Effective Implementation of Food Recall Systems for Trade Facilitation

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Overview

• Introduction

• Food recalls
  - Background and purpose
  - Key features of food recall
  - Elements of national food recall systems
  - Preparation for a food recall
  - Steps of a food recall

• Codex/FAO activities in area of food safety incidents/emergencies and recalls
Introduction

- Globalization - increasing demand by consumers for variety - creation of global market - transboundary movement and trade across countries – imports/exports - trade

- Quality, health, safety, labelling, fraud issues acquiring global focus

- Requirements imposed - government & buyers – need to be met

- WTO role important in global trade - SPS/TBT Agreements allow governments to impose measures within rules to prevent use of standards as trade barriers

- Non compliances – various reasons; handled through various options – recall

- Rejections/ NCs/ FS emergencies - require the food safety/ quality/ fraud problem to be contained – varias RM options

- Food recall a fundamental RM tool used in events of FS/ quality/ fraud events/ food safety emergencies which helps to avoid unnecessary wider disruption of trade & thereby facilitate trade

- Role of paperless or e-systems for food recall
Food safety and quality in value chain

- Food production chain highly complex involves many steps from primary production or imports right to sale to final consumer. At each stage there is scope for introduction of food safety hazards or even issues that relate to food safety, quality or fraud.
RM Options for handling non-compliance

• Food destroyed
• Food reconditioned/ retreated
• Exported to another country whose requirements not as stringent
• Food recalled
Food Recall

“The action to remove food from the market at any stage of the food chain, including that possessed by consumers”

It is a fundamental tool in the management of risks in response to food safety events and emergencies.
Food Safety & Product Recalls - Some Examples

- **Melamine** Contamination of Infant Formula in 2008
- **E.coli O104:H4** (in 2011) in northern Germany
  - serious outbreak of foodborne illness (characterized by bloody diarrhoea, serious complications)
- **Dioxin** contaminated Irish pork in 2008
- **radionuclide** contamination of food items from Japan
- **Pesticide residues** found by EU in vegetable consignments from Thailand in 2009-11
- **Horse meat** - fraudulent labelling - horse meat being passed off as beef – issue of consumer confidence & trust
A snapshot of recent recalls in US

- **Listeria and Salmonella contamination continues to be the main causes of recall** even during 2013
- Jan 25, 2013 [Michigan Retail Store Recalls Ground Beef Products Due To Possible Salmonella Contamination](#)
- Jan 26, 2013 [Oklahoma Firm Recalls Chicken Fried Chicken Breasts That May Contain Foreign Materials](#)
- Jan 26, 2013 [Whole Foods Market Recall Whole Catch Wild Alaskan Sockeye Salmon Because of Possible Health Risk from Listeria](#)
- Jan 29, 2013 [Sprouter Northwest Recalls Alfafa, Brocco Sandwich Sprouts, Clover, Spicy Sprouts Because of Possible Health Risk](#)
- Jan 29, 2013 [New Mexico Firm Recalls Beef Jerky Products Due to Misbranding and An Undeclared Allergen](#)
- Jan 30, 2013 [Whole Foods Market Expands Its recall from 18 states of Whole Catch Wild Alaskan Sockeye Salmon Because of Possible Health Risk From Listeria](#)
- Jan 31, 2013 [California Firm Recalls Veal Trimmings Due to Possible E. coli O157:H7 Contamination](#)
- Feb 1, 2013 [Texas Firm Recalls Chicken and Pork Tamale Products Due to Misbranding and Undeclared Allergens](#)
- Feb 2, 2013 [Whole Foods Market Voluntarily Recalls Prepared Food Items Made with Circle Sea Salmon Lox Trim in Two States Due to Possible Health Risk](#)
- Feb 3, 2013 [Wisconsin Firm Recalls Liver Paté Due to Misbranding and An Undeclared Allergen](#)
  sodium caseinate
Purpose & Causes of a food recall

• To protect public health, by ensuring
  ➢ a rapid removal of unsafe food from all possible stages of the supply chain (single event/ emergency)
  ➢ the concerned consumers and customers are informed; and
  ➢ food under recall has been handled (retrieved, destroyed or reprocessed)

• Also
  ➢ Ensure compliance with legal requirements
  ➢ Protect company assets including brand reputation
  ➢ Overall trade facilitation

Causes
  * Microbiological results beyond acceptable limits,
  * foreign matter presence (glass, needles, metal pieces)
  * chemical contamination
  * Radio nuclear materials (radioactive chemicals at unacceptable levels)
  * labeling errors
  * tampering of products
Key features of food recall

- **Aim**: quick retrieval from FC
- **Shared responsibility** (FBO/CA)
- **Traceability**
- **Communication/collaboration/IT tools facilitate**
- **Resources** – limited, consider SLDBs/street food
- **Applied safety/NC, Q**
Key Features of food recall

- Applied in cases of safety (emergency), non-compliance, quality...
- Aim is quick retrieval of food from food chain;
- Shared responsibility: FBO for recall; oversight CA
- Communication/ information to consumer, governments, media, international organizations, others
- Data collection & collaboration (national/ regional/ international organizations and networks)
- **Traceability** – a tool to enable effective recalls (minimize size, accuracy of recalls)
- **Resources** – limited, consideration to **SLDBs** including street food vendors & market stalls
- IT tools facilitate
- Preparation is important
Why effective traceability
Traceability - Important Concepts

• A traceability system is an **effective tool** with which FBOs can trace food throughout the food chain—possibly through **uniquely identified lot/batch/consignment** of food.

• **Common legal requirement** - FBO to have a documented one-step-back & forward traceability

• Having **accurate T information** is **cost-effective** (entire lot not recalled if only one batch affected)

• Traceability refers to “one step forward” & “one step backwards” approach—can have **information of product flow in the entire food chain**

  ➢ Identify immediate **customers & suppliers**

  **Customers**

  Downstream tracing refers to ability to establish where products went to - important to identify & recall contaminated products & not safe ones –so minimize size of recall

  **Suppliers**

  Upstream tracing refers to ability to identify where products came from –need to investigate & rapidly establish the source of problem & rectify the same, prevent further occurrences & resume production
Key elements of a national food recall system (8)

- a legal framework enabling **powers** of CA
- clearly assigned **roles & responsibilities** (FBO & CA) – food recall plan and National food recall systems
- capability for **effective & timely RM decision-making**
- provision/availability of **guidance/training materials**
- an effective mechanism for **information exchange** among implementing partners (role of IT)
- procedures for **communication/ notification** (media & consumers, international)
- procedures for **documentation & record-keeping**
- effective mechanisms for **verification/ evaluation/ review**
Food Recall Plan

“The procedures and arrangements that a food business operator may have in place to retrieve food and food products from the food chain if a problem arises.”

National food recall System

“The system/framework that national governments put in place for effective food recalls.” The system/framework may include the legislative framework, guidance, training, communication mechanisms, record-keeping, evaluation, etc.
Example of food recall workflow

Initial communication with relevant partners (government & industry) – format/ template, procedures

Initiation & implementation of food recall across the food chain – forward & backward

Monitoring & documentation of the recall (verification also)

Verification of retrieval, correction or disposal of affected food items

Providing consumer advice (industry/ govt actions)

Monitoring actions to prevent the recurrence of unsafe products – check controls, increase audits, monitor consumer complaints

General evaluation of the recall
Example of a recall action decision tree

- Intimation of incident
  - Suspicion of health risk
    - Determine whether food is unsafe – may include RA
      - Health risk
        - Food on the market
          - Initiate a recall & Corrective actions
        - Food not on market
          - Hold product & take corrective actions or disposal
      - No health risk but non compliant
        - May take other actions
      - No health risk and compliant
        - No action & monitor if needed
Codex/FAO activities on Food safety incidents, emergencies & recall

- Codex documents on food import and export inspection and certification systems (CCFICS)
- GL for design, prodn, issuance and use of generic official certificates
- FSER (FAO/WHO)
  - Framework for developing national FSER plans
  - Guide for application of risk analysis principles & procedures in food safety emergencies
  - Guide for developing & improving National Food Recall Systems
- Early Warning/Rapid Alert, Horizon Scanning on food safety
- INFOSAN - A voluntary network of national food safety authorities (178 countries) jointly managed by FAO/WHO; Aims to prevent international spread of contaminated food and foodborne disease and strengthen food safety systems globally
Introduction – purpose, target audience, scope - Guidance on development, review & implementation of effective national food recall systems as key management option to respond to FS events/ emergencies

Terminologies

Preliminary steps for developing and/or improving national food recall systems

National food recall systems (Elements, Traceability, Data collection & exchange systems)

Setting up & operating a national food recall system

Food recall management

Elements of food recall management

Example of food recall workflow

Conclusion

Support countries to establish/ implement effective national food recall system to respond to FS events/ emergencies through BPs
Useful websites


• Emergency prevention & early warning in area of food safety (EMPRES Food Safety): EMPRES-FS@fao.org

• INFOSAN – International food safety authorities network – https://extranet.who.intinfosan/

• *FAO Regional office for Asia and the Pacific http://www.fao.org/asiapacific/rap/home/en/

• *Capacity Building and implementation of international food safety standards in ASEAN countries http://foodsafetyasiapacific.net/

• Food Retail Network in Asia http://foodretailnetwork.asia/
Conclusions

• Food recall an important **RM option** to address food safety

• **Prevents escalation of food safety events** to emergencies

• **Legal framework** important

• **Coordination** with government & cooperation with FBOs

• **Resource intensive** so need to consider the purpose & benefits – food safety, confidence in product, reputation of country, future market access

• **Traceability important** (may be simple one)

• Well handled food safety issues essential for trade facilitation
THANK YOU