

Guidelines for Seafood Recall Programmes

**Fishing Industry Inspection and Certification Council
Wellington
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Preface

The Fishing Industry Inspection and Certification Council has agreed that it would be desirable for guidelines to be developed to assist with the establishment of seafood recall programmes.

These guidelines have been adapted from the Ministry of Health guidelines for recall procedures and the current recall section in the FIICC guidelines for the management of *Listeria monocytogenes*. These guidelines are written to assist premises develop a documented recall plan as required in IAIS 003.5.

Recall is limited in this document to those actions taken to remove from sale, distribution and consumption any fish or fish product found to be contaminated or otherwise reasonably believed to be unsafe for human consumption.

These guidelines are intended as recommendations for seafood recall programmes, but it should be noted that the requirements of the legislation and the Fishing Industry IAISs and circulars must be met.



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Amendments

Suggestions are welcomed for alterations, deletions or additions to these guidelines to improve them or to make them better suited to the needs of the fishing industry and inspection staff. Suggestions should be forwarded to the co-ordinator, together with reasons for the change and any relevant experimental or documentary data.

Amendments to these guidelines can be identified by the issue number in the page header and a background screen over the changes which have been made. Deletions are marked by a background screen appearing where the entry has been deleted.

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Amendment Record

It is important that these guidelines are kept up-to-date by the prompt incorporation of amendments.

To update these guidelines when you receive an amendment, remove the appropriate outdated pages, destroy them, and replace them with the pages from the new issue. Complete instructions will be given on the covering letter accompanying the amendment. File the covering letter at the back of the guidelines and sign off and date this page.

If you have any queries, please ask your local Inspector.

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1. Introduction

- 1.1 The Fish Export Processing Regulations, First Schedule to the Regulations, Part II clause 22, states:

“All fish premises shall have in place an approved quality control programme that provides for -

(d) The steps to be taken in the event that any fish or fish product is found to be contaminated or otherwise unsafe for human consumption”.

- 1.2 IAIS 003.5, Section 7 requires:

“The plan shall be documented and contain the following elements:

- the person responsible for co-ordinating any product recall;
- procedures to be followed in the event of a recall;
- the responsibilities and actions of the company staff involved in the recall;
- notification to the Inspector of the recall.”

- 1.3 The Food Act 1981, Section 9 (4) sets out the general prohibitions on sale of food on the domestic market. On the basis of these legislative requirements, food that has been identified as a food safety risk must be recalled.

- 1.4 Recalls may be required because a defective product has been released for sale through failures in food safety programmes, quality assurance systems, accidents or other circumstances (e.g. sabotage). No two recall events are identical and therefore such a plan needs to cater for the worst case scenario (e.g. recall on Christmas Day). It is recognised that food products can also be withdrawn from sale for minor reasons not associated with public health or food safety. Therefore these procedures, although they focus on food safety recalls, can be used as general recall guidelines.

- 1.5 It is important that all appropriate staff in a premises are aware of what action is necessary in the event of a recall. Each section within a company should have procedures prepared and should practise them to ensure an effective recall.

- 1.6 The critical factors in a successful product recall are the speed and completeness of the identification, hazard assessment, isolation and removal of product from the food chain. All information relevant to the recall needs to be gathered and distributed promptly and accurately.

- 1.7 IAIS 003.5, Section 6 sets out the requirements for the notification of fish and fish product found to be non-complying by any country (including New Zealand).

2. Recall Objectives

The objectives of a recall are:

- to prevent the consumption of fish or fish product that is unsafe or contaminated;
- to retrieve from distribution and sale any fish or fish product which does not meet the required standard or is unsafe;
- to notify industry, consumers and relevant regulatory authorities (e.g. Inspectors and Health Protection Officers) as necessary of the recall when product is found to be contaminated or otherwise unsafe for human consumption;
- to provide timely and accurate information.

3. Co-operation with the New Zealand Authorities

Full and timely information on the product recall, where public health and/or safety is involved, must be provided to the Inspector and, in the case of the domestic market, Health Protection Officers in the local CHE. In general, Inspectors and Health Protection Officers are sensitive to the effects of adverse publicity and will work with the premises to ensure the most effective recall procedure is instituted. In some cases the notification requirements of IAIS 003.5, Section 6 for non-complying fish and fish products or IAIS 003.9 for positive *Listeria monocytogenes* results will apply. MAF Regulatory Authority needs to be informed in a timely manner by the Inspector so as to be aware of recalls that may be happening in overseas or domestic markets.

4. Batch Coding

- 4.1 Recall of a particular lot of a consumer product is not possible unless all packages for retail sales are marked with a legible batch code. IAIS 004.1, Sections 3.1.1, 3.2.1 and 3.3.1 require outer containers, retail packs or transfer containers to be labelled with "date of packing" which may be in clear or in code.
- 4.2 A "lot" is defined in the New Zealand Food Regulations 1984, as "a quantity of food produced under essentially the same conditions during a particular period, and usually from a particular "line" or other identifiable processing unit". IAIS 005.1 has the following definition of "lot" for shellfish, "a lot means shellstock harvested from a particular area (e.g. marine farm) at a particular time (i.e. not more than 1 day)".
- 4.3 The manufacturer may choose to include in the lot identification, or as an addition to the date mark, a further code which identifies a processing batch, production line, shift, packing machine, etc. Such a code does not have to be "open". In the event of a recall, such information may assist the withdrawal of the minimum amount of product necessary to isolate a problem. The alternative, if batch coding is not employed, is the total recall of all similarly labelled products. This could be extremely costly.

5. Organisation for Recall

5.1 A pre-determined recall infrastructure within each premises is necessary. The appointment of a "recall co-ordinator", operating from within the organisational structure of the premises concerned, is essential. This person could be an experienced executive reporting directly to top management but should at least be a person who knows the details of the management systems, and has total responsibility for the conduct of any recall. To be effective, the plan should not only have the support of the company's chief executive but also be seen to have the support.

5.2 The Recall Co-ordinator will often need the wider assistance of other experts. Therefore a "Recall Co-ordinating Committee" should be formed, with roles which could include:

- assessment of the overall problem,
- notification of the relevant authorities,
- evaluation of the hazard,
- decision on the strategy to be followed,
- recommendations as to whether or not to close production plants,
- provision of sole contact with the media,
- contact with suppliers and customers,
- recommendations on when production may recommence.

Membership of the Recall Co-ordinating Committee should comprise appropriate representatives from the following areas within the company:

- quality assurance,
- warehousing and distribution,
- processing,
- finance,
- marketing and sales.

5.3 As part of the recall procedure, each premises should also nominate specific people to handle the public relations and legal aspects of a recall. The implications of a particular recall should be communicated by the Recall Co-ordinator directly to such company representatives.

6. Guidelines for the Procedures to be Followed During a Recall Event

6.1 Guidelines

The following activities are suggested as guidelines to the Recall Co-ordinator for the implementation of a recall, upon the receipt of notification of a significant complaint, or of the existence of a product which is found to be contaminated or otherwise unfit for human consumption:

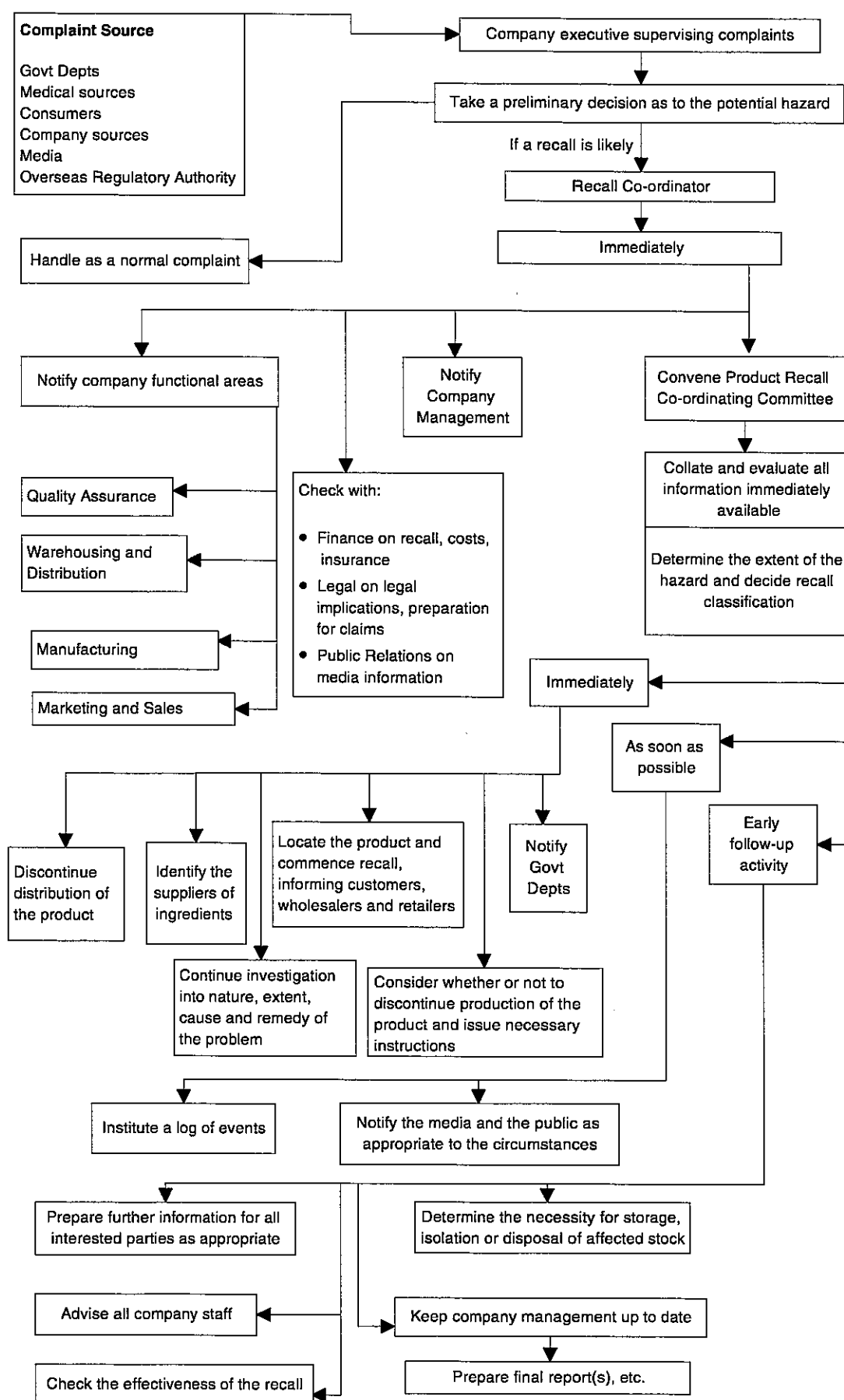
- Consider the extent of the problem and make a preliminary decision as to the implications to food safety and public health.
- Decide whether a recall may be necessary, or whether the problem should be handled through normal operational procedures.
- Should it be likely that a recall will be necessary, convene the Recall Co-ordinating Committee. The Committee should collate and evaluate all information immediately available on the extent and nature of the problem.
- Clearly identify the responsibilities and actions required by Committee members.
- Notify the management of the company and functional areas of the situation (premises should prepare an appropriate list for inclusion in their plan).
- Institute a log of events and actions taken, to be maintained until all aspects of the recall are finalised. Ensure that original manifests, vouchers, notices, reports and papers are retained for later scrutiny, including official, if this becomes necessary.
- Take immediate action to:
 - establish the amount of the affected product produced and have it fully identified (description, packing house number, manufacture date, batch or lot codes, shift, product line, time of manufacture, dates, pack sizes);
 - discontinue distribution of the product;
 - locate the product (on-site, company coolstores, commercial coolstores, transport companies, customers involved) and commence the recall, notifying customers, wholesalers and retailers;
 - identify the suppliers of ingredients;
 - continue an investigation into the nature, extent, cause and remedy of the problem, gather supporting information (test results, hygiene assessments, independent audit results);

- consider the need to discontinue production of the product, and issue necessary instructions;
 - where necessary, notify the Inspector and the Health Protection Officer (for the domestic market);
 - keep returned stock in a quarantine area and maintain a tally of that stock.
- Notify the media and the public of the situation, as appropriate to the circumstances (see Section 7).
 - Notify company staff of the situation.
 - Prepare further information as it becomes available for all interested parties.
 - Determine the necessity for storage, isolation or disposal of the affected stock and/or ingredients.
 - Maintain periodical checks of the effectiveness of the recall.
 - Where appropriate, notify the company's insurance company.

6.2 Example of a Recall Action Plan

Figure 6.1 shows an example of a product recall action plan. It is an outline plan only. Each premises should develop its own action plan according to its particular needs, products and circumstances, and detail the responsibilities and actions.

Figure 6.1: Example of a Recall Procedure



7. Release of Information on the Recall

7.1 Publicity

The supply of facts to the media is of prime importance as it can be expected that any significant product recall could constitute important news for the press, radio and television. The Ministry of Health have strict media release requirements for domestic markets. The press release policy should be based strictly on the following principles:

- Only one source within the company should be authorised to issue press statements to the media.
- Only substantiated facts should be given. Information should be given in a written format and updated regularly.
- Unless companies are frank and open with the media there is the risk that the media will present its own story based on rumour, misinformation and unrelated circumstances.

7.2 Advice to Inspectors and the Media

The following material should be contained in advice to the Inspector (and where appropriate the Health Protection Officers and Ministry of Health for the domestic market) and where appropriate to the media in the event of a product recall (see also Section 3):

- description of the hazard;
- description of the product, with name and identification including as much as possible identification/code numbers (including their location on the package concerned);
- copies of relevant certificates for export product;
- distribution or sale dates, arrival in overseas markets;
- geographical distribution;
- method for consumer identification;
- action to be taken by consumers;
- action being taken by premises;
- contact person within the premises;
- name, address and telephone number of the contact person;
- number of product units affected.

In some cases, the requirements of IAIS 003.5, Section 6 for non-complying fish and fish products may apply.

7.3 Advice to Company Staff

Announcements to company staff about the situation should reinforce that normal confidentiality still applies.

8. Records

- 8.1 Records should be kept, and should be adequate to identify the processing history relative to the expected shelf life of the product and product turnover periods.
- 8.2 It is important that sufficient records are kept which are auditable and which will provide assurances that all product has been accounted for.

Copies of all reports, notices, papers, documents, etc., and actions taken relating to the recall should be kept.

9. Overseas Government Involvement

- 9.1 Prompt efficient and complete action by the packhouse, exporter or both to recall product in an overseas country is essential. Critical to this process are product identification and knowledge of the distribution network. If an overseas government is involved in invoking and publicising a recall, the company loses control of the situation and resulting actions taken.
- 9.2 There will be situations where MAF Regulatory Authority is obliged (e.g. MOU with Canada) to involve the relevant authorities in an export market, but MAF Regulatory Authority prefer the New Zealand exporter to initiate the appropriate recall action to meet the specific markets requirements. As a general guide, MAF expects the processor/exporter to be able to provide documented evidence (e.g. within 24 hours of the recall being initiated) that product in overseas markets has been recalled and/or detained.

10. Assessment of the Effectiveness of a Product Recall

To determine if a recall has been carried out successfully, the following should be considered by the Recall Committee:

- the speed of the recall action taken;
- the time taken to retrieve the affected product from the market place;
- the accuracy of the recording of the amount of product and its location in the distribution system and in the market place;
- the accuracy of identification of the faulty product in the market place;
- the percentage of product that was recalled, not recalled or consumed;
- the scope and effectiveness of the media campaign in the recovery of the faulty product and in minimising adverse publicity;
- recommendations for the correction of any system deficiencies identified.

It can be useful to run trial recalls.