

**Conference for Food Protection
2012 Issue Form**

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Council Recommendation:	Accepted as Submitted _____	Accepted as Amended _____	No Action _____
Delegate Action:	Accepted _____	Rejected _____	

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Title:

Uniform Food Recall System

Issue you would like the Conference to consider:

The Recall Evaluation Committee requests that a letter be sent to the FDA and USDA requesting they work together in collaboration with stakeholders on developing a uniform food recall system that is easier to understand and contains guidelines and best practices that will make the process faster and more efficient.

Public Health Significance:

Beyond question, the current system of recalling food products in the United States in case of real or purported health or quality issues is flawed. While part of the problem resides in the sheer complexity of the global food production and distribution system, the process of recalling a product is difficult for industry and incomprehensible to the general public. While new (pending) food safety legislation will address a few of the problems, there remains the need to overhaul and clarify the current recall classification and notification process.

Consider:

- FDA is guided by Ch. 7 of their 2009 Regulatory Procedures Manual/ 21CFR
- Recalling Firm is guided by "GUIDANCE FOR INDUSTRY" document by FDA
- Firms affected by the recall throughout the complex food system (distributers, sub-producers, brokers) have no official FDA guidance
- There is no time limit for executing a Class I Recall, or any other Class
- There are no minimum requirements for the information required in a recall notice
- There is no consideration of cost to benefit
- Current Classification system is ambiguous and confusing

Recommended Solution: The Conference recommends...:

that a letter be sent to the FDA and the USDA requesting that they work together in collaboration with industry stakeholders on developing a uniform food recall system. Examples of what should be considered in this initiative are:

- A mechanism for working with industry and other stakeholders to further identify the specific changes needed to enhance the current recall system
- A uniform recall process be used by all federal food regulatory agencies

- A revised classification system that is prompt, transparent and meaningful to industry, regulatory, and the general public using consistent definitions for recall classifications
- Consistent information provided with every recall, especially a decision on the classification
- Clarifying instructions and procedures for industry and the public
- A mechanism for engaging relevant private-sector expertise in recall investigations and recall decisions
- Reasonable "best practice" time frames for execution of recall communications and actions including verification of notification
- Clear and consistent information in recall notifications to each segment of the supply chain including information that clearly identifies the product being recalled in sufficient detail
- Consistent protocol for audits and/or effectiveness checks
- Consistent and more specific consumer messages (for example, explaining the difference between recalls for pathogens that present a risk to the general public versus a recall for an allergen that impacts a select portion of the population)
- A single website and database for all food recalls with a consumer- friendly format

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