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New Approaches to Recalls

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Agency Versus Establishment Initiated Recalls

- Question: Should establishment initiated recalls with their own recall plans be approached differently from the Agency's traditional approach?
 - If a product is adulterated and therefore subject to recall, the recall process should be treated the same whether the problem is identified by the establishment, FSIS, a state agency or a consumer because the same issues are present.
 - Lack of real control of the recall process once the product leaves the plant.
 - Possible miscommunication as the recall notice is passed from the plant to the distributor to the next facility in the supply chain.
 - The establishment will benefit from full disclosure and cooperation through improved public confidence and assistance with the recall process and effectiveness checks.



Withholding Mark of Inspection

- Question: Should the mark of inspection be withheld from products pending sample results.
 - This should probably be determined on a case by case basis, based on risk to the consumer.
 - Some criteria that could be used include:
 - Is there valid evidence from elsewhere that this product is adulterated, contaminated (confirmed tests, epi statistics, etc.)
 - Is it a high risk product – ready-to-eat, destined for the school lunch program, etc.
 - Is it a high risk adulterant with serious consequences if consumed - i.e., HUS, death, miscarriage, etc.