

2016

FOOD WITHDRAWAL AND RECALL GUIDELINE OF FOOD SAFETY AND QUALITY AUTHORITY

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FOOD SAFETY AND QUALITY AUTHORITY | Kotu East, Serrekunda, The Gambia

FOOD WITHDRAWAL AND RECALL PROCEDURES MANUAL

Scope and objective

The following document has been developed with a view to set standards, procedures and define responsibilities during a food incident to the removal of unsafe food from the market. The objectives of the manual among others reasons is the reduction of risks associated with food consumption, strengthen coordination in managing a food safety crisis.

The document is a guide in managing the safety of food produced, imported, processed, transported, stored and sold in the country. It also specify what the responsibilities of both the food business and the Food Safety and Quality Authority of The Gambia will be during the course of recall. It also details a series of recommendations that food companies should take into account to ensure rapid and effective removal of a product considered to possess risk to the national market.

INTRODUCTION

Recall is the action taken to remove from sale, distribution and consumption foods which may pose a safety risk to consumers. Safety in the food distribution chain must be sought after at the stages of distribution this include even when the food is already at retail point and/or already available to the final consumers. The national food regulatory and enforcement agency (Food Safety and Quality Authority of The Gambia) and the private stakeholders have the responsibility to ensure that food is safe for human consumption and it does not pose any risk to the consumers. Recalls are normally the last option in consumer protection, it is the measure use to manage a risk detected from:

- Reports: this can be from different sector of the community like consumers, NGOs food companies etc.
- Actions initiated by the national health agencies
- Inspection report by inspectors of the Food Safety and Quality Authority of The Gambia etc.

The decision to conduct a recall can be for the following reasons:

- Immobilize food that is infected and prevent it from reaching the consumers.
- Recover contaminated foods that are already in the distribution chain including those that are already in the hand of the consumers

It is important to note that the best recall process is conducted in the shortest possible period of time to avoid the risk from getting to larger number of consumers. Food processing plants, food importers, food packaging businesses and mayor distributors should have an elaborated recall procedure manual, this may not be the case for direct food retail establishments like restaurants and supermarkets unless they are involved in selling or distributing foods they directly import.

Legislation

A food recall manual is essential to ensure the proper and complete removal of food products from the market during a food incident. The Gambian legislation under The Food Safety and Quality Act sections 38 (I, II, III), 39 and 40 clearly outlined responsibilities and set limits for food business establishments and the Food Safety and Quality Authority of The Gambia.

Definitions

Food: any substance or mixture of natural substances or elaborated substances that when ingested by humans, provide the body with the materials and energy need for its biological functions. Food in the present manual may include water and other substances that are consumed for habits, costumes and pleasure.

Recall: for the purpose of this manual recall refers to the actions taken to remove from sale, distribution and consumption foods which may pose a safety risk to consumers.

Consumers: any individual or group of people or institution that acquire food for own consumption

Food business establishment: for the purpose of this document, it is the institution that commercialized food that is involved in a food incident.

Food incident: the following is considered a food incident for the purpose of document:

- An event that has potentially harmful consequences for the population resulting from the consumption of certain food.
- The identification of contaminated foods that if consumed can cause illness
The identification of human disease that may be related to food consumption.
- Identifying poor hygiene practices in handling food from a local that may cause damage to consumer health

Risk: the probability that a negative food related incident can occur.

Client: for the purposes of this Manual, it is the institution or person who is the next link in the food chain that manipulates, trades and market the food

RECALL MANAGEMENT TOOLS

For every particular case the depth and extend of the recall with the food chain is determined based on the distribution channels the food business establishment utilized in distributing the food in question. The process of determining the depth and extend of the recall process is what is referred to as recall strategy, it is a planned course of action that permits the recovery of food products deemed unfit for human consumption and it includes the following:

- Recall depth: this indicates the starting point of the recall or how far have the product gone in the distribution chain. There are 3 steps
 - Major distributor level*
 - Retailer level*
 - Consumer level*

Furthermore the geographical distribution of the product should be considered:

Limited distribution: the product is distributed within a district or region

Extended distribution: the product is distributed within the whole country

- Public warning and/or press release: depending on the specific incident a public warning and/or a press release can be necessary or not. If it is deemed necessary the time and extend of this should be evaluated based on a risk evaluation and the geographical distribution of the product. A public warning should be release in all *class I* recalls, mass communication Medias like GRTS (both radio and television) outlets should be considered for a public warning.
- Recall effectiveness verification: it is the method the food business establishment uses to verify how effective a conducted recall process have been. This verification could be on different levels depending on the percentage of consulted customers during the recall process. Example:

Level A is 100% of the customers

Level B is more than 10% but less than 100%

Level C is 10%

Level D is 2%

Level E this was no effectiveness verification conducted

- Management and disposal of recovered products: the disposal process will be conducted by clearly identifying each product and separating it from other products to avoid confusion. The will-be of the recovered products should be evaluated and determined by the Food Safety and Quality Authority of The Gambia.

In order to establish the recall strategy the food business establishment in coordination with the Food Safety and Quality Authority of The Gambia have to conduct a risk evaluation by using a scientifically acceptable model that can clearly indicate the risk profile and the population in risk. Based on that model with the objective of orienting the strategy to follow, the recall process will be classified into:

1. *Class I recall*: the food has defects that pose a serious risk to the health of consumers, backed with documented death or serious adverse health consequences. The product should not be consumed anywhere, should be totally recovered including products already in possession of the final consumer.
2. *Class II recall*: It applies to those incidents in which there is a reasonable probability of temporary and / or reversible adverse health consequences to consumers.
3. *Class III*: The reason for the withdrawal does not pose a significant risk to consumers' health but constitutes an infringement, this may include labelling problems or records that do not pose a risk to consumers.

In exceptional situations where the necessary information is not available at hand and the need to initiate a recall is at hand it is recommended the food business establishment take the necessary measures to protect the consumers.

RESPONSIBILITIES OF THE FOOD SAFETY AND QUALITY AUTHORITY OF THE GAMBIA AND THE FOOD BUSINESS ESTABLISHMENT DURING A RECALL

Responsibilities of the Food Safety and Quality Authority of The Gambia	Responsibilities of the food business establishment
<ul style="list-style-type: none"> • Inform the food business establishment that it need to conduct a recall of one of and/or all its products in the market. 	<ul style="list-style-type: none"> • Carry out a recall on the authorization of the Food Safety and Quality Authority of The Gambia when an incident is detect
<ul style="list-style-type: none"> • Oversee and coordinate a recall process. 	<ul style="list-style-type: none"> • Notify the Food Safety and Quality Authority of The Gambia anytime a product is deemed to pose a risk to the consumers
<ul style="list-style-type: none"> • Inform or warn the public through a press release 	<ul style="list-style-type: none"> • Present a company's recall manual to the Food Safety and Quality Authority of The Gambia for its evaluation
<ul style="list-style-type: none"> • Audit and evaluate the effectiveness of the recall process. 	<ul style="list-style-type: none"> • Make available the distribution and consumption data of the 'to-be –recall' product to the Food Safety and Quality Authority of The Gambia
<ul style="list-style-type: none"> • Act as a technical, scientific and legal reference point during a recall process. 	<ul style="list-style-type: none"> • Establish recall financial tools like insurance schemes to finance recall processes when the need arise
<ul style="list-style-type: none"> • In an exceptional case recall a food product whose producer is not available. 	
<ul style="list-style-type: none"> • Oversee the proper management of recall products and ensure that the same product do not pose a risk to the consumers. 	

Upon the reception of the information of a food safety incident related to a food already in the market the Food Safety and Quality Authority of The Gambia will evaluate the risk and the population expose to that risk, decide whether to authorize a recall (if it is deemed unnecessary this have to be documented and kept).Evaluate and recommend the best recall strategy in that particular case, notify the public of an incident with a particular food, monitor the recall process, and audit its outcome. This have to be in the fullest possible collaboration with the food business establishment.

The food business establishment will develop a recall plan that should contain the following:

- A standby recall coordination group(this can be the same group of the HACCP)
- Update records and documentation of all consumer complains
- A step-by-step recall procedure
- Documented evaluation and verification of the recall procedure

ITEM	CONTENT
<ul style="list-style-type: none"> • Recall coordination group 	Here the following should be part of the group: management, production and technical direction, quality control, procurement, sales and the legal representative of the business establishment.The contact details of these people and there after hours contact details
<ul style="list-style-type: none"> • Step-by-step recall procedure 	This should describe the sequence of the actions the food business establishment will take following the reception of a recall recommendation from the Food Safety and Quality Authority of The Gambia and a business preparedness confirmation document
<ul style="list-style-type: none"> • Consumer complains and reports 	This have to include the types of complains, where are they coming from, who is doing them, frequency and the products involved in these complains.

The food business establishment should develop an updated and well detailed contact information of all the members of the recall coordination group, this should include the contact information of the establishment itself, its suppliers, its customers and the relevant national state authorities (the food safety and quality authority of the Gambia)

The table below can be used as a quick reference in compiling contact information for recall purposes:

THE FOOD BUSINESS TO BE FILL BY THE FOOD ESTABLISHMENT CONTACT BUSINESS ESTABLISHMENT DETAILS

<i>The business name</i>	
<i>Address</i>	
<i>Postal address</i>	
<i>main phone number</i>	
<i>After Hours</i>	
<i>Email</i>	
<i>Website</i>	
<i>Name of quality control person</i>	
<i>Phone number</i>	
<i>After hours phone</i>	
NATIONAL AND STATE AGENCIES CONTACT DETAILS	
<i>Food Safety and Quality Authority of The Gambia</i>	
<i>Director of food control directorate of the Food Safety and Quality Authority of The Gambia</i>	
<i>National public health office</i>	
SUPPLIERS CONTACT DETAILS	
<i>Business name</i>	
<i>Address</i>	
<i>Phone number</i>	
<i>After hours phone number</i>	
COSTUMERS CONTACT DETAILS	
<i>Business name</i>	
<i>Address</i>	
<i>Phone number</i>	
<i>After hours phone numbers</i>	

THE FOOD BUSINESS PREPAREDNESS CONFIRMATION

This is a document the food establishments have to prepare to confirm their preparedness to recall and withdrew reported unfit food from the food chain when the need arise, it should include details of the business's traceability plan, product identification and linkages of suppliers and customers to finished products. It may also include staff training details and records of successfully conducted recalls.

The table below maybe use as template when preparing a food preparedness confirmation

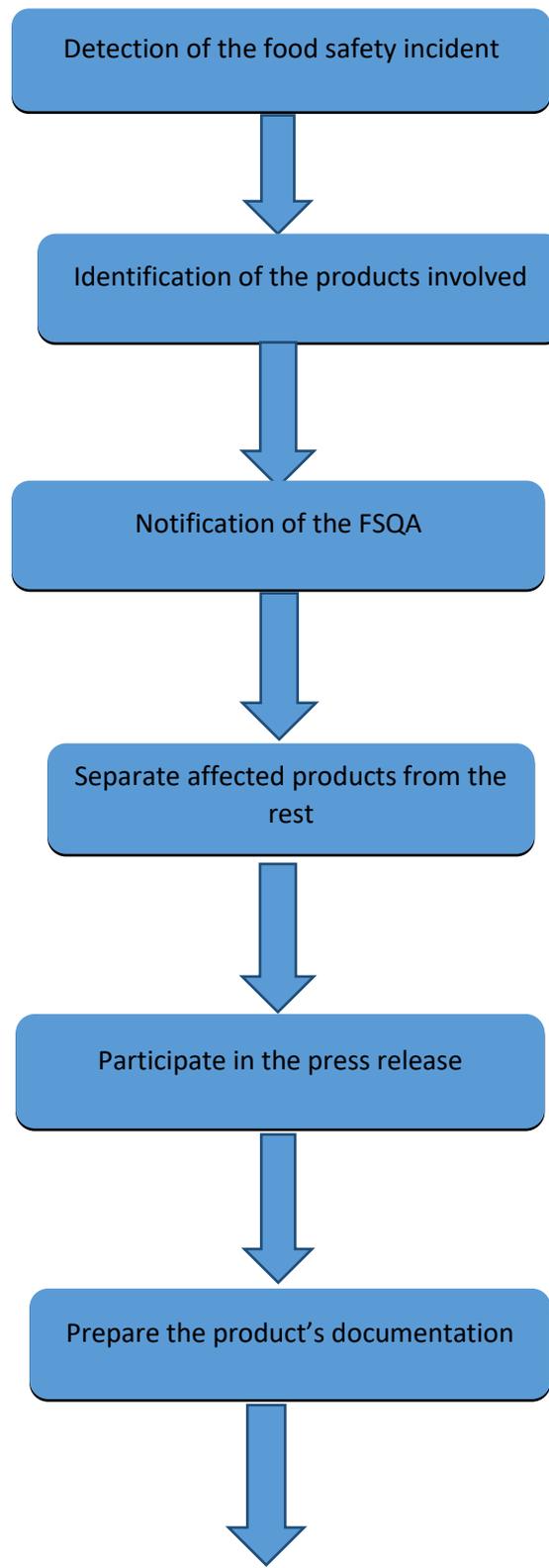
<i>ITEM</i>	<i>WHY</i>	<i>WHAT</i>	<i>WHO</i>
<i>The traceability plan of the food business establishment</i>	<p>It ensures:</p> <ul style="list-style-type: none"> • The traceability of products and their ingredients • The correlation of raw materials and affected finished products • Quick compilation of a list of customers and suppliers when needed 	<ul style="list-style-type: none"> • Create and maintain a supplier's list • Create and maintain a costumer's list • List of current products in the distribution chain • Update of distribution documents 	Quality control manager
<i>Staff training</i>	To ensure the preparedness of the food business personnel in charge of recall processes	<ul style="list-style-type: none"> • Review and or create training manuals • Train staff on recall • Keep records of conducted trainings and their outcomes 	The food business establishment
<i>Verification of the funcionability of the recall plan</i>	To ensure the perfect functioning of the recall plan	Revision of the recall plan for every 6 months	Quality control manager

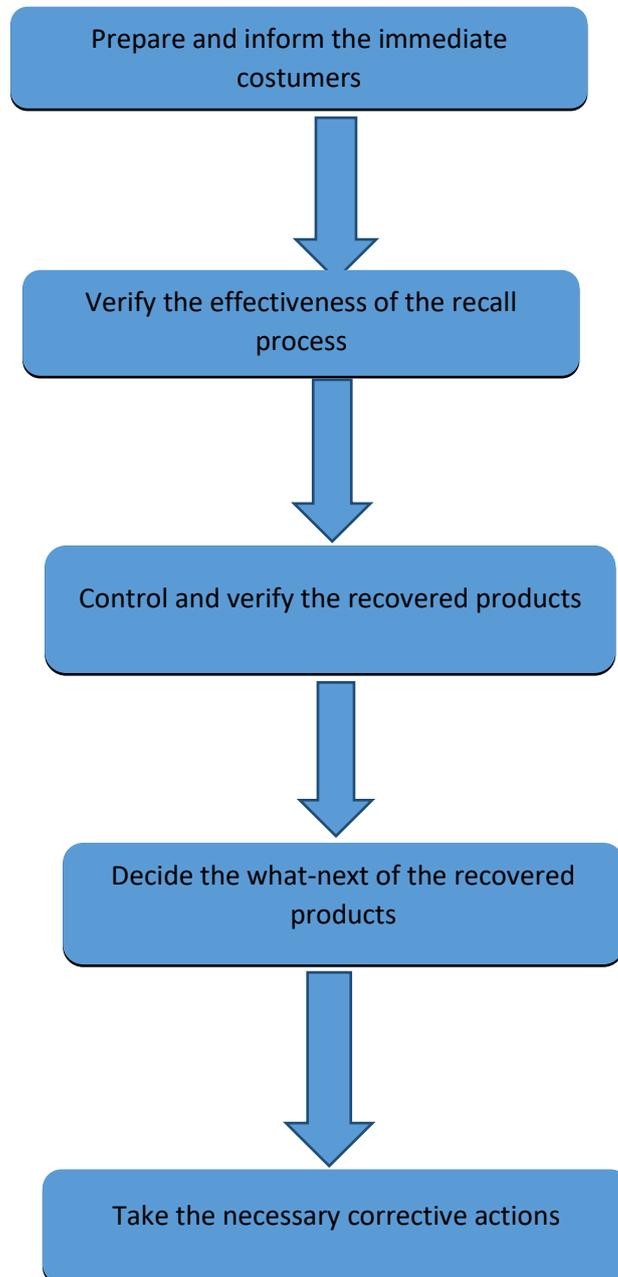
It also recommended the food business establishment be financially prepared to handle recall processes. Preparation may include insurance plans and/or specially prepared financial tools to fund the recall.

THE WITHDRAWAL PROCEDURE

The withdrawal procedure is the step-by-step process of retrieving an unsafe food from the market. It starts from the identification of a food safety issue and ends with a withdrawal report. Recalls are conducted and carried out by the food establishments whose products are to suffer a recall, however The Food Safety and Quality Authority of The Gambia may request or recommend a recall.

The following steps are recommended in conducting a recall:





In the case the incident is detected by the Food Safety and Quality Authority of The Gambia, the food business establishment will be notified and given recommendation and/or authorization on what its actions have to be starting from that point.

The following steps should be take when executing a food recall:

- ❖ Assemble the recall coordination group: make sure that each and every member of the group is well informed about the incident and that each member know his/her role in the group and what is expected of him during the recall process.
- ❖ The food business establishment should conduct a Risk evaluation of the incident to decide the necessity of a recall and at the same determine the depth of the recall process. It is recommended that the risk evaluating personnel used the following information of the product: lot number, production date, commercial name, name of manufacturer (in case the food business establishment is only a distributor), expiry date, costumers who received the product, distribution area number of complains about the product etc.
- ❖ Determine who and how to notify: the food business establishment should clearly, precisely and without any form of ambiguity inform the Food Safety and Quality Authority of The Gambia and it's immediate costumers of a food incident involving a product already in the distribution chain. The notification to the Food Safety and Quality Authority of The Gambia should include : products' ID, lot number, production date, expiry date, a copy of the labelling of the product(this have to scanned and send via email or faxed), quantity of the product in market, and distribution details of the product.
- ❖ Proceed with the recall process: once the notification and the decision to recall have been authorized by the Food Safety and Quality Authority of The Gambia, the food business establishment will coordinate and provide the logistical needs and establish the physical location where, when and how to get the products back to the food establishment's installation. The food business establishment should be financially up-to-date and capable to carry out the recall process.
- ❖ The monitoring of the recall process is the responsibility of the food business establishment and it should implement a checking and verification plan to ensure the proper progress of the recall process. The Food safety and Quality Authority of The Gambia will develop an audit scheme to oversee the proper withdrawal of the product that poses risk to the consumers.
- ❖ Decide what-next of the recovered products: the food establishment will have to take the necessary measures to make sure that the recovered food does not re-enter the distribution chain. The food Safety and Quality Authority of the Gambia will determine the necessary steps to ensure the disposal and/or re-processing of the recovered products.
- ❖ Once the investigations and the recallrelated actions are finalized, the Food Safety and Quality Authority of The Gambia will inform all the stake-holders involved that the recall process has come to conclusion. This Notice will include a summary of the actions that were taken, the amount of recovered products and the final decision on whether to dispose or reprocess the recovered products.

Once the recall processed is finalized and documented by the Food Safety and Quality Authority of The Gambia, it is recommended that the food business establishment take the incident as an opportunity to revisits its quality and safety measures. It is recommended that the head of the recall coordination group heads an investigation into the incident putting serious consideration in the following:

- ❖ The cause of the incident and how it all started. The group should be able to recommend short, median and long term preventive plans
- ❖ In relation to the recall process, the coordination group should write a report detailing the effectiveness of the process, the problems encountered during the process and recommendations on how to avoid such problems in the future.

The food business establishment should submit to the Food Safety and Quality Authority of The Gambia a report within 30 days of the conclusion of the recall incident. This report should detail the origin and causes of the incident, clearly indicating what failed and was not done and what should have been done. The post-recall report should also detail the corrective and preventive actions the food business establishment have implemented.

Every food establishment's recall procedure manual should contain the following:

- ❖ The food business's recall coordination group, this should include the names, roles and contact details of each of the members of the group.
- ❖ The food business's contact detail. This will include the business's contact person, the address, telephone number, emails and website
- ❖ Contact details of The Food Safety and Quality Authority of The Gambia. This should include the physical address of the agency, contact details of the management of the agency, telephone numbers, emails and website.
- ❖ A well detailed step-by step recall procedures.

It is important to mention that food recalls can never be successfully carried without an up-to-date traceability plan.

ANNEX

