Commodity Holds and Recalls

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The Katrina of Food Safety

Hallmark / Westland Beef Recall
Largest in History
143 million pounds

The Up Side

- No illnesses

- No deaths

- Much learned

- Applies to Food Defense preparedness

Session agenda…

- Roles and responsibilities

- Communication and action flow

- ECOS/Rapid Alert System

- Reimbursement/Replacement issues

- Ideas for improvement

Who is involved in holds/recalls?

■ Product manufacturers

■ Two primary regulatory agencies:

➤ Food Safety and Inspection Service, USDA
   ■ Meat, poultry, and egg products

➤ Food and Drug Administration, HHS
   ➤ All other foods

Who is involved in commodity holds/recalls?

- USDA AMS and FSA determine when a food product is on hold or is recalled

- AMS and FSA identify affected commodity contracts and delivery orders

- FNS communicates commodity hold or recall information to SDAs through the Rapid Alert System (RAS)

- SDAs notify Recipient Agencies (RAs)

Holds

- Invoked while investigation is pending

- Initiated by AMS or FSA

- Announced by FNS

- Policy states initial hold is for 10 days
  – Circumstances may require longer period

- State and local agencies must
  – Identify
  – Isolate
  – Not serve
  – Account for quantity

What you need to know about Recalls

- Similarities exist up to a point

  But…

- Never identical
- Expect information to change as things develop
- Consult USDA for latest information
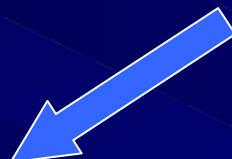- SDA's are in charge

All Recalls are Voluntary

- Violations found, for example:
  - Microbiological, chemical
  - Statutory violations, mislabeling

- Regulatory agency presents data to vendor

- Vendor voluntarily complies with recall request

- Vendor conducts recall
  - Notifies consignees = distribution chain
  - Issues press release

FSIS Recall

FSIS and Manufacturer FSIS and vendor discuss voluntary recall

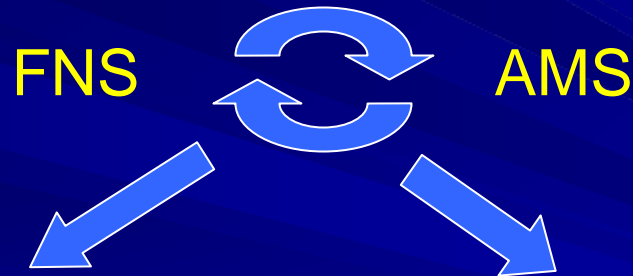Manufacturer Begins recall

Consignees

Vendor begins to notify further processors and other customers

FSIS Press Release

FNS Recall Events

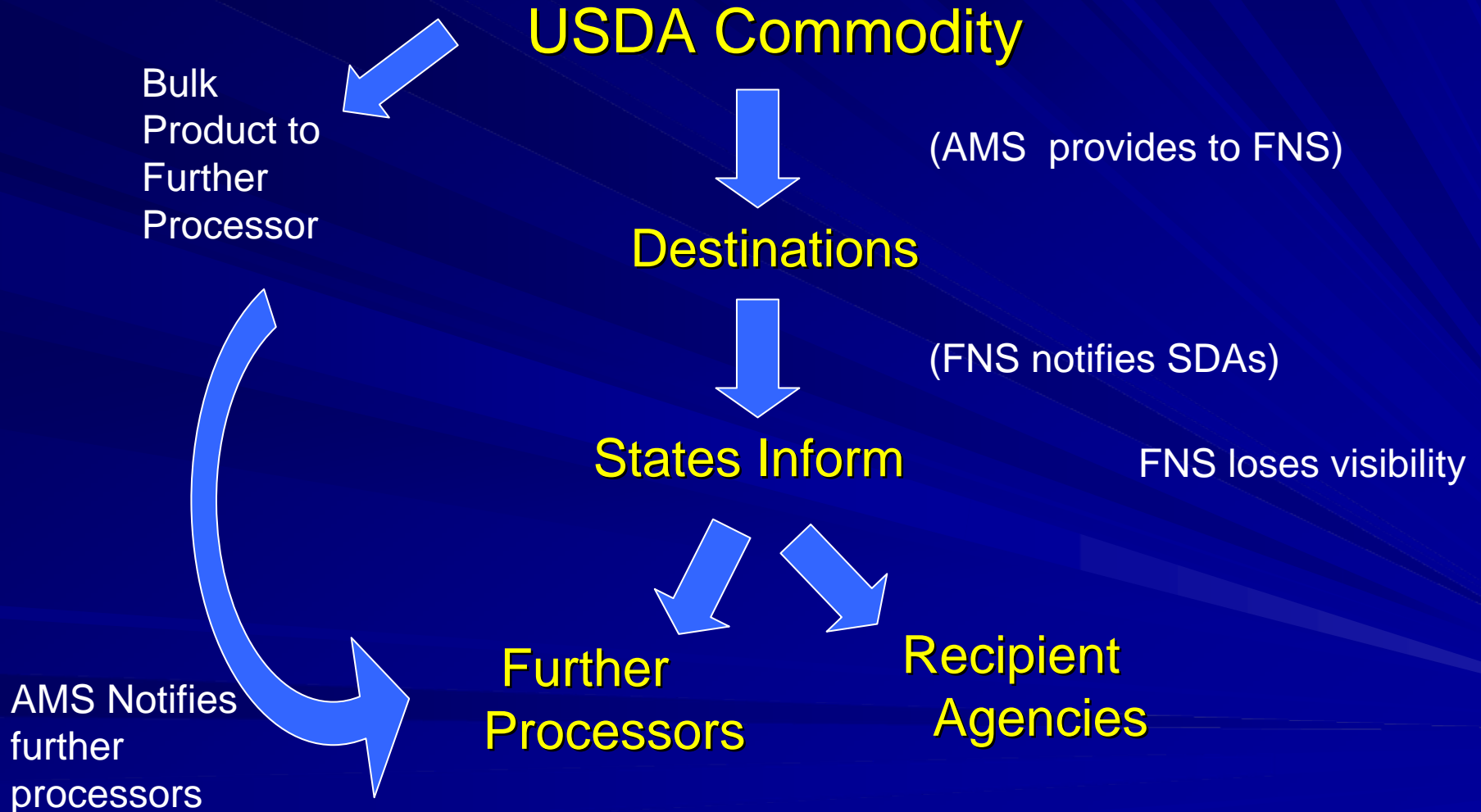FSIS
Public Notice

FNS   AMS

NOT USDA
Commodity

USDA
Commodity

No ECOS (RAS) Notice

Post to ECOS Home Page

FNS Recall Events

USDA Commodity

Bulk Product to Further Processor

(AMS provides to FNS)

Destinations

(FNS notifies SDAs)

States Inform

FNS loses visibility

AMS Notifies further processors

Further Processors

Recipient Agencies

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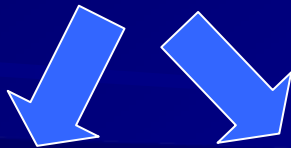# Recall Scenario #1: Product was Shipped Directly to States

USDA Commodity

↓

SDA Destinations

↓

States Deliver Further

↙ ↘

Further Processors   Recipient Agencies

- AMS Role: work with FNS to get product inventoried and located (how much, and where is it?)

- AMS works with contractor to get product recalled and replaced

Recall Scenario #2: Product was Shipped to Further Processors

USDA Commodity

Bulk
Product to
Further
Processor

Further
Processors

AMS Notifies
further
processors

- AMS notifies processor & provides information about what's involved

- Processor determines disposition of the product(s)

- AMS/FNS works with further processor to get product recalled

- Processor is responsible for contacting States and recalling product

Standard Guidance

■ FNS Regulations:

7CFR Part 250

Section 250.13 through 250.30 contain requirements related to food safety

■ Hold and Recall Document, 2001

http://www.fns.usda.gov/FDD/foodsafety/hold-recallpros.pdf

State and Local Responsibilities

- 7CFR Part 250

  – Defines State Agency and/or local agency requirements

  – Locals must comply with USDA and/or State direction

Warehousing, Distribution and Storage of Donated Foods

- States are required to physically separate donated commodities from other inventory

- Schools are allowed to use single inventory, if the SDA permits

Source: 7CFR 250.14

Storage Facilities

State owned, or contracted, storage facilities must:

- Clearly identify donated food
- Conduct annual reviews of facilities and document compliance
- Document to whom commodities were distributed and
- Who picked-up commodities

Source: 7CFR 250.14

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Traceability is Key

Know:

- what is in inventory – easy to identify
- where it is stored
- to whom product was sent
- who picked-up product

Source: 7CFR 250.14

Product Identification

Specific to each hold or recall, information must be provided by manufacturer:

- Company name
- Brand name
- Product name
- Case markings, ex. Manufacturer name and address
- Establishment number
  (meat, poultry or egg products)
- Product markings
  - Can codes
  - Lot numbers
  - Product dating, ex. Sell-by date, use-by date
- UPC alone is not enough

Records are Key

- **All agencies – SDA or RA must:**
  - Record what they received
- **SDAs must:**
  - Record what they distributed and to whom
  - Know what USDA Delivery Order went to Further Processing
  - Show receipt of reimbursement funds and
    - Disbursement of funds to SFA or Further Processor

Source: 7CFR 250.16

Other Records

- Food Service Management Companies
- Warehouses
- Others with contracts

Must keep records on:

- ➢ Distribution
- ➢ Disposal
- ➢ Storage
- ➢ Inventory

Source: 7 CFR 250.16

Other Records -- continued

■ Further Processors

Must keep records on:

➢ Distribution
➢ Disposal
➢ Storage
➢ Inventory
➢ Commingling

Source: 7 CFR 250.16

SFA Requirements

■ SFA or its commercial storage facility must comply with

– State or local laws and regulations on safety

– Applicable Federal, State, or local laws or regulations regarding destruction

– State and local health authorities provide disposal instructions, which can vary

Source: USDA/FNS Guidance

2001 Commodity Hold and Recall Process

■ Federal responsibilities:

- FSIS or FDA determine recall in cooperation with manufacturer
- FSIS or FDA contacts AMS/FNS and decision is made to put product on hold or recall

- Hold – 10 day clock starts for investigation

- Recall – FNS notifies SDAs within 24 hours of recall
- Recall – FNS provides recall notification, press release, other information about tracing product and documenting reimbursement

Source: USDA/FNS Guidance

2001 Commodity Hold and Recall Process

■ SDA responsibilities:

   – Assign a State Food Safety Coordinator
   – Compile similar list for RAs

   – SDAs contact RAs with hold or recall notification within 24 hours or as soon as possible
   – SDAs contact distributors/warehouses and determine:
      ■ Amount of product still in storage at State level
      ■ Amount and location delivered to RAs

   – SDAs compile and provide to FNS:
      ■ Amount and location of product still in storage
      ■ Amount of product consumed
      ■ Documentation for reimbursable costs

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2001 Commodity Hold and Recall Process

■ RA responsibilities:

– Assign a Food Safety Coordinator

– RAs contact sites with hold or recall notification immediately and ask that product be isolated and inventory taken

– RAs provide to State:
   ■ Amount and location of product still in storage
   ■ Amount of product consumed
   ■ Documentation for reimbursable costs

Source: USDA/FNS Guidance

SDAs and Others….

- Are, in fact Food Distributors
- So are State Contracted Warehouses and Distributors

- All are subject to FSIS Recall Requirements whether commodity or non-commodity product:
  - Locations of product and quantities
  - Documented removal/destruction
  - Effectiveness checks

ECOS/ Rapid Alert System

ECOS RAS Hold/Recall Process

- Case created in ECOS when hold / recall is declared
  - Document current information
  - Create a RAS alert notification message
  - Transmit RAS notice to Recall Contacts identified in ECOS
    - Updates can occur for new information on:
      - Additional Affected Agencies
      - Increased scope (i.e., products, delivery periods, etc.)
      - Any new information that is critical

ECOS RAS Hold/Recall Process

- Recall contacts acknowledge receipt of notification and check ECOS for details

- FNS monitors ECOS to ensure all Agencies are aware of hold / recall

ECOS Hold / Recall Case

- **ECOS Recall Case Limitations**
  - Supply Chain visibility ends at delivery point
    - Rely on SDA, distributors & processors to track further
    - Substitution & redirection of orders unknown to ECOS
  - Delivery Order product quantity and type is identified
    - Quantities from order or product receipt acknowledgement
    - Processed product calculations required to determine donated food quantities
    - Co-mingling of raw product further complicates donated food accounting
  - ECOS design allows only SDA Recall Contact to provide product quantity and disposition information

Hold & Recall Coordination

- **State Agencies**
  - Monitor ECOS for DO information & instructions
  - Coordinate RA and Industry partner efforts
    - Product destruction, re-donation or return
  - Collect and compile case information to enter into ECOS case file
    - Product quantities
    - Illness or injury information
  - Manage financial aspects of hold / recall

Hold & Recall Coordination

- Processors & Distributors:
  - Locate and sequester product in possession
  - Provide information to State
    - Identify Recipient Agencies who received product
    - Quantities of product sequestered, delivered or unaccounted for
  - Dispose of product as directed

Hold & Recall Coordination

- Recipient Agencies:
  - Locate and sequester product in possession
  - Provide information to State
    - Quantities of product sequestered, delivered or unaccounted for
  - Dispose of product as directed

RAS ECOS User Functions

- Two RAS user functions in ECOS
  - Recall Contact
  - Recall Role
- Establish User functions in ECOS Administration, User Profile
  - User may have either or both functions assigned
- Recommend at least 2 persons per organization for each function

RAS ECOS User Functions

- **Recall Contact**
  - User who will receive alerts
  - User specifies up to 3 devices (i.e., email, fax, phone, text messaging)
  - Specify device order for notification
    - If no contact made on first device then contact on next specified device is attempted
  - Contact prompted to acknowledge message
  - Must have at least one Recall Contact identified in an organization

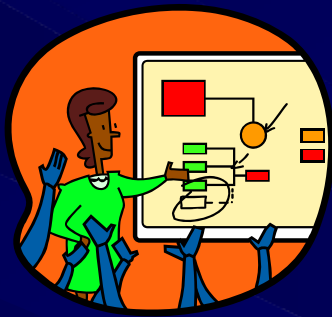# RAS ECOS User Functions

- **Recall Role**
  - User who responds to information requests
  - Access to Recall Case response form
    - Provides information on commodity quantities isolated, destroyed or distributed
      - ECOS Delivery Order or Receipt Acknowledgement provides initial quantities for accounting
  - Must have at least one Recall Role defined in an organization

New Notification Service

- **ECOS notification capability for non-ECOS users**
  - Provide notification of a hold/recall event in the commodity program
    - Notify public of event - not restricted by FNS
    - General information about the event
  - Recipients self-register with ECOS notification service provider
    - Registration link will be provided on FNS Web site
    - Notification by email message only
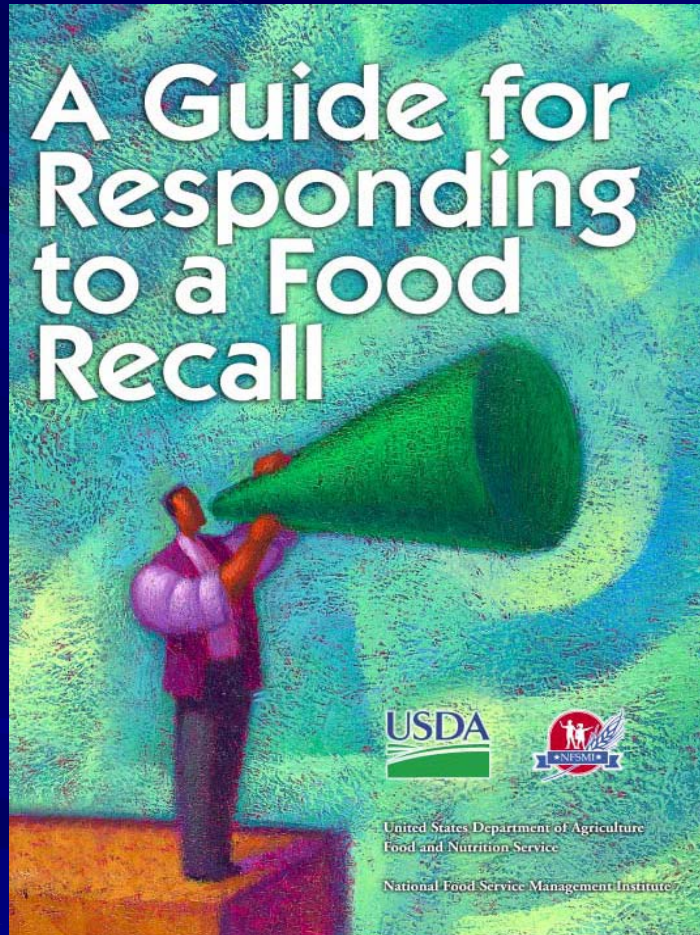 - Notification by email message concurrent with current SDA notifications

Reimbursement/Replacement Issues

Ideas for Improvement

- Hold a "lessons learned" meeting and act upon those lessons
- Revise and update the 2001 "Hold and Recall Procedures"
- Train on hold and recall procedures
- Train on inventory management
- Resolve issues with further processed products
- Formalize communication strategies with other organizations – information multipliers
- ECOS notification of hold/recall event to non-ECOS users

Responding to a Food Recall
Under Revision!!

• **Resource for foodservice directors and managers.**

• **Contains a checklist with procedures for responding to a food recall.**

From NFSMI
http://www.nfsmi.org/Information/recallmanual.pdf

Resources

- National Food Service Management Institute www.**nfsmi**.org
  - ➤ free training – just ask!

- **Training Available from the FNS Food Safety Staff :   Inquire through the Food Safety Staff Mailbox** FoodSafety@fns.usda.gov

- **FNS Food Safety web page:** http://www.fns.usda.gov/fns/food_safety.htm

Thanks!

Questions?