

Managing Food Recalls Standard Operating Procedure

Purpose

- To ensure Food Service staff follow proper recall procedures.
- To guide Food Service staff in communicating with stakeholders during food recalls.

Scope

This procedure applies to any Food Service staff who are tasked with preventing and responding to food recalls.

Key Words

Recall, Contamination, Foodborne Illness

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Instructions

When there is a food recall, your students' safety is the number one priority. Clear communication among food service professionals, food vendors, administrators, students, and parents is key to managing food recalls. It is also an opportunity to build trust with your community about the quality of school meals, which can help maintain or increase participation in your programs.

Use this standard operating procedure to identify roles and responsibilities during a recall, steps for enacting a recall plan, procurement actions during recalls, communication strategies to keep your stakeholders informed, and steps for conducting mock recalls.

Gathering Information About Food Recalls

Follow local, state, and federal government guidance when responding to food recalls. View food recall lists from [Foodsafety.gov](https://www.foodsafety.gov), the [Food and Drug Administration](https://www.fda.gov), and the [U.S. Department of Agriculture](https://www.usda.gov).

Recall Classifications:

- **Class I:** Involves a health hazard situation where there is a reasonable probability that the use of a product will cause serious, adverse health consequences or death.
 - **Example:** The presence of *Listeria Monocytogenes*, *E. coli* 0157, *E. coli* Species, or *Salmonella*.
 - **Example:** Undeclared Allergen: A product containing an allergen ingredient such as peanuts, tree nuts, fish, or crustaceans with no mention on the label.
- **Class II:** Involves a potential health hazard situation where there is a remote probability of adverse health consequences from the use of the product.
 - **Example:** Undeclared Allergen: a product containing an allergen ingredient such as dairy, eggs, soy, or wheat with no mention on the label.

- **Class III:** Involves a situation where the use of the product is not likely to cause adverse health consequences.
 - **Example:** Labeling Mistake; incorrect net weight, volume, or water content.

School District Food Service Roles and Responsibilities

Upon the receipt of a food safety or consumer complaint or in the light of other unforeseen circumstances, Food Services will initiate recall procedures as follows:

The Food Services Crisis Management (CM) Team will monitor vendor communications and work with the vendor to assess the problem's extent and severity to determine whether a recall is necessary.

The CM Team will consist of the following:

- Recall Coordinator/Quality Assurance (QA) Manager
- Executive Chef
- Food Services Director

The Recall Coordinator (RC) will prepare for and coordinate all activities related to the recall. They will oversee and approve any action or plan before it takes place. RC will get documentation verifying the cause of the recall and determine the classification. The RC will notify and act as liaison with the local health department. Under the guidance of the health department authorities, the RC will determine the disposition of the recalled product: destroy it, discard and document it, or correct the product (in the event of a mislabel, etc.). If, for any reason, the RC cannot perform these tasks, the **Director or Executive Chef (EC)** will assume responsibility.

The RC will determine the destination of all recalled products. They and the office team will then call all consignees and inform them of the recall and give instructions on what to do with the affected product. The RC will coordinate the pick-up of quarantined products if necessary. If the RC cannot perform these tasks, the **Director or Executive Chef (EC)** will assume responsibility.

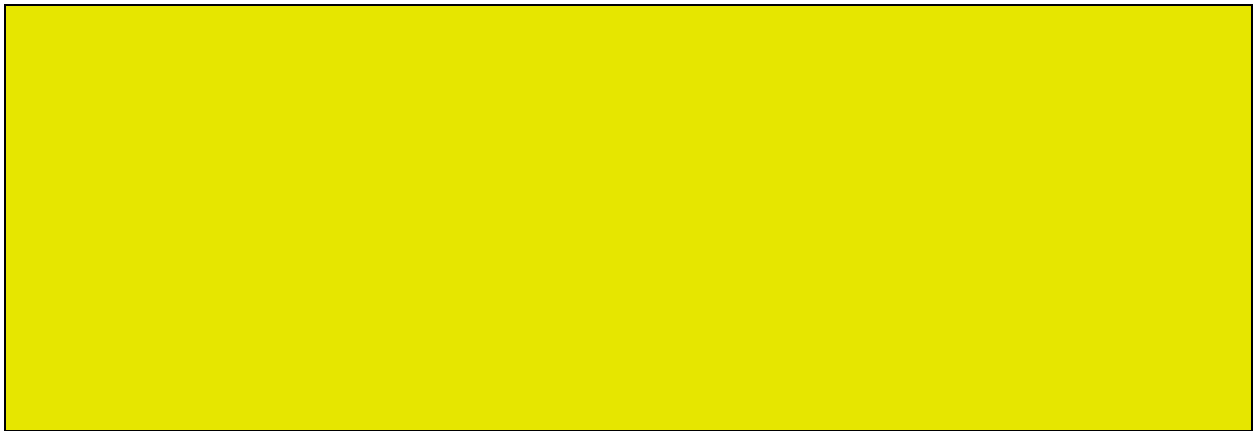
The Director or Executive Chef (EC) will evaluate the status of ingredients, in-process materials, and finished products involved in a recall. Before production begins, QA will ensure that all

ingredients, materials, and workspaces are suitable and will issue a written document confirming this. PS will also make sure all released finished products are packaged and stored safely, and that all recalled products found on site are quarantined and either destroyed or held pending further instructions. If the EC cannot perform these tasks, the QA Manager will complete them.

The Food Service Director will alert the media in the event of a Class I or Class II recall. If the Director cannot perform these tasks, an assigned agent will assume responsibility to gather the following references and associated materials:

1. Ingredient Traceability Procedure
2. Q.C. Hold Policy and Procedure
3. Emergency Contact List
4. Approved Supplier List or Vendor Emergency Contact List
5. Mock Recall Procedure

EMERGENCY CONTACT LIST:



In the event of a Class I or Class II Recall, a designated Food Services representative will notify local health department authorities.

Steps to Enact a Recall Plan

1. In the event of a generated complaint or recall alert, the Food Services Crisis Management (CM) Team will evaluate potential health hazards, the scope, and records in determining whether or not to issue a recall by answering the following questions:

- a) Health Hazards: Have any diseases or injuries already occurred from use of the product?
 - b) What are the hazards to various segments of the population: children, the elderly, and immunocompromised individuals?
 - c) Who is expected to be exposed to the product being considered for recall?
 - d) What are the relative degrees of seriousness of health hazards to which the population at risk would be exposed?
 - e) What is the likelihood of occurrence of the hazard?
 - f) Assess the consequences (immediate or long-range).
2. If a recall is determined necessary, communicate to all site staff to hold the product, and provide substitute meals if necessary.
 3. Determine the class and scope of the recall. Is the recall due to contamination of a foreign object, microbiological testing, or incorrect labeling? Was the same contaminated raw material used in other lots on other days of production?
 4. Gather batch records of recalled product, any microbiological testing records, and invoices of product received. Gather all information regarding consignee names and addresses, shipment method, shipment date, etc. Note whether any consignees are sellers to Child Nutrition Programs, such as the National School Lunch Program, or to the Department of Defense.
 5. Determine the Depth of the Recall: Wholesale Level, Retail Level, or Direct Consumer Level.
 6. Initiate a Recall Paperwork Trail (Supplier to Consumer). Pallet Tags are created for all incoming products with the following information:
 - Customer
 - Package
 - Label
 - Lot Number/Lot Code
 - PO and/or Invoice Number
 7. A sample from the batch(s) should be analyzed at a Testing Laboratory in the event that the recall or destruction was due to possible foodborne bacteria or suspected contamination.

Submit all information to the local health department authorities. Coordinate the next steps of the recall with them.

8. Develop a press release as outlined in the “[Communication Strategies to Keep Your Community Informed](#)” section below, and notify the media if needed. Since the majority of products are sold through wholesale, retail, and direct-to-consumer sales, media help will be needed.
9. Perform an effectiveness check on the recall effort and document.
10. When the crisis is deemed under control, submit a letter to the local health department.

Procurement During a Recall

1. **Monitor your vendor communications and government recall websites** to stay informed about impacted products, vendors, and regions. When sourcing replacement products, avoid products from affected producers and regions as much as possible.
2. **Order alternative products** if a specific item is indicated as the source. For example, if green leaf romaine is affected, consider switching to other lettuce and leafy green options.
3. **Purchase from a local vendor or farm**, so you know your grower and their growing practices. [Regional supply chains often have refined traceability measures](#), making it easier to track the product through every step from farm to consumer. Local vendors or farms may also offer greater transparency into on-farm practices. Switching to small- or medium-sized farms reduces the risk of receiving commingled products, which is often a key contributor to large recalls. One way to implement this year-round is to [integrate values-aligned procurement](#) strategies into your procurement process and prioritize local purchases.

Communication Strategies to Keep Your Community Informed

Clear and open communication between your team and your school community is necessary to keep everyone informed and build trust in your school meal programs. Being proactive rather than

reactive, when possible, supports operational transparency and helps your community understand the steps you are taking to respond to critical events in a timely manner.

1. **Keep administrators up to date** on current recalls and the steps your team is taking to minimize risks to students and staff.
2. **Share information quickly with parents** about your purchasing and food safety practices. Send a representative to the PTA, post on social media, contribute to school newsletters, and keep your website updated so parents know you are taking immediate steps to protect their children's safety.
3. **Be prepared to answer student questions.** Students are likely getting information about foodborne illness outbreaks from social media, which may or may not be accurate. This is an opportunity to educate students about food safety and, for higher grades, about your sourcing strategies. Engage with Student Government Associations and other student clubs, where you can talk with student leaders. Partner with an agriculture, science, or health teacher and set up a table during meal service to answer student questions directly.
4. **Publish a press release** for your stakeholders.

Guidelines for Press Release:

- Description of the product.
- Name / Brand.
- Package Description.
- Lot Code / Code Number.
- Product destinations.
- Dates shipped.
- Statement of hazard or risk associated with the recall.
- The immediate actions that have been taken.
- Food Services Emergency Contact Information:
 - Address
 - After Hours Phone Number
 - Business Phone / Fax

- Email
- Website address
- Logo
- Contact Name

MODEL PRESS RELEASE – FOREIGN OBJECT

Company Recalls [product] That May Contain Glass/metal shards

County, [Date] School District Food Service Commissary, a town, state establishment, is voluntarily recalling approximately 10,000 lbs. of [Food Product Name] because the products may contain [hazardous material, e.g., metal]. Consumption could cause [lacerations].

[Specific information on how to identify the product] (e.g., the type of container [plastic/metal/glass], size or appearance of the product, product brand name, establishment number and location on package, flavors, codes, and expiration dates, etc.).

Product was distributed [listing of the states and areas where the product was distributed and how it reached customers, e.g., through retail stores, mail order, direct delivery]

[Status of the number of and types of related illnesses that have been confirmed to date] (e.g., “no illnesses have been reported to date”).

[Brief explanation about what is known about the problems, such as how it was revealed, and what is known about its source.] An example of such a description is: “the recall was the result of the plant finding several pieces of glass on routine examination of the product. The company immediately contacted USDA and has ceased distribution of the product as USDA and the company continue their investigation as to what caused the problem.”

Because of the potential hazard, [Information on what consumers should do with the product and where they can get information] (e.g., “consumers who have purchased products produced by Food Services are urged not to eat the product but to return it to the place of purchase for a full refund”).

Consumers with questions about the recall may contact [name and position] at [phone number], or the consumer hotline at [toll-free number]. Media with questions may contact the Director of Food Services.

5. **Regularly share your food-purchasing choices** to build trust in your community. When students and families know where their food comes from and how it is made, there is more connection, appreciation, and trust.

- ✓ [Explore our marketing resources](#). The most successful school lunch programs are supported through effective marketing and education initiatives. Explore our marketing resources to learn how to educate students and your community.
- ✓ **Use our [Salad Bar Local Procurement Labeling Cards](#)** to identify foods offered in your cafeteria as School Garden Grown, Locally Grown, or Harvest of the Month.

Mock Recalls

Conduct an annual Mock Recall as part of your school food safety plan and training at least once every 12 months. To start, select a product at random as the starting point for the Mock Recall. Provide a product description and product ID number for the randomly selected “suspect” product. Record the date and starting time of the recall and follow steps 1-6 in the section “[Steps to Enact a Recall Plan](#).” Thoroughly document the Mock Recall.

Corrective Action

- Retrain any Food Service staff found not following the procedures in this SOP.

Verification and Record Keeping

- The Food Service Director will verify that staff are trained on food recalls.

Date Implemented _____ By _____

Date Reviewed _____ By _____

Date Revised _____ By _____