Document F11

Focus Area 11 Worksheet: Food Recall

Focus Area 11: Food Recall

To help you understand what is included in this Focus Area, review the following goals and keys to success.

GOALS FOR FOOD RECALL:

Agency/jurisdiction ensures that the food implicated in an outbreak is removed from the market, retail establishments, and the homes of consumers as quickly as possible.

KEYS TO SUCCESS FOR FOOD RECALL:

"Keys to success" are activities, relationships, and resources that are believed to be critical to achieving success in a Focus Area. Determining whether an agency/jurisdiction has a particular key to success in place is somewhat subjective. Metrics, such as measures of time (e.g., rapidly, timely, and quickly), have not been defined. Your Workgroup should provide its own definitions for these terms, as is appropriate for your agency/jurisdiction, and use its best judgment in deciding whether a particular key to success is fully or partially in place.

- o Agency/jurisdiction collaborates with state and federal agencies and the implicated facility or production site in the recall.
- o Agency/jurisdiction proactively embargoes or seizes the implicated food product while awaiting official recall.
- o Agency/jurisdiction has means to quickly notify retail establishments and other sites (e.g., food banks) under its jurisdiction about the recall.
- o Agency/jurisdiction has means to quickly notify public about recall.
- o Agency/jurisdiction monitors the effectiveness of the recall at all appropriate establishments.

Making changes

- o Agency/jurisdiction conducts a debriefing among investigators following each outbreak response and refines outbreak response protocols based on lessons learned.
- o Agency/jurisdiction has performance indicators related to food recall and routinely evaluates its performance in this Focus Area.

List the persons participating in the discussion of this Focus Area and list their affiliations.

1. DESCRIBE YOUR CURRENT ACTIVITIES AND PROCEDURES IN THIS FOCUS AREA.

Considering the keys to success on the previous page, describe your agency's/jurisdiction's current activities and procedures in this Focus Area. Refer to written protocols, if available, and materials related to ongoing efforts in capacity development or quality improvement (e.g., FDA Retail and Manufactured Food Regulatory Program Standards). As you list current activities and procedures related to this Focus Area, indicate those that might need work to improve your agency's/jurisdiction's response to foodborne disease outbreaks.

Activity/Procedure	Needs Improvement? ✓
	☐
	☐
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2. PRIORITIZE CIFOR RECOMMENDATIONS TO ADDRESS NEEDED IMPROVEMENTS.

Having identified activities and procedures in need of improvement, review the CIFOR recommendations related to this Focus Area (listed below). Rate the priority for implementing each recommendation based on its likely impact on foodborne outbreak response at your agency/jurisdiction and available resources. Use a scale of 1to 5 to rate each recommendation (1 = Low priority for implementation and 5 = High priority for implementation). If a recommendation is already in place in your agency/jurisdiction, check the appropriate box. If a recommendation is not relevant to your agency/jurisdiction, select N/A. **Refer to the hyperlinked section number following each recommendation to view the recommendation as it appears in the CIFOR *Guidelines*.**

	Already in place	Priority for Implementation or Improvement (LOW – HIGH)
Before a food event occurs		
Know which regulators have responsibility over which food products. (3.1.2.6)	☐	1 2 3 4 5 N/A
Work with manufacturers, processors, and retail establishments in the jurisdiction to prepare for a recall. Ask them to • Maintain product source and shipping information for quick access, • Develop the ability to rapidly notify all customers of a recall, and • Develop procedures to prevent recalled food from being put back into commerce. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Develop materials to support businesses and the industry during a recall, including the following: • A list of control measures to implement immediately when an outbreak-related or illness-related recall has been identified, • Guidance for interacting with public health, environmental health, or agriculture officials investigating an outbreak, including contact information for regulatory agencies, • Guidance for communicating with the news media, and • Guidelines for mitigating the impact of the recall. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Develop templates, message maps, or community information sheets for common foodborne agents for use during a recall. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Ensure that regulators responsible for food facilities have a means to immediately notify all food facilities in their jurisdiction through e-mail, blast fax, or phone calls. Identifying subcategories of facilities is highly recommended so notices can be targeted to specific facilities. (6.2.2.2.1)	☐	1 2 3 4 5 N/A

Additional ideas:

After a food event occurs		
Contact the federal or state regulatory agency that has jurisdiction over the product implicated in an outbreak immediately because that agency will be responsible for working with the manufacturer/producer regarding the recall. (6.2.2.2.1)	☐	1 2 3 4 5 N/A

After a food event occurs (cont'd)	Already in place	Priority for Implementation or Improvement (LOW – HIGH)
Work with the appropriate regulatory agency to determine whether to remove a food from the market. The decision should be based on the likelihood that consumers are still at risk for exposure to the food, the quality of the information implicating the food, and the virulence of the pathogen. (6.2.2.2)	☐	1 2 3 4 5 N/A
Document fully the information that led to the decision to recall the food and the process used to make the decision. (6.2.2.2)	☐	1 2 3 4 5 N/A
Once a decision is made to remove a food from the market, remove it as quickly and efficiently as possible, working closely with state and federal regulatory agencies and the implicated manufacturer/producer. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
If your jurisdiction has legal authority to do so, embargo (impound) the food at the manufacturer/producer while awaiting the official recall. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
If the implicated food is associated with a highly dangerous condition consider the possibility of food seizure. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Ask retailers in your jurisdiction to voluntarily remove the product from their shelves and ask distributors to voluntarily withhold the product from distribution while awaiting the official recall. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Work with manufacturers, processors, and retail establishments to assure that they complete the following: • Quickly remove the recalled product from distribution, • Quickly notify customers of the recall, • Have clearly defined storage areas and handling processes for recalled products, and • Implement a system for safe handling or disposal of recalled products. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Advise a manufacturer/processor that refuses to recall a food that public health agencies or regulators might issue their own notice to the public, and the notice might include the message that the firm declined to voluntarily recall the product. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
Monitor recall activities to ensure the food is completely removed from distribution. (6.2.2.2.1)	☐	1 2 3 4 5 N/A
Obtain interim and final reports about the recall from the manufacturer/producer that recalls a product to determine the need for further recall actions. (6.2.2.2.3)	☐	1 2 3 4 5 N/A

Additional ideas:

	Already in place	Priority for Implementation or Improvement (LOW – HIGH)
Communication with public		
If the outbreak involves a distributed product, notify the public. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
Communicate with the public about food recalls by using good risk communication practices. Provide only objective information. Do not give preliminary or unconfirmed information. Provide clear actions that the public should take (e.g., handling the suspected product, actions to take if illness occurs). (6.2.2.2.2)	☐	1 2 3 4 5 N/A
Seek assistance from the agency's Public Information Officer or the Public Information Officer at another agency (if the agency does not have this resource), to help in developing messages for the public. (6.2.2.1.8)	☐	1 2 3 4 5 N/A
Use standardized scripts for reporting complex procedural or technical information to the public and actions the public should take during a recall. (6.4.3)	☐	1 2 3 4 5 N/A
Use established channels for communication with the public. (3.6.2.5)	☐	1 2 3 4 5 N/A
Use other means to disseminate information (e.g., the Internet, television, radio, newspapers) depending on the public health risk associated with the recalled food. (6.4.3)	☐	1 2 3 4 5 N/A
Attempt to reach all members of the population at risk, including non-English-speaking and low-literacy populations. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
If the outbreak is large or the etiologic agent is highly virulent, consider setting up an emergency hotline so the public can call with questions. Train persons answering the hotline so that they will provide consistent messages. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
If press releases are to be issued by the manufacturer or retail establishments, review and approve their statements before release. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
Even if the affected industry or business is issuing a press release, consider issuing a release because local press releases often get better coverage from the local media. If time allows, give affected industry members or businesses an opportunity to comment on your release. (6.2.2.2.2)	☐	1 2 3 4 5 N/A
Coordinate press releases with others releasing messages about the recall (e.g., the manufacturer, retail establishments, regulatory agencies) to ensure consistency in the message. (6.2.2.2)	☐	1 2 3 4 5 N/A

Additional ideas:

3. MAKE PLANS TO IMPLEMENT SELECTED CIFOR RECOMMENDATIONS.

For each CIFOR recommendation selected in the previous step (or idea formulated by the Workgroup), identify who might take the lead in implementing the recommendation and the timeframe for implementation (e.g., a specific completion date or whether the change is likely to require short-, mid- or long-term efforts). If certain actions must precede others, make a note of this and adjust the timeframe. In addition, consider factors that might positively or negatively influence implementation of the recommendation and ways to incorporate the recommendation into your agency's/jurisdiction's standard operating procedures.

CIFOR recommendations or other ideas from previous step	Lead person	Timeframe for implementation	Notes (e.g., necessary antecedents, factors that might influence implementation, ways to incorporate the recommendation into standard operating procedures)

Date worksheet completed _____