



TIP SHEET 11 - FOODSERVICE

PRODUCT IDENTIFICATION, TRACE, AND RECALL

The ability to identify and trace food is an important aspect of any food business. Food regulators, retailers, insurance companies and food manufacturers require that food be traceable, and at a minimum have a process in place that enables them to trace food one up to whom it was sold and back to the ingredient supplier (one back). However, even with best efforts, there may be a breakdown in controls that can lead to a recall or withdrawal. Having an effective plan in place that includes the ability to effectively identify and trace food and respond to a recall will help minimize the impact of the event to the brand.

LEARNING OBJECTIVES

APPLICABLE CODE ELEMENTS

- DESCRIBE THE REQUIREMENTS FOR IDENTIFYING FOOD WITHIN ITS PROCESS
- DESCRIBE THE BASIC COMPONENTS OF TRACING PRODUCTS
- LIST COMMON REASONS FOR RECALLS
- PREPARE FOR A SERIOUS INCIDENT, SUCH AS A RECALL
- EXECUTE THE BASIC STEPS OF A RECALL

- 2.6.1
- 2.6.2

KEY TERMS

○ TRACEABILITY

The ability for sites to track food through all stages of receipt, storage, cooking, and service. Traceability movements should be traced one step backwards and one step forward from the site's point in the supply chain.

○ RECALL

A site's action to protect the public from food that and may cause health problems for possible death. A recall removes food from the market when there is reason to believe that the food is contaminated, adulterated, and/or misbranded.



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Recalls are often voluntary; however in some instances regulatory agencies may mandate a recall. In some countries, the term withdrawal is used to describe the action of recalling food.

PROCESS STEPS

1. The first step in an effective traceability and recall program is to have established protocols with your distribution and supplier partners. The ability to identify and trace products during all stages of receipt, preparation, storage and servicing to the customer needs to be documented and implemented.
 - a. Product must be properly labeled upon receipt, identifiable and tracked at every stage of production including any rework.
 - b. Product identification records must be maintained.
2. An effective identification and labeling program will help improve response time and minimize the overall impact to operations and the company.
 - a. The effectiveness of the product identification and traceability systems are to be internally tested through a traceability exercise at least annually.
 - i. The exercise must include both inputs, such as ingredients and final product.
 - ii. Document and implement corrective actions as a result of the test.
3. Additionally, the site must have a process in place that enables them to trace product to the customer (one up) and back to the ingredient supplier (one back).
 - a. The site's procedure must include details of how all ingredients, packaging materials and work in progress are linked from receipt through the point of service.
4. Common foodservice recalls include:
 - a. Mislabeling of product and allergens not included in the ingredient statement.
 - b. Biological contamination from environmental pathogens- specifically *E.coli*, *Listeria* and *Salmonella*.
 - c. Foreign material such as plastic, metal shavings, etc.



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5. The best way to handle a recall is to prevent one from occurring. Having an SQF food safety system in place is one means to help prevent a recall. However, despite all best efforts and good intentions, recalls are still a fact of life. Prepare for a recall or other serious incident that may have an impact on the ability of the organization to provide safe food before it occurs.
 - a. Establish a response team and select a recall coordinator.
 - i. The team should be made up of decision-makers from senior management, the technical staff, suppliers, public relations, and legal. Consider any outside expertise.
 - ii. The coordinator will have the primary responsibility for coordinating and directing all recall related activities.
 - iii. The response team also includes the communication team and strategy.
 - b. Establish recall contacts.
 - i. This includes all response team members, distributors/suppliers, and purchasing.
 - ii. The certification body and SQFI are to be included on the recall contact list.
 - iii. Include business and emergency contact information.
 - c. Develop a process flow of the site.
 - i. This helps to identify the location of all affected food.
 - ii. Be sure to show the flow of products from receiving through service.
 - iii. Include all storage facilities (on site and off).
 - iv. Identify a segregated area for returned product.
 - d. Develop an ingredient product identification program (see above).
 - i. Maintain a supplier register for all major and minor ingredients, processing aids, lubricants, chemicals, food packaging, etc.
 1. Obtain product codes and lot identification information for each supplier.
 - ii. Maintain invoices.
 1. Maintain invoices and bills of lading for all ingredients.
 2. Keep records orderly, such as in chronological order.



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- iii. Develop and retain receiving records.
 - 1. Show the use of all the incoming ingredients and material.
 - 2. Maintain distribution records.
 - 3. Include invoices and bills of lading.
 - 4. Identify distributors, brokers, wholesalers and retailers.
- e. Test the plan and conduct a mock recall.
 - i. Test all elements of the recall plan at least one time annually.
 - 1. Choose a mock incident either end of the process flow.
 - a. For example, test the system by choosing a menu item or an ingredient.
 - ii. Test the full process including the recall contacts, investigation process, communications, and actions taken during the recall and to the affected product.
 - iii. Keep records of all mock recalls and supporting documentation, including follow up and corrective actions.
 - iv. Be cautious in your test as not to trigger actual publicity.
- 6. A recall is a crisis situation and like other crises must be handled in a calm, logical and methodical manner. The steps of a recall include:
 - a. Remain calm
 - i. If you have a tested plan in place, you can have confidence that you will be able to live through this recall.
 - b. Investigation
 - i. Gather the necessary information.
 - ii. Determine if product is in inventory, and its disposition.
 - iii. Speed and accuracy are important.



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- c. Evaluation
 - i. Decide the extent of recalled product in inventory and amount of a substitute needed, if applicable.
 - ii. Develop the recall strategy.
- d. Coordination
 - i. Responsibilities should be assigned to coordinate all activities.
 - ii. Send out recall notification.
- e. Implementation
 - i. Notify corporate and operation contacts.
 - ii. Double check the notification.
- f. Document, review and evaluate

RELEVANT RESOURCES

- FDA - Recalls, Outbreaks & Emergencies
<https://www.fda.gov/Food/RecallsOutbreaksEmergencies/default.htm>
- National Restaurant Association
What do you do if a recall happens? Here are 5 tips
https://www.restaurant.org/Articles/News/Batch2_201901/What-do-you-do-if-a-recall-happens-Here-are-5-tips