Do You Have a Recall Plan?

by Ronald Doering

APART FROM THE increasingly scary prospect of class action lawsuits for food borne illness, a food company's worst nightmare is a recall. Surprisingly, there is still a lot of misunderstanding about the process and a remarkably large number of companies that are not as prepared as they should be.

All public food recalls are managed by the Office of Food Safety and Recall (OFSR) at the Canadian Food Inspection Agency (CFIA). OFSR has assigned numerical designations to indicate the relative degree of health risk presented by the product being recalled.

Class I is a situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious adverse health consequences or death.

Class II is a situation in which the use of, or exposure to, a violative product may cause temporary adverse health consequences or where the probability of serious adverse consequences is remote.

Class III is a situation in which the use of, or exposure to, a violative product is not likely to cause any adverse health consequences.

When the CFIA investigation results in a determination that the appropriate risk management strategy is to recall the affected product, the recalling firm is advised and the OFSR staff work with the firm to implement the recall. In the case of a Class II or Class III recall, Public Alerts may or may not be issued depending on the circumstances. Public Alerts are always issued for Class I recalls. Where the recalling firm has agreed to draft a news release in a timely way, the CFIA will provide a template and assistance in translation and in transmitting the news release to the media. Depending on the circumstances, OFSR may proceed with the preparation and release of a separate Public Alert.

Every year the CFIA carries out threats of investigations that result in about 300 recalls a year. In its first five years (1997 - 2002) the CFIA managed 1509 recalls, with all but three, following the voluntary recall process described above. If a firm is unable or unwilling to carry out a recall, then under Section 19 of the CFIA Act, the Minister may order a mandatory recall, the contravention of which can lead to a fine or imprisonment. While Section 19 has only been used three times, it has been threatened several times. After years of debate, the United States still does not have this important enforcement power.

While most firms have many controls to make sure that their products are safe and will never have a recall, every firm should have a recall plan. It's always surprising to see how many firms are just not ready when the awful day arrives. Ask yourselves these questions: "If you needed to remove a product from the market right now, would you be able to do it? Would you be able to remove the product quickly? Would you be able to remove all of the product?" All three questions point to the critical need for traceability systems.

Fortunately, the CFIA has produced comprehensive recall guides for producers, manufacturers, distributors and retailers to help each sector develop a recall plan and how to ensure that they can act on that plan in the event of a recall. These guides and other very useful information may be found at the CFIA's website: *www.inspection.gc.ca.* ■

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