**West Virginia Department of Agriculture**

**TEFAP Program**

**Recall Control**

**INTRODUCTION:**

The purpose of this document is to provide a guideline for TEFAP agencies throughout West Virginia in the event that there is a USDA product recall. It is very important that we ensure food safety of all our clients receiving food through the TEFAP Program.

A food recall almost always is a voluntary action initiated by a food manufacturer to remove food from commerce that may cause health problems, or death. A food recall is a serious situation; therefore, it is very important that everyone involved in the recall process understands the terms associated in the recall. Here are some terms that may be used.

**KEY TERMS:**

Adulterated– Any purposeful change (e.g., soil, dirt, mold, yeast, bacteria, insects, pesticides, unsanitary conditions, unapproved activities) that alters the product composition or the meaning of the name under which it is sold.

Correction – The organization’s modifications, relabeling, or destruction of violated product.

Depth of Recall – The level of product distribution to which the recall is to extend. The agency and client or user level includes the consumer in addition to any intermediate distribution level.

FDA Requested Recall – A recall initiated by the company in response to a formal request from the FDA.

Health Hazard Evaluation – An evaluation of the health hazard presented by the product being recalled or considered for a recall. A team of experts from the FDA will conduct the evaluation. The company may also evaluate the potential health hazard presented by the product.

Misbranded – Any number of label or product identification deficiencies including use of a false label, false advertising, wrong product name, misleading container, not bearing the name and address of the manufacturer, packer or distributer, inaccurate statement of net quantity, or mislabeled.

Recall Classification – The numerical designation, i.e. I,II, III assigned by the regulatory agency to a particular product recall that indicates the relative degree of health hazard presented by the product being recalled.

Recall Completed/Recall Terminated – The classification status used for monitoring purposes when the recall reaches the point, where the company has retrieved and corrected all outstanding product that could be reasonable expected to be recovered. A recall will be officially terminated when the regulatory agency determines that all reasonable efforts have been made to remove or correct the violated product.

Recall Strategy – The course of action recommended by or to the recalling firm in order to achieve its goals.

Recalling Firm – The organization who initiates a recall, or in case of a regulatory requested recall, the company that has primary responsibility for the manufacturing and/or marketing of the product to be recalled.

Stock Recovery – The food bank’s removal or correction of a product that has not been distributed or is still under control of the food bank.

Trace Procedure – The process used to identify and isolate product at any point during the time in which the food bank controls the product.

**Food Recall Classifications**

A recall occurs when action is taken to remove a food from the market because there is evidence that it is unsafe, adulterated, or mislabeled. Food recalls are classified according to the level of risk that would be posed to the health of those who might consume the food. Table 1 defines and provides examples of the food recall classifications.

Table 1. Recall Classes

|  |  |  |
| --- | --- | --- |
| **Class** | **Definition** | **Examples** |
| Class I | A health hazard situation where there is a **reasonable probability** that eating the food will cause serious, adverse health consequences, or death. | *E. coli* O157:H7 in ground beef; *Salmonella* in peanut butter; Food with an undeclared allergen |
| Class II | A health hazard situation where there is a **remote probability** of adverse health consequences from eating the food. | Product containing a foreign material |
| Class III | A situation where eating the food will **not** **cause** adverse health consequences. | Minor labeling problems, such as improper format or undeclared ingredients that are not allergens |

**Procedures**

The purpose of a recall procedure plan is to assure that a recall is conducted in a manner that achieves the orderly return or other appropriate disposition of the violated product to the extent necessary to protect the consuming public from products that present any potential health risk or consumer deception. Below is the Recall Procedure Flow Chart in the event of a USDA Product recall.

**Recall Procedures Flow Chart**

USDA

WVDA

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Kate Hill – TEFAP Coordinator (304-558-0573)

Facing Hunger Food Bank

Cyndi Kirkhart – Ex. Director (304-523-6029 ext. 25)

Bethany Nielson – Safety Coord. (304-523-6029 ext. 30)

Keith Hysell – Warehouse Mgr. (304-523-6029 ext. 34)

Mountaineer Food Bank

Chad Morrison – Ex. Director (304-364-5518)

Dale Bollinger – Director of Operations (304-364-5518)

Lisa Legg – Network Services Coord. (304-364-

5518)

Recipient Agencies

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Clients

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Within hours of receiving the recall alert, FNS will notify the WVDA of any and all information pertaining to the recalled product. WVDA will then notify Facing Hunger Food Bank and Mountaineer Food Bank with the information given by FNS along with the product identification information and instructions for removing and isolating the affected food. WVDA must also provide specific disposal instructions. Both food banks are responsible for notifying all of their sites within 24 hours or less of being notified themselves. They must conduct an inventory assessment within 48 hours or less of the affected product and send it to WVDA.

**Record Keeping**

All parties involved in the recall process must keep accurate and complete records of the recalled product for three years following the end of the federal fiscal year (September 30th). These records include: Inventory, Distribution, Storage, and Disposal.

**Recall Completion/Termination**

Once the recall has been completed and the product has been properly disposed of a final report will be prepared by each food bank documenting the collection and recording of all information generated for the recall.