

Recall Plan Procedures

Introduction

Poor-quality products may reach the Central Kitchen or school sites. These products may constitute a public health risk to the consumer or be of such poor quality that the consumer will be wary of future purchases. The recall of products under these circumstances serves in the best interest of the consumer and School District Food Service.

It is important to be proactive and to treat a recall as a positive experience to enhance the reputation with customers and consumers.

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, Ecoli157, Ecoli Species or Salmonella.
Undeclared Allergen: A product containing an allergen ingredient such as peanuts, tree nuts, fish or coruscations 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 Services:

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 work with the client and / or brand owner to consider the extent and severity of the problem and decide whether a recall is necessary.

The CM Team will consist of the following:

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

Allocated Action Assignments:

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 guidance of the health department authorities, the RC will determine the disposition of the recalled product; destroy it, discard and document, 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. In addition, 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.

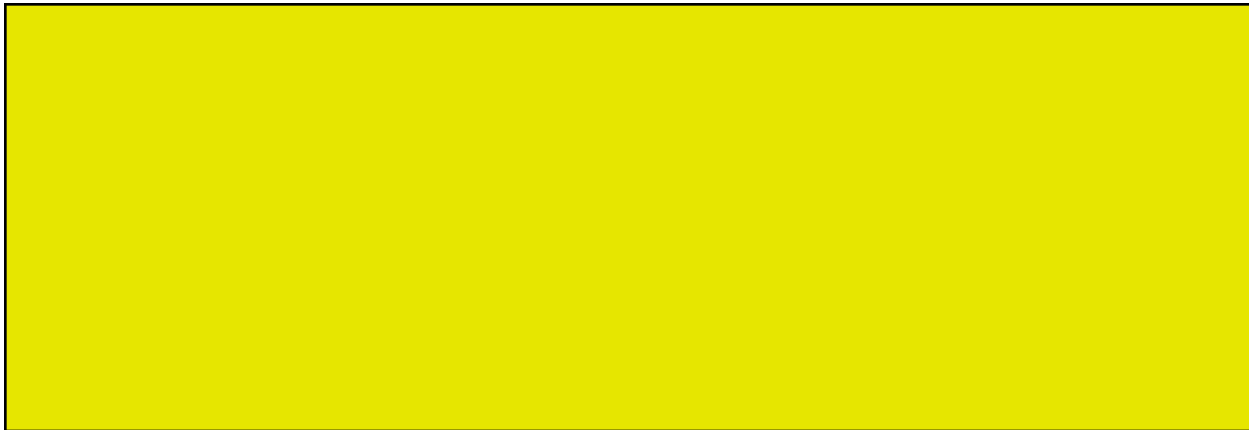
The Director or Executive Chef (EC) will evaluate the status of ingredients, in-process materials, and finished product involved in a recall. Before the start of production, QA will make sure all ingredients, materials, and work spaces are suitable, and release a written document stating this. PS will also make sure all released finished products are packaged and stored safely and all recalled products found on site are quarantined and destructed or held for further instructions. If the EC cannot perform these tasks, QA Manager will complete.

The Food Service Director, who 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.

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.

Recall Steps:

1. In the event of a generated complaint or recall alert, the Recall 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 disease or injuries already occurred from use of the product?
 - b) What are the hazards to various segments of the population: children, the Elderly, and immune-compromised 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 hazard 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 ship substitute meals if necessary.
3. Determine the 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 the name and addresses of consignees, shipment method, date of shipment, etc. Note if any consignees are hospitals, chains, restaurants, distributors, independent retailers, or sellers to the National School Lunch Program or the Department of Defense.
5. Determine the Depth of the Recall; Wholesale level, HRI 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 the recall or destruction was due to possible food borne bacteria or suspected contamination.
8. Submit all information to local health department authorities. Coordinate the next steps of the recall with them.
9. Develop a press release as outlined on the attached sheet, and notify the media if needed. Since the majority of our product is sold through wholesale, retail, and direct to consumer sales, media help will be needed.

10. Perform an effectiveness check on the recall effort, and document.
11. When the crisis is deemed under control, submit a letter to the local health department.

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.
- What immediate actions have been taken.
- BVSD Food Services Emergency Contact Information:
 - Address
 - After Hours Phone Number
 - Business Phone / Fax
 - Email
 - Website address
 - Logo
 - Contact Name

Mock Recalls:

A Mock Recall will be conducted annually or when requested by customers and/or third-party audits. The Quality Assurance Manager is responsible for conducting the Mock Recall. The Food Service Crisis Management Team will review at least one Mock Recall per year. All Mock Recalls will be thoroughly documented at the time they are completed. See Mock Recall Procedures for additional information.

Date Implemented _____ By _____

Date Reviewed _____ By _____

Date Revised _____ By _____