



MARYLAND Department of Health

Elements of a Food Recall Plan

The objective the food recall is remove all of the product in the market place at the time of the recall and prevent further consumption of the product by the general public. A Recall is defined by the Food and Drug Administration (FDA) as a firm's removal or correction of a marketed product that the Food and Drug Administration considers to be in violation of the laws it administers and against which the agency would initiate legal action. Your Recall Plan should contain the following basic information:

- Legal name of the firm
- Mailing address of the firm
- Phone and fax numbers of the firm
- Emergency phone numbers for the State of Maryland Office of Food Protection, main office Local Health Department, FDA local and regional offices
- Complete list of all approved sources, their phone numbers and addresses
- Complete list of customers, their phone numbers and addresses

The Federal FDA Food Safety Modernization Act passed on January 4, 2011, does include provisions that require food facilities to develop written food safety plans. One of the provisions of the food safety plan is that a facility should have written Food Recall Plan (21 CFR 117, effective date November 2015). At a minimum the written recall plan must include procedures that describe the steps to be taken, and assign responsibility for taking those steps, to perform the following actions as appropriate to the facility. Following are the minimum FSMA requirements for a recall plan:

- Directly notify the direct consignees of the food being recalled, including how to return or dispose of the affected food;
 - *The objective here will be to prevent further movement of the product through the food distribution network. It is typically quicker, cheaper and more effective to stop the recalled product from reaching the general public than to have to deal with the dispersed product in the consumer's homes.*
 - *The plan should address the how to properly identify the product being recalled including any labeling, current ingredients and an explanation of any coding that appears on the product.*
 - *If the product is returned, the plan should address how the product will be identified and where it will be stored and protected against re-use.*
- Notify the public about any hazard presented by the food when appropriate to protect public health;
 - *The plan should address how the information should be released to have greatest chance of reaching their consumer base quickly. This will be very dependent on the*

demographics of the firm's customer base. Typically delivery vehicles have included:

- *Prominently displaying the announcements on the firm's own website;*
- *Email to customers if email addresses are known;*
- *Social media;*
- *Professional media – newspapers and television;*
- *Surface mail;*
- *Printed flyers for display at points of sale; and/or*
- *Local community organizations.*
- *The plan should identify a point of contact for public inquiries.*
- *Conduct effectiveness checks to verify that the recall is carried out*
 - *Provide sufficient evidence to demonstrate the effectiveness of the product recall; this typically will be based on the amount of product manufactured and the amount of product recovered, destroyed or documented by any other means.*
- *Appropriately dispose of recalled food—e.g., through reprocessing, reworking, diverting to a use that does not present a safety concern, or destroying the food.*
 - *The final disposition of the recalled food product will be dependent on the commodity being recalled and the reason for the recall. Typically following a recall, the recalled product will either be;*
 - *Destroyed,*
 - *Reworked to remove or correct the product defect*
 - *Tested for release by demonstrating that the defect is not present in the product.*

This above information is intended as a guide in developing a recall plan. It is recommended that that the plan be review and tested annually to both determine the adequacy of the plan and to provide an opportunity to evaluate the thoroughness of the plan. For additional guidance on recall see FDA's website at: <http://www.fda.gov/safety/recalls/industryguidance/ucm129259.htm>.

For more information or assistance on recalls contact the State of Maryland Rapid Response Team at (410)767-8400