

Product Recall Plan

Plant Name
Address
City, State, Zip

Introduction

Plant Name Product Recall Plan will be reviewed annually and revised by **Plant Name** as necessary, when key management personnel, procedures, processes, or other factors change.

Recall Team

- _____; Recall Director
Office: _____; Cell: _____; Fax _____
Email: _____

- _____; Assistant Director
Office: _____; Cell: _____; Fax _____
Email: _____

- _____; Sales Manager
Office: _____; Cell: _____; Fax _____
Email: _____

- _____;
Office: _____; Cell: _____; Fax _____
Email: _____

Recall Procedures

1. Respond to an identified or reported problem
2. Assemble Recall Team for recall determination
3. Report Problem to Meat Inspection Personnel
4. Identify scope and depth of recall
5. Identify and implement recall communications
6. Returned product control and disposition
7. Verification of recall effectiveness
8. Recall status reports
9. Recall terminations and follow ups

Respond to an identified or reported problem

Recall director or designee will start a Product Recall Situation Packet based on possible reasons for a product recall including but not limited to:

- a. Positive laboratory result for a biological hazard
- b. Consumer complaint
- c. Illness outbreak
- d. Misbranding of product
- e. Undeclared allergen
- f. Foreign material
- g. Epidemiological data from public health agency
- h. Inspection finding
- i. Underprocessed product
- j. Adulterated product
- k. Other.

Assemble Recall Team for recall determination

Plant Name Recall Director and Assistant Recall Director will assemble to collect and analyze all information and data it has regarding a product that may be recalled. The Recall Directors will take into account the following factors:

1. Has a product been produced that has a positive biological result, is adulterated, mislabeled, contains an undeclared allergen, is underprocessed, contains a foreign material, contains a wrong formulation, contain recalled ingredients or other potential hazards to human health?
 - a. If yes, explain the details, and proceed to next step.
 - b. If no, issue a report detailing why recall will not be issued.
2. Determine if the hazard has already or has the potential to cause disease or injury from use of the product.
 - a. Explain Details
3. Determine the likelihood of occurrence of the hazard.
 - a. Explain Details
4. What segments of the population are expected to be exposed to the product, children, elderly, immune-compromised, others.
 - a. Explain Details
5. What are the consequences, both immediate and long-term, from exposure to the hazard?

6. Determine class of recall

- a. Class I – there is a reasonable probability that eating the product will cause serious, adverse health consequences or death. Examples: the presence of pathogens in ready-to-eat meat or poultry products or the presence of *E. coli* O157:H7 and other shiga-toxin producing *E. coli* O157:H7 or non-O157:H7 STEC in raw ground beef. Undeclared Class I Allergen (peanuts, shellfish, eggs, milk, etc.)
 - b. Class II – There is a remote probability of adverse health consequences if the product is eaten. Examples of a Class II recall include the presence of very small amounts of undeclared allergens typically associated with milder human reactions, Class II allergens (wheat, soy, etc.) and/or on-sharp-edged foreign material in a meat or poultry product.
 - c. Class III – Eating the product will not cause adverse health consequences. Examples: presence of undeclared ingredients, such as excess water and/or G.R.A.S ingredients in meat or poultry products.
7. After analysis of problem has begun, recall director is to notify and assemble if necessary remaining recall team.

Report Problem to Meat Inspection Personnel

After analysis of a problem has begun and within 24 hours of identifying the need for a recall, the recall director is to notify plant inspector and either the Assistant Manager or Manager of Wyoming Department of Agriculture Consumer Health Services. This communication should be through phone, meeting conversation, or written communication.

Wyoming Department of Agriculture Consumer Health Services Team

- [redacted]; CHS Plant Inspector
Office: [redacted]; Email: [redacted]
- Linda Stratton; CHS Manager
Office: 307.777.6592; Email: linda.stratton@wyo.gov
- Jon Cecil; CHS Assistant Manager
Office: 307.777.5533; Email: jon.cecil@wyo.gov

Records

Plant Name [redacted] HACCP records are located in the [redacted] office at Address [redacted].
Sales records are located in [redacted] office at Address [redacted].

Identify scope of Recall

After problem is identified, define the scope of the recall taking into account these factors:

1. Determine initial product of concern, brand name and product name.
2. Determine production date.
3. Determine packaging date.
4. Determine if product is to be recalled from clean to clean, certain lot code(s), or other time frame.
5. Determine lot codes to be recalled.
6. Determine amount of product produced, packaged and distributed.
7. Determine packaging types and sizes.
8. Determine if other products contain identified product.
9. Determine hazard of concern (undeclared allergen, misbranded with incorrect label, product is underprocessed, pathogens, other)
10. Determine implicated portions of facility and equipment contact by product.
11. Determine implicated HACCP Plans and SSOP's, and review records before, during, and after time frame of concern
12. Other.

Possible Scenarios:

- a. Equipment contaminated with foreign material, or pathogen
- b. Incorrect use of label
- c. Multiple lots product(s) produced from, other lots of concern, time frames of concern
- d. Product ingredients (casing, spices, etc.) recalled from manufacture
- e. CCP's not met, corrective action not taken, verification oversight
- f. Other.

Identify the depth of the recall

After scope of recall is determined, define the depth of the recall taking into account these factors:

1. Determine all known types of product sales:
 - a. Direct
 - b. Retailer
 - c. Internet
 - d. Other

2. Determine distribution level:
 - a. Wholesale: product distributed to a warehouse or distribution where it is not under direct control of the production company.
 - b. Retail: product has been distributed and received by a retailer for sale to household consumers but has not yet been sold to consumers
 - c. HRI: product has been distributed and received by hotel(s), restaurant(s), and/or other institutional customers
 - d. Consumer: product has been received by direct sales to consumers.

3. Determine the geographical distribution area.
 - a. Distribution area is to include any and all reasonable geographical areas where product has been distributed to, purchased, and/or consumed.

4. Determine potential for consumption by following demographics
 - a. Children
 - b. Elderly
 - c. Immune-compromised
 - d. Military
 - e. Other

Recall Communications

1. Wyoming Department of Agriculture Notification
 - a. After the recall team has determined a recall is warranted. The recall team is to notify WDA within 24 hours of recall determination. The recall director is to notify plant inspector and either the Assistant Manager or Manager of Wyoming Department of Agriculture Consumer Health Services. This communication should be through phone, meeting conversation, or written communication.
 - b. Communication to WDA should include but not limited to this basic information
 1. Complete and accurate product identity
 2. The reason for the recall and details about when and how any defect or deficiency was discovered
 3. An evaluation of the risk associated with consumption of the product and how the evaluation was made
 4. How much of the product in question was produced and during what period of time
 5. An estimate of how much of the product is in distribution and how long it has been in distribution
 6. Geographical area of distribution of the recalled product
 7. Information about which wholesalers, retailers, HRI, or consumers received the product
 8. Copies of any company correspondence with wholesalers, retailers, HRI, or consumers relating to the recall strategy or actions, and a copy of any proposed press release.
 9. Name, title, and telephone number of the recall coordinator for the company.
2. Public Communication
 - a. After the recall team has determined a recall is warranted. The recall team is to notify all known recipients of the recall within 48 hours of a recall determination. Recall communication to known recipients shall be through telephone, email and/or fax. In addition, all known recipients shall be contacted via mailed letter on company letter head and with “URGENT FOOD RECALL” conspicuously marked on the outside of the envelope.

- b. After the recall team has determined a recall is warranted. The recall team is to notify all known recipients of the recall within 48 hours of a recall determination. Recall communication will continue to all known recipients until the recall team has had verbal communication with or has received written communication from all known recipients about the recall. Recall communication to unknown recipients shall be through public press release to news agencies within geographical area of recall. And other notification means of communication through social media will be utilized if determined effective.
- c. All recall communication will be written or conveyed according to the following guidelines:
 - 1. Be brief and to the point
 - 2. Clearly identify the product and any other pertinent, descriptive information including:
 - a. Product and Brand Name
 - b. Product code
 - c. Package and/or case size
 - d. Package and/or case date
 - e. Lot number and/or expiration date
 - f. Universal Product Code (UPC)
 - 3. Describe the risk involved in consuming the product
 - 4. Concisely explain the reason for the recall and the hazards involved
 - 5. Provide specific instructions on what should be done with the recalled product
 - 6. Request an official, written statement from consignees
 - 7. Provide a mean for recipients to report whether or not they have any of the product under their control.
 - 8. Include the company's contact information and a point of contact.
- d. Responsibility of Recipient
Recipients who receive recall communication should immediately carry out all instructions provided and, when necessary, extend the recall to their known recipients of product.
- e. The class of a recall and the extent to which the product was distributed will determine the distribution of public notification by WDA. The recall team will decide if its own recall communications will be issued. Recall communication templates are located on page 14 and 15.

Returned product control and deposition

Product that is recalled and returned to us will be collected and stored in a controlled environment either within the facility or at a secure location to prevent any further spread of the hazard. Returned product will be tagged with tags stating “RECALLED PRODUCT, NOT FOR SALE, INEDIBLE.” Returned product tags should also contain the name of who returned the product, date and the amount product. Returned product will be rendered inedible for human and animal consumption and will be disposed at a proper location (landfill, hazardous waste facility, etc.) under the direct observation of WDA personnel. Product labels will be removed and made unusable for trade.

Recalled product remaining in the facility will be assessed to determine if it can be made safe or if it will be destroyed. Product that can be made safe will be handled in accordance with plants HACCP plans and labeled properly. Product that cannot be made safe for human and/or animal consumption will be tagged with tags stating “RECALLED PRODUCT, NOT FOR SALE, INEDIBLE.” Tags should also contain the date and the amount of product. Product will be rendered inedible for human and animal consumption and will be disposed at a proper location (landfill, hazardous waste facility, etc.) under the direct observation of WDA personnel. Product labels will be removed and made unusable for trade.

All recalled product will be tracked in recall packet.

Recall effectiveness Checks

In an effort to assess the effectiveness of a recall, the recall team will conduct an effectiveness check to verify that the recall team has had verbal communication or a written response with all known recipients. To assess the effectiveness of the recall, the recall team will compile at least the following information:

1. How much product is involved in the recall?
2. How is the product identified to recipients (names, markings, codes, dates, etc.)
3. How much product is in our control
4. How much product has left our control
5. How many locations did we ship product to and where are they
6. How did we communicate the product removal action to those who received it?
 - a. Did we document this contact?
 - b. Did we ask for and receive written response acknowledging receipt of the information.
7. What actions were taken with the product and by whom?
8. If the product was destroyed, then was the destruction witnessed and documented?
 - a. Were WDA inspection program personnel present?
9. Is there a written record of:
 - a. When the issue was identified?
 - b. When recipients were notified?
 - c. When we received notification that the product was either placed on hold or was no longer in a recipients control?
10. Can we account for most (or all) of the product?

Recall Status Reports

The recall team will regularly and in a timely manner report the status of the recall, based on results of effectiveness checks. The report frequency will be agreed upon by the recall team and WDA and will be expected to be more frequent as the degree of public health hazard concern increases. In addition the firm will notify WDA when it appears that the recall has been completed. Recall status reports should contain at least the following information:

- a. The number of recipients notified of the recall, the date and method of notification
- b. The number of recipients responding to the recall communication
- c. The quantity of product each recipient had on hand at the time of the communication was received
- d. The number and identity of recipients that have not responded
- e. The quantity of product returned or held by each recipient
- f. An estimated time for completion of the recall.

Recall Termination

A recall will be terminated when WDA has completed the recall effectiveness checks and determines that the recall team has made all reasonable efforts to recall the product, and that it has disposed of the returned product, and has documented control of the product. The effect of a timely termination of a recall, the recall team should provide all information to WDA once the team has determined that it has retrieved all possible products. The team will send a termination memo to WDA containing at least the following information:

1. A list of customers
2. Amount of product retrieved
3. The actions taken with the product
4. Other.

Once WDA determines that the team has made all reasonable efforts to recall the product, WDA will notify the Recall Team in writing.

Recall Follow-up

Once the recall action has been completed, the Recall Team will notify its customers that the recall action has been completed, thanking them for their assistance, and provide assurances that the problem has been corrected. The Recall Team should evaluate how the recall action was conducted to determine whether things should have been handled differently, and what, if any, changes should be made to the plan.

Recall Simulations

The recall team will conduct annual simulation exercises to evaluate our recall plan. The simulated recall will involve the selection, without prior notice to personnel involved in the exercise, of at least one product lot that has been distributed in commerce.

A hypothetical reason for recalling the product will be specified and will involve the activation of the recall plan. The simulation will proceed at least to the point at which communication is made beyond the organizational limits. In addition, the recall simulation exercises will include scenarios in which the recalled product has been shipped beyond the initial customer, to one or more of its customers.

A recall simulation file will be maintained to record the details and results of all simulated recall exercises. The simulation file will contain a Recall Packet labeled “Simulation Only” and notes from the simulation results and any suggested changes to the recall plan.

Letter to Customer Template

LETTER HEAD

Date:

Customer Name and Address

RE: FOOD RECALL OF **TYPE OF PRODUCT**

Dear Sir or Madam:

This letter is to confirm our telephone conversation that the **Plant Name** is recalling the following product because, **describe the product including name, brand, code(s), package size and type, establishment number, and dates.**

We request that you review your inventory and segregate and hold the above product. If you have shipped any of this product, then we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved as much of the product as possible, please contact us. We will arrange to have the product picked up or shipped to our facility. Please DO NOT destroy the product. We will credit your account for the returned products.

We are undertaking this action in cooperation with the Wyoming Department of Agriculture Consumer Health Services division. WDA CHS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist the **Plant Name** in this recall. If you have any questions, please do not hesitate to contact **Customer Contact** at **Phone Number and email.**

Thank you for your cooperation.

Sincerely,
Recall Director

Press Release Template

PLANT NAME

RECALLS **(PRODUCT)** DUE TO **(HAZARD)**

(CITY), **(DATE)** – **Plant Name**, a **City**, Wyoming establishment, is recalling approximately **(AMOUNT)** pounds of **(PRODUCT)** due to **(HAZARD)**.

The following products are subject to the recall:

- **(IDENTIFYING INFO: TYPE OF CONTAINER, SIZE, BRAND NAME, PRODUCT NAME, CODES, DATES, ESTABLISHMENT NUMBER)**

The products were produced **(DATE)** and distributed to **(LEVEL OF DISTRIBUTION)** in Wyoming.

The problem was discovered through **(SPECIFY HOW PROBLEM WAS DISCOVERED)**. There have been **(NUMBER)** reports of illness associated with consumption of these products. Anyone concerned about injury from consumption of these products should contact a physician

Consumption of food with **(HAZARD)** **(EXPLAIN HEALTH CONSEQUENCES)**.

Consumers with questions about the recall may contact the **Plant Name** Customer Contact **(NAME)** at **(PHONE AND EMAIL)**. Media questions about the recall may contact the **Plant Name** Media Contact **(NAME)** at **(PHONE AND EMAIL)**.

Recall Packet

Packet Start Date: _____

Plant Name: _____ Establishment # _____

Address: _____

Phone: _____

Recall Director: _____

Title: _____

Office: _____

Cell: _____

Recall Media Contact: _____

Title: _____

Office: _____

Cell: _____

Recall Consumer Contact: _____

Title: _____

Office: _____

Cell: _____

Recall Determination:

1. Has a product been produced that has a positive biological result, is adulterated, mislabeled, contains an undeclared allergen, is underprocessed, contains a foreign material, contains a wrong formulation, contain recalled ingredients or other potential hazards to human health?

Explain: _____

-
-
2. Has a hazard already or does it have the potential to cause disease or injury from use of the product.

Explain: _____

3. What is the likelihood of occurrence of the hazard?

Explain: _____

4. What segments of the population are expected to be exposed to the product, children, elderly, immune-compromised, others?

Explain: _____

5. What are the consequences, both immediate and long-term, from exposure to the hazard?

Explain: _____

6. Determine class of recall
Class I _____ Class II _____ Class III _____

7. **Is a recall warranted?** Yes _____ No _____

Explain: _____

Product Identity:

Brand name:	
Product name:	
Production date:	
Packaging date:	
Time frame of recall:	
Lot code(s):	
Amount produced:	
Amount packaged:	

Amount distributed:	
Packaging type and size:	
Additional products containing this product:	
Is this product carry over from other production runs:	
Hazard of concern:	
Implicated portions of facility and equipment:	
Implicated HACCP plan(s)	
Type of product Sales:	

Distribution level:	
Geographical distribution area:	
Potential demographics:	
Describe the production/process: Attach Flow Diagram	
What were the clean to clean times:	
Has the source of the hazard been identified:	
Is there any data that would limit the amount of product affected:	
Were there any deviations reported on documentation:	

<p>Were there other products produced in the area or with the same equipment in between clean to clean times:</p>	
<p>What was the internal cooking temperature reached:</p>	
<p>Did the product reach any other requirements, Aw, pH, MPR, etc.</p>	
<p>Last date of environmental monitoring:</p>	
<p>Was there microbiological testing performed by the plant or WDA:</p>	
<p>Other notes about the product in question</p>	

Records involved in recall:

HACCP Record and Date:	
Pre-Operational Record and Date:	
Pre-Shipment Review Record and Date:	
Sales Record Dates:	

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Recall Team Effectiveness Check

Date: _____

(Add checks as needed)

How much product is involved in the recall?	
How is the product identified to recipients? (name, markings, codes, dates, etc.)	
How much product is in our control?	
How much product left our control?	
How many locations did we ship product to and where are they?	
Did we communicate the product removal action to those who received it?	
Did we document contact?	
Did we ask for and receive written response acknowledging receipt of the removal information?	

Plant Name

Revised June 2, 2017

<p>What actions were taken with the product and by whom?</p>	
<p>If product was destroyed, then was the destruction witnessed and documented?</p>	
<p>Is there written documentation of when the issue was identified?</p>	
<p>Is there written documentation of when the recipients were notified?</p>	
<p>Did we receive notification that the product was either placed in holding or no longer in control by customers?</p>	
<p>Can we account for most (all) of the product?</p>	

Recall Status Report

(Add pages as needed)

Date: _____

Overview of the number of recipients notified of the recall, the date, and method of notification.	
The number of recipients responding to the recall communication.	
Overview of the quantity of product recipients had on hand and the time of communication.	
Overview of the number and identity of recipients that have not responded.	
The quantity returned by recipients to date.	
An estimated time for completion of the recall.	

Recall Termination

Date recall was terminated: _____

Recall Directors Authorization: _____

WDA Acceptance: _____

Recall Follow Up

Date of recall termination notification sent to customers: _____

Notes: _____

