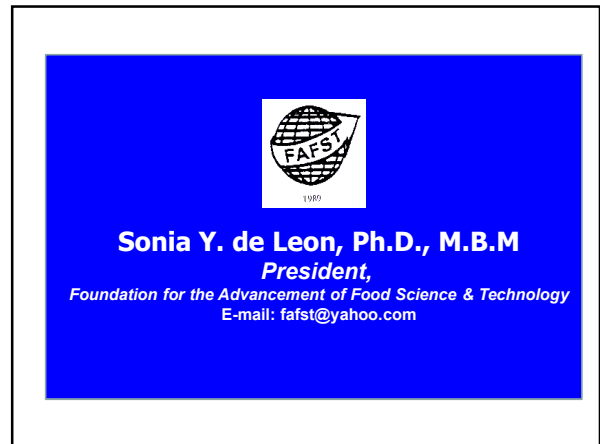
Resource Speakers

- Food and Agriculture Organization** – Ms Sashi Sareen
- World Health Organization** – Ms Jennifer Bishop
- Food Standards Australia New Zealand** – Dr Barbara Butow and Mr Elliot Hill
- US Department of Agriculture** – Dir. Elizabeth Volk
- University of Hawaii at Manoa** – Dr. Aurora Saulo

Reminders



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- Welcome Dinner
 - Meals
 - Correction participant list
 - Confirmation of flights
 - Information about the area
 - Any handouts that are unreadable
 - Other additional information about the place or other places that you would like to visit
 - Be sure to keep every receipts of any documents for your reimbursement as stated in your travel undertaking
 - Hotel-airport transfer
 - Other matters



I. Introduction

“Globalization has changed the system of food and trade”

- ✓ The amount and variety of food trade has increased tremendously
- ✓ Safeguarding safety has become difficult
- ✓ Rapid spread of foodborne diseases

Leon & Divina casabas

I. Introduction

1.1 Demand for regulated safe food and information

- Food poisoning is possible everywhere e.g. jack in the box hamburger (E.coli poisoning), milk plants poisoning in Japan

1.2 Prevention of Rapid Spread of food and waterborne diseases

- Dr Yasmine Motarjemi: food poisoning is like airplane crashes. “Swiss cheese” model

I. Introduction

1.3 Improve chances of facing national and transboundary food safety emergencies

- BSE or Madcow disease, FMD, dioxin, avian influenza, BADGE and bioterrorism

1.4 Need to develop capacity to network to address current and future food safety issues

* The world has to think of innovative ways of defending the food safety of its population

Food Recall

- There are widespread programs in strengthening different national food safety systems, but little has given importance to strengthening and development of effective food recall system
- Every year many food manufacturers, distributors, retailers and importers within the APEC region are faced with the prospect of conducting a recall.

Food Recall

- A food recall is an action by a manufacturer, importer, distributor or retailer to remove unsafe food products from the market to help protect the public.
- Recalling a product is a planned action. This will help you remove unsafe or violative products



Objectives of Food Recall

- Remove potentially dangerous product from the market
- Properly inform the public of the problem
- Stop distribution and sale of unsafe product
- Stop further spread of contaminated/unsafe product



What triggers a recall?

Possible Scenario

- Testing or inspection by a regulatory authority shows some problem
- Routine testing by the company
- Consumer complaint and/or illness
- Overseas authorities detect and report a problem with imported food



Why are products recalled?

- Food products can be recalled for many reasons, including the presence of :
 - pathogens (*listeria*, *salmonella*),
 - chemical contaminants,
 - undeclared allergens,
 - extraneous matter (glass, shell fragments),
 - non-permitted food ingredients.



Food Recall Classifications

- Depends on the country, food recall is classified into:
 - **"Class I"** is a situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious adverse health consequences or death
 - **Class II**" is a situation in which the use of, or exposure to, a violative product may cause temporary adverse health consequences or where the probability of serious adverse health consequences is remote.
 - **Class III"** is a situation in which the use of, or exposure to, a violative product is not likely to cause any adverse health consequences.

Before conducting the recall

Ask yourself these questions:

- If you needed to remove a product from the market right now, would you be able to do it?
- Would you be able to remove the product quickly?
- Would you be able to remove all the product?



FOOD STANDARDS
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Kaitiaki Take Kōwhiri
Te Kaitiaki Take Kōwhiri

Food Recalls in Australia

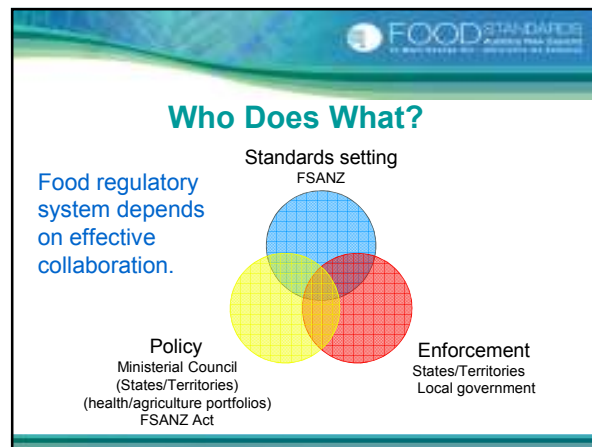
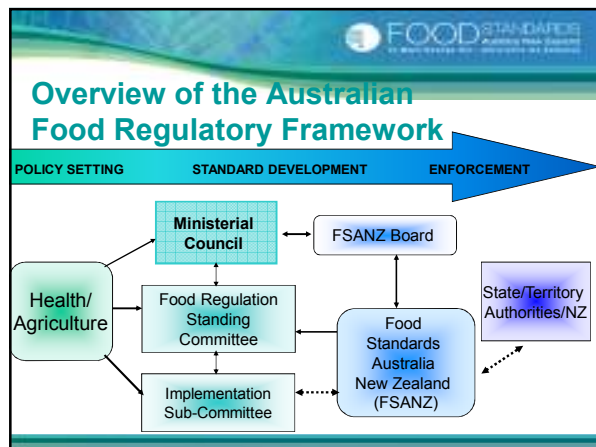
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APEC Recall Workshop, Manila
4th – 6th May, 2010

FOOD STANDARDS
Australia New Zealand
Kaitiaki Take Kōwhiri
Te Kaitiaki Take Kōwhiri

Australian System

- Federal system
- Comprises Commonwealth Government,
- 6 States, and
- 2 Territories
- > local Government Authorities

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Food Standards Australia New Zealand (FSANZ)

FSANZ is a bi-national, independent,
expertise-based statutory authority
that develops food standards

FOOD STANDARDS
Australia New Zealand
Kaitiaki Take Kōwhiri
Te Kaitiaki Take Kōwhiri

FSANZ Set Up



Australia New Zealand

Canberra Office Wellington Office

What does FSANZ do?

FSANZ develops food standards for the composition and labelling of foods sold in NZ and Australia.

In Australia, FSANZ also develops food standards for food safety and primary production.

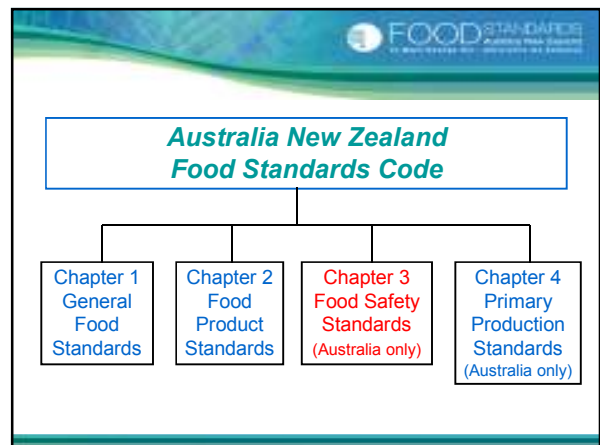
Standards are included in the **Food Standards Code**

FSANZ objectives when developing or reviewing food standards

- ✓ Protects public health and safety by maintaining a safe food supply.
- ✓ Provides consumers with information about food so they can make informed choices.
- ✓ Prevents misleading and deceptive conduct.

What does FSANZ do?

- FSANZ coordinates national food surveillance in Australia
- FSANZ coordinates **incidents** and **food recalls**
- FSANZ works closely with the Australian Quarantine and Inspection Service (AQIS) to ensure imported food is safe in Australia
- FSANZ works closely with other government food regulatory bodies to ensure consistency in standards setting



Standards Setting Process

- Evidence based
- Based on risk analysis model – risk assessment, risk management and risk communication
- Consultative
- Economic and Social Analysis
- International

Food Standards Enforcement

- Health authorities in the Australian States and Territories
- New Zealand Food Safety Authority
- Australian Quarantine and Inspection Service - imported foods

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

The Role of States and Territories

- State Territory Food Acts adopt the Code as a regulation or as a standard
- Food standards are enforceable under State and Territory Food Acts
- A breach of the Food Standards Code is an offence

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

Food Recalls...

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

Food Recalls

- May involve one, or a number of government agencies
- Can occur at any time
- Can range from fairly simple, localised problems to complex, multi-jurisdictional (national and international)
- Are managed under an agreed set of structures, processes and protocols

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

Outline

- Objectives of a recall
- Food recall implementation – key elements
- The food recall system in Australia

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

Definitions

- **Recall** - Action taken to remove from sale, distribution and consumption foods which may pose an unacceptable risk to public health and safety
- **Withdrawal** - Product withdrawn from sale for either:
 - Quality defect
 - Before an official recall, pending further investigation

FOOD STANDARDS
Public Health Standard
11. Food Safety and Inspection Act 2003

Objectives of a Food Recall

- Stop distribution and sale of affected product
- Inform the appropriate authorities and the public of the problem
- Effectively and efficiently remove potentially unsafe product from the marketplace



FOOD STANDARDS
Australia New Zealand
Food Standards Australia New Zealand

Legal Requirements

The Australia New Zealand Food Standards Code

A food business engaged in the wholesale supply, manufacture or importation of food must:

- Have in place a system to ensure the recall of unsafe food
- Set out this system in a written document and make this document available to an authorised officer upon request
- Comply with this system when recalling food

Standard 3.2.2 (clause 12) 19

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Food Standards Australia New Zealand

Level of recall

1. TRADE

- Food has not been available for direct purchase by the public
- Recovery of food from wholesalers, distribution centres, supermarkets/grocery stores, hospitals, restaurants

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Level of recall

2. CONSUMER

- More extensive than trade recall
- Recovery of food from the production and distribution network (trade/retail outlets, grocery and health stores, supermarkets, consumers)
- The public must be informed through the media

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Other terms...

Voluntary

- Occurs when the sponsor initiates the recall and voluntarily takes action to remove food from the market place
- **All of the affected food must be removed from the market place**

or

Mandatory

- Commonwealth, State or Territory Government **orders** a food to be recalled
- Only occurs when the sponsor will not voluntarily recall the product

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Key Elements of a Food Recall

- A Plan
- A Trigger
- Initiate
- Undertake
- Evaluate (report/review)

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Food Standards Australia New Zealand

Key Elements of a Food Recall

A PLAN
– needs to be fully documented

Example of information required:

- Contact phone number for the relevant food authority (Department of Health)
- Customer contact details
- Recall management
- Recall advice

FOOD STANDARDS Australia Peak Standard

What Triggers a Recall?

FOOD STANDARDS Australia Peak Standard

Possible Recall Situations

- Routine testing by a food company
- Testing or inspection by a regulatory authority shows problem
 - Incorrect labelling (e.g. undeclared allergens)
- Consumer complaint and/or illness
- Overseas authorities detect and report a problem with imported food

FOOD STANDARDS Australia Peak Standard

Common causes of food recalls

FOOD STANDARDS Australia Peak Standard

Common Causes of a Recall

<ul style="list-style-type: none"> • Microbiological • Foreign matter • Chemical • Biotoxin 	<ul style="list-style-type: none"> • Processing • Labelling • Tampering
---	--

FOOD STANDARDS Australia Peak Standard

Food Recall Statistics - 2009

Category	Percentage
Microbial	29%
Foreign Matter	29%
Labelling	18%
Other	8%
Undeclared Allergens	6%
Chemical	8%
Biotoxins	2%

29

FOOD STANDARDS Australia Peak Standard

Number of Recalls

Year	Domestic Foods	Imported Foods
2002	34	24
2003	57	29
2004	51	19
2005	42	18
2006	45	23
2007	49	5
2008	42	9
2009	40	20

FOOD STANDARDS Australia New Zealand

Key Elements of a Food Recall



INITIATE



FOOD STANDARDS Australia New Zealand

Key Elements of a Food Recall - Undertaking a Recall

- **Notify Relevant Parties – stop distribution**
 - discussions with recall coordinator/health authorities
 - inform distribution network and customers
 - media advertisement

FOOD STANDARDS Australia New Zealand

Undertaking a Recall

- **Retrieve and dispose of product**
decide on disposal with approval of government authority



FOOD STANDARDS Australia New Zealand

Key Elements of a Food Recall – Report/Evaluation

- Report on progress of recall
- Review company processes
 - plans, systems, training etc
 - implement preventive strategies
- Measures to prevent recurrence of problem

FOOD STANDARDS Australia New Zealand

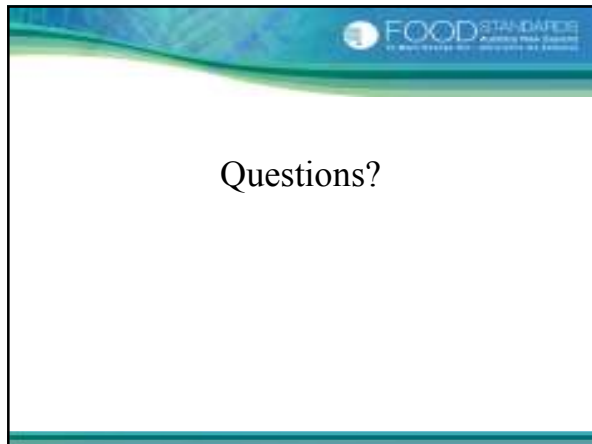
Food Recall Review

- Review in consultation with government and industry stakeholders
- Training of after hours recall officers has been revised and improved
- Updated versions of the Food Industry Recall Protocol and Government Authority Food Recall Protocols published in 2008

FOOD STANDARDS Australia New Zealand

Conclusion

- FSANZ's role is one of coordination and monitoring
- FSANZ assists in the recall process, but the decision whether or not to recall foods rests with the States and Territories
- Prompt and effective recall action ensures safety of the food supply and promotes consumer confidence in a company's products



UN Programmes on Food Recall

at
**WS on the Development & Strengthening of
 Food Recall System for APEC Member
 Economies**

(Manila, 4-6 May 2010)

Ms Shashi Sareen
 FAO Regional Office for Asia & the
 Pacific, Bangkok
 E-mail : shashi.sareen@fao.org

Product Recalls - Some Recent Eggs

E.Coli contaminated spinach recall...

Then it spread to lettuce

China Milk Recall

China Milk Recall - Some Details

Sanlu China
 Saturday, 2nd August 2008

BEIJING

- ↳ Suppliers are believed to have added melamine, a banned chemical normally used in plastics, to diluted milk to make it appear higher in protein.
- ↳ Melamine was first found in baby milk powder made by the Sanlu Group.
- ↳ In total, melamine has been found in products made by 22 companies.
- ↳ 13,000 babies in hospital
- ↳ 53,000 people affected and milk recalled around the world.

Product Recalls - Some more recent eggs

Europe - Belgium- Coca Cola Recall

- 5 months to recover the sales
- 249 cases of illnesses in Belgium
- Recall of 15 million cans and bottles
- Crisis cost \$200 million in expenses and lost profit

EU - Sudan 1 Crisis (Red chillies)

- Led to ~600 food product recalls in UK
- Sudan I & IV classified as carcinogens by Int Agency for Research on Cancer
- Dye detected in chilli powder used to make Worcester sauce
- Imported from India in 2002 & recall issued in 2005

Data of Published Worldwide Food Product Recalls (US)

Year	Recalls	Year	Recalls
1999	279	2004	293
2000	384	2005	255
2001	393	2006	240
2002	396	2007	338
2003	266	2008	565

Food Institute Report, 2009

Recalled Food Products (565 products)

Product Categories Affected by Recalls-2008

Category	Count	Percentage
Bakery	60	11%
Beverages	12	2%
Confectionary and Snacks	43	8%
Dairy/Non Dairy	31	5%
Fish and Seafood	34	6%
Fruits and Vegetables	117	21%
Ingredients and Spices	24	4%
Meat and Poultry	52	9%
Pet Food	109	19%
Prepared Foods	67	12%
Sauces and Seasonings	16	3%

As compared to 2007, recalls due to:

- Salmonella, ↑ by 800%
- E. Coli, ↓ by 22%
- Listeria, ↑ by 20%
- Undeclared ingredients ↑ by 16%

Food Institute Report, 2009

Recall

- Recall means action taken to remove a marketed food product that may pose a health & safety hazards/ risk to consumers, from distribution, sale and consumption
- Recalls are undertaken to : (Objectives)
 - Minimize risk of injury to consumers (food safety)
 - Ensure compliance with legal requirements
 - Other quality related issues such as labelling, BB date
 - Protect company assets including brand reputation

Causes of Recall

- **Health & safety** concerns – which include
 - Residues & contaminants – pesticides, vet drugs, heavy metals, toxins, cleaning chemicals, food additives adulterants
 - Pathogens & spoilage micro-organisms
 - Zoonotic diseases
 - GMO issues
 - Irradiation issues
 - Physical contaminants – glass/ metallic pieces, grit, vermin fecal matter /body parts
 - Persistent organic pollutants – eg dioxins
 - Food allergens
 - Labelling & claims – incorrect, past BB date



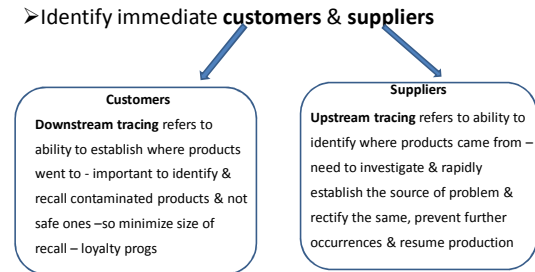
Pre-requisites to Operate a Recall

- Targeted and accurate information concerning the implicated product
 - Linking to the **origin** for a root cause & thereby decision on batches to be recalled
 - Product **location** or the customer (s)



Traceability - Important Concepts

- ☐ Traceability refers to “one step forward” & “one step backwards” approach to
 - Identify immediate **customers & suppliers**



Codex/FAO Work in area of Food Recall

Codex/FAO Work in area of Food Recall

- Recommended international Code of Practice – General principles of food hygiene
- Principles & guidelines for exchange of information in food safety emergency situations
- Principles for traceability/ product tracing as a tool within a food inspection & certification system
- Assuring food safety & quality: GL for strengthening national food control systems. FAO Food & Nutr Paper 76
- FAO Technical Guidelines for responsible fisheries - Aquaculture Devt – 1. Good Aquaculture feed m/f practices
- FAO/WHO Framework for Developing national food safety emergency response plans (recent document)
- Food Recall Guidelines –under preparation

1. Recommended International Code of Practice - General Principles of Food Hygiene

- Fourth revision (2003)
- **“5.8 Recall Procedures requires food businesses to have effective procedures in place to deal with any food safety hazards and to enable the complete, rapid recall of any implicated lot of the finished food from the market. “**
Where product withdrawn because of an immediate health hazard, **other products produced under similar conditions to be evaluated** & may need to be withdrawn
Recalled products to be **held under supervision till disposed off**, used for purposes other than human consumption, determined to be safe or reprocessed into a safe product

2. Principles & GL for Exchange of Information in Food Safety Emergency Situations

- CAC/GL 19-1995; rev 1 2004
- Purpose is to enable countries to assess & decide on their risk management/ communication strategies (recall would be part of strategy)
- Annex gives standard format for information exchange covers information on actions taken such as to recall food from markets (mandatory & voluntary)

3. Principles for Traceability/Product Tracing as a Tool within Food Inspection & Certification Systems

- CAC/GL 60-2006)
- **Definition** - Traceability/product tracing: the ability to follow the movement of a food through specified stage(s) of production, processing and distribution
- Traceability does not make a food safe but is a **risk mgmt tool** for use to **assist in containing a food safety problem**
- Traceability is meant to ensure that
 - ✓ **targeted & accurate** withdrawals or recalls are undertaken
 - ✓ appropriate **information** given to consumers & Food Business Operator,
 - ✓ **risk assessment** carried out by control authorities &
 - ✓ unnecessary **wider disruption of trade** avoided

4. Assuring Food Safety & Quality: GL for Strengthening National Food Control Systems

- FAO Food & Nutrition Paper 76
- Elements of a food control system under food laws & regulations requires ‘provision of tracing of food products and for recall in case of problems’
- ‘Principles of food control’ gives recall of products as an eg under establishing emergency procedures for dealing with particular hazards

5. FAO Technical Guidelines for Responsible Fisheries

- Aquaculture Development – 1. Good Aquaculture feed manufacturing practices – cl 14 deals with recalling defective or mislabelled products
 - Based on feed quality or labelling errors
 - Recall to be handled quickly, properly & be well documented
 - Detailed procedure at Annex 1

6. FAO/WHO Framework for Developing National Food Safety Emergency Response Plans

- Very recent (26/04/2010)
- Key elements - reinforcing preparedness & responding rapidly to emergencies
- Covers - incident identification, incident mgmt, post incident review & evaluation, communication
- **Under incident management** requires procedures for traceability, withdrawal & recall amongst others
- **Under communication strategy** covers recall/withdrawal notices

7. Food Recall Guidelines

- A guidance manual for introducing effective food recall systems into national food control programs (under preparation)

Some Important Points in a Food Recall - 1

- Legal basis – legislation applicable across food chain, authority & responsibility, disposals, communication, etc; covers recall by authorities/ business
- Implemented by govt, industry, jointly
- Recall by food business otherwise withdrawal
- Food business recall plan to be part of food safety control system (linkage with HACCP-based systems)
- Involvement of consumers in a recall – communication, public notice
- International involvement in a food recall – imports/ exports, INFOSAN networks
- Planning in advance – Risk basis, mock withdrawals/ recalls – to ensure system is effective

Some Important Points in a Food Recall 2

- **Plan** of recall - also relevant in an emergency, shared with all involved
- **Information** from various sources – food industry, consumer, labs, surveillance programmes, hospitals - INFOSAN
- **Level** of recall depends on distribution in food chain
- **Disposal** of products
- **Rectification** of problem or Corrective action
- **Communication** systems - (authorities/food businesses); website, mob phones, toll free phones
- Lot **identification & traceability** – only effected lots, reduced impact of lots
- **Data** system & flow of data

Procedure for a Product Recall (Feed)

- Potential product recalls to be quickly **reported & investigated** by a **responsible decision-maker** who has **authority** to assign the recall classification to the situation.
- When warranted, a Recall Committee to be appointed & quickly convened when a Class I, II, or III situation exists.
 - Class I Recall - A serious emergency recall situation involving product which may have an immediate or long range effect on the life or health of aquatic animals or human consumers.
 - Class II Recall - A priority situation involving product which may be a potential hazard to human or animal life or health.
 - Class III Recall - A situation involving product which does not pose a health threat, but which may have serious or wide-spread customer or public relations implications.

Procedure - 2

- When potential for a recall is evident, the production & QC manager to be informed immediately
- The QA manager to immediately investigate & determine if situation is a Class I, II, or III recall or is of lesser priority.
- If it is a Class I, II, or III recall, QC manager to immediately convene Recall C
- Chair then co-ordinates all recall activities, keeps C informed
- A lesser priority situation may be handled at plant level without committee being convened.
- The Recall C to include persons with expertise in: Regulatory, Production, Sales, QC, PR, Legal, Purchasing, Nutrition
- The Recall C to decide quickest & best overall procedure for handling recall

Procedure - 3

- As each situation is unique, following guidelines are useful:
 - Determine suspect product's identifi codes & dates of m/f
 - Determine entire product location
 - Immediately notify all locations. Mandate a "stop sale."
 - If product sold to consumers, procure customer details from distributors
 - Get Recall Committee input on handling all contacts outside company, eg consumers, agents, dealers, media
 - Decide if media to be notified. PR dept to handle.
 - Decide if govt agencies to be notified (may make matters worse if officials feel concealment attempted)

Procedure - 4

- Assign responsibility (production manager) for records of production, shipments & disposals. Also a record of recall actions with date & time (for legal protection).
- All samples secured to be properly identified & safeguarded;
- Refrigerate to prevent degradation . If analysis required, do expeditiously (retaining duplicates).
- Communication critical. Keep the Recall C, plant manager, any customers, & news media (if necessary) informed, so that no inaccurate information
- A 24-hour hotline ph no for any queries from consumers.
- Yearly review of recall policy & procedures

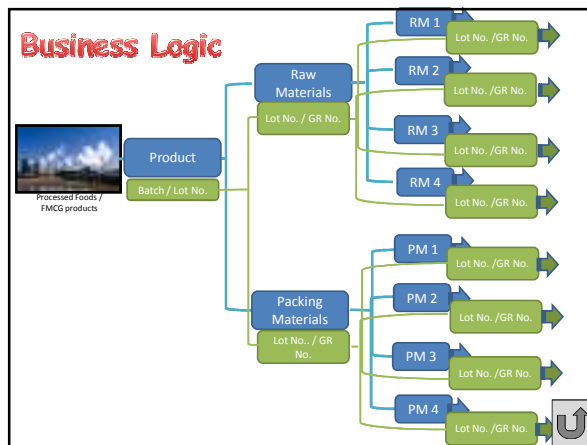
For Further Details Please Contact

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Fax +66 (2) 6974445
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Any Questions?



The World Health Organization's Food Recall Activities

Jenny Bishop
for the WHO Western Pacific Regional Office programme on Food Safety



World Health Organization

National and Global Activities associated with Food Recalls




Western Pacific Regional Office of the  World Health Organization


National Level Activities


In the absence of a food recall system – a case study

2007 Cacucaco, Angola

- 467 cases of bromide intoxication
- Drowsiness, blurred vision, walking difficulties and difficulties in muscular control



Western Pacific Regional Office of the  World Health Organization





In the absence of a food recall system – a case study

- Sodium bromide sold as salt was identified as the cause

No recall system in place =

- Delay in action
- Massive resource input
- Additional cases



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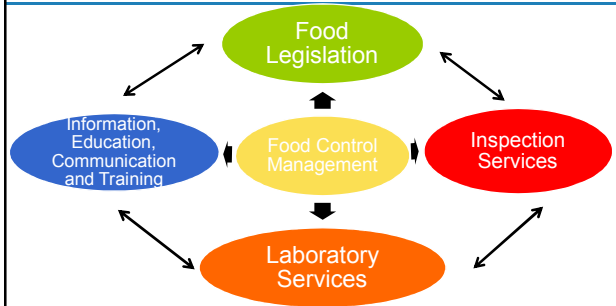
WHO assistance at a National Level for Food Recalls

- Working with WHO air...
- WHO wo...
- Activities
 - In-cou...
 - Techn...
 - Region...
 - Guide...
 - Assist...



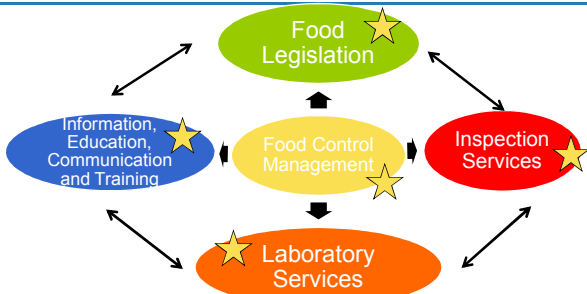
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FAO/WHO Key Components of National Food Control Systems



Western Pacific Regional Office of the World Health Organization

FAO/WHO Key Components of National Food Control Systems – associated with food recalls



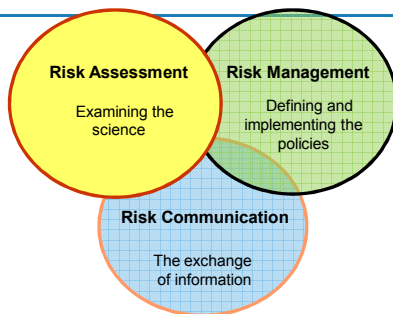
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Food Recall Key Principles - Prevention



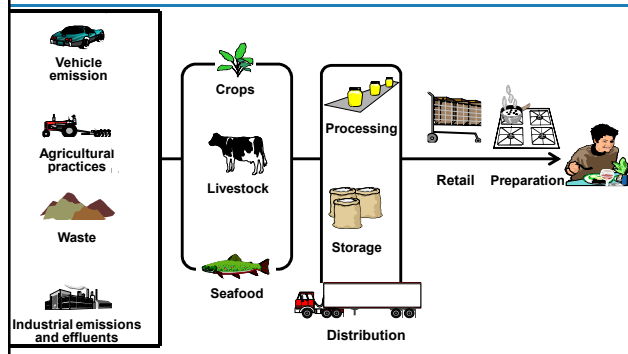
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Food Recall Key Principles – Risk Analysis



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Food Recall Key Principles – Farm to Fork



Food Recall Key Principles – System needs to reflect local situation



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Food Recall Key Principles– Meet International Obligations



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WPRO Food Recall Guidelines

- Developed in 2007 and has been subject to international peer review.
- Not yet published, but available for use by National Governments.
- Outlines key components of a recall system.
- All input is welcome!

Western Pacific Regional Office of the  World Health Organization

WPRO Food Recall Guidelines

- Legal basis
- Risk assessment
- Role and responsibilities
 - Food business
 - National authority
 - Consumer
 - International obligations

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WPRO Food Recall Guidelines

- Planning, implementing and reviewing a food recall
 - Planning a recall
 - Implementing a food recall
 - Reviewing a food recall
 - Inspector skills
- Guidance questions to be considered when drafting or reviewing food legislation
- Food business recall plan
- Recall plan for National Authorities
- Checklist for public notices

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Food recall systems in WPRO countries and areas



The International Organization for Standardization (ISO) is a global organization that develops and publishes international standards. The World Health Organization (WHO) is a specialized agency of the United Nations that is concerned with international health. © 2007 Regional Office for the Western Pacific, WHO. All rights reserved.

Case Study: Fiji

- Fiji is a small island developing state in the Pacific
- Population of 850,000
- WHO supported Food Recall Protocol developed in 2002:



- The roles and responsibilities of involved stakeholders
- Who should be notified of the recall
- Notification procedures
- Post recall reporting

Challenges in developing recall systems

- Risk assessment in urgent situations
- Action proportionate to risk
- Defining the scope of a recall
- Action in time critical situations
- Development of communication mechanisms
- Management of 'informally traded foods'

Global Action – INFOSAN

International Food Safety Authorities Network

International foodborne disease outbreaks: Rapid spread worldwide by movement of food



Globalisation of Food Trade

Chicken Kiev



- Herb Butter:**
 - Salted butter - Ireland
 - Garlic puree - China, USA, Spain
 - Garlic salt - China, USA, Spain
 - Lemon - USA
 - Parsley - France, UK
 - Pepper - Indonesia
 - Water - Ireland
- Chicken Breast:** Chicken - Ireland, Belgium, UK, France etc.
- Batter:** Flour - Belgium, France
- Water - Ireland
- Bread Crumb:** Bread crumb - Ireland, UK
- Rape-seed oil - EU, Australia
- Eastern Europe

Courtesy A. Reilly, FSAI, Ireland

What is INFOSAN?



A global network of national food safety authorities that...

- Promotes the rapid exchange of information during food safety related events
- Shares information on important food safety related issues of global interest
- Promotes partnership and collaboration between countries, and between networks
- Responds to requests for assistance during international food safety events
- Helps countries strengthen their capacity to manage food safety risks

As of today, there are 177 country members of INFOSAN



Mandate for INFOSAN

World Health Assembly (WHA) Resolutions

Codex Guidelines

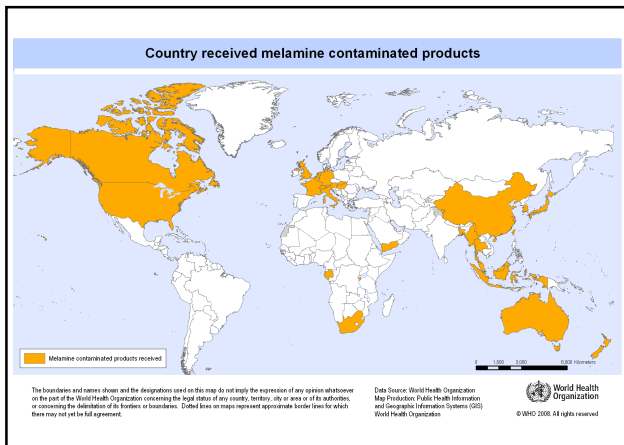
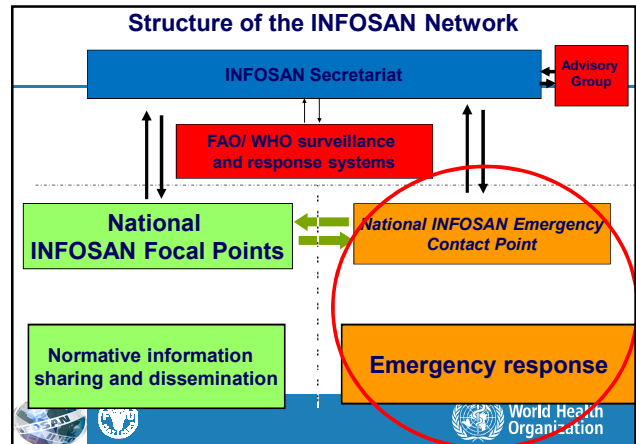
Principles and Guidelines for the Exchange of Information in Food Control Emergency Situations (CAC/GL19-1995 Rev.1-2004)



International Food Safety Conferences


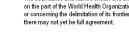
Reinforced by the Beijing Declaration on Food Safety (2007)

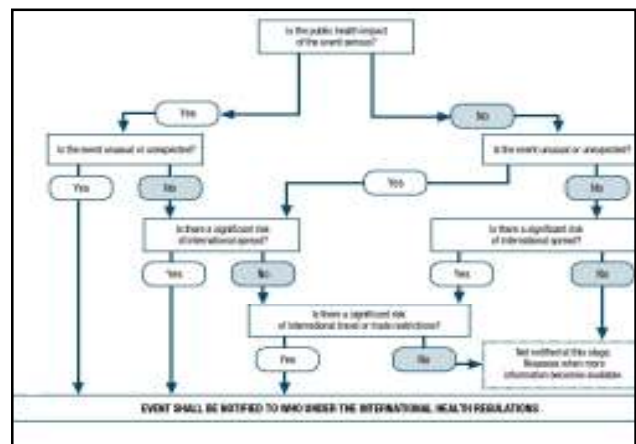
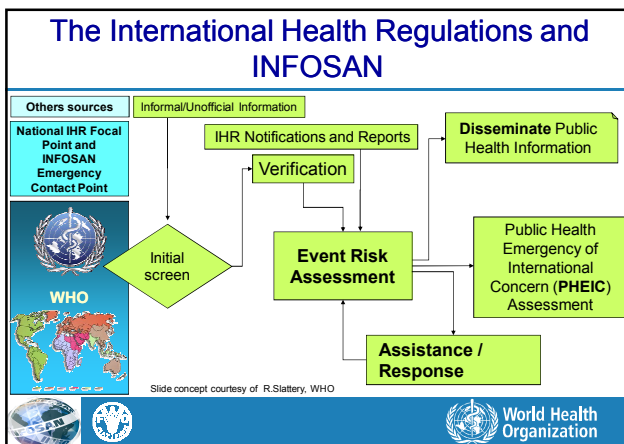




International Health Regulations (IHR)

- Old IHR (1969) only covered Yellow Fever, Cholera and Plague
- New IHR (2005) include all public health emergencies of international concern - including those caused by food
- IHR (2005) entered into force on 15 June 2007
- All WHO Member States are obliged to declare all public health emergencies of international concern to WHO





Examples of INFOSAN Emergency Alerts

- August 2009 - *Listeria monocytogenes* associated with chicken wraps served on an aeroplane
- December 2009 – Excessive levels of iodine in an internationally distributed seaweed product causing illness
- January 2010 - Multi-state outbreak of *Salmonella* Montevideo infections in the United States of America linked to internationally distributed salami
- November 2009 – March 2010 Possible link between Hepatitis A and semi-dried tomatoes



INFOSAN Emergency and National Food Recall Systems

- Relevant national food recalls should notified to WHO via the INFOSAN Emergency Contact Point or the National IHR Focal Point
- Food recalls maybe triggered by INFOSAN Alerts
- Reflect this in the recall procedures
- Please let me know if you would like the contact details of the INFOSAN Emergency Contact Point for your country



INFOSAN – The International Food Safety Authorities Network



"Only if we act together can we respond effectively to international food safety problems and ensure safer food for everyone"

Dr Margaret Chan – Director-General





Food Safety Incident Management

Dr Barbara Butow

APEC Recall Workshop, Manila
4th – 6th May 2010

Food Safety Incidents

- Usually involve a number of government agencies
- Can occur at any time
- Can range from fairly simple, localised problems to complex, multi-jurisdictional (national and international)
- Are managed under an agreed set of structures, processes and protocols

Outline

- What is a food safety incident?
- What is incident management?
- Why develop a system?
- Features of an incident management system



Food safety incidents

- No single definition
- Common characteristics
 - Risk (actual or potential) to human health
 - Involves a physical, chemical or microbiological hazard
 - Can occur at any stage of the food supply chain
 - Requires some form of action
- Incidents will happen!

Food Safety Incidents – what we know

- Public health and safety risks
- Consumer concerns...
- Usually do not have all of the information at the start
- Scientific uncertainties
- Involve more than one agency/organisation
- Inconsistent responses
- Impact at a number of government levels
- Disruption to domestic and international trade
- May last for weeks, or months!

'Pre-washed' salads in bags aren't as clean as you may think



Food Safety Incidents – what we know

- Public health and safety risks
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Impact



Consumers responded to the Food and Drug Administration's September 2006 warnings to avoid eating spinach because of possible contamination with *E. coli* O157:H7.

Food Safety Incidents – what we know

- Public health and safety risks
- Consumer concerns
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- Involve more than one agency/organisation
- Inconsistent responses
- Impact at a number of government levels
- Disruption to domestic and international trade
- May last for weeks, or months!

Is this a food incident?

- Non-compliance with food standards.
- Perception of a risk to public health and safety.
- Specific level of risk to public health and safety.
- 'Routine' food recalls (e.g. voluntary recalls initiated by industry)
- Differences in enforcement activities across different jurisdictions.
- An incident in only one or two jurisdictions
- Terrorism and food tampering.

Challenges for Responding to incidents

- New and emerging hazards
- Uncertainties in science
- Perceptions
- Legal liabilities
- Political sensitivity

Response should be ...

- Scientifically based
- Effective
- Consistent
- Legally sound
- Balanced – public health, social impacts, cost-benefit
- Well communicated

What is incident management?

- Measures to manage the risk to consumers from unsafe/unsuitable food
- A management framework that is:
 - Comprehensive and can address all hazards
 - Integrated at all levels of government and with industry
 - Contains prevention, preparation, response and recovery elements

Why develop a system?

- Frequency and complexity of incidents have increased worldwide
- Impacts to governments, industry and consumers can be significant
- Several agencies may need to respond
- Need for a consistent and timely response

What is required in a system?

- Robust
- integration of activities and resources of multiple agencies
- Operate effectively for any type of incident (imminent or actual)
- System and supporting principles can be applied broadly to food safety management


Response Protocols

- Operation, coordination and communication between agencies/jurisdictions
- Builds on existing individual organisation protocols
- Emergency management principles
- Roles and responsibilities
- Response and review phase and activities

Summary

- System need to be in place
- Networks need to be in place
- System need to be integrated
- Common command and control and coordination system
- System and roles need to be known and exercised
- Protocols need to be reviewed





An Overview of Australia's National Food Incident Response Protocol

Why have a Protocol?

- Ensure response and communication is timely, consistent, appropriate, coordinated
- Formalise current arrangements and link Commonwealth and State/Territory protocols
- Manage incidents for widely distributed foods

Scope

- A guidance document for coordinating the response of food regulatory agencies during a food incident

"Any situation within the food supply chain where there is a risk, potential risk or perceived risk of illness or confirmed illness associated with the consumption of a food or foods."

"A food incident that could, or is expected to, impact on multiple government jurisdictions."

Structure of the Protocol

- Single coordination point
- Roles and responsibilities defined
- Consultative mechanisms involving government and industry
- Response actions designed to minimise disruption to industry/consumers while protecting public health and safety
- Graduated responses depending on the incident
- Integration of food incident and public health incident response processes


Roles and Responsibilities

- Notifying Agency
- Central Notification Point
- Food Incident Contact Officer
- Lead Agency
- National Food Incident Coordinator
- Agency Food Incident Controller
- Participating Agencies
- Risk assessor
- Communications controller

How Does the Protocol Work?

Three phases:

- ALERT
- ACTION
- STAND DOWN



Alert Phase

- Awareness of incident from variety of sources
- Notifying agency notifies the Central Notification Point (CNP) – early notification encouraged
- CNP circulates a Food Incident Notification, including to National Incident Room (International Health Regulation obligations)
- May be only response for many incidents

Action Phase

- If more than initial info circular is required, then response moves to Action Phase.
- Actions may be restricted to the Notifying Agency or affected jurisdiction for minor incidents
- For other incidents – agencies notified of expected activities (e.g. a teleconference)
- Allocation of roles and responsibilities
- National Food Incident Coordinator
- Agency Food Incident Controllers nominated
- Lead Agency nominated

Action Phase Response Activities

- Incident Objective established
- Risk analysed and evaluated
- Consultation with industry – early as practical
- Response action to meet Incident Objective determined (e.g. recall, communication, survey)
- Best endeavours to reach an agreed response action
- Situation Reports circulated
- Implement agreed actions
- Communication activities – developed by National Food Incident Controller
- Escalation/De-escalation – participating agencies decide depending on the changing complexity of the issue

Stand-down phase

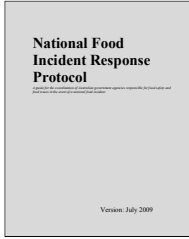
- Participating Agencies agree that a nationally coordinated response no longer required and incident deemed to be over
- Participating Agencies should do de-brief or conduct after action review
- Outcomes considered by Incident Response Working Group, who may make recommendations to ISC on changes to the Protocol

Protocol Annexes

- Intentional interference
- Chemical contaminants
- Environmental investigation/traceback

Incidents

- 2007 – 01: *Clostridium botulinum* type A, nachos
- 2007 – 02: plastic contamination, chocolate bars
- 2007 – 03: wheat gluten
- 2007 – 04: apple juice contamination
- 2007 – 05: *Listeria monocytogenes*, meat products
- 2008 – 01: cyanogenic glycosides, vegetable crackers
- 2008 – 02: metal contamination, meat and frozen products
- 2008 – 03: Melamine contaminated baby formula from China
- 2008 – 04: Dioxin contaminated pork from Ireland
- 2009 – 01: Hepatitis A in semi-dried tomatoes
- 2010 – 01: Bonsoy milk suspected link to thyroid dysfunction



National Food Incident Response Protocol

Version: July 2009

A copy of the Protocol can be accessed at:
[http://www.health.gov.au/internet/main/publishing.nsf/Content/CDA339ACBEE60CF8CA25709600193198/\\$File/National%20Food%20Incident%20Response%20Protocol%20-%20July%202009.pdf](http://www.health.gov.au/internet/main/publishing.nsf/Content/CDA339ACBEE60CF8CA25709600193198/$File/National%20Food%20Incident%20Response%20Protocol%20-%20July%202009.pdf)

Questions?

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Meat and Poultry Recalls

Lisa Volk
Director, Recall Management
USDA FSIS
May 2010



Recall

A firm's removal of distributed meat or poultry products from commerce when there is reason to believe they are adulterated or misbranded under the Federal Meat Inspection Act (FMIA) or the Poultry Products Inspection Act (PPIA). Recall does not include a market withdrawal or a stock recovery.



Market Withdrawal

- A firm's removal or correction by its own initiative of a distributed product that involves a minor regulatory infraction that would not cause the product to be adulterated or misbranded.
- No violation of FMIA or PPIA
- No Health Hazard



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.
- Example: Product is located at company warehouse and no portion of the lot has been released for sale or use.



Why Recall?

A Recall is a fast and effective method of removing distributed products, particularly when many lots of product have been widely distributed. A recall may be an alternative to FSIS detention or seizure.



Who Recalls?

- Manufacturers and distributors of product
- FSIS does not have mandatory recall authority.
- However, FSIS may initiate the recall process by informing a firm that adulterated product has been identified in commerce .



Recall Process

- **Problem Identification:**
 - The company discovers the problem
 - FSIS microbiological sampling
 - Information from in-plant inspection program personnel (IPP)
 - Epidemiological or other data gathered by other Federal, State, or local Agencies
 - Consumer complaints

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Recall Process

- Preliminary Investigation
 - FSIS program personnel begin the preliminary inquiry by gathering product and contact information, and any additional relevant information.
 - For domestic production, FSIS contacts the plant and works with the firm to complete recall worksheets. The District Recall Officer (DRO) directs these activities and forwards the information to RMS.
 - If imported product is involved, Office of International Affairs (OIA) assigns an Import Recall Coordinator (IRC) to direct these activities.

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Preliminary Investigation

- Contact Information for Official Est.
 - Est. number, name, and address
 - Company Recall Coordinator, Media Contact, and Consumer Contact (name, title and phone number)
- Contact Information for Imported Products
 - Import and Foreign Est. identification and contact information
 - Importer of Record (IOR), IOR Recall Coordinator, IOR Media Contact, IOR Consumer Contact (name, title, and telephone number)

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Preliminary Investigation

- Product Information (for all products)
 - Reason for recall
 - Brand and Product names
 - Packing type/size, dates, codes (Use by/Sell by), Case Codes, Count/Case
 - Production dates, Distribution areas
 - Whether or not the products were part of School Lunch, DoD, or internet/catalog sales

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Preliminary Investigation

- Additional Information (all products)
 - Amount produced/imported (pounds/cases)
 - Amount held at Est./Import Est.
 - Amount distributed (pounds/cases)
 - Distribution level (Depth of Recall, if known)

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FSIS May Also

- Collect and verify information about suspect product
- Document chronology of events
- Contact manufacturer/distributor for additional information
- Interview consumers who allegedly became ill or injured from suspect product
- Collect/analyze product samples
- Contact other Federal, State, or local Agencies
- Analyze any available epidemiological data

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FSIS Recall Committee

- Consist of representatives from various FSIS offices and staffs assembled to respond to potential or real health hazard incidents reported to Recall Management Staff (RMS)
- Recall worksheets and any other information is gathered by RMS, who forwards the relevant materials to the Recall Committee
- RMS makes every effort to ensure the five primary members of the committee are available

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FSIS Recall Committee

- Chaired by Recall Management Staff
- Includes personnel from:
 - DRO and other district staff as appropriate
 - Microbiology/Toxicology/Public Health
 - Policy Office
 - Media Relations/Communications
 - Other (OIA, OPEER, ODIFP)
 - Other Federal or States agencies as appropriate (FDA, CDC, FNS)

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FSIS Recall Committee

- Evaluates Hazard, Circumstances, and Statutory basis for recall
- Reviews FSIS and Plant Data
- Reviews Recall Worksheet
- Classifies Hazard
- Evaluates Scope (product lots involved)
- Recommends Recall
- Evaluates Firm's Recall Strategy

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Recall Classification (Health Risk)

- **Class I:** Reasonable probability that consumption of product will cause serious, adverse health consequences or death
- **Examples:**
 - Pathogen in ready-to-eat product
 - *E. coli* O157:H7 in raw ground beef

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Recall Classification (Health Risk)

- **Class II:** Remote probability of adverse health consequences from use of the product
- **Examples:**
 - Very small amounts of allergens typically associated with milder reactions, such as wheat or soy products
 - Extraneous, non-sharp edged, material such as pieces of plastic

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Recall Classification (Health Risk)

- **Class III:** Use of product will not cause adverse health consequences
- **Example:** Undeclared, non-allergenic, Generally Regarded As Safe (G.R.A.S.) ingredient such as excess added water

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Public Health Alerts

Product presents a public health risk

- Specific class of product implicated, rather than a specific product brand
- Human illness associated with a common, but unidentified source
- Product is long out of date

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Recall Process

- The plant recall coordinator is contacted by the recall committee and advised of the recommendations
- Questions from both FSIS and the plant are discussed
- Although not required, FSIS expects the firm to provide the Committee its recall strategy, including how it intends to notify and instruct its consignees to retrieve or dispose of recalled product

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Firm's Recall Action

- Promptly Notify Each Consignee about Recall
 - Telephone followed by Fax, Letter, and/or Email
- Identify Exact Product, Lot(s), Codes, Sizes
- Explain Reason for Recall and Hazard Involved
- Explain how recalled product is to be handled/disposed

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Public Notification

- **Recall Release** – for Class I & II recalls, post to FSIS Web site and distribute to wire and media services in area of product distribution
- **Publish Recall Notification Report (RNR)** on Web site – Class III recalls or Class I & II distributed only to the wholesale level (not likely to be sold directly to consumers)
- Subscribers receive email notification of all recalls
- If MOU with a state - share distribution records
- **Publish Retail List** – for Class I Recalls only

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Recall Verification Activities

FSIS personnel conduct **Effectiveness Checks** to verify the recalling firm has been diligent and successful in contacting and advising the consignees of the need to retrieve and control the recall product, and that consignees have responded accordingly.

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Recall Verification Activities

- Effectiveness checks are conducted throughout the distribution chain
- Risk Based and dependent on the class of the recall, the number of consignees, and other relevant factors

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DRO/IRC Responsibilities

- Primary contact for recalling firm
- Request product distribution information (names, addresses, and phone numbers of consignees)
- Coordinate Effectiveness Checks
- Request assistance from other DDMs, Regional Import Field Supervisors, Office of Program Evaluation, Enforcement and Review (OPEER) Regional Managers to conduct effectiveness checks and gather any additional distribution information from consignees
- Develops sampling plan based on distribution

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Field Recall Responsibilities

- DRO (DDM) coordinates and directs Enforcement Investigations and Analysis Officers (EIAOs) to conduct effectiveness checks
- IRC coordinates and directs Import Surveillance Liaison Officers (ISLOs) or Compliance and Investigation Division (CID) Investigators to conduct checks if recalling firm is an importer

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EIAO/CID/ISLO Responsibilities

- Randomly conduct effectiveness checks
- Verify consignees are handling product in accordance with regulatory requirements and instructions of recalling firm
- Take action, if necessary, to detain product
- Submit findings to DRO/IRC
 - Identify process or product failures/trends?
 - Determine whether distributor or consignee failed to appropriately address recalled product
 - Issue Prohibited Activity Notice as appropriate
 - Consider other enforcement actions, if necessary

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Verification Process


Determine the risk

Determine the hazard (class of recall) and exposure

Recall classification	FSIS verification activities begin as soon as possible within a period of:	FSIS verification activities should be substantially completed within:
Class I	3 Days	10 Days
Class II	5 Days	12 Days
Class III	10 Days	17 Days

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Verification Process


Number of Effectiveness Checks

Class I recalls with illness, outbreak, or school lunch implications

Number of Consignees	Number of Effectiveness Checks to Make	Deviations for Recall to be Considered Ineffective
1 to 200	100%	0
201 to 10,000	200	0
10,001 – 500,000	800	1
Over 500,001	1250	2

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Verification Process

Class I recalls without illness, outbreak, or school lunch implications.

Number of Consignees	Number of Effectiveness Checks to Make	Deviations for Recall to be Considered Ineffective
1 to 20	100%	0
21 to 150	20	0
151 to 1,200	80	1
1,201 to 2,300	125	2
2,301 to 10,000	200	3

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Verification Process

Class II recalls

Number of Consignees	Number of Effectiveness Checks to Make	Deviations for Recall to be Considered Ineffective
1 to 5	100%	0
6 to 25	5	0
26 to 150	20	1
151 to 280	32	2
281 to 500	50	3

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Verification Process

Class III recalls

Number of Consignees	Number of Effectiveness Checks to Make	Deviations for Recall to be Considered Ineffective
1 to 8	100%	1
9 to 50	8	1
51 to 90	13	2
91 to 150	20	3
151 to 280	32	5

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Findings of Product in Commerce

1. Findings of product in commerce are those occurrences where recalled product remains available to the consumer
2. DDMs should immediately inform DRO when recalled products are encountered in commerce, so that the recalling firm can be informed
3. DRO determines if the findings follow a pattern or trend.

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Effectiveness Determinations

The objectives of verification activities are to evaluate:

1. The overall effectiveness of the recall
2. The recalling firm's process

If the recall is **ineffective**, FSIS will take further appropriate action to mitigate the risk to the public, including detention, seizure, or other action within the rules of practice.

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Verification Follow-up

- The objective of verification follow-up is to determine that product has undergone proper disposition in accordance with regulations.
- Is conducted on a subset of consignees. The same tables used to determine the number of recall effectiveness checks are also used to determine the number of verification follow-ups.
- Disposition includes return to recalling firm, destruction, lethality treatment, relabeling. Verification is on-site by FSIS personnel, independent verification, or may be a records review.

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Verification Result Summaries

The DRO summarizes recall activities and provides Final Recall Effectiveness Report to RMS which includes:

- A summary of findings of the recall effectiveness and product disposition verification checks, and
- Any supporting documentation voluntarily provided by the firm, including information about the amount of recalled product recovered.

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Verification Result Summaries (Continued)

- State the total number of effectiveness checks and disposition verification checks performed and the numbers conducted both on-site and by telephone
- Assign an overall effectiveness rating to the recalling firm's recall activities (effective or ineffective)
- Determine how many consignees may still have product on sale
- Identify other deficiencies in the firm's recall process (if applicable)
- Summarize actions taken by FSIS in the case
- Description of corrective actions for each deficiency found

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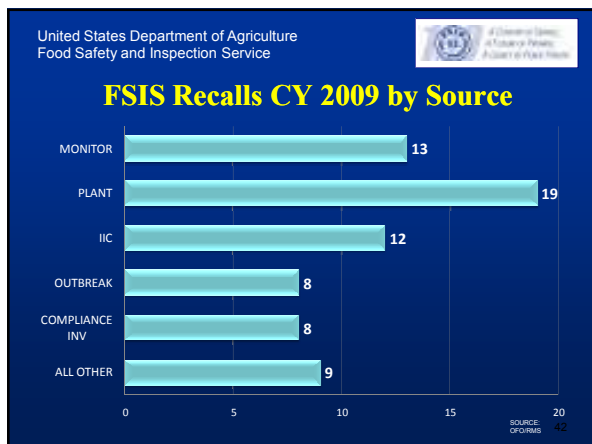
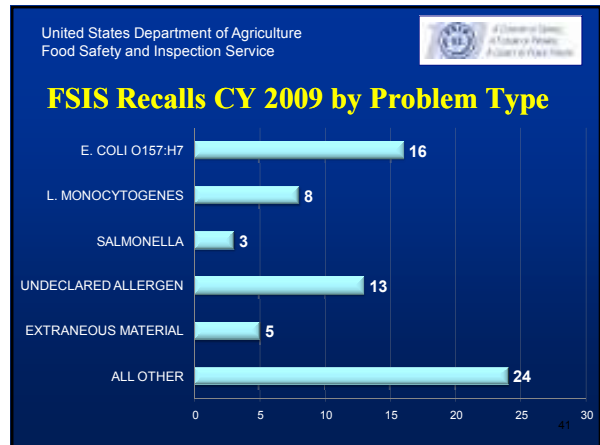
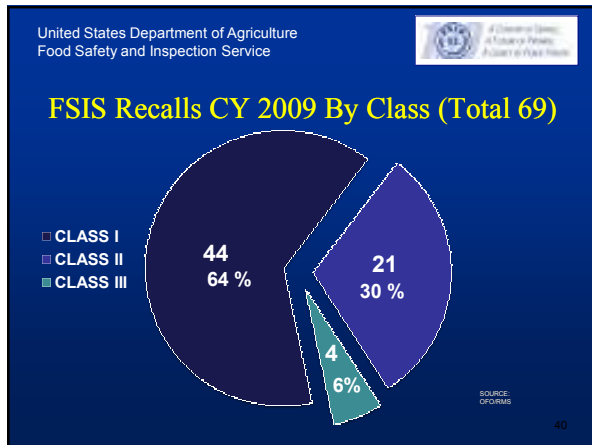
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Recall Termination

- When the establishment completes the recall, it notifies the DRO of amount recovered and disposition of product
- FSIS verification: recall effectiveness checks
- Recommend close-out following reasonable efforts to recover product

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Questions ?

- For more information on FSIS recalls, visit our website (www.fsis.usda.gov)


Thank you!

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RECALL – The word that brings shudders to the food industry

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May 4-6, 2010
 Manila, Philippines



Goal of the Food Industry

- To produce safe and wholesome foods







How to Insure Safe Food is Distributed

- Develop and follow programs
 - Identify products accurately
 - Document procedures
 - Validate results with third-party audits
- Know where your products come from and where they go (traceability)
 - Trace forward; trace back (product identification is key)
 - Raw materials, ingredients, packaging
- During crisis, respond quickly




But sometimes, things go wrong...



And When Things Go Wrong

- Usually at very inconvenient times






Then It Hits the News (Noose)!

- Adverse publicity almost instantaneously




And Even If The Story Is Inaccurate, or Not Even True

You still get unwanted exposure:

“A lie can travel halfway around the world while the truth is putting on its shoes.”
(Mark Twain)



Public Health Issue-Botulinum Toxin

Bolthouse Farms
Carrot Juice, 450-ml
and 1-l bottles, “Best
if used by”
November 11, 2006

– Improper
refrigeration may
have caused the
development of
C. botulinum toxin



Public Health Issue-Salmonella

- Outbreaks: 2001, 2004
- Resulted in mandatory pasteurization of raw almonds by September 1, 2007



2006 Spinach Outbreak



Over 200 illnesses and one death....



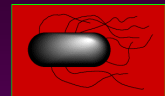
Salmonella typhimurium


691 cases in 46 states with latest confirmed, most recent reported illness beginning on February 24, 2009, making this one of the largest food recalls ever in the USA.



High Profile Outbreaks


- Jewell Dairy *Salmonella* (1985)
- Jalisco Cheese (1985)
- Jack-in-the-Box *E. coli* O157:H7 (1993)
- Schwann's Ice Cream *Salmonella* (1994)
- Japanese Radish Sprouts (1996)
- Odwalla Apple Juice (1998)
- Pre-Cut Spinach (2007)
- Tomatoes then peppers (2008)





Costs of Recall


- Direct costs
 - Product and package loss
 - Retrieval
 - Destruction
 - Cleaning
 - Potential health risks
 - Lawsuits and legal issues
 - Human time
- Indirect Costs
 - Potential reduction in demand and sales
 - Decrease in share value



Source: Resende-Filho *et al.*, June 19, 2007

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\$ Losses To The Industry

Produce		Est. Revenue Loss
Spinach 2006 <i>E. coli</i> O157:H7		\$350 million (shippers & growers)
Peanut butter 2007 <i>Salmonella</i>		\$140 million (\$55 million in lost sales)
Tomatoes/Peppers 2008 <i>Salmonella</i>		>\$100 million (growers)

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Recalls are expensive!

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US FDA Recall Policy 21CFR7.40

- Recall: “...removing or correcting consumer products that are in violation of laws administered by the Food and Drug Administration.”
- Therefore, recall is the
 - Prompt removal of contaminated, mislabeled products, or sick animals from the market (includes proper disposal)

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US FDA Recall Policy 21CFR7.40 (cont'd)

- Objective of a recall: “...to protect the public health and well-being from products that present a risk of injury or gross deception or are otherwise defective.”

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US FDA Recall Policy 21CFR7.40 (cont'd)

- Voluntary action by food manufacturers and distributors
- “...an alternative to a FDA-initiated court action...”

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Different from Seizures or Other Court-Actions

- That are done by US FDA when
 - Firm refuses to undertake a recall
 - A recall is ineffective
 - The agency believes a recall would be ineffective
 - Violation is continuing

US FDA Enforcement Policy

- 21CFR7.41 – 21CFR7.59 (Guidance on policy, procedures, and industry responsibilities)
 - Sec 7.41 Health hazard evaluation and recall classification
 - Sec 7.42 Recall strategy
 - Sec 7.45 FDA requested recall
 - Sec 7.46 Firm initiated recall

US FDA Enforcement Policy (cont'd)

- 21CFR7.41 – 21CFR7.59
 - Sec 7.49 Recall communications
 - Sec 7.50 Public notification
 - Sec 7.53 Status Reports
 - Sec 7.55 Termination
 - Sec 7.59 General industry guidance

Health Hazard Evaluation and Recall Classification (21CFR7.41)

- Ad Hoc FDA committee will determine
 - Has disease or injury occurred?
 - Are there conditions that will expose humans or animals to a health hazard?
 - Will humans or animals be exposed to a health hazard?
 - Who are expected to be exposed?
 - How serious are the hazards?
 - What is the likelihood of occurrence?
 - What are the consequences of occurrence?

Health Hazard Evaluation and Recall Classification (21CFR7.41)



- Based on the assessment, a recall classification will be assigned relative to the degree of health hazard:
 - Class I
 - Class II
 - Class III


Types of Recall

- Product Recalls
 - Class I
 - Class II
 - Class III
- Not included in public notifications
 - Market Withdrawals
 - Stock Holds
 - Mock Recalls





Class I Recalls

- Reasonable probability that the use of, or exposure to, a violative product cause serious adverse health consequences or death 
- Examples: food pathogens, allergens
- Public warnings 
- Maximum efficacy check likely


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Class II Recalls

- Involve products that may cause temporary or reversible health consequences
- Probability of serious adverse health consequences is remote 
- Public warning likely
- Intermediate effectiveness checks

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Class III Recalls

- May not involve public warning
- Wholesale or retail level
- Effectiveness checks are minimal
- Affected products have no health hazards 

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Market Withdrawals

- This is a situation where no violation is involved or the violation is minor and product is not subject to seizure under current FDA or USDA policy or guidelines.

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Stock Recovery

- Involves the recovery of products that remain under the *complete* control of the manufacturer and its clients, regardless of the severity of the problems.
- For example, most of Multiple Organics products are dried, shelf stable ingredients. Such a retrieval could be possible.

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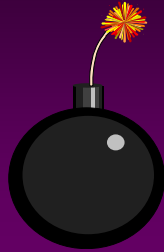
Recall Summary

CLASSIFICATION	RETRIEVAL LEVEL	EFFECTIVENESS CHECKS	PUBLIC WARNING
Class I	Consumer	100% at retail	Yes
Class II	Retail or more	90 – 100% at retail	Yes
Class III	Wholesale or more	Variable	Sometimes
Withdrawal	Company Criteria	Company Assessment	No

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Who Identifies the Problem?

- Regulatory Agency
- Consumer
- Physician
- Field Sales Staff
- Customer Service
- Others



Who Determines the Severity of the Problem?



- Quality Assurance or Technical Group evaluates the concern
- Is the concern of public health significance?
- Their evaluation results determine the next steps.

If Product is a Suspected Health Concern

The following actions must be started simultaneously:

- Confirm the presence or absence of a health concern
- Notify management
- Trace all suspect products
- Collect & review production or quality records
- "HOLD" product in company control



If Product is a Confirmed Health Hazard



- Initiate recall
- Sales & Marketing - Notify buyers; pick up product; isolate product
- Confirm coverage with insurance company
- Marketing - Public relations
- Purchasing - Work with suppliers if issue is supplier-related
- Human Relations - Work with staff
- Production - Assist in investigation; stop operations

Firm-initiated Recall (21CFR 7.46)

- Firm should notify FDA with required information.
- Firm action will be considered by FDA as a recall when product involves a violation subject to legal action.

FDA-requested Recall (21CFR7.45)

- Except in limited circumstances (e.g., infant formula), a firm need not initiate a recall even when at FDA's request.

Recall Strategy (21CFR7.42)

- = Recall Plan (entails a Recall Program)
- Should include
 - Depth of recall: level in the distribution chain (consumer, retail, wholesale)
 - Public warning: general or using specialized media
 - Effectiveness checks: level A (100%), level B (10-99%), level C (10%), level D (2%), level E (0)

Recall Program

- Documented procedures developed and maintained by a Recall Coordinator
- Staff training
- Must be practiced regularly as a company
 - Goal: to have recalled products within 24 hours of first alert



Recall Program => Addresses Recall Needs

- Assesses personnel needs
- Needs management support
- Needs a Recall Action Group
 - Recall Action Coordinator
- Requires team effort



Recall Action Team or Retrieval Team

- Coordinator
- Technical Representative
 - QA, R & D, Laboratory, Contractor
- Warehouse & Distribution
 - Warehouse, receiving, distribution, marketing, customer service
- Communication
- Legal

Recall Action Team or Retrieval Team (cont'd)

- President/CEO
- Financial Staff
- Public Relations
- Legal Staff
- Outside Help (if needed)




Recall/Retrieval Structure




How to Recall the Product

- When out-of-compliance food inadvertently reaches any part of the food chain, including the consumer, the product needs to be recalled.
- Traceback or tracking systems or traceability
 - Used to trace the route of contaminated food or sick animals in the food chain

Traceback or Tracking Systems or Traceability

- Initiated by the food producer or manufacturer
- Offer additional safety reassurances to food
- Used in post-market monitoring (e.g., unintended health effects)
- Important in insuring liability and compensation



Recall & Traceability

- Statutorily required of some products but all products must involve these.
- Protect the business
- Different issues for distributor than a producer
 - Reliance on vendors & warehouse operations
 - Lot sizes may be variable
 - Mixed pallets



Commitment to Traceability

- Needs total management support





How to Trace the Product

- **Product identification** is critical in tracing the product through distribution from supplier to consumer.
- Rigid coding system preferred
- Test the system through mock recalls
 - Evaluate performance at post mock-recall meetings




Product ID → Tracking → Recall

- Proper identification of product is a **prerequisite** to tracking & recall.
- Plan ahead. A crisis is not the time to find that your recall program doesn't work.



Required Label Information

- Legibility
- Establishment
- Product
- Pack Date
- Pack Year
- Shift or Period





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Identifying Initial Source



- Critical information
- Use accurate and recorded product identifications linking successive packaging and transport/storage configurations.




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Product Labels

- Code allows traceability to date of production, but labels allow the manufacturer or distributor to be contacted




- **Manufactured by:**
- **Distributed by:**
 - Distributors work with manufacturers to put their labels on items.


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Product Labels (cont'd)

- Clear contact information including;
 - Company name
 - Phone, preferably an toll free number
 - Address
 - Email or web address




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Other Product Information

- Product type
- Packaging
- Labeling
- Shelf life
- Lot number
- Date processed/received/rotated
- Inventory
- Shipping and handling information




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Facility Designation

- Differentiate plants
- Needed for troubleshooting




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Mock Recall (cont'd)

- Be proactive
- Seamless, not a fire fighting exercise
- Have backups



Recall Communications (21CFR7.49)

- Lists the necessary information for a recall
- Gives instructions on product handling

Role - Communications

- Responsible for communicating with the media, consumers, and regulatory Agencies
- Instructs all employees to refer all questions to Communications
- Statements are pre-evaluated and pre-approved by the Recall Action Team and Legal Counsel

Contact List

- Detailed contact lists shall be developed, documented and maintained on a regular basis.
- Quarterly at least
 - All team members
 - All warehouse and distribution centers
 - All clients
 - All vendors

Communicating the Problem

- Radio, television, & print media
- Full details on product
- State what is known and NOT known and what the company is doing to address uncertainties
- Instructions on how to handle suspect product
- Be open & honest



Group Exercise

- Recall Action Team Members:
 - Take 15 minutes to jot down your duties
 - Include types of documents, locations and key contacts
 - This will become the basis of your work instruction.
 - Discuss the duties

Public Notification (21CFR7.50)

- Published in the weekly **FDA Enforcement Report**
<http://www.fda.gov/Safety/Recalls/EnforcementReports/default.htm>
- Then click on **Recalls, Market Withdrawals, & Safety Alerts**



Recall Status Reports (21CFR7.53)

- By the initiating firm to the FDA usually at 2-4 week intervals
- Discontinued upon termination of the recall

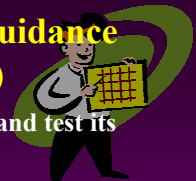


Recall Termination (21CFR7.55)

- Depends on the hazard
- By FDA when all reasonable efforts had been made to remove or correct the product
- Requested by the firm demonstrating effectiveness of the recall

General Industry Guidance (21CFR7.59)

- Prepare a contingency plan and test its effectiveness
- Use product identification that will positively identify the lot and facilitate effective removal of violative lots
- Keep records beyond product shelf life and expected use (e.g., 3 years total)




A Case Study

Salmonella in Hydrolyzed Vegetable Protein (HVP)




Salmonella in HVP

- Considered a major product recall due to public health impact (*Salmonella* Tennessee)
 - Used worldwide in many products
- Given expanded coverage on
<http://www.fda.gov/Safety/Recalls/MajorProductRecalls/HVP/default.htm>
- February-April 2010
- Some say it is potentially the largest recall in US history



Salmonella Tennessee

- Symptoms
 - Fever
 - Diarrhea (may be bloody)
 - Nausea
 - Vomiting
 - Abdominal pain
 - If the organism enters the bloodstream, may cause arterial infections
- Can survive in dry products




- Manufacturing HVP since 1980
- HVP is a flavor enhancer
 - Imparting meaty or savory taste (umami)
 - Available in liquid, paste, vacuum dried granules, spray dried powder, Identity Preserved Non-GMO forms
 - Found in ~10,000 packaged, processed foods





Source: <http://www.basicfoodflavors.com/>




Some HVP Applications


- Beef
- Chicken
- Pork
- Snacks
- Soups
- Stews
- Gravy
- Sauces
- Dips
- Salad dressings
- Spice rubs
- Seasonings





The HVP Recall


- HVP by Basic Food Flavors, Inc.
 - in liquid and paste forms manufactured after September 17, 2009
 - Including foods using this HVP if not cooked before serving (e.g., snacks, dips)
- As of March 24, 2010, no foodborne illness from this HVP or products using this HVP had been reported.



Inspection History of Basic Food Flavors, Inc.


- 1990: by US FDA; no violations
- 1996: by US FDA; one violation; company took voluntary action
- 2009: by a State contractor; no violations





Law on Reporting Problems with Food

- September 2009: US FDA established the Reportable Food Registry (RFR) that mandates food industry to report within 24 hr of detection any problems with a food product
- February 5, 2010: Upon testing HVP purchased from Basic Food Flavors, Inc., a customer reported detection of *Salmonella*.



Inspecting Agency's Response

- February 12, 2010: US FDA and the Nevada State Health Department began investigations
 - Later found contamination of one lot with *Salmonella* Tennessee
 - Also found *Salmonella* in the processing plant
- Set up a database of products containing this HVP



<http://www.accessdata.fda.gov/scripts/HVPCP/>

Inspecting Agency's Response (cont'd)

- March 4, 2010: US FDA issued a press release about the firm-initiated recall
 - Industry must destroy or recondition recalled this bulk HVP
 - Recall foods containing this HVP
 - Issued consumer instructions
 - Check list of recalled products on FDA website
 - Follow cooking instructions for all foods
 - Report symptoms of foodborne illness

Inspecting Agency's Response (cont'd)

- April 1, 2010: about 177 products containing this HVP have been identified
 - Database is searchable by brand name, product name, or a combination
 - Each product (e.g., bouillon, frozen food, gravy mix, sauce and marinade, etc.) may have been manufactured by several processors.



Inspecting Agency's Response (cont'd)

- Brands included

– McCormick	– Great Value
– Durkee	– Trader Joe's
– French's	– Herbox
– Pringles	– Garden Harvest
– Quaker	– Publix
– Safeway	– Kroger
– Fresh Food Concepts	– Dean's
– Hawaiian	– Great Nut Supply

Inspection Form 483

- Observations of the inspection team, not a final FDA determination
- Listed FDA's own *Salmonella* findings



Source: <http://www.fda.gov/Safety/Recalls/MajorProductRecalls/HVP/ucm203784.htm>

Inspection Form 483 (cont'd)

- January 21, 2010: company received COA showing positive for *Salmonella*
- January 21-February 15: company continued distribution
- January 21-February 20: company continued manufacture under the same conditions without microbial contamination control

Source: <http://www.fda.gov/Safety/Recalls/MajorProductRecalls/HVP/ucm203784.htm>

Inspection Form 483 (cont'd)

- Detailed significant issues in the plant
 - Lack of microbial contamination control during manufacture, packaging, and storage of foods
 - Failure to conduct cleaning and sanitation procedures
 - Inadequately installed plumbing and inadequate drainage
 - Plant construction and design do not allow floors to be adequately cleaned and kept in good repair.

Source: <http://www.fda.gov/Safety/Recalls/MajorProductRecalls/HVP/ucm203784.htm>



Basic Food Flavors' HACCP Plan

BASIC FOOD FLAVORS - HACCP PLAN SUMMARY									
CCP HACCP Plan Summary		Review Date		PRODUCT					
		March 2009		HVP - VACCUM DRIED POWDER					
		SUPERVISORS		PAGE 1 of 1					
Critical Control Points (CCP)	Hazard	Critical Limits	Monitoring				Correction Action	CCP Verification Procedures	Records
			What	How	Frequency	Who			
Treatment CCP-1	C. BACT	2 hours at pH 5.0	pH & Time during treatment, check the pH	Sample is taken and pH checked using pH meter	Before treatment and then after every 4 hours	Reaction Operator	If pH is < 5.7 raise pH by adding more Caustic (NaOH)	Calibrating the pH used in determining the pH. Observing monitoring activities to ensure the records are completed and to verify that the documented values are within specified limits.	Treatment Log pH Calibration Log
							If treatment exceeds more than 8 hours react to 24 hours.	Observing correction actions whenever that records are complete and appropriate action taken.	Reviewing records including verifying signatures and dates for completeness.

Source: http://www.basicfoodflavors.com/pdf/HACCP_PLAN_1CCP_2009.pdf



Basic Food Flavors' Response

- February 26, 2010: began notifying its customers of a recall of all HVP in liquid and paste forms it had manufactured from September 17, 2009
 - February 27, 2010: Kroger recalled products
- Mid-March 2010: Company still refused to comment on the recall

Source: <http://www.foodproductiondaily.com/Quality-Safety/Basic-Food-Flavors-denies-wrongdoing-in-HVP-recall>



Basic Food Flavors' Response (cont'd)

- Company's sales and marketing manager hoped media freeze "would help publicity of the recall to pass quickly."
 - "Quite honestly, we didn't bother answering the press because we just wanted it to go away," he said. "...It's working. It's beginning to die down."
 - The recall affected "only 10,000 lb of 10 million" or 0.1% of the production volume of the company.

Source: <http://www.foodproductiondaily.com/Quality-Safety/Basic-Food-Flavors-denies-wrongdoing-in-HVP-recall>



Basic Food Flavors' Response (cont'd)

- March 17, 2010: Company broke its media freeze to FoodNavigatorUSA
 - "While it is unclear whether FDA is suggesting in the Form 483 that Basic Foods knowingly shipped adulterated product, the language used by the agency and reported by the press has created that implication. We, therefore, consider it important to clarify that Basic Foods has not knowingly shipped into commerce any product the Company believed had the potential to contain Salmonella."

Source: <http://www.foodnavigator-usa.com/Financial-Industry/Basic-Food-Flavors-denies-wrongdoing-in-HVP-recall>



Basic Food Flavors' Response (cont'd)

- Form 483 of the company issued March 9, 2010 by the US FDA (FoodNavigatorUSA)
 - "After receiving the first private laboratory analytical results [dated January 21] indicating the presence of Salmonella in your facility, you continued to distribute HVP paste and powder products until 2/15/2010. Furthermore, from 1/21/2010 to 2/20/2010, you continued to manufacture HVP paste and powder products under the same processing conditions that did not minimize microbial contamination."

Source: <http://www.foodnavigator-usa.com/Financial-Industry/Basic-Food-Flavors-denies-wrongdoing-in-HVP-recall>



Basic Food Flavors' Response (cont'd)

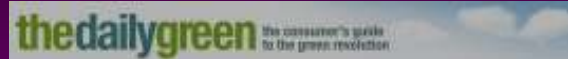
- Their website does not contain any progress report on the recall. There is no information on:

- Company responses to the recall
- What the company is doing to insure no product contamination in the future
- What stage the recall is at



Unwanted Exposure (cont'd)

- The Daily Green, April 27, 2010. "HVP, a Non-Food, Continues to Cause More Food Recalls"



- "...the industrialized food system and how easily it can sicken us, rather than nourish us."
- "...food manufacturers, it doesn't sound like a farm, does it?"
- "...how weirdly disgusting our food system is."



Unwanted Exposure (cont'd)

- March 13, 2010 Pacifica Riptide

"They documented dirty utensils and equipment-mixers and tubing coated with brown residue-and cracks and fractures in the floor, as well as standing water on the floor-all conditions where bacteria can breed. In one area where paste mixers and belt dryers were positioned, FDA inspectors noted "standing, grey/black liquid" in the drain near the area where the hydrolyzed vegetable protein was turned from paste to powder. "We sensed an odor in the vicinity of this drain," the inspectors wrote. Enough said? "

Source: http://www.pacificariptide.com/pacifica_riptide/

Unwanted Exposure (cont'd)

- March 12, 2010 Care2 Healthy and Green Living

"We will now attempt to scare you into walking away from the processed food. "

"Thousands of types of processed foods—including many varieties of soups, chips, frozen dinners, hot dogs and salad dressings—may pose a health threat because they contain a flavor enhancer that could be contaminated with salmonella. "

Source: <http://www.care2.com/greenliving/hvp-biggest-food-recall-in-us-history.html>

Lessons Learned

How the US FDA Minimized the Risk of Foodborne Illness

- Immediately began investigations after report of detection of *Salmonella* on RFR
- Communicated with the company
- Issued press release about the recall



How the US FDA Minimized the Risk of Foodborne Illness (cont'd)

- Set up online Q&A for consumers, Q&A for the industry
- Set up online database of recalled products and brands
- Posted online public documents about the investigation and recall
- Posted online appropriate contacts



How the Company Minimized the Risk of Foodborne Illness

- Voluntarily recalled all involved products but not sufficiently timely
 - Form 483 cited their continuing to manufacture and distribute for more than 3 weeks after receiving confirming lab results of *Salmonella*

Basic Food Flavors, Inc.



To Minimize the Risk of Foodborne Illness, the Company Should Have...

- Known what to do when the investigators knock
- Ceased production and distribution while confirming lab results
- Had a tested Crisis Management Program and a trained Crisis Management Team



To Minimize the Risk of Foodborne Illness, the Company Should Have...

- Had tested Recall Program and a trained Recall Team
- Announced recall to the industry and the consumers immediately upon verification (in different languages)
- Publicized on their website events and activities related to the recall



To Minimize the Risk of Foodborne Illness, the Company Should Have...

- Promptly returned media calls (only by designated company communication persons)
- Within the company
 - Checked coverage of insurance policy
 - Reviewed supplier qualification procedures and supply contracts
 - Obtained criminal law advice



Communicating the Problem

- Radio, television, & print media
- Full details on product
- State what is known and NOT known and what the company is doing to address uncertainties
- Instructions on how to handle suspect product
- Be open & honest



Group Exercise

- Recall Action Team Members:
 - Shall we do a mock recall?
 - Use your notes from the first exercise and let's go.
 - Select a product to track.


**Thanks to Jennifer Thomas of
US FDA for her kind
assistance.**

**Mahalo nui loa!
Maraming salamat po!**

Aurora A. Saulo, Ph.D.
Professor and Extension Specialist in Food Technology
University of Hawaii at Manoa
aurora@hawaii.edu

May 4-6, 2010
Manila, Philippines


United States Department of Agriculture
Food Safety and Inspection Service




Outbreak to Recall A Case Study

United States Department of Agriculture
Food Safety and Inspection Service
Lisa Volk, Director of Recall Management

United States Department of Agriculture
Food Safety and Inspection Service


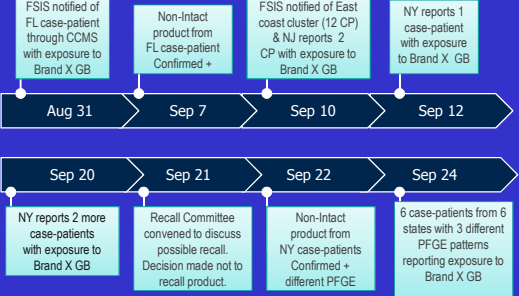


Tainted-Beef Recall Sparks Consumer Concerns



- "2007- year of the recall"; peanut butter, pet food, toys, cribs....
- Of 21 meat recalls for *E. coli* O157:H7 in 2007, 10 are associated with illnesses.
- *E. coli* fears trigger large beef patty recall.

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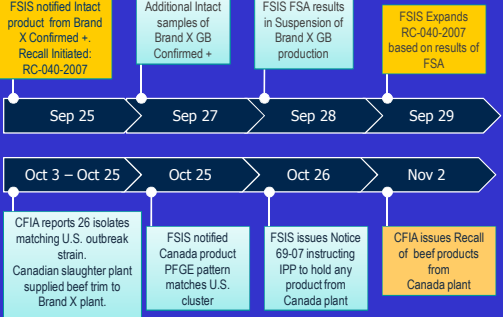



Timeline of events:

- Aug 31:** FSIS notified of FL case-patient through CCMS with exposure to Brand X GB
- Sep 7:** Non-Intact product from FL case-patient Confirmed +
- Sep 10:** FSIS notified of East coast cluster (12 CP) & NJ reports 2 CP with exposure to Brand X GB
- Sep 12:** NY reports 1 case-patient with exposure to Brand X GB
- Sep 20:** NY reports 2 more case-patients with exposure to Brand X GB
- Sep 21:** Recall Committee convened to discuss possible recall. Decision made not to recall product.
- Sep 22:** Non-Intact product from NY case-patients Confirmed + different PFGE
- Sep 24:** 6 case-patients from 6 states with 3 different PFGE patterns reporting exposure to Brand X GB

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Timeline of events:

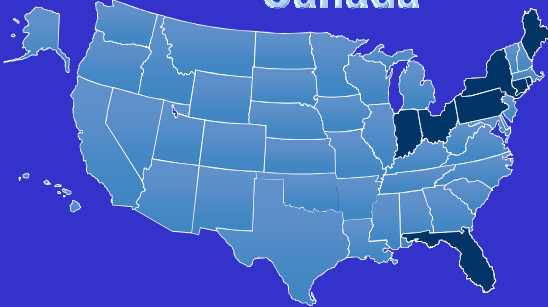
- Sep 25:** FSIS notified Intact product from Brand X Confirmed +. Recall Initiated: RC-040-2007
- Sep 27:** Additional Intact samples of Brand X GB Confirmed +
- Sep 28:** FSIS FSA results in Suspension of Brand X GB production
- Sep 29:** FSIS Expands RC-040-2007 based on results of FSA
- Oct 3 – Oct 25:** CFIA reports 26 isolates matching U.S. outbreak strain. Canadian slaughter plant supplied beef trim to Brand X plant.
- Oct 25:** FSIS notified Canada product PFGE pattern matches U.S. cluster
- Oct 26:** FSIS issues Notice 69-07 instructing IPP to hold any product from Canada plant
- Nov 2:** CFIA issues Recall of beef products from Canada plant

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Canada



5


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- Recall expands to 21.7 million pounds (1 years production)
- Distribution Nationwide retail and Exports
- Impacts 11 Brands and 1 other Federal Establishment
- Occurred on a Friday!

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Consequences

- 43 case patients from 8 states
- 21 hospitalizations; 2 HUS; no deaths
- Add'l cases in Canada
- Firm ceased operations
- 2.2 million lbs recovered/destroyed
- At the time, 5th largest recall;
 - Largest beef recall


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Outcomes

- Heightened interest in all recalls by Congress, media, and general public.
- OIG audit to evaluate FSIS recall procedures



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Recommended Actions

- Final OIG report issued August 2008
- 1. Collect and analyze greater number of representative samples during outbreak investigations.
- 2. Implement new Directive for investigating foodborne illness and for handling recalls. (FSIS Directive 8080.3)
 - Revised Recall Directive 8080.1 issued Nov. 2008

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Policy Changes

- Notices to expand sampling programs
 - Sampling of raw ground beef based on volume
 - Routine sampling of trim and source materials other than trim, such as two-piece chuck, sub-primals, LFTB, and bench trim
 - Includes follow up sampling of component materials at all suppliers to a positive event
- FSA scheduled at all firms with a reported positive FSIS sample result
- Focus on getting available best practices to establishments
- Reassessment of E. coli controls
 - Checklist/survey to catalog industry practices
 - Draft compliance guidelines issued in 2008
 - Criterion for high event periods
 - Verifying sanitary dressing procedures

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Proposed Next Steps

- Initiate rulemaking to identify tenderization as a material fact that must be identified on labeling
- Propose mandatory "test and hold"
- Begin earlier traceback activities to identify all affected product and suppliers and respond more rapidly to protect the public health
- Mandatory record keeping requirements that would facilitate traceback at retail when a product is recalled
- Develop new N60 sampling instructions

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Published Guidance

- FSIS Directive 10, 010.1, Revision 2, July 31, 2009, Verification Activities for Escherichia coli O157:H7 in Raw Ground Beef Products
- Posted on Significant Guidance Page at http://www.fsis.usda.gov/Significant_Guidance/index.asp
 - Compliance Guidelines for Establishments on the FSIS Microbiological Testing Program and Other Verification Activities for Escherichia coli O157:H7
 - Draft Compliance Guideline for Sampling Beef Trimmings for Escherichia coli O157:H7
 - Draft Guidance for Small and Very Small Establishments on Sampling Beef Products for Escherichia coli O157:H7
 - Draft Label Policy Guidance for N-60 Testing Claims for Boneless Beef Manufacturing Trimmings ("Trim") Concerning E. coli O157:H7

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Thank you





Food Recalls in Australia

Mr Elliot Hill

APEC Recall Workshop, Manila
4th – 6th May, 2010



Key Elements of a Food Recall

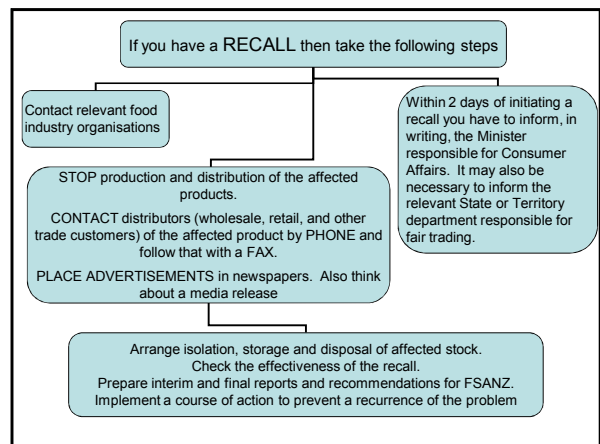
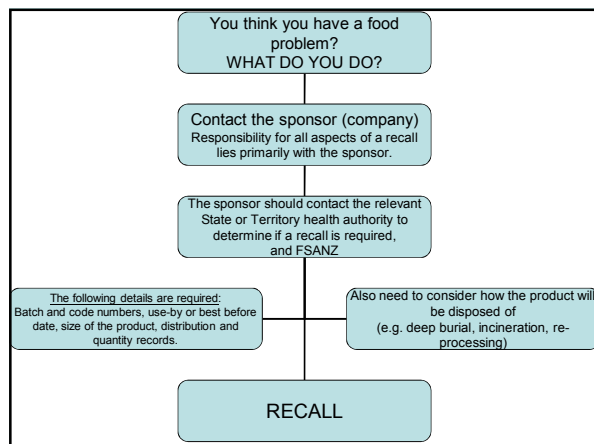


The FSANZ Recall Process

- FSANZ’s role is one of coordination and monitoring
- Process supported by legislative requirements for food businesses to act and report
- FSANZ assists in the recall process, but the decision whether or not to recall foods rests with the States and Territories

The FSANZ Recall Process

- FSANZ is notified of a potential recall situation
- The Home State or Territory determines whether a recall is warranted
- FSANZ collects information concerning the recall and disseminates it



Product Information Required

Details required:

- Food Type
- Brand Name
- Use By or Best Before Dates (as they appear on packaging)
- Packaging and size
- Sponsor Details
- Distribution

Other Relevant Details

- Category and sub category of the hazard risk
- Proposed recall level (consumer or trade)
- Action proposed by the company
- Australian Product Number (APN) or other code number
- Method of disposal
- Country of origin
- Domestic and overseas distribution

Post Recall Reporting

- Reports used to show recall carried out satisfactorily and consumers have been protected
- Examples of questions asked
 - Circumstances leading to recall
 - How widely were the relevant batches distributed
 - How much manufactured? Recovered?
 - How was stock disposed of? Provide destruction certificates

State/Territory Challenges

- Dealing with different State/Territory can be a challenge
- Each State/Territory deals and assess food recalls differently
- One State/Territory would recall a product while another may just withdrawal
- FSANZ is working with each State/Territory to develop better continuity for food recalls

Issues that may slow down a recall

- How to conduct a recall
- Lack of preparation
- Distribution Lists
 - Accuracy – Contact details of those that received implicated product
 - Knowledge – whether a company received the implicated product
- Timeliness – sponsor carries on with the day to day running of the business

Mistaken use of the recall process

- Garlic Bread Recall – 2008
 - Sponsor recalled garlic bread because of blue colouration
 - FSANZ advised that this was not a public health and safety risk
 - Sponsor went ahead with recall
 - Later the sponsor admitted that the product was recalled for aesthetic reasons

Recalls and Media Attention

- Some recalls get a lot of media attention
 - Woolworths Fresh Milk Lite 2 L – 2009
 - Microbial – *Escherichia coli*
 - Bonsoy Soy Milk - 2009
 - very high levels of Iodine due to Kombu
 - World wide recall



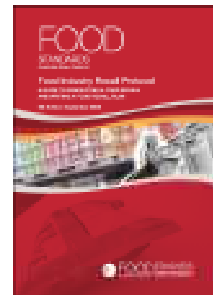
International Recalls and Australia

- Food Incidents overseas have triggered recalls in Australia
- Recall of Pistachios from Setton Pistachio of Terra Bella Inc in the US resulted in 3 recalls in Australia
- FSANZ receives information from overseas agencies about recalls and investigates possible imports

Food Industry Recall Protocol

What is the purpose of this protocol?

- Guidance for food businesses on
- Developing a written recall plan
 - Conducting a food recall
 - Roles of government and industry



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Food Recall Review

- Review in consultation with government and industry stakeholders
- Training of after hours recall officers has been revised and improved
- Updated versions of the Food Industry Recall Protocol and Government Authority Food Recall Protocols published in 2008

Conclusion

- Prompt and effective recall action ensures safety of the food supply and promotes consumer confidence in a company's products



FOOD RECALL BRUNEI DARUSSALAM EXPERIENCE



Presented by:
Mahani Muhammad
Ministry of Health, Brunei Darussalam
May, 2010

INTRODUCTION


- Brunei Darussalam imports about 80% of food from all over the world
- Minimal Production
- Brunei Darussalam gears towards self sufficiency and producing local food products



ALERTS

Receives alerts through various reporting systems such as:

- INFOSAN – International Food Safety Authority Network
- Food Authorities – Subscription to websites
- Bi-lateral Agreement - Exchange of information between two countries



ANALYSIS OF INFORMATION

Information received
is analyzed

ALERTING THE PUBLIC

- Verbal & written notifications to importers / traders
- Issue press releases if required
- Post updates to MOH Web site regularly to alert people
- Media updated

CHECKS

- Carry out checks and investigation a
- Product destroyed
- Re-sampling



SURVEILLANCE

- Carry out frequent and regular inspections
- Take enforcement action



CHALLENGERS

- Human resources:
Constraint of manpower, lack of speciality training,
- Capacity building:
Recruitment of manpower, training on enforcement
- Laboratory capability and facility
- Cottage food industries: Increasing numbers
- Meeting food standard

THANK YOU
FOR
YOUR ATTENTION



Food Safety & Quality Control Division
Environmental Health Services
Department of Health Services
Ministry of Health
BRUNEI DARUSSALAM
Tel. No.: 673 2 331100-10 Fax. No.: 673 2 331107
e-mail : fsqc@moh.gov.bn



CHILE:

On the western coast of South America (4.200 km long and 152 km wide on average)
Inhabitants: 17.094.275
Urban: 86.6%
Life expectancy at birth (y): 75.5 M / 81.5 F
Electricity: 99.5 %
Tap water: 98.1 %
Sewerage: 82.8 %
Literacy: 95.8 %

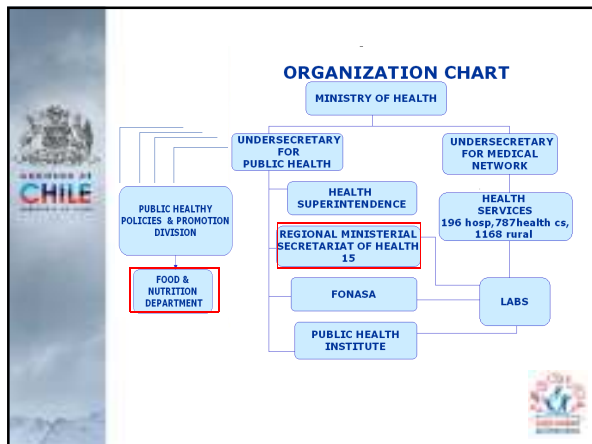
ORGANIZATION AND SYSTEMS RELATED TO FOOD CONTROL AND INSPECTION

The Ministry of Health is the national sanitary authority in charge of sanitary administration and control on food products for domestic use (imported food and local production).

Two other major regulatory bodies are in charge of the food sanitary administration regarding international trade agreements on food products for export. The Agricultural and Livestock Service (SAG), depending on the Ministry of Agriculture; and the National Fisheries Service (SERNAPESCA), depending on the Ministry of Economy.

MINISTRY OF HEALTH

The mission of Ministry of Health (MINSAL) is to contribute to elevate the level of the population's health; to develop the systems of health harmoniously, centered in people; to strengthen the control of the factors that can affect the health and to reinforce the administration of the national network. All this to collect opportunely needs of the people, families and communities, with the obligation of to render accounts to the citizenship and to promote the participation of the same ones in the exercise of their rights and their duties.



MINISTRY OF HEALTH

Food Safety Area:

MINSAL is responsible of protecting consumers health, promoting healthful nutritional habits and it has legal attributes in reducing all kind of contaminants in foods, assuring the safety and quality of them. To comply with this role, the Ministry takes permanent sanitary control and inspection measures appropriately at each stage of the food chain.

MINSAL carries out a range of work to make sure that food is safe to eat. Some activities to achieve these goal are:

From the central level:

- Developing, updating and harmonizing the food regulation, according current requirements and international guidance.
- Coordinating policies in food sanitation, according to strategies indicated in the Public Health National Plan.



From regional level, through regional offices (SEREMI).

- Food establishment authorization
- Sanitary inspection on Food establishments
- Control and surveillance of food
- Meat and poultry inspection
- Control of Food Imports
- Monitoring, Investigation and control of food poisoning
- Control of labeling
- Monitoring and controlling poisonings by Red Tide.



GENERAL CONDITION OF FOOD CONTROL AND INSPECTION

- **The Sanitary Code** is the main official regulatory document on sanitary matters, assigning responsibilities and authority to the different regulatory bodies, and constitutes the basis for the more specific regulations.
- **The Food Sanitary Regulation** is the document that regulates all those matters concerning manipulation, storage and manufacture of food products. It also specifies the minimal nutritional qualities, and the maximum levels permitted of chemical and biological residues.



This regulation applies to imported food products and local production, and is executed by the Regional Health Secretariats (SEREMI) through their inspecting and analytical divisions.

The Public Health Institute (ISP) is the appointed reference laboratory for the analytical laboratories of the public health system.

The monitoring programs are mainly directed to the most sensitive issues, according to the specific needs of the different regions.

SANITARY CODE

TITLE III

ABOUT SANCTIONS AND SANITARY MEASURES

Article 178 (169).: The authority, as sanitary measure, will be able to order in justified cases the closing, prohibition of operation of houses, premises or establishments, paralyzation of tasks, seizure, destruction and denature of products.

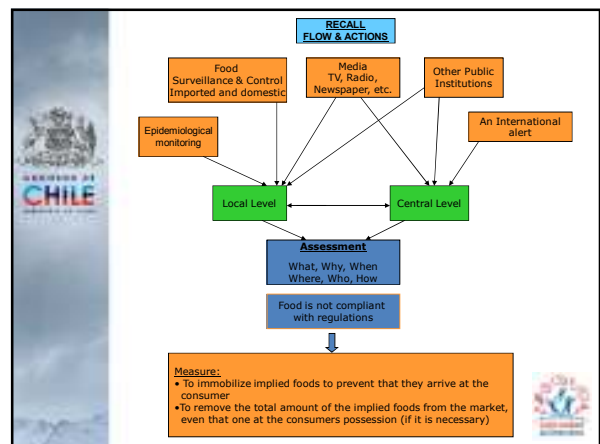
FOOD SANITARY REGULATION

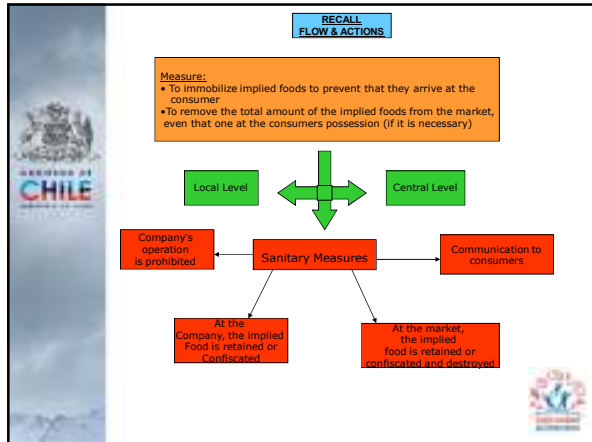
TITLE II

FOODS

General provisions

Article 102.- The manufacture, import, possession, distribution, marketing or transfer for any reason of foods that are altered, contaminated, adulterated and falsified is prohibited.





Minsal prohíbe manufacture and sale to any kind of foods "ADN"

•Hotline


- ❖ In spite of sanitary regulation does not consider any indications about how to develop a Recall, regulation frame is strong enough to give us support on different sanitary measures to avoid consumer exposition.
- ❖ The following points must be our challenge the next coming years:
 - Plants are not maintaining enough time the records or documents or they are not sufficient
 - Communication between stakeholders and sanitary authority must be more fluently
 - Stakeholders are understanding that their own recall procedures are an important part of pre requirement programs
 - Information about food incidents may not be clear for consumers
 - Exist a delay to close food events and make the final evaluation.

THANK YOU

Marcelo Ulloa B.
 Department of Food and Nutrition
 Ministry of Health
 CHILE
Mulloa@minsai.cl
 (56 - 2) 5740445

Food Recall Guidelines of Chinese Taipei



TFDA
Section Chief
Fang-Ming Liu



TFDA

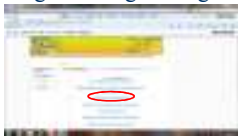

Department of Health
Food and Drug Administration

Officially operate
January 1, 2010


Food Recall Guidelines Purpose

- These Food Recall Guidelines are established to provide a guide for carrying out food recall in order to ensure the hygiene, safety and quality of food and to protect health of consumers.
- <http://food.doh.gov.tw/english/english.asp>


Purpose

- These Food Recall Guidelines are established to provide a guide for carrying out food recall in order to ensure the hygiene, safety and quality of food and to protect health of citizens.




Scope

- These Guidelines apply to the recall of food, which will or probably will cause hazard to the diet safety of the public or, whose quality does not conform to regulations.




Initiation of Food Recall

- The responsible entity shall proceed with recall where the food:
 - (1) by law shall be recalled for violating hygiene or other applicable regulations; or
 - (2) is of defect that it is deemed necessary for a recall.



Initiation of Food Recall


- Food recall is initiated under the following two circumstances:
 - Where an entity launches the recall on its own initiative as required by law or where it deems recall necessary; and
 - Where the competent health authority orders the entity by law to conduct the recall.




Classes and Levels of Recall

- Recall is divided into the following three classes subject to the degree of harm the food causes to public health:
 - Class 1:

The food is expected to have a probability to cause death or serious harm to public health.







Classes and Levels of Recall

- Class 2:

The food is expected to have a low probability to cause harm to public health .




Pb:174 ppm




Classes and Levels of Recall

- Class 3:

The food is expected not to cause harm to public health but is not in conformity with the quality regulations (ex. Labeling)






Classes and Levels of Recall-II

- Recall is divided into the following three levels depending on the extent sales channels are involved in food recall:
 - Consumers:

to the extent of individual consumers

※News release






Classes and Levels of Recall-II

- Retailers:

to the extent of sales premises.
- Wholesalers:

to the extent of importer and wholesaler premises etc. where the food is not directly sold to consumers.

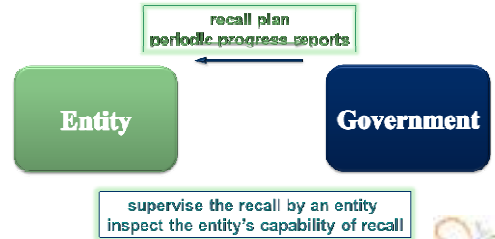


Operation of Recall System

- Class 1 recall, the recall plan of the responsible entity shall specify the recall being extended to the consumer level and such entity shall issue a press release.
- Class 2 or 3 recall, the responsible entity initiating the recall shall propose the level of recall taking into consideration the nature of the potential hazard caused by the food to public health, and report to the local competent health authority prior to finalizing the recall proposal according to the instructions of such authority.



Operation of Recall System



Responsibilities of entity – recall plan

- An entity shall devise a recall plan at least covering, inter alia, the following information:
 - (1) Name, address and telephone number of the responsible entity of the food to be recalled;
 - (2) Reason of the recall and nature of the potential hazard;



RECALL PLAN

1. Responsible entity

2. Reason of the recall

3. Product name, form

4. Date to be recalled

Responsibilities of entity – recall plan

- (3) Product name, packaging, form, or special distinguishing features or signs of the food to be recalled;
- (4) Date, lot number, code, or other identifying information and number specified on the food to be recalled;



Responsibilities of entity – recall plan

- (5) Total production volume of the food to be recalled;
- (6) Total volume of the food to be recalled in the sales channel;



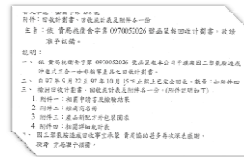
Operation of Recall System

- (2) Number of entities responding to the notification and quantity of the particular food in their possession;
- (3) Number of companies or individuals not responding to the notification;



Operation of Recall System

- (4) Quantity of recalled food;
- (5) Number of times and result of investigation;
- (6) Anticipated time limit for completion.



Responsibilities of entity

- An entity shall, upon completion of food recall, report the process and result of the recall in writing to the local competent health authority and, where necessary, to the central competent health authority, for placing the matter on the file for future reference.
- An entity shall properly retain complete documentation on food recall for inspection and verification.



Responsibilities of Government Authority

- The local competent health authority shall supervise the recall by an entity and inspect the entity's capability of recall. The work of such authority shall include the following:
 - (1) inspect the violating food, take action by law, and advise the entity to recall such food;



Responsibilities of Government Authority

- (2) give instruction on the class and level of the recall proposed by the entity, and file the entity's recall plan for future reference;
- (3) request the entity having submitted an incomprehensive recall proposal to make improvement;



Responsibilities of Government Authority

- (4) give instruction on the frequency of reporting the condition of recall, subject to the urgency of the case, and monitor the entity's recall progress;
- (5) supervise the entity in its completion of recall;
- (6) assess the entity's recall report;
- (7) offer follow-up guidance to the entity;



Responsibilities of Government Authority

- (8) conduct periodic inspections to ascertain the extent of recall accomplished; and
- (9) file relevant recall information and issue the necessary press release.



periodic inspections



supervise the completion of recall



Responsibilities of Government Authority

- The central competent health authority shall supervise the local competent health authority in the execution of the above work and, where necessary, may assess the relevant reports submitted by the entity and give instructions.



Challenges

- Responsibility of recall :
ingredients already made in food ?
- Class of recall :
media pressure + public confidence
vs. risk assessment + risk communication



Thank You For Your Attention !!!



INDONESIA FOOD RECALL SYSTEM

APEC SEMINAR-WORKSHOP ON THE DEVELOPMENT AND STRENGTHENING OF FOOD RECALL SYSTEM FOR APEC MEMBER ECONOMIES
PHILIPPINES, 4-6 MAY 2010

INDONESIA REGULATION

General Guidelines for the Control of the Implementation of Products Recall
(established on 1997)

Code of Practice for Food Product Recall
(established on 2008)

Draft Revision of Code of Practice for Food Products Recall
(under development)

- ## Referenses
- Food Industry Recall Protocol, Food Standards Australia New Zealand (FSANZ)
 - The Canadian Food Safety System – Food Recall, The Canadian Food Inspection Agency (CFIA)
 - Code of Federal Regulation, FDA
 - etc.

- ## classes of food recall
- Class I**
- Product is suspected to cause serious adverse health effect or even death because of pathogen (e.g. *Clostridium botulinum*, *Salmonella*, *Vibrio cholerae*, etc) or chemical hazards (boric acid, formaldehyde, prohibited coloring, etc)
- Class II**
- Product is suspected to cause temporary adverse health effect because it does not comply standards (e.g. chemical contamination exceeds its maximum limit)
- Class III**
- Product is not likely to cause any adverse health effects but in violation of legislative (e.g. incorrectly labelled, illegal products)



- ## Responsibilities :Manufacturers/Importers
- remove the unsafe food from sale
 - maintain records and establish procedures that will facilitate a recall (records should be in a form that can be quickly retrieved)
 - have a written recall plan
 - initiate the action for implementing a recall
 - in the case of a consumer level recall, notify the public (generally by press advertisement)
 - for imported product, contact overseas supplier/manufacturer when initiating recall action

Responsibilities :Distributors

- maintain distribution records, and
- establish procedures that will facilitate a recall

Responsibilities :Food Retailers

- remove all recalled products from sale.
- Return the product to the distributors.

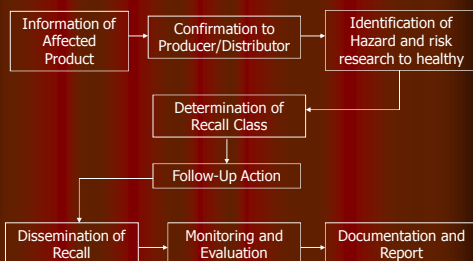
Responsibilities :National Agency of Drug and Food Control

- monitor supervise the implementation of recall and ensure that the implementation is taken in the appropriate manner.
- ensure that recalled products secured or reconditioned in the appropriate manner.
- evaluate sufficiency of food recall implementation
- act as witnesses when the products are destroyed.
- investigate the cause of affected product

Implementation of Food Recall

- **Voluntary Recall**
= a recall that is initiated and carried out by the food businesses without ministerial order
- **Mandatory Recall**
= a recall done by the instruction/order of Head of NADFC

Step of Mandatory Recall



Information

- Information of affected product can be received from manufacturer, distributor, consumer, food inspector, other institution, other country, etc.

Confirmation

- Confirmation is done by collecting information about the manufacturer/distributor, investigation to the manufacturer/distributor location, collect information on the affected product, sampling and product examination.

Identification of hazard and risk analysis

- Disease or disease symptoms appeared after consuming the affected product
- Hazard identification and risk analysis to children or high risk population
- Hazard level identification

Determination of recall class

- class I, class II or class III

Follow-Up Action

- coordinate with NADFC's regional officer on supervision of implementation food recall of affected product
- prepare and issue recall instruction letter to manufacturer/distributor/importer
- monitor the food recall implementation.

Currently, there are 30 NADFC's regional offices, Responsibilities of NADFC's Regional Officer in the food recall implementation

- Investigate the distribution facilities (market) and secure products and act as witnesses when products are destroyed.
- Provide report to NADFC not later than 2 months.

Dissemination of recall information (Press Release)

- whole range of product distributions
- Product characteristics
- Consumer targets
- Precautionary measure that should be done.
- Type of Media Release

Monitoring and Evaluation

- Food recall conducted effectively and in accordance with the regulations
- Recalled product are treated in accordance with the regulations

Documentation and Report

- Documentation and report must describe all of recall activities. Report can be provided step by step based on the process of food recall. Period for providing report are determined by NADFC and or NADFC's regional officer.

Example of Products Recall in Indonesia

No	Date	Subject
1	27/09/2008	NADFC Press Release on products containing milk from China tainted melamine
2	12/12/2008	NADFC alerts to recall Munchy's Lexus Peanut Butter for tainted of melamine
3	20/03/2009	NADFC alerts to recall all Munchy's and Apollo biscuit products tainted melamine
4	01/06/2009	NADFC Press Release on beef jerky tainted pork (halal concern)
5	05/01/2010	NADFC alerts to recall "Terasi Udang cap Rambutan" for the use of prohibited coloring agent of Rhodamin B
6	08/01/2010	NADFC alerts to recall Yeo's Drink based on cancellation of product registration approval

No	Date	Subject
7	12/01/2010	NADFC alerts to recall Marquisa Syrup for the use of sodium benzoic exceed the maximum levels
8	15/01/2010	NADFC alerts to recall Mentalk – Coffe and Ginseng Coffee based on cancellation of product registration approval
9	02/02/2010	NADFC alerts to recall Orens Orange Syrup for the use of sodium cyclamate and sodium benzoic exceed the maximum levels
10	02/02/2010	NADFC alerts to recall Prigo Strawberry Jam for the use of sodium benzoic exceed the maximum levels
11	02/02/2010	NADFC alerts to recall Seprit Ice for the use of sodium cyclamate exceed the maximum levels
12	05/02/2010	NADFC alerts to recall Zamghua Bottled Water based on legality of product registration approval





CTI 55/2009T
SEMINAR- WORKSHOP ON THE
DEVELOPMENT & STRENGTHENING OF
FOOD RECALL SYSTEM FOR
APEC MEMBER ECONOMIES

MANILA, PHILIPPINES

4th MAY 2010

DR. MOKTIR SINGH
MALAYSIA




FOOD RECALL SYSTEM

- ❖ Ministry Of Health
- ❖ Ministry of Agriculture & Agro Based Industry (DVS)



FOOD SAFETY OBJECTIVES

- ❖ To protect consumer's health
- ❖ To ensure fair trade practices



Product Recall/Withdrawals

Objectives:

- Stop production and distribution of effected product lot
- Notify the public and relevant government agencies
- Enable a voluntary withdrawal or recall of product from market place
- Response time in determining affected product withdrawn or recalled is critical.



Product Recall/Withdrawals

Recovered products:

- Shall be secured or held under supervision until they are
 - destroyed or
 - used for purpose other than originally planned or
 - if can be determined to be safe for the same (or other) intended use or
 - reprocessed in a manner to ensure they become safe

ACTIVITIES: ENFORCEMENT

Import Control

- Inspection based on:
 - Document
 - Physical inspection
 - Sampling
- Priorities based on:
 - Past violations (black listed items)
 - Food entering for the first time
- Approach undertaken
 - Hold-test-release
 - Undertaking letter



ACTIVITIES: LEGISLATIVE SUPPORT

- **Food Act 1983**
 - gazetted on 10 March 1983
- **Food Regulations 1985**
 - gazetted on 26 September 1985
- **Enforced together on**
 - 1st October 1985
- **Food Hygiene Regulations 2009**

Legislation – Animal Quarantine/Import-Export

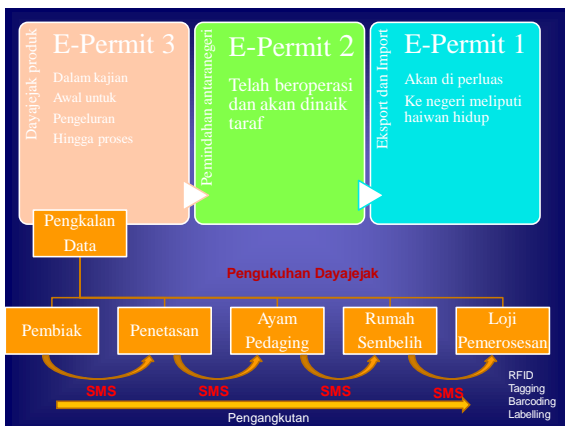
- **Animal Act 1953 (Act 647)- West Malaysia
Revised 2006.**
- **Animal Rules 1962**
- **(Custom Act 1967)**

Legislations

1. **Animal Act 1953**
 - Part II(Importation and Exportation of Animals and Birds)
 - Exportation (sect 14,15,16 & 17)
 - No person to export any animal without licence
 - Exportation to Singapore
 - Examination before exportation
 - Exportation of diseased animal or bird
 - Sect 83 (Certificate of freedom of State from disease)

Legislations(cont)

2. **Animal Rules 1962**
 - Prescribed landing place (entry & exit point) for importation/exportation of animals and animal products
 - Issuance of health certificate



ANIMAL QUARANTINE STATIONS AND CHECK POINTS IN WEST MALAYSIA

QUARANTINE STATION	FACILITIES
KLIA Sepang	• Cattle / Buffaloes / Horses / Goats / Sheep / Dogs / Cats / Birds / Zoo Animals / Fish / Aquaculture
Pangkal Besar	• Cattle / Buffaloes / Horses / Goats / Sheep / Dogs / Cats / Birds
Sekeloa Pangang	• Cattle / Buffaloes / Goats / Sheep
Sekeloa Kelang	• Horses / Dogs / Cats / Birds
Sekeloa Kajang	• Cattle / Buffaloes / Goats / Sheep / Horses
Sekeloa Kajang / Merau	• Cattle / Buffaloes / Goats / Sheep

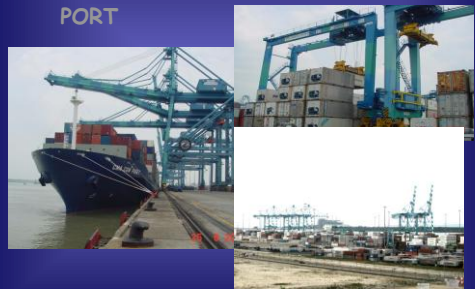
ENTRY POINT

Airport



ENTRY POINT

PORT



ENTRY POINT

LAND

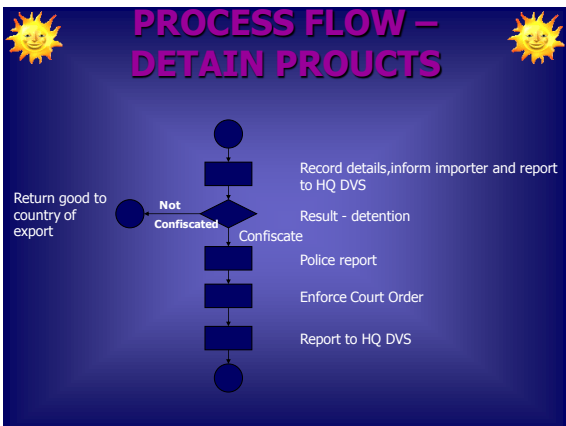


WORK PROCESS- DETAIN PRODUCTS

Work Proses	Approving Officer/ Ref.
Record animal and animal product held	PPV/PV Senior
Inform importer and prepare report for HQ DVS using appropriate form (Borang Laporan Kes Penahanan/Rampasan/Penyakit di Pintu Masuk/SKH)	Peg. Vet/PPV/PV Enforcement Officer DVS
Animal or animal products held will be sent back or confiscated	
If confiscated do a police report together with enforcement officer	
Obtain and carry out Court Order	
Complete Forms (Laporan Kes Penahanan/Rampasan/Penyakit di Pintu Masuk/SKH)	



PROCESS FLOW – DETAIN PRODUCTS



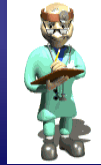
DISPOSAL

- Animal Act 1953 (Part II – Seksyen 9)
 - ❖ Disposal Cost – Borne by Owner
 - ❖ No reimbursement (Tiada Pampasan)
- Action – Court Order
 - ❖ Destroy
 - ❖ Auction
 - ❖ Hapuskira



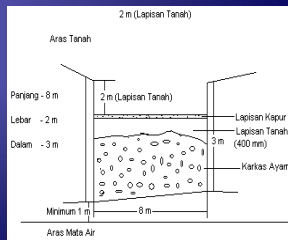
Disposal Method

- Bury
- Rendering
- Incinerator)
- Dispose at allocated site (Need Supervision)
- Include proper disinfectant



Method - Bury

- Specify Disposal Hole
- To cover hole filled with carcass



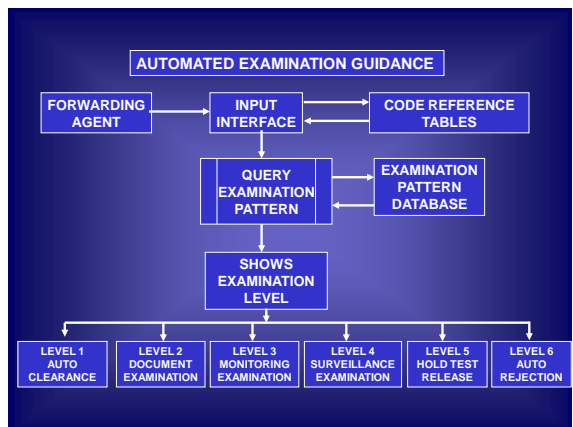
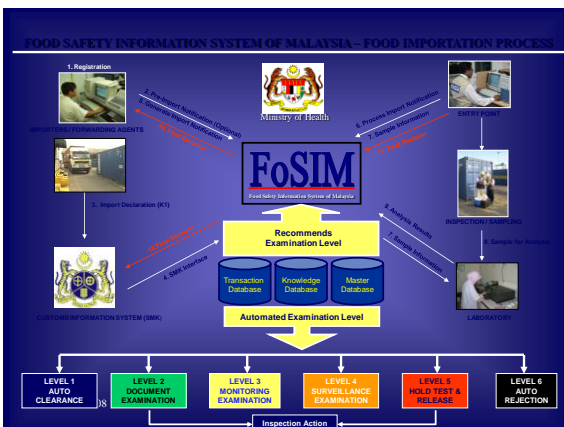
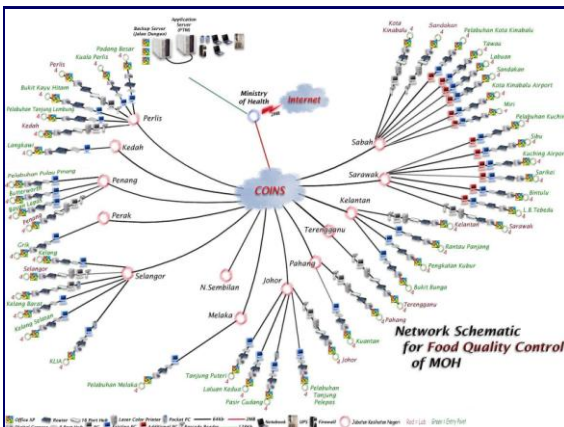
METHOD – BURY





Food Safety Information System of Malaysia (FoSIM)

- Development of a web-based system linking all 36 entry points to control food import to ensure speedier clearance, consistent scrutiny and greater transparency
- Launched in Aug 2003
 - to be integrated with Custom's system
- Adapted from FAIINS (Food Automated Import Inspection Network System) of Japan with customization to FSQ existing procedures
- In-built intelligent/knowledge databases
- Automated examination levels, food codes, analytical parameter codes, electronic references

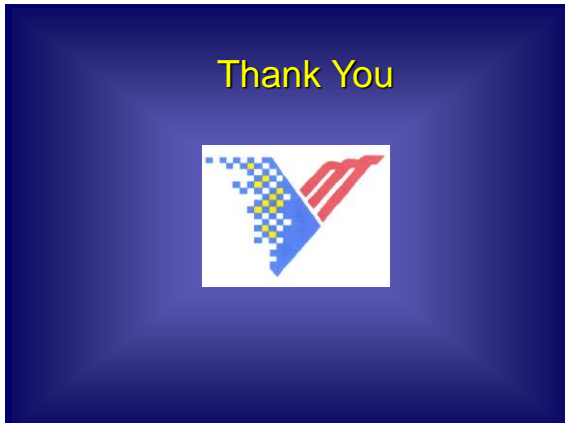







DOMESTIC FOOD RECALLED FROM LOCAL MARKET

No	Product	Country of origin	NCR	Quantity/ Value
1	2005 - 2008 : Biscuits : Puff (Square, Lemon, Creamy Chocolate, Citrus), Cracker (Supercrown, Tastylic)	Malaysia	Melamine	-

- 
- RECOMMENDATION/ STRATEGIES**
- Establish, Review, & Update Food Legislation To Ensure Safe Food Supply Domestically And Internationally.
 - Continuous Strengthening of Food Safety Infrastructures Including Food Inspection Capabilities, Sampling And Laboratory Facilities & ICT To Ensure Food Safety.



COFEPRIS




FEDERAL COMMISSION FOR THE PROTECTION FROM SANITARY RISK

EMERGENCY RESPONSE MANAGEMENT

SPECIAL PROGRAMS EXECUTIVE DIRECTORATE

4-6 MAY, 2010

1

COFEPRIS

- Governmental office under the Ministry of Health with technical, administrative and functional autonomy, which makes it a de-concentrated organization.
- Its authority comprises regulation, control and sanitary promotion under a unique coordination, operated by processes.

2





Mission

To protect the population from sanitary risks caused by the use and consumption of goods and services, as well as from exposure to environmental and occupational factors, through prevention, regulation and sanitary inspection.

Vision 2012

Mexico will have a reliable and efficient national authority for the protection against sanitary risks, outstanding for its technical, operational and regulatory capacity, as well as for its commitment to the human and professional development of its personnel.

3








OUR MAIN OBJECTIVES

- Offer suitable protection to the population.
- Collaborate on competitiveness improvement of the industries in order to direct them into the foreign trade stream.
- Prevent conflicts for the national productive industry.

4








Institutional Framework

Assessment, regulation, control, surveillance and analysis of RISKS related to:

1. Food <ul style="list-style-type: none"> ➢ Processed goods ➢ Slaughter houses ➢ Mollusk shellfish ➢ Red tide ➢ Genetically modified organisms 	2. Health Products <ul style="list-style-type: none"> ➢ Drugs ➢ Pharmacovigilance ➢ Expired and counterfeit drugs 	3. Medical Services <ul style="list-style-type: none"> ➢ Infectious and pathologic hospital residues ➢ Transplant centers ➢ Blood bank ➢ Tissues
4. Other products and services <ul style="list-style-type: none"> ➢ Tobacco ➢ Alcohol ➢ Cosmetics ➢ Cleaning products ➢ Sanitary control of publicity 	5. Sanitary Emergencies <ul style="list-style-type: none"> ➢ Basic Sanitation 	6. Occupational Health <ul style="list-style-type: none"> ➢ Radiological Protection ➢ Pesticides
		7. Environmental <ul style="list-style-type: none"> ➢ Air ➢ Water ➢ Soil

5

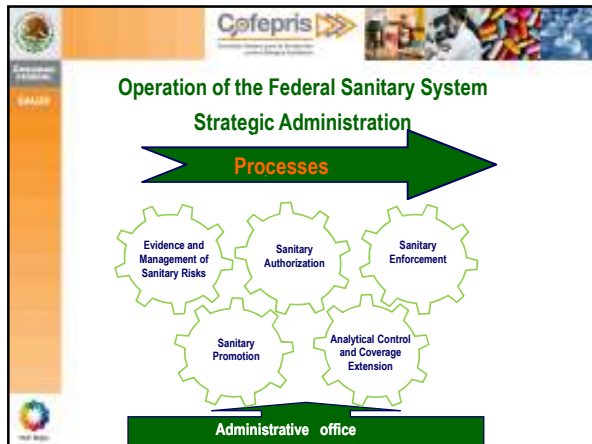
ORGANISATIONAL STRUCTURE

```

graph TD
    FC[FEDERAL COMMISSIONER]
    L1[Linkage with National and International organizations and the local governments]
    L2[Linkage with Congress and with the Judiciary]
    TS[TECHNICAL SECRETARIAT]
    R[Reception of proceedings and attention to customers]
    E[Evaluation of risk and sanitary risk Management policies]
    C[Communication with the private sector and general population. Training]
    I[Issuing of licenses and registries]
    M[Monitoring and inspection of establishments and products]
    L3[Laboratory analysis and certification of third parties]
    A[Administration of financial, human and material resources]

    FC --- L1
    FC --- L2
    FC --- TS
    FC --- R
    FC --- E
    FC --- C
    FC --- I
    FC --- M
    FC --- L3
    FC --- A
    
```

6



EMERGENCY ATTENTION PROJECT

BACKGROUND

THE EXECUTIVE DIRECTION OF SPECIAL PROGRAMS OPERATES THIS PROJECT OF EMERGENCY ATTENTION PROJECT. IT STARTED IN 2003. IT IS, OF COURSE AN IMPORTANT AND VITAL ACTIVITY AT SANITARY ENFORCEMENT COMMISSION

OBJECTIVE

TO GUARANTEE THAT THE SYSTEMS, PROCEDURES AND RESOURCES ARE EFFICIENT AND SUFFICIENT.

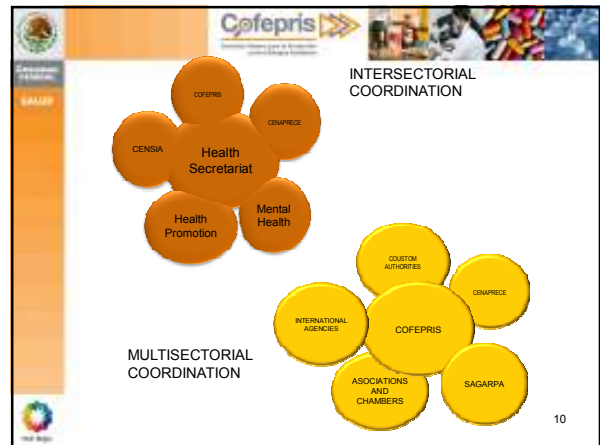
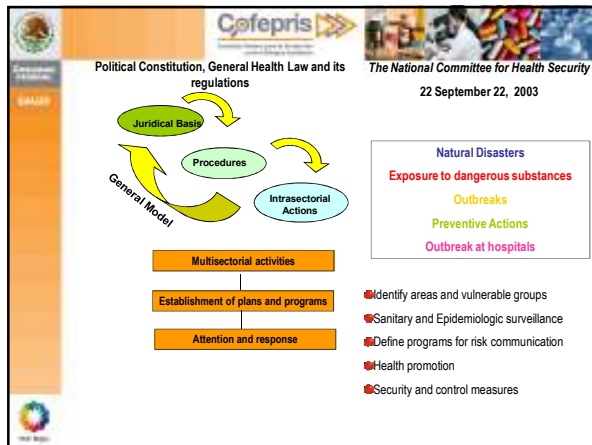
TO PROVIDE WITH A QUICK AND PROFESSIONAL ASSISTANCE

IMPACT INDICATOR

PROTECTED POPULATION

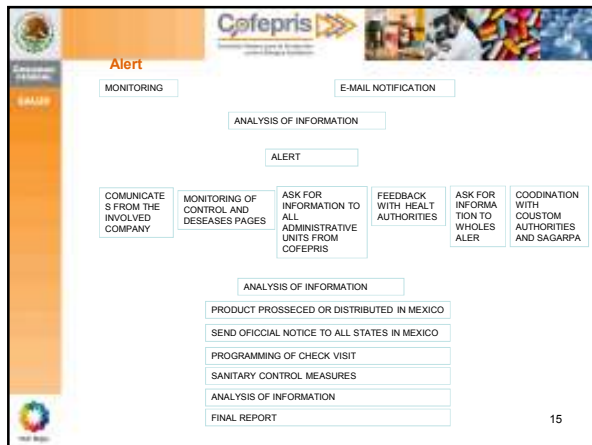
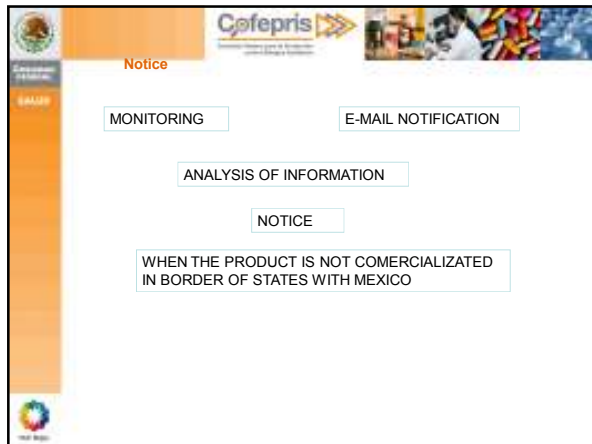
MEXICAN POLITICAL CONSTITUTION.

ARTICLE 4.- "ALL CITIZENS HAVE THE RIGHT TO HEALTH PROTECTION"



- Organization and Response**
- Coordination with all administrative areas from COFEPRIS**
 - Evidence and Risk Management Commission
 - Sanitary Promotion Commission
 - Sanitary Authorization Commission
 - Sanitary Enforcement Commission
 - Analytic Control and Expansion of Coverage Commission
 - General Coordination of the Federal Sanitary System
 - Coordination with other Authorities**
 - National Center of Preventive Programs and Disease Control (CENAPRECE y DGEpi)
 - Customs Authorities (SAT)
 - Secretary of Agriculture, Livestock Production, Rural Development, Fishery and Food (SAGARPA, SENASICA)
 - Coordination with Chambers and associations**
 - National Association of Department Stores (ANTAD, ASACHOC, ETC.)
 - National Association of Drug Stores (ANAFARMEX)
 - Self Services Stores (COSTCO, WALMART)
 - Others**
 - Importers (CUSTOM AGENTS)
 - Direct contact with sellers

- Procedure for the attention of sanitary alerts**
- Monitoring of several web pages including news and Health Authorities from other countries.
 - Reception of e-mails from FDA, USDA, CFIA, Health Canada. RASFF, INFOSAN
 - Classifies the e-mails from other countries in to:
 - Notice
 - Warning
 - Alert
 - Investigation in web pages
 - Official health pages
 - Producers or sellers pages



EXAMPLES

- MELAMINE IN MILK PRODUCTS FROM CHINA 2007
- *Salmonella Saintpaul* IN TOMATOES FROM MEXICO 2008
- *E. Coli H7:O157* IN GROUND BEEF FROM USA 2009
- *Salmonella Typhimurium* IN PEANUT BUTTER USA 2009

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Melamine in milk products


- After the report from INFOSAN were babies get ill for the consumption of infant formula COFEPRIS ask CENAPRECE for cases and did not report any case of illness.
- COFEPRIS did 10,485 visits and did not find infant formula from China.
- COFEPRIS secured the profit of 700 kg of white rabbit candy, 12 kg of cookies and 120 pieces of chocolate.
- COFEPRIS analyzed 5 samples of candy and no traces of melamine were found.
- In February 1, 2009 the restriction of the imported products from China was ended.

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SALMONELLA SAINTPAUL IN TOMATOES FROM MEXICO

- FDA reports 57 cases of salmonellosis associated to the consumption of tomatoes from Mexico.
- CENAPRECE did not report any cases of illness associated to the products.
- FDA, SAGARPA and COFEPRIS worked coordinated to make inspection visits at harvest fields and packing companies, they took samples from water, products, surfaces and farmland in 4 companies in different states of Mexico.
- Less than 10% out of 130 samples taken, resulted whit the presence of *Salmonella*, but not *Saintpaul* specie.
- FDA said that tomatoes in the market were not associated to the outbreak and therefore a new warning for jalapeños and chile serrano was launched
- The institutions worked coordinated again and visited 3 companies and took similar samples from tomatoes.
- As a result of different visits and analysis, specific evidence from *Salmonella Saintpaul* was not found.
- Mexico reiterated its cooperation and its support by allowing these investigations.
- Several companies were put on the white list because FDA found *Salmonella* however *Saintpaul* specie was *never* found.


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E. Coli H7:O157 IN GROUND BEEF FROM USA

- After SAGARPA's notification about the recall of ground beef in the USA.
- CENAPRECE did not report any cases of illness
- COFEPRIS did 35 visits and did not find any products for sale
- COFEPRIS had found that 2 companies processed meat in Mexico and both companies had acquired this meat, but in different plants from the involved company.
- The USA Embassy sent a document giving guaranties of safety products.
- COFEPRIS and SAGARPA worked coordinated with USDA to make an inspection at the involved plant of the recall of such product .
- SAGARPA has developed a program for the sample taking from imported beef.

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SALMONELLA TYPHIMURIUM IN PEANUT BUTTER FROM USA

- CENAPRECE did not report any cases of illness associated to the consumption of the product.
- COFEPRIS asked the customs authorities to deny the entrance of products that contain peanut butter from USA.
- COFEPRIS did 2,396 visits and did not find any products for sale from the FDA list
- COFEPRIS designed an importation scheme so every company has to notify the entrance of products with previous documental analysis. Then COFEPRIS takes samples of products for the *Salmonella* test. When the importer accumulates 10 negative sample results the scheme changes from 1 to 5 shipments
- Under this scheme, 4 companies are operating at this moment
- There has been 94 negative results to *Salmonella* so far.
- In this moment the importation scheme is in evaluation for improvement.

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THANK YOU

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DEVELOPMENT & STRENGTHENING OF FOOD RECALL SYSTEMS FOR APEC MEMBER ECONOMIES

4 – 6 MAY 2010
MANILA
PHILIPPINES

1

FOOD RECALL SYSTEM IN PAPUA NEW GUINEA

Terry Daniel
a/CEO
Food Sanitation Council Secretariat

2

CONTENT


- Food Sanitation Council
- Food Safety Regulatory System
- Food Laws
- Purpose
- How the purpose is achieved
- Food Recall Procedures
- Food Recall PNG Experience

3

FOOD SANITATION COUNCIL

- FSC was established under the Food Sanitation Act 1991, Part II – Section 3 (1)
- It was established on the 17 April 2002
- Food Sanitation Council is an independent, expertise - based authority which comprises of stakeholders in various government organizations & agencies which addresses food safety and quality in the country.

4



- Operates under the Ministry of Health
- Reports to the Minister for Health on all matters related to food safety and quality
- Meets at least 4 times a year

5

- Members are appointed by notice in the National Gazette by the Minister for Health
- Appointed for a period of two (2) years
- Members are eligible for re - appointment
- Elected Chairman to be appointed as Chairman by notice in the National Gazette

6


FSC MEMBERSHIP

1. NDOH	7. UNITECH
2. Dept. of Finance & Treasury	8. Food Inspector (NCDC)
3. DAL	9. Food Analyst (CPHL)
4. Dept. of Commerce & Industry	10. IMR
5. NISIT	11. ICC
6. PNG Chamber of Commerce	12. CIMC – Informal Economy
	13. DEC

7

SUB - COMMITTEES

- Review Committee
- Food Fortification Committee



8

FSC SECRETARIAT

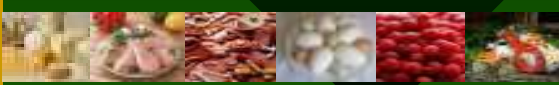


➤ Oversees the functions & affairs of the FSC

9

ROLE OF FSC

➤ The role of the FSC is to protect the public health and safety of the people of Papua New Guinea by maintaining a safe food supply.



10

OBJECTIVES

- (a) Protect public health and safety by maintaining a safe food supply
- (b) Provide consumers with information about food so they can make inform choices
- © Prevents misleading and deceptive conduct

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FOOD SAFETY REGULATORY SYSTEM

Standards setting
National Institute of Standards & Industrial Technology (NISIT)

Policy
National Department of Health
Food Sanitation Council
Food Sanitation Act /Regulation

Enforcement
Provincial Health Dept. & Urban Local Level Government Authorities

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FOOD LAWS

- Food Sanitation Act
- Food Sanitation Regulation
- Food Safety Code

13

PURPOSE

The main purpose of the Food Laws are as follows;

- (a) To ensure food for sale is safe & suitable for human consumption
- (b) To prevent misleading conduct relating to sale of food
- (c) To apply the food safety code

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HOW THE PURPOSE IS ACHIEVE

The main purpose are to be achieved primarily by;

- (a) Providing for the licensing of particular food businesses &
- (b) Requiring particular licenses to have an accredited food safety program &
- (c) Providing for the accreditation and auditing of food safety programs; &
- (d) Providing for the monitoring & enforcement of compliance with this food laws & food safety code.

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Food Recall Procedures

- Food Recall Procedures document are with the Independent Consumer & Competition Commission (ICCC)
- Their Officer's enforce this legislation but not effective
- We (EHOs) use our powers in the laws to enforce / recall food of none compliance

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Food Recall PNG Experience on Melamine

- EVENTS
- Receive of information on Milk & Milk Products tainted with melamine
- Melamine Task Force formed
- Task Force develop Plan of Action

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- EVENTS (cont')
- Plan of Action included;
- ✓ Press Release in daily news papers
- ✓ Ban on importation of all infant formula, milk & milk products made from China

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➤ Plan of Action (cont')

- ✓ Circular instruction for EHOs to remove all milk & milk products from shelves of food shops.
- ✓ Information on Melamine & its health effects sent to CEOs, PHAs, Paediatricians & all Clinicians

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THANK YOU!

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 Ministerio de Salud
 Dirección General de Salud Alimentaria

FOOD RECALL NATIONAL SYSTEM






PERÚ
2010


Food Recall - Peru

- Part of the provider's auto control system (HACCP, lot identification, traceability program).
- The manufacturer is responsible of maintain an efective traceability and recall system, and keep process and traceability documentation available.




Food Recall - Peru

- The provider must inform about the food safety incident to the competent authority (fishery, manufactured and primary products)
- There's no legal requirement if it is a quality issue.




Food Recall - Peru

- If it is detected by the Regulatory Authority (market surveillance, complains or food incidents), the provider is notified for giving further information in order to evaluate an intervention.




Food Recall - Peru

- If there is part of an external sanitary alert noticed by the Chancellery, the Authority identifies the importers (Sanitary Register) and through the Tributary Administration, the lots that have been imported to dispose the recall.



Food Recall - Peru

- Depending on the localisation and the distibution area the regional and local governments are informed and update.
- Role of the Sanitary Authority:
 - Risk asses
 - Planing and coordination for activities
 - Risk communication



Food Recall - Peru

Peruvian experience:


- Melamine in milk derivative products (2009)
- *Bacillus cereus* in instant powder food for infants (2008 and 2009)
- Soybean oil with date expired (2009)



Relevant Legislation

- Regulation on Fiscalization and Sanitary Control of food and beverages (1998).
- Sanitary Regulation on the HACCP System application for food and beverages manufacturing (2006).
- Food Safety Law (2008).
- Food and Beverage Sanitary Alerts Attention (2009).






**PRODUCT RECALL SYSTEM
In the Philippines**


Presented by:
Albina M. Mendoza
Food Drug Regulation Officer
Food and Drug Administration

Workshop on the Development & Strengthening of Food Recall System for APEC Member Country
4-6 May 2010 Manila, Philippines




LEGAL BASES

Republic Act 3720
Foods, Drugs, Cosmetics, and
Devices Act
Bureau Circular No. 8 series 2001
Product Recall System




Bureau Circular No. 8 s. 2001

**Guidelines To Be Observed On The
Implementation Of Product Recall
System**




SCOPE:

**This guideline shall apply to the
recall of all types of products
regulated by BFAD.**




BFAD Committee for Product Recall:

- Chief of Product Services Division
- Chief of Laboratory Services Division
- Chief of Legal Information
Compliance Division
- Chief of Regulation Division I and II
- Medical Consultant / Deputy Director



BFAD Committee for Product Recall:

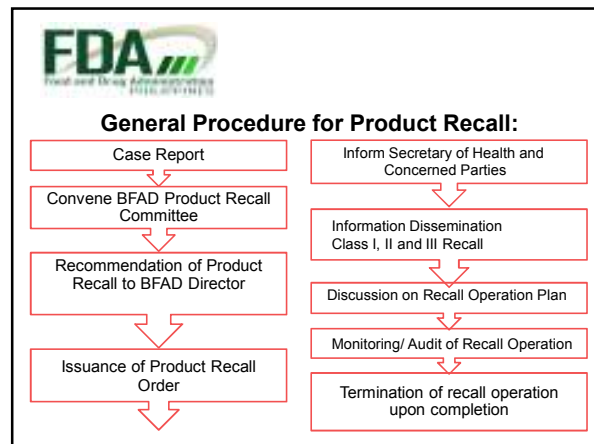

- *Created to evaluate the health risk presented by a violative product*
- *In case a product recall is agreed upon, a written concurrence shall be submitted to the BFAD Director for approval and proper issuance of recall order.*



Who will initiate Recall?

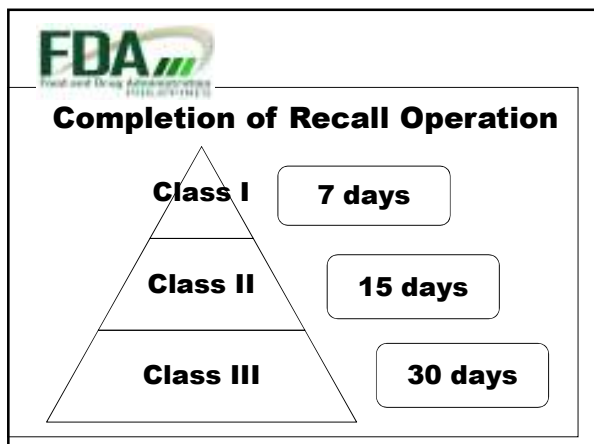
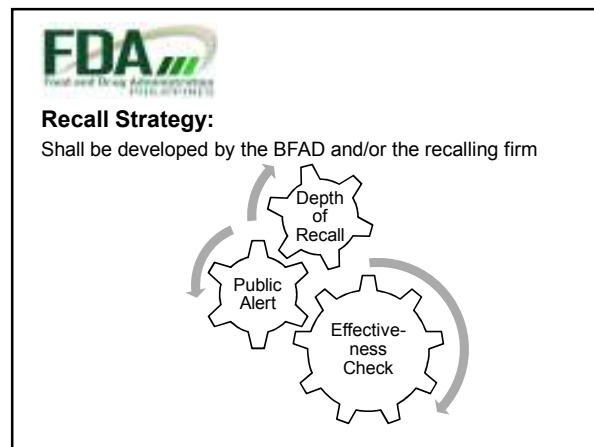

Manufacturers and Distributors of a violative product:

1. at any time on their own initiative
- Firm Initiated Recall
2. in response to a recall order by BFAD
- BFAD Ordered Recall

Public Health Alert:
To be issued by BFAD within 24-hours after issuance of Order for Product Recall.

Class I Recall	• Notice and warnings shall be issued by tri-media to the general public, health professionals, health institutions, industry associations, distribution outlets for such products and other concerned parties.
Class II Recall	• Notices and warnings shall be issued to : 1) groups and institutions that are identified as those who generally use or are exposed to the product, and 2) those who could help remove such violative products from the market or prevent such products from being used.
Class III Recall	• Notice and warnings shall be issued to the concerned parties and distribution outlets.

Recall Status Report:

- The recalling firm is mandated to submit Periodic Recall Status Reports to BFAD so that the agency may assess the progress of the recall.
- Frequency of such reports will be determined and specified by BFAD in each recall case relative to the urgency of the recall.



Content of the Recall Status Report:

- Number of consignees notified of the recall, and date and method of notification;
- Number of consignees responding to the recall communication and quantity of products on hand at the time it was received;
- Number of consignees that did not respond (if needed, the identity of non-responding consignees may be requested by the BFAD)



- Number of products returned or corrected by each consignee contacted and the quantity of products accounted for;
- Number and results of effectiveness checks that were made;
- Estimated time for completion of recall.



Disposition of Recalled Products:

- The recalling firm will notify BFAD of the final disposition:
 1. For destruction.
 - Submit Procedure for the disposal of recalled products
 - Destruction should be witnessed by BFAD representatives
 2. For reprocessing
 - Reprocessed products shall be allowed for distribution and sale only upon recommendation by BFAD



Thank you !

Food Recall in Korea

Kyoung-Mo Kang
(e-mail: kmokang@kfda.go.kr)
Korea Drug and Food Administration

Overviews

- ❖ What is recall and how it runs in Korea
- ❖ Electronic system for urgent recall
- ❖ Obstacles in recall activity

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for APEC Member Economies, 4-6, 2010

2/20



What is recall ?

Recall

- ❖ An appropriate alternative method for removing marketed consumer product,
 - as a result of self-inspection by firm,
 - a violation of the laws administered by the Korean Food and Drug Administration



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Recall Situations

- ❖ Routine testing by firm
- ❖ Inspection by regulatory authority
 - Violation of Food safety standard etc.
- ❖ Reporting of a problem with imported food
- ❖ Manufacturer's decision to fit for it's purpose



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Recall Initiation

- ❖ Voluntary recall
 - Firm noticed its violations as a result of self-inspection
- ❖ Request by KFDA
 - When firm responsible do not undertake recall on its own
 - Problems occur during on-site inspection
 - Investigation authority found risky factor in food provided by collection authority



➤ Mainly initiated by KFDA

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Recall process

1. Recall announcement
 - KFDA's website, newspapers
 - Title of recall activity & Reason for recall
 - Brand and product name, Lot No.
 - Production dates and shelf life
 - Details of manufacturer : telephone number, address etc.
 - Publish in a daily newspaper
 - TV subtitle advertisement, SMS Text





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Recall process

2. Recall monitoring
 - Check on-going recall activities
3. Recall termination
 - Firm reports the recall results
 - based on it's initial recall plan, amount of uncollected products
4. Recall verification
 - effectiveness check
 - firm's communication system with their dealer
5. Corrective action and preventive action
 - The cause of the recall, and disposal etc.

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Disposal of Recall product

- ❖ Discard of recall products
 - Secure objective evidence. e.g. photos of disposal scene
- ❖ Return of recall products
 - Send recall products back to exporting countries
- ❖ Conversion for use other than food
 - e.g. animal feed or fertilizer

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Firm's duty

- ❖ The firm report result of recall to KFDA or regional office
 - Date of announcement
 - Media to which announcement through
 - Number of announcement performed
 - A copy of announcement and its contents
 - Proper Disposal of recall product



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Electronic system for Urgent recall



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Urgent Notification System

- ❖ Unfit food's details are notified to Urgent recall center
 - e.g. firm's details, inspection history and reason for recall etc.
- ❖ Then the center propagates the message via the system to....
 - related organizations and retail stores across the nation
 - mid/small-sized distributors, retailers nationwide

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Urgent Notification System

(8,771 shops are available now and expand to 100,000 by 2011)

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Sales Ban System

- ❖ Recall products are blocked by POS data system
 - Related organizations and retail stores across the nation
 - mid/small-sized distributors, retailers nationwide
 - POS is the place in a shop where a product is passed from the seller to the customer

POS data system in retail shop

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Challenges in recall enforcement

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Recall Statistics

Year	Number of Recall Products	Result (%)
2005	84	
2006	45	
2007	106	> 40%
2008	227	
2009 (1/4)	74	

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High turnover rate of food

- ❖ Short-term distributed products take up majority of recall
 - account for 42.5 % of total recall cases in Korea
 - KFDA Statistics (05~07.6)
 - e.g. Kim chi, seafood

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Complicated distribution channel

- ❖ Small and medium enterprises(SMEs) and importers take up the majority of recall
 - Vulnerable distribution channel
 - Manufacturer (207,172), restaurants (718,092) nationwide
- ❖ Difficulties of product tracing in companies
 - Distribution channels with many stages
 - manufacturer → 1st wholesaler → 2nd wholesaler → retailers

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Other issues



- ❖ Firm's concerns over decline in their image due to recall
 - Call for easing criteria on announcement to media
- ❖ Consumer has a right to know the result of recall
 - release the recall statics officially ?
 - Just focus on identifying the exact cause of recall and recall statics is not announced officially ?



Summary

- ❖ KFDA makes an effort to ensure that consumer warned about hazardous products ubiquitously
- ❖ We develops Sales Ban system for liaison between headquarter and District, and POS data system for blocking hazardous food on-site of purchase
- ❖ We understand firm's concerns over decline in their image due to recall, so the recall strategies must be set up in a considerate way



Russian Federation
Social & Industrial Foodservice Institute

Food Recall in Russian Federation

Speaker: Shirkov Andrey

Contents

- › Why recall food?
- › Causes of food recall in Russia
- › Stages and responsibilities
- › Expertise, utilization and destruction
- › Reform of technical regulation
- › Procedures in case of information about non-conformance of food production with technical regulations
- › Advanced practices: traceability and food recall procedures
- › Food safety control and recall in government procurement sector
- › Features of food recall system in Russia

2

Why Food Recall?

- › Efficient food recall system strengthens food safety and minimizes economic losses in emergency of food hazard
- › Efficiency of food recall depend on creating environment (when producer is interested in recall) and technical capabilities (when producer can do it efficiently)
- › Context of Russian Federation is the transition from old system of safety control to new model

3

Causes of food recall

- › Non-conformance with technical documents
- › Non-conformance with requirements for circulability of food products

4

Stages and responsibilities

What must be done if emergency of food hazard is identified on different levels

- › Production level
- › Transportation and storage
- › Realization of goods
- › Handling food during time of laboratory investigations
- › Role of control authorities

5

Expertise, utilization and destruction

- › Assessments in expertise
- › Decision of control authorities on utilization or destruction
- › Rules for utilization
- › Rules for destruction

6

Reform of technical regulation

- ▶ Rationale for technical regulation reform (voluntary national standards and regulations in conformity with WTO rules)
- ▶ Coverage of new technical regulations in Russian economy

7

Procedures in case of information about non-conformance of food production with technical regulations

- Information transfer once information of non-conformance with technical regulation is received
- Check of validity of the information
- Designing of Program of prevention of harmful impact (for period of validity check)
- If information is valid — another Program of prevention of harmful impact
- If harm can't be eliminated — suspension of production, realization, recall
 - and compensation of losses to purchasers
- Procedure of compulsory withdrawal
- Administrative and criminal responsibilities

8

Advanced practices: traceability and food recall procedures

- ▶ Systems HACCP and ISO 22000 as basis for strengthening traceability and food recall procedures in Russia
- ▶ System of traceability provides identification, records
- ▶ Established procedure of recall
- ▶ Efficiency of food recall procedures assessment

9

Food safety control and recall in government procurement sector

Government procurement sector in Russia (Armed Forces)

- ▶ Developing requirements for range, quantity and quality of food purchased
- ▶ Conducting of competitive tendering, making contracts
- ▶ Examination of food on level of production and acceptance
- ▶ Withdrawal in case of non-compliance
- ▶ Key findings: efficiency of the system because of contract requirements, lack of state control mechanisms

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Features of food recall system in Russia

- ▶ **Weaknesses:** lack of responsibility for production of food non-compatible with requirements, lack of mechanism
- ▶ **Opportunities:** creating recall-stimulating environment, developing technical capabilities
- ▶ **Threats:** bureaucratization in case of strengthening control, low sensitivity to reputation losses

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Thank you.

12

Thailand Public Health Ministry Food&Drug Administration Import & Export Inspection Division

Sureewan Pattanawongyuenyong

Organisation in Thailand Dealing With Food

- Ministry of Public Health
- Ministry Of Agriculture and Cooperatives (MOAC)
- The police Crime Suppression Division on Consumer Protection.

The Police Office of Consumer Protection Board

Consumer Protection Board under the Prime Minister's Office to protect consumer rights, which involves food safety, advertisement and product labeling.

The Consumer Protection Act B.E. 2522 (1979)

- Consumer protection in the ad.
- Consumer protection in the label.
- Consumer protection in the contract.
- Actions on goods that could be dangerous.
- Actions instead of consumers.
- Association aims to protect consumers.
- The appeal of the business.

Ministry Of Agriculture and Cooperatives (MOAC)

- **is responsible for the control of imports and the safety of raw and semi-processed meat, plants, and fish products as well as the certification of exports**
- Department of Fisheries.
- Department of Livestock
- Department of Agriculture
- Office of Agricultural Commodity and Food Standards National (ACFS)

The National Bureau of Agricultural Commodity and Food Standards (ACFS)

The ACFS is responsible for six key tasks

- (i) the control and safety monitoring of fresh and processed agricultural products and foods by certifying and enforcing standards within the production and processing industry;
- (ii) development of agricultural commodity and food standards;
- (iii) serving as the national accreditation agency for certification bodies for standards, hazard analysis as well as supervision of both public and private agricultural commodities and food laboratories to be in line with prescribed standards; With the assistance of JAS-ANZ.
- (iv) representing the country in international standard-setting organizations;

- (v) SPS risk assessments and negotiation with international partners in order to reduce technical barriers to trade; and
- (vi) improvement and enhancement of the competitiveness of Thai agricultural and food standards.

- Contravention of the standards or orders issued by the **ACFS** constitutes a **criminal offence** which is punishable by imposition of fines and/or imprisonment, apart from the administrative measure of licence revocation

The Ministry of Public Health (MOPH)

has three departments and one food center that are concerned with food safety and human health

- (i) the Food and Drug Administration (FDA)
- (ii) the Department of Medical Sciences (DMSc)
- (iii) the Department of Health (DOH)
- (iv) the Food Safety Operation Center

The FDA

- in charge of national food regulations
- based on the risk analysis principle
- under the Food Act B.E. 2522 (1979)
- the FDA has the power to prosecute violators of the Act and its secondary legislations and to impose administrative sanctions such as licence revocation

- FDA inspectors conduct site-inspection of processing plants and imported food products that need to comply with GMP for domestic supply and HACCP for export.
- The inspection procedure is based on risk analysis,
- The FDA acting as the national risk manager sets up the food mandatory regulations and enforcement activities under Food Act B.E. 2522 (1979).

The FDA

- Food Control Division
- Import & Export Inspection Division

Food Control Division

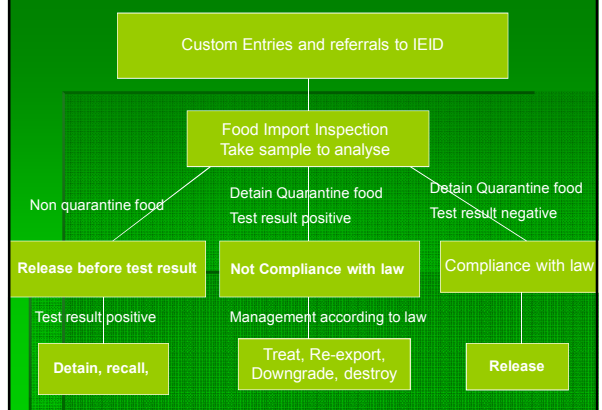
- Development standards and rules and regulations relating to control measures. Regulatory quality. And food safety standard
- Development of audit supervision of food surveillance. Food establishments and food advertising to be in the same legal standards consistent with national and international
- Corporate control food safety standards and in accordance with law.

- Capacity Development for the import and manufacture food for quality and Safety standards.
- Recommendation for academic knowledge. Research and development data to provide information on food
- Networks and sought support from all sectors to participate.
- Coordination and cooperation with foreign partners and building networks.

Import & Export Inspection Division

- To supervise the import and export product to meet the standards quality for health safety In accordance with the law

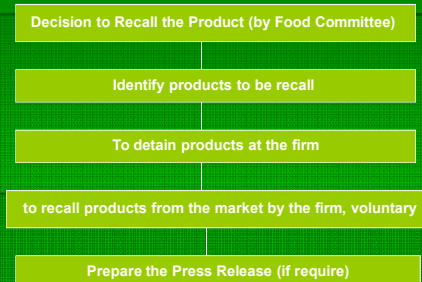
Inspection Process -Import & Export Inspection Division

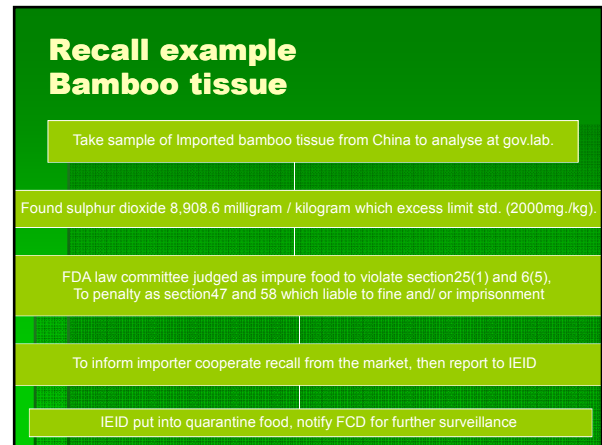
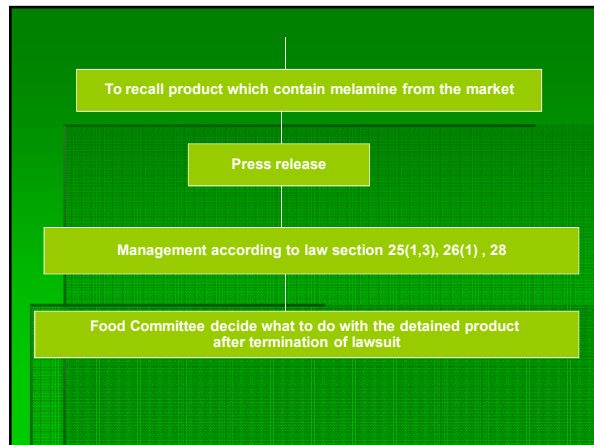
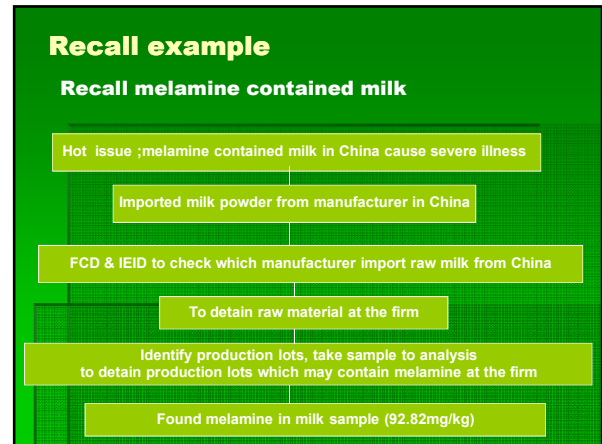
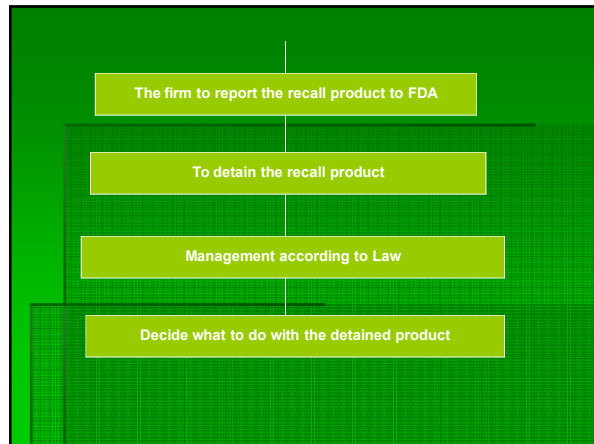


Food Recall Process -Food control Division



Recall Process





Food Acts B.E.2522 (1979)

- SECTION 15 No one may import food for sale except receiving licence from the authority.
- SECTION 25 No one may produce, import for sale or distribute the following foods:
 - (1) impure food;
 - (2) adulterated food;
 - (3) substandard food;
 - (4) other food which specified by the Minister.

- SECTION 26. Food of the following description shall be deemed impure;
 - (1) Food which contains anything likely to be dangerous to health
 - (2) Food in which a substance or chemical substance has been mixed which could deteriorate the quality unless such admixture is necessary to the process of production, the production and has been authorized by the competent officer

- (3) Food unhygienically produce, packed or stored.
- (4) Food produced from animals having disease which might be communicated to man.
- (5) Food in containers made of materials which are likely to be dangerous to health.

▪ SECTION 27. Food of the following description shall be deemed adulterated:

- (1) Food for which other substances are partly substituted or inwhich valuable substances are wholly or partly removed and which isslod as or under the name of the genuine food.
- (2) Substances or food produced as substitutes for any food and distributed as being genuine food.
- (3) Food Which is mixed or prepared in any way to conceal defects or inferior quality of the food.

- (4) Foods labelled in order to deceive or try to 'deceive the purchasers in matters of quality, quantity,, usefulness or special nature or place or country or production
- (5) Food not up to the quality or standard prescribed by the Minister under Section 6(2) or(3) and the quality or standard of that food deviate from the upper or lower specified limit more than thirty percent or its deviation may harmful to the consumer.

▪ SECTION 28 Substandard food is a food not up to the quality or standard prescribed by the Minister under Section 6(2) or(3) but its deviation is not as high as in Section 27(5).

▪ SECTION 29 Food of the following description shall be deemed food under Section 25(4)

- (1) not safe for consumption;
- (2) unreliable indication;
- (3) value or usefulness is not appropriate to the consumer.

▪ The Food Act B.E. 2522 (1979) is currently subject to amendment. Its final content will depend on the National Food Commission Act. A proposal is submitted to increase liabilities for those who violate the Act, with emphasis on product, premises and advertisements and scope for improved traceability.

▪ The FDA is taking part in the process of the Act's revision

- The ACFS takes the leading role for coordination while field works are undertaken by various line departments such as the DOA, the FDA, and the DLD. The ACFS has the coordinating role for the ASEAN Food Safety Network and maintains, develops and improves the website (<http://www.aseanfoodsafetynetwork.net>).

- Food Safety has been part of the national policy since 2003 with a view to strengthening food control strategies along the food chain more effectively, hence the promulgation of the National Food Commission Act (2008) and the revision of the Food Act.

Tran Minh Thanh

Department for Goods, Products Quality Management
Directorate for Standards, Metrology and Quality
Vietnam

Legislation document system about goods, product quality management

1. Law on goods and product quality No.05/##
2. Decree No.132/2008/NĐ-CP dated 31/12/2008 laying down the details of the execution of the goods, product quality management rules
3. Food Hygiene and Safety Ordinance
4. Decree No.163/NĐ-CP dated 7/9/2004 laying down the details of the execution of some of the parts of the Food Hygiene and Safety Ordinance

Recalling products that violate the Food Hygiene and Safety Quality

- This is the method of protecting the rights and legal benefits of consumers
- Vietnamese government is now composing the circular about banning, recalling food that violate the Food Hygiene and Safety Quality and it will soon be passed, promulgated and executed nationwide.

Example

- This information was issued at VN foods administrator's seminar on food safety and hygiene on Jan 1st 2010
- 147 occurrences with 33 deaths due to foods poisoning
- Most of the occurrences were discovered by the media channels
- General Assessment of the problem: It develops complicatedly and difficult to control as:
- Smuggled products in a small volume
- Home-made products, separated, using old techniques
- Policy System haven't reached the integrity, human resource is not adequate, Quality Standard System may needs modifying

Example (Continued)

- Another example from Vietnam is that the rumor that dried squid is made of rubber. When burned, it melts like burned rubber. Vietnamese Food Administrator is carrying out market surveillance, taking some samples and testing. But they haven't found out anything yet.

So the prerequisite is to pass a circular on procedures of food recall in Vietnam.

Products that must be recalled

- Products that violate the Food Hygiene and Safety Quality can be either:
 - Expired
 - Has one or more norms that are not qualified in comparison to the standards
 - Dishonest announcement
 - Hi-tech products that have not yet been given the rights to be circulated
 - Not reaching the quantitative standards
 - Illegal labeled
- So the prerequisite is to pass a circular on procedures of food recall in Vietnam.

Products that must be recalled (continued)

- Products that need to be announced but not be announced
- Dud products
- Products recalled by the producer or foreign authorities

Banning the violating products

There exist 2 levels

1. Temporarily banning: applied to the products with no risk such as insufficient quantitative or illegal labeled
2. Banning the circulating permission: When having evidence about the usage or consuming of products with high risk to human health

Forms of recall

1. Self-recall: Businessmen, Organization discovering and recalling in order to protect their brand name
2. Compulsory recall: Authorities or businessmen applying to violating product with high risk (recognized or suspected) to consumers

Recalling Scales

1. Plot-Recall: When exactly defined the product plot
2. Recalling all products of the same type: applied when having objective evidence about the violation being popular and/or risky

Levels of Recalling

- Lvl 1: Around 5 days, applied to violating products that cause serious consequences that may even lead to death
- Lvl 2: Around 15 days, applied to violating product that only cause temporary or immediate but not serious consequences
- Lvl 3: Around 30 days, applied to suspected product

Recalling Coercion

- Applied when businessmen have violated, received the recalling decision from the authorities yet have not executed the recalling before the deadline; or ones that have denied the decision of the authorities

Method of treatment

Recalled plots can be treated in one of the four following ways

1. Recycling: Applied to products with low risk to human health
2. Redirecting the purpose of using: Applied to products with risks to consumers yet do not need to be recycled or not recyclable and can be accepted for another purpose.

Method of treatment (continued)

3. Elimination: Applied to plots that have been affected by harmful bacteria, contain high rates of heavy metal or poisonous chemical content that is higher than the acceptable level. Those are products which is unable to redirect the purpose of usage
4. Re-exporting: Applied to imported plots that violate the terms of food safety

Authorities of making recalling decision

1. Vietnam Food Administrator (VFA) make the decisions to ban and recall products that was given the circulation license by the VFA itself and/or requested by related government bodies
2. Department of Health in cities and provinces under central authority make the decisions to ban and recall products that was given the certificate of qualification by the Department itself and/or requested by related government bodies

Authorities of making recalling decision (Continued)

3. Specialized inspecting agencies when discover false products will punish them in administrative way depending on their capacity and submit to their authorities to obtain permission to recall
4. Other authorities (not related to Health) (i.e. The Ministry of Agriculture and Rural Development, The Ministry of Industry and Trading, etc.) also have the rights to recall products related to their fields






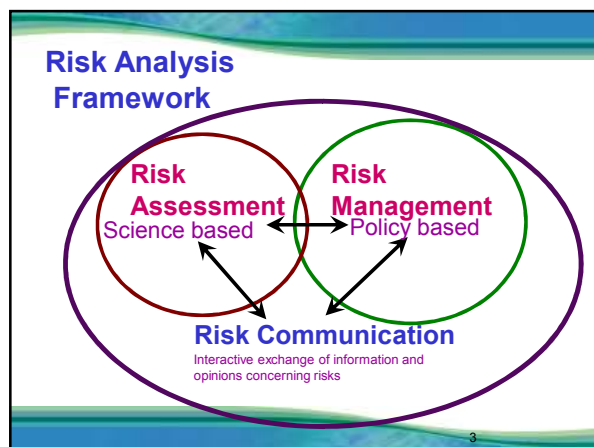
Risk Communication

Dr Barbara Butow

APEC Recall Workshop, Manila
4th – 6th May, 2010

Outline

- Risk communication
- Public perceptions of risk
- Communication strategies and tools
- Communication methods in an incident

Risk Communication

- Why are we communicating?
- Who is our audience?
- What do our audiences want to know?
- What do we want to get across?
- How will we communicate?
- How will we listen?
- How will we respond?

4

Risk communication is...

- Important part of both risk assessment and risk management
- active at the start of the process – not an add-on at the end
- **everyone's** responsibility

Risk communication is...

- two-way process
- understanding people's perception of risk
- opportunities for public involvement in decision making
- timely and accurate information
- internal communication

Risk communication is **not**...

- just about communicating risk;
- simply selling decisions to the public;
- a crisis-related process;
- the sole responsibility of communication specialists.

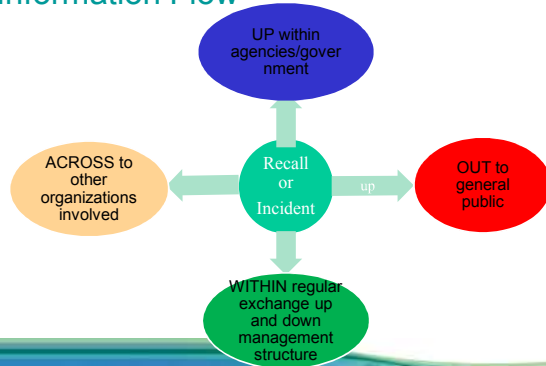
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Risk communication **is** about..

- Relationship building – developing a feeling of partnership among stakeholders.
- Consultation – input from stakeholders, including attitudes and motivating factors.
- Maintaining the contact – keeping people in the loop.

8

Information Flow



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Perceptions of risk

- We all see the world differently (mind sets).
- People of similar backgrounds tend to perceive risk in a similar way.
- Some gender differences.
- People with less control over their lives tend to see greater risk.

What we worry about

- Kids crossing the road
- Air travel
- Avian Flu
- Smallpox
- Allergies
- Breast cancer
- Asthma – smog
- Secondary smoke

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Managing risk or fear?

- actual risk, and the perception of risk, often differ
- We're often managing **fear** more than we are risk
- "Fear management" can be minimised by good and timely communication

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Perceptions of risk

Evidence-based perception of risk:

RISK = HAZARD

Consumer perception of risk:

RISK = HAZARD + OUTRAGE

Some outrage factors affecting 'acceptability'

Lower risk	Higher risk
Natural	Man-made
Familiar	Exotic
Control	No control

Trust

- Public confidence in the safety of the food supply.
- Trust in industry and government regulators to ensure safe food.
- Hard to regain trust once it is lost.

Trust

- Negative events are more noticeable than positive events.
- Sources of bad news are seen as more credible.
- Media is attracted to bad news.
- Special interest groups are skilful in using media.

Communication strategies and tools

10 ways to build trust

- Involve people in decisions that directly affect their lives.
- Release information as early as you can.
- Peoples' feelings – don't consider them to be irrelevant, irrational or an over-reaction.
- If you make a mistake, own up!
- If you don't know the answer, say so – it's OK to say "I don't know"

10 ways to build trust

- Always follow up.
- Speak in plain language – don't use technical jargon.
- Avoid presenting yourself like a bureaucrat.
- Involve other organisations as soon as possible.
- If one of your people hates talking to the media or stakeholders, choose someone else.

Adapted from New Jersey Department of Environmental Protection, 1987

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Communication strategies

Low risk – Low perceived risk eg. allowed microbial contaminant levels	PASSIVE
Low risk – High perceived risk eg. <i>E. coli</i> , in yet-to-be-cooked meat	RESPONSIVE
High risk – Low perceived risk eg. (<i>Campylobacter</i> in chicken)	EDUCATIVE
High risk – High perceived risk eg. <i>E. coli</i> O157 H7, in salami	PROACTIVE

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Communication action plan

- Build at outset of risk analysis process
- Team comprising government, industry and consumer representation
- Think of how and what want to convey (to whom?)

Communication tools

- Fact sheets, publications, advertising.
- Media releases, backgrounders.
- Telephone advice lines.
- Website, email bulletins.
- Conferences, seminars, meetings.
- Speeches, presentations, talks.
- Exhibitions, displays, launches.
- Education campaigns.
- Media relations.

Communication skills

- Listening.
- Writing (reports and material for lay audiences).
- Public speaking.
- Publishing (hard copy and web).
- PowerPoint presentations.
- Media relations.

Media

- Press, radio and television.
- Establish working relationships and credibility in non-crisis times.
- Know what messages you want to convey.
- Be open and honest... and available.
- Be helpful.
- Understand how the media works.

Risk communication and food safety incidents

Communication elements of your system

- Mechanisms of communication between organisations
- Communication tools required before, during and after a food safety incident (e.g. media releases, fact sheets).
- Responsibility for preparing and releasing communication tools and communicating with media.
- Timeframe and clearance process for communication tools.
- Communication responsibilities when the incident is spread across food, agriculture and health organisations.

Communication methods

- Spokesperson – who it is depends on emphasis
- Press conferences – more for major crises
- Messages developed and updated
- Webpage and fact sheets

Communication methods

- Scripts for enquiry staff
- Use press agencies to disseminate media quickly especially out of hours
- Travel advice
- Medical advice on doctors' website in case of symptoms

Communication tools (conventional)

- Have an emergency plan - keep a hard copy!
- Regular internal meetings in incident room
- Use existing networks/structures
- Know everyone before the emergency
- Establish emergency contact list

Communication tools (conventional)

- Have good established media contacts
- Keep a media log (a notebook is fine)
- Use print and electronic media
- Ethnic media
- Scripts for phone enquiry lines

Communication tools (new media)

- mobile phones and Blackberries (always be available)
- website essential – establish specialist web page for the subject and link to other experts
- Email media issues and updates to key stakeholders and influencers
- Use Google news to monitor the issue

Melamine contamination incident – Alert phase

- 12 September National Food Incident Response Protocol triggered
- 17 September INFOSAN Emergency alert reports 6,244 kidney stone cases in China
- 17 September China initiates a widespread recall of infant formula involving 22 producers

Action phase – “holding message”

23 September first Australian media interest

Key messages:

- Taking seriously
- Commenced National Food Incident Response Protocol
- Liaising with states and territories and AQIS and overseas agencies
- Mainstream dairy products, like milk, yoghurt and cheese - none imported since 2007
- Checking for imported foods with minor ingredients

Action phase – “targeted message”

Key messages:

- 24 September withdrawal of white rabbit candy
- Product is being withdrawn
- Don't consume and dispose of out of reach of children and pets
- Would have to consume several bags a day for many months for any ill effect



FSANZ Media statement: Advisory on White Rabbit Brand Confectionery

24 September 2008

Australian Food Regulators have commenced a formal request today to wholesalers and importers to voluntarily withdraw White Rabbit Brand Candies from shops pending further results of testing for melamine.

Testing in New Zealand released late today has confirmed that this product contains sufficiently high levels of melamine which may, in some individuals, cause health problems such as kidney stones if consumed in high quantities over a long period.

People are advised not to consume these milk-based sweets imported from China. This product is sold in retail packs through Asian retailers, supermarkets and restaurants.

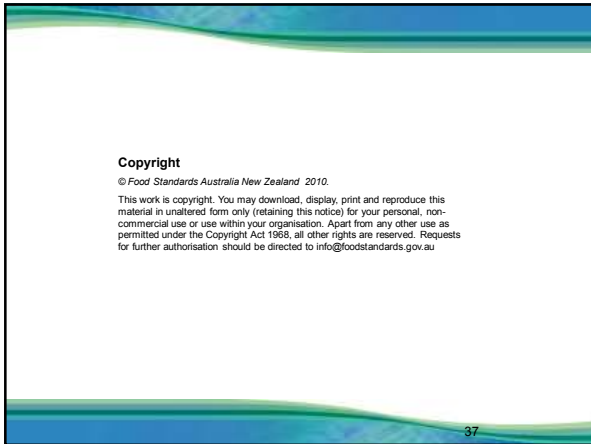
Anyone who has the product should not to consume it. It is unlikely that there could be a problem if consumed in small amounts but people with concerns about the consumption of this product should seek medical advice.

The Australian State and Territory agencies will be working closely with wholesalers and importers to facilitate this voluntary withdrawal.

Australia does not import infant formula products from China and has not imported full-dairy products, such as yoghurt or condensed milk, from China since March 2007

Summary

- What is and is not risk communication
- Perceptions of risk
- Trust
- Communication strategies and tools
- Case study



SWOT ANALYSIS

GROUP A (Brunei Darussalam, Republic of Korea, Indonesia, Papua New Guinea, Malaysia, Chile, Mexico, the United States of America)

Strength

- Big companies have recall in place
- Register product before being marketed
- Integrated network of all stakeholders
- Import control of foods and register imported products
- Surveillance system on all foods
- Identity lead agency
- Legislation in place
- Record and Documentation in place
- Traceability in place

Weakness

- Complexity of distribution channel (traceability) for products
- Country geographical distribution
- Insufficient human resources
- Small industries – no documentation
- Limited technical support
- No guidelines and protocols to involve all stakeholders
- Companies do not take responsibility
- Lack of products information
- Lack of Government support and commitment
- Complex of coordinated enforcement
- From farm to table bio security risk

Opportunity

- To develop guidelines and protocols
- To obtain government commitment and support
- To improve legislation
- To accelerate exchange of information between stakeholder and agencies
- To improve producer and consumer awareness
- To improve technical support/services
- To develop template/SOP for
 1. crisis management
 2. rapid response
- Quality Assurance System demanded by vendors
- More active participation in INFOSAN worldwide

Threats

- Failure to take timely action
- Fraudulent documents e.g. smuggling
- Internet sales no control measures
- Consumer misperception of low risk foods
- Inaccurate distribution of imported food
- Lack of defined role of responsibilities in agencies
- Outdated legislation

RECOMMENDATION :

Information System

Draft Recall Protocol Guidelines Recommendation

Operational Plan

Comprehensive training Risk Communication

National Information Centre on Food Recall

Establishment of a Food Model that could be used for a food recall plan

Economical traceability system for small and medium industry

Food safety management response

SWOT ANALYSIS GROUP B

	Philippines	Thailand	Viet Nam	Chinese Taipei	Russia	Peru	Australia
Strengths	<ol style="list-style-type: none"> 1. Laws and guidelines are in place 2. Infrastructure and management support, technical manpower 3. Presence of analytical laboratories 	<ol style="list-style-type: none"> 1. Strong public relations strategies, good image of FDA 2. Public health Ministry have network in all provinces may help strengthen food recall policy. 3. Food safety is the country policy since 2003 4. Put GMP, HACCP as preventive measures. 5. well educated personnel(pharmacist, food chemist) 	<ol style="list-style-type: none"> 6. GMC-HACCP as preventive measures – public health ministry have network in all provinces may help strengthen food recall policy 	<ol style="list-style-type: none"> 1. Awareness of food safety issue 	<ol style="list-style-type: none"> 1. Strong scientific foundation 	<ol style="list-style-type: none"> 1. A good background in HACCP System implementation because of food exports 	<p>Central coordination part</p> <p>Expertise</p> <p>Networks with stakeholders</p>
Weaknesses	<ol style="list-style-type: none"> 1. Resources 2. Insufficient number of manpower/equipment 3. Policies not fully implemented 4. Rapid alert system is not well-organized 5. Lack of coordination between departments of health and agriculture 6. Weak risk communication 7. Weak monitoring at production (agriculture) 8. Frequent change in leadership 9. Delineation of duties and responsibilities amongst concerned agencies is not clear 10. Devolution 11. Lack of reporting on food 	<p>Less cooperation between organizations.</p> <p>Food Act not mention ‘food recall’, mostly are voluntary recall, low effective recall plan and management.</p> <p>Less technology due to limited of potential IT personnel.</p> <p>more workload Less personnel, Less training, Less budget</p>	<ol style="list-style-type: none"> 1. Less cooperation between organization 2. Policy system about recall on food haven’t reached the integrity 	<ol style="list-style-type: none"> 1. Small food producer, long food supply chain 	<ol style="list-style-type: none"> 1. Lack of responsibility because not strong public pressure 	<p>Lack of statistics and laboratory capacity</p> <p>Lack coordination with the epidemiology area (information system)</p>	<p>Traceability</p> <p>No enforcement powers</p> <p>No input into risk assessment</p> <p>Sanctions lack of consistency and approach of jurisdiction</p>

SWOT ANALYSIS GROUP B

	borne illnesses						
Opportunities	1. Presence/available trainings from international bodies to continue strengthening regulatory agencies	revision of Food Act to mention 'food recall', more food recall training Asian single window policy may increase in exchange information of hazardous product between Asian country	1. Experience from APEC member economies; ASIAN single window my increase in exchange information of hazardous product between asian country	1. Because of the awareness of the different government agency, public entity and media, it strengthen the recall program	1. Creating environment 2. Creating technical capabilities	We have a permanent and multi sectorial commission on food safety (2008) Currently developing a project with EU in market surveillance	GSI recall portal Refine recall levels
Threats	1. Political interventions 2. Climate change	Political problem, changing government, changing policy. always changing key executive person due to political problem FTA policy increase workload, Economic problem effect to budget.	1. Always changing key executive person due to political problem	1. Public panic	1. Bureaucracy	Decentralization process to a local regional levels that need to improve not only the central level tasks but also the coordination	Emerging hazards/tampering Increase in processed foods with many ingredients which are hard to trace globalisation

Recommendations for Joint APEC Action Program

1. Information system/Web Base
2. Draft Recall Protocol Guidelines Recommendations
3. Operational Plan
4. Comprehensive training risk communication
5. National Information Center on food recall and best practice
6. Establishment of a food model that could be used for a food recall plan
7. Establishment of a traceability system on an economy scale (for small and medium industry)