Food Recalls at the Processing Level

Food manufacturers process, package and distribute billions of food containers each year. Seldom is there a reason to question the safety of the food product primarily due to the precautions and safeguards built into the manufacturing process. Good manufacturing practices (GMPs) and HACCP are such safeguards. A *Food-recall,* a vital component of GMPs,can have such an impact on food safety that it warrants special mention.

Food Recall Plan

Legal responsibility for product safety and wholesomeness rests with the manufacturer. It is in their best interest to use a *system of food recall* which is designed to isolate any lots that are deemed to pose a health risk and to assure their most effective possible withdrawal. Typically, recalls are due to human mistakes or machine malfunctions or they may be in response to a customer's complaint or illness.

A *food recall plan* is accomplished by having a written plan or procedure which includes:

- identification of all internal and external personnel involved in the recall;
- means to implement a recall and decide on its extent (ie. production codes);
- means of notifying affected customers in a manner appropriate for the degree of risk involved;
- control of returned food; and
- recall progress assessment.

Not only is it important that a recall plan is in a written form but it must be kept current and occasionally practiced.

Due to the publicity and uncertainty involved, product recalls can be very stressful for everyone involved. The absence of a written recall plan will likely result in "chaos" which will affect a firm's ability to expediently remove a hazardous food product from the market place.

Why Use A Production Code?

The assignment of *production codes* to manufactured food products is a critical part of a recall system. These codes can vary significantly but generally will identify the production date, production line and/or specific batches. If a serious public health risk is identified and the final product is not coded, *all* of the manufacturer's product may have to be recalled at an obvious added expense and embarrassment.

The objective of coding is to:

- help determine the cause of a problem;
- limit losses;
- allow orderly withdrawal of identified product from sale; and
- allow quick identification for FIFO (first in/first out) control in product distribution.

Production Code Design

The ideal production code is designed to provide all the necessary information, as well as be easy for the manufacturer to decipher.

A typical production code for a smoked product may read "5-162-2/1". This code tells us that the product was smoked on the one hundred and sixty second day of 1995 and that it was part of the first batch from smoker number two. The industry standard is to include no more than one day's production under a single code.

For any number of reasons a manufacturer may choose to simplify the coding system even more. For instance, incoming lots for some firms are small and are processed soon after they enter the plant. In such cases, the incoming *raw product* may be assigned a lot number (i.e. 22) which is also the same number that is attached to the finished product. The lot size may involve several batches, but this can be justified due to the simplicity of the coding.

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In-House Records

Once a problem is identified, in-house processing and production records can be reviewed. *Smoke house records* for instance, will be able to estimate the total amount of product involved and also give specific details about that day's processing, *i.e.* type of smoke used, times and temperatures obtained, source of fish, deviations from standard process (if any), etc. Other records such as *sales invoices* can indicate where the identified lots were shipped. The availability of these and other records will not only expedite the recall but may help determine where the defect occurred.

Documented records which clearly show that a company is "*in control*" during its handling and processing of its products will likely absolve the firm from a liability viewpoint as the cause of a customer's complaint or illness. Any benefit of the doubt will likely be given to the company that is "in control". On the other hand, a manufacturer that chooses to operate without such records will have a difficult time in demonstrating they have consistently maintained control of their operation.

For further information please contact your local Health Authority

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