



جهاز أبوظبي للرقابة الغذائية
ABU DHABI FOOD CONTROL AUTHORITY

Code of Practice

No. (4)/2011

Food Traceability and Recall

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CODE OF PRACTICE No. 4/2011 FOOD TRACEABILITY AND RECALL

INTRODUCTION

All food business operators in the Emirate of Abu Dhabi are obliged to ensure that the food they produce is safe and that their food operations are in compliance with food law and regulations. Codes of Practice produced by the Abu Dhabi Food Control Authority (ADFCA) specify guidelines for compliance with UAE food regulations and requirements, and ensure a high degree of consistency with Gulf Standards.

Recent food scares have demonstrated that the identification of the origin of food is of prime importance for the protection of consumers. In particular, traceability helps facilitate the recall and withdrawal of food and provides consumers with accurate information concerning implicated products. Traceability does not itself make food safe but is a risk management tool to be used in order to assist in containing a food safety problem.

The Abu Dhabi Food Law No (02) of 2008 requires all food business operators to have traceability systems in place that will enable them to withdraw and, where necessary, recall unsafe food from the market

This Code of Practice is an essential reference document for food business operators. It aims to clarify and standardise procedures for the identification and removal of unsafe food from the market. Traceability and recall systems are fundamental components of the food safety management system of any business. It is important that food business operators are aware that food safety issues can arise with their products and therefore recognise that there is a need to plan ahead. These systems and plans should be periodically tested to ensure that they are effective.

SCOPE AND DEFINITIONS

This document outlines the requirements and best practice for the traceability and recall of unsafe foods from the market

In addition to the definitions enlisted within Food Law No.2/2008 and the published Regulations, the terms and expressions indicated below shall apply unless the text indicates otherwise;

Codex Alimentarius	(Latin for food code) is the joint food standards programme of the Food and Agriculture Organisation of the United Nations (FAO) and the World Health Organisation (WHO).
Final Consumer	The ultimate consumer of a foodstuff who will not use the food as part of any food business operation or activity.
Ingredient Batch	A clearly identified unique volume of ingredient from a single supplier that is either identified by a traceability code applied by the supplier or is identified as a single delivery.
Placing on the market	The holding of food for the purpose of sale, including offering for sale or any other form of transfer, whether free of charge or not, and the sale, distribution, and other forms of transfer themselves.
Product Batch	A clearly identified unique volume of product consisting of one or more saleable units sharing a common process, common ingredients, packaging and services.
Saleable Unit	The smallest identifiable unique unit of product or ingredient, e.g. in the case of a manufacturer selling product to a retailer the saleable unit would be the retail unit. In the case of a supplier selling bulk ingredient the saleable unit would be an individual bulk delivery.

PART 1 - TRACEABILITY

1.1 Introduction

This section of the Code of Practice will address the main issues concerning the traceability of food. It will outline the legal requirements and the role of the Abu Dhabi Food Control Authority and food business operators. It will also outline best practices for traceability systems.

1.2 Objective of a Traceability System

The objective of a traceability system is to uniquely identify a batch of food and the ingredient/packaging batches used in its production in a way which allows tracking of the food forwards through the food chain to the immediate customer and tracing of the food backwards down the food chain to the immediate supplier. The system should be capable of generating and maintaining relevant traceability records for inspection by the Abu Dhabi Food Control Authority (ADFCA) on demand.

1.3 The role of food businesses

Food business operators are responsible for ensuring the safety of food for human consumption as designated in Article (7) of the Food Law No (02) of 2008. They are also responsible under Article (6) of this Food Law for establishing food traceability systems that, as a minimum, comply with Article (6). However, for traceability systems to work effectively and to ensure food safety and public health protection, they must operate within a food business and also across the entire food chain. Every food business, at every step of the food chain, has a role to play. Consequently, food businesses should pay particular attention to the effective and efficient transfer of accurate traceability information to other businesses where applicable.

Food industry trade bodies may also have a role in developing more specific detailed guidance based on this document for the food sector that they represent.

1.4 The role of the Abu Dhabi Food Control Authority

Under Article (6) of the Food Law No (02) of 2008 ADFCA is responsible for setting and enforcing rules governing traceability systems across the food chain. The Authority is also charged with inspecting food business operations to verify compliance with the food law.

Enforcement powers of inspectors and offences for breaches of legal requirements by food businesses are laid down in Articles (14) and (16) of the Food Law no (2) of 2008.

1.5 Importance of a Traceability System

- 1.5.1 Traceability is a way of responding to potential risks that can arise in the food to ensure that all food products on the market in the Emirate of Abu Dhabi are safe for consumers to eat.
- 1.5.2 It is vital that when national authorities or food businesses identify a risk they can trace it back to its source in order to swiftly isolate the problem and prevent contaminated food products entering the food chain.
- 1.5.3 In addition, traceability allows targeted withdrawals and the provision of accurate information to the public, thereby minimizing disruptions to trade.

1.6 Creating a traceability system

Food business operators should:

- 1.6.1 define the scope of the traceability system;
- 1.6.2 identify the traceability information needed;

- 1.6.3 establish a system of record keeping and retrieval;
- 1.6.4 establish mechanisms to review and periodically test the traceability system.

As a matter of best practice, food businesses should document the traceability system and include details of all of the elements listed above as well as the roles and responsibilities of staff in the operation, upkeep and maintenance of the system. Such documentation is useful for a number of purposes including management review and training of new employees.

1.7 Defining the Scope of a Traceability System

Food businesses should define the scope of their traceability system before starting to develop it. The traceability system should be capable of efficiently and accurately following products through the food chain. Businesses involved in all sectors of the food chain from farm to retail sale will require traceability systems composed of the following elements, depending on the nature of the food or business:

- 1.7.1 Supplier Traceability: traceability of food, and packaging suppliers and their goods entering the food business operator's establishment;
- 1.7.2 Process Traceability: traceability of foods, and packaging, where applicable, through the operations within the food business operator's establishment (whether new products are produced or not);
- 1.7.3 Customer Traceability: traceability of food via distribution to the immediate customers.

Attention must be given to the interface between the three areas to ensure that the traceability system is seamless. Food business operators operating in different sectors of the food chain may develop traceability systems that differ in their scope. The following examples can be considered as guidelines to the scope of traceability systems in different types of food business but should not be regarded as comprehensive:

- a. Businesses solely engaged in catering and supply of food direct to the final consumer may only need to include supplier traceability;
- b. Businesses engaged in catering and supply of food to other catering or retail businesses may need to include supplier traceability, process traceability and customer traceability;
- c. Businesses solely engaged in retail supply of food to the final consumer may only need to include supplier traceability and process traceability;
- d. Businesses solely engaged in manufacture and supply of food to other food businesses may need to include supplier traceability, process traceability and customer traceability. However, very small businesses with single product lines may only need to include supplier and customer traceability;
- e. Businesses solely engaged in wholesale supply of food to other food businesses may need to include supplier traceability, process traceability and customer traceability. The process, in this case, may be re-palletisation of goods inwards or breakdown of pallets for onward distribution.

1.8 Traceability information

Food business operators should identify the information that is necessary for the effective functioning of their traceability system. This should include the relevant information which needs to follow raw materials and packaging through a process, where applicable, and information that must accompany a batch of food to a customer either on the label and/or on the documentation accompanying a delivery.

There are numerous issues that must be taken into account when determining what constitutes the size and batch of food. Generally the broader the definition of a food batch the less detailed the batch coding system is but the greater the volume of product that may need to be recalled in the event of a food incident.

Manufacturers of food delivered in bulk may only be able to define a product batch within a defined time frame such as a day's production. Users of bulk ingredients may only be able to define an ingredient batch in terms of a number of mixed deliveries over a defined date range. However, other manufacturers or retailers may be able to define a batch as an individual saleable unit. The majority of food businesses will adopt an approach between these two extremes. A balance must be struck between the complexity and workability of a traceability system and the smallest feasible batch size. This is a commercial decision based on the food business operators risk management approach.

1.8.1 Supplier traceability for food business operators

Food business operators should be able to ensure that foods and packaging entering their premises are traceable to the supplier.

Features of best practice supplier traceability include:

- a. the creation of a documented purchasing control system that is compliant with the specifications laid down in recognised guides to good practice.
- b. goods inwards documents for all deliveries to record information necessary to maintain traceability from the supplier. Examples of relevant information are:
 1. supplier name;
 2. address of supplier;
 3. nature and description of the food supplied;
 4. any supplier batch codes;
 5. delivery date;
 6. confirmation of acceptance;
 7. number of saleable units;
 8. weight of the saleable unit, if applicable;
 9. lot number (if any) assigned to the delivery;
 10. details of the deliverer and vehicle (as applicable); and
 11. reference to any in-house quality control records associated with the ingredient/ packaging delivery.
- c. Each incoming food/package and, where applicable, package of primary packaging material should carry an identification code as a means of tracing its source of supply e.g. batch code. In situations where this is not possible a business should apply its own identification code as soon as the goods are received.

1.8.2 Process traceability for manufacturers and large scale caterers

Each food manufacturer or large scale caterer should be able to ensure that foods produced on site are traceable back to the ingredients and primary packaging used in their production. Processors involved in re-wrapping products should ensure that traceability to the original supplier is maintained.

Features of best practice process traceability include:

- a. a product batch must be identified;
- b. A unique batch code identifier should be applied to:
 1. Each and every saleable unit comprising the product batch unless the saleable unit is too small to allow for a code to be applied;
 2. The outer case if any; and
 3. Internal process documentation accompanying the product batch;
- c. The traceability codes of ingredients (e.g. batch codes, lot codes etc) and primary packaging used in the production of a product batch should be recorded and associated with the product batch code on internal process/quality documentation;
- d. Production and quality records should contain all the necessary information relating to ingredients, packaging and process times to allow traceability to the finished product;

Examples of relevant traceability information are:

1. the product name;
2. the product batch code;
3. the date of production;
4. the time of start and end of production (where appropriate);
5. the saleable unit size;
6. the number of saleable units per case;
7. the number of cases;

8. the means of linking the product batch code to batches of foods and packaging used in the production of the product. For example, via:
 - a. reference to any in-house quality control records associated with the product batch;
 - b. reference to any in-house process control records associated with the product batch;
 - c. reference to any in-house packaging control records associated with the product batch;
9. the product release procedures by quality assurance staff should ensure that the traceability system has been maintained; and
10. any food business engaged in re-work should ensure that the documentation associated with a product batch contains all the information necessary to allow traceability of any rework incorporated.

1.8.3 Process traceability for wholesale businesses and central distribution food businesses

These businesses carry out activities that do not involve processing or preparation of food but do involve breakdown of product deliveries and reassembly into new product deliveries, often involving mixed batches of food. Each wholesale, Central Distribution Centre or retail food business should at least be able to ensure that foodstuffs handled on site are traceable to the supplier at all times.

Features of best practice process traceability include traceability information accompanying foods entering a wholesale or retail business should be maintained throughout any handling operations that may occur in the premises. Specifically, food deliveries that are broken down and/or re-palletised should be handled in a manner that ensures that the batch codes for all foods in the delivery remain with those foods at all times through the premises.

1.8.4 Customer traceability for all food business operators

Each food business operator involved in business-to-business trade should be able to ensure that product leaving the control of the business is traceable to the immediate customer.

Features of best practice customer traceability include:

- a. a list of all immediate customers, the details of all the products they purchase and full contact details should be held by the food business. These lists must be updated regularly;
- b. any documentation accompanying product to a customer should also be maintained by the food business operator and should contain all the information necessary for traceability of food through the distribution chain. Examples of relevant traceability information are:
 1. the name, address and contact details of the customer;
 2. the name, address and contact details of the transport firm (where applicable);
 3. container code of transport vehicle (where applicable);
 4. date of delivery or transaction; and
 5. a full list of the products being purchased by the customer with details for each product. For example:
 - I. product name, nature and description;
 - II. product batch codes;
 - III. number of cases;
 - IV. number of saleable units; and
 - V. supplier details where necessary (for wholesale, import and retail)

1.9 Record keeping and retrieval

The Law and Regulation no. (3) of 2009 require food business operators to generate and maintain records of traceability information and have these available for the Authority on demand. Food business operators should keep all relevant traceability records for an appropriate period of time as specified by the food law. The current legal requirements are as follows:

- 1.9.1 for 6 months beyond the shelf-life in the case of a food having a shelf life of more than 5 years;
- 1.9.2 for 6 months from the date of delivery in the case of highly-perishable food having no 'use by' date, or having a 'use by' date of less than 3 months, where such food is destined for distribution to the final consumer;
- 1.9.3 for 5 years in all other cases.

1.10 Verification of traceability information

As a matter of best practice, those food business operators that actively engage in supplier audits or operate supplier approval procedures should seek to verify that the traceability information provided by their suppliers is accurate and sufficient to facilitate trace back of the raw materials supplied.

1.11 Reviewing the traceability system

A traceability system that is being operated by the food business operator should be reviewed at least yearly to ensure that it is delivering the required level of traceability. Preferably, a multi-disciplinary team comprising members from each of the functional areas, with representatives from senior management, should be involved in this process. The team should audit the traceability system.

The audit should consist of a horizontal and vertical assessment of the system. The horizontal check should consist of an audit of several batches at the same point in the process to ensure all identification marks and documentation are correct. The vertical check should follow several batches from the customer to the supplier to ensure all identification marks and documentation are correct.

Any non-conformance or areas for improvement should be addressed with appropriate action. The review procedure should be fully documented and signed off by senior management.

PART 2 - PRODUCT RECALL

2.1 Introduction

This section of the Code of Practice will deal with the recall or withdrawal of an unsafe food under the general title 'product recall'. It outlines the roles of the Authority and food business operators, the risk assessment process, the elements of a product recall plan and the actions to take when an unsafe food must be removed from the market. The general guidance is supported by templates for forms, guidelines and templates for product recall notices as well as guidelines for media communication. These in addition to a recall/withdrawal decision tree form the appendices to this Code of Practice.

Articles (6) and (7) of Food Law No (02) of 2008 specifies the legal requirements of food business operators regarding the recall and withdrawal of unsafe foods from the market.

Successful removal of food from sale relies on the clear assignment of responsibilities within the food business and the competent execution of a tested product recall plan. A fully functional traceability system is the only effective way of identifying the location of unsafe food within the distribution chain. The effectiveness and efficiency of attempts to remove a food from sale will be hampered without a traceability system.

2.2 Objective of Product Recall

The objective of product recall in the context of this document is to protect public health by informing consumers (where necessary) of the presence on the market of an unsafe food and by facilitating the efficient, rapid identification and removal of unsafe food from the market.

2.3 Classification of the Level of Product Recall

For the purposes of this document there are only two levels of product recall. These are:

- 2.3.1 Recall: This is the removal of unsafe food from the market and extends to food distributed to the final consumer and therefore involves communication with consumers. A recall should be initiated when a foodstuff is identified as potentially injurious to health and has been supplied to consumers.
- 2.3.2 Withdrawal: This is the removal of an unsafe food from the market up to and including the point of retail sale. A withdrawal should be initiated when a food is identified as unsafe but can be demonstrated to remain wholly in the distribution chain and not to have reached the final consumer. The above classification should always be used in communication with other businesses and the Authority to avoid confusion.

2.4 The Role of the Abu Dhabi Food Control Authority

The Authority has a role in providing food business operators with advice on risk assessment. Food business operators should always consult ADFCA when they become aware that potentially unsafe food has been placed on the market. Food business operators have a legal obligation to inform the Authority when they become aware that potentially unsafe products have been placed on the market. The Authority's role is to enforce food laws and regulations, and to ensure that food business operators comply with legal requirements.

2.5 The Role of Food Business Operators

The primary role of food business operators is to remove unsafe foods from the market without delay and notify ADFCA, other food business operators and where necessary, the consumer.

Abu Dhabi Regulation No (3) of 2008 on the traceability and recall of food requires that:

Article (9): If a food business operator considers or has reason to believe that a food which it has imported, produced, processed, manufactured or distributed may be injurious to human health or is not in compliance with the food safety requirements, it shall immediately initiate the following procedures:

- 2.5.1 withdraw the food in question from the market where the food has left the immediate control of that initial food business operator;
- 2.5.2 inform the Authority of the procedures undertaken in article (9-a) thereof.

Article (10): Where the food product may have reached the consumer, the food business operator shall:

- a. initiate procedures to recall food from the market where products have already been supplied to consumers;
- b. effectively and accurately inform the consumers of the reason for its food recall;
- c. inform the Authority of the procedures undertaken in article (10-a and 10- b) thereof.

Article (11): A food business operator shall immediately inform the Authority if it considers or has reason to believe that a food which it has placed on the market may be injurious to human health. Operators shall inform the Authority of the action taken to prevent risks to the final consumer and shall not prevent or discourage any person from cooperating with the Authority in the withdrawal of unsafe food from the market.

Food business operators shall collaborate with the Authority on action taken to avoid or reduce risks posed by a food which they supply or have supplied.

2.6 Stages of a Product Recall

There are two distinct stages of a product recall. The planning stage focuses on development and documentation of procedures which are necessary for effective product recall. The execution stage focuses on the important considerations for efficient removal of unsafe food from the market during a product recall.

2.6.1 Planning product recall:

- a. development of a product recall policy;
- b. development of a product recall plan; and
- c. testing of a product recall plan.

2.6.2 Managing product recall:

- a. identification of unsafe products;
- b. managing the recall process;
- c. closing a product recall; and
- d. review of the recall.

Stage 1: Planning product recall

It is recommended that product recall systems be fully documented and form part of a businesses food safety management program. There are a number of advantages to this including management review, crisis support and training of new employees. Documented product recall systems should contain all the information necessary for efficient and effective recall of foods. It is more likely that a food business operator with a documented product recall system will be able to comply with their legal obligations to withdraw unsafe food from the market. The planning stage should seek to identify and set up all the documentation necessary to support the management of a product recall when a food incident occurs.

Stage 1.1: Developing a Product Recall Policy

All food businesses should develop a product recall policy. A product recall policy demonstrates commitment to protect public health. It should clearly state the objective of the product recall plan and the senior management commitment to providing the necessary resources to ensure successful removal of unsafe food from the market. The product recall policy should be incorporated into the food business operators' quality management system. A product recall policy should be clear and unambiguous. The product recall policy should be in place prior to the development of the product recall plan.

Stage 1.2: Developing a Product Recall Plan

A product recall plan consists of a set of documented procedures and support materials that are designed to facilitate the efficient and effective removal of unsafe food from the market. A multi-disciplinary recall team should develop the product recall plan. Examples of items that may be incorporated into a plan are:

- 1.2.1 reference to the product recall policy;
- 1.2.2 list of members of the recall team;
- 1.2.3 definition of roles and responsibilities of the product recall team;
- 1.2.4 critical contact names and details;
- 1.2.5 product recall decision tree;
- 1.2.6 mechanisms of notification of a product recall;
- 1.2.7 reference to the company's traceability system;
- 1.2.8 guidelines for media contact;
- 1.2.9 sample press releases;
- 1.2.10 sample product recall notices;
- 1.2.11 a product recall plan testing procedure;
- 1.2.12 a product recall plan review procedure; and
- 1.2.13 ADFCA requested interim and final reports on all food recalls.

Stage 1.3: The product recall team

The product recall team could consist of the people from the following areas of the food business, where applicable:

- 1.3.1 Production;
- 1.3.2 Quality;
- 1.3.3 Purchasing;
- 1.3.4 Marketing;
- 1.3.5 Legal services;
- 1.3.6 Distribution and supply chain; and
- 1.3.7 Consumer affairs/public relations.

These may be represented by one or more people depending on the size of the company.

The responsibilities of the team are to:

- develop the company's product recall plan;
- manage the testing and adjustment of the product recall plan;
- regularly update the product recall plan;
- direct the company's product recall activities; and
- recommend changes in the operating procedures within the company that will reduce the possibility of having to remove unsafe foodstuffs from the market.

A product recall co-ordinator should be appointed by senior management from within the product recall team. The product recall co-ordinator should be knowledgeable about every aspect of the operations of the business. The product recall co-ordinator should be responsible for the activities of the product recall team and should be authorised to make decisions concerning the product recall procedure.

Stage 1.4: Definition of roles and responsibilities

Effective product recall requires all employees to be clear about their roles during a product recall and the boundaries of their responsibilities. This is best achieved using a product recall 'role and responsibility' diagram. A sample diagram is shown in Figure 1 of Appendix 1. Each food business should develop their own product recall 'role and responsibility' diagram to suit their own organisational structure.

Stage 1.5: Product recall contacts list

This is an essential feature of any good product recall plan and should be kept up to date. Updating the contact list should not be an activity that is undertaken during a product recall. Responsibilities for updating the list should be specified in the product recall role and responsibility diagram and the accuracy of the list should be frequently checked by the product recall team.

It is suggested that the contact lists available in the product recall plan are split into five sections as follows:

- 1.5.1 The product recall team and senior management (incl. key personnel if not part of the recall team);
 - 1.5.2 Suppliers of all ingredients (incl. water) and primary packaging;
 - 1.5.3 Distribution company and business customers; for imported product, contact overseas supplier/manufacturer when initiating recall action;
- Sources of technical advice and support including laboratory facilities; and
Government agencies.

The lists should also contain references to files (electronic or otherwise) where full details are kept along with the contact details of the persons responsible for the files.

Experience has shown that a significant number of food safety incidents occur out of normal business hours. Therefore, it is suggested that the contact lists are as comprehensive as possible and kept as an integral part of the product recall plan to facilitate fast and efficient information recovery.

Stage 1.6: Product recall decision tree

The product recall plan should contain a decision tree. The decision tree should be designed to clarify the thought processes leading to a final decision on the necessity and extent of the product recall.

Figure (2) of Appendix (1) shows an example of a typical decision tree. However, food businesses should draw up a decision tree applicable to their own business and management structure.

The timely and effective removal of unsafe food/ from the market is dependent on careful, considered assessment of risk. This risk assessment should only be carried out by, or with the cooperation of, a person who is technically competent to evaluate the severity and impact of food safety hazards. The risk assessment should also be carried out in consultation with the Authority.

Stage 1.7: Notification Procedures

Procedures for four levels of notification should be included in the product recall plan. The first three are applicable to product recalls and product withdrawals. However, notification procedures for consumers are only applicable to product recalls. The four levels of notification are:

- a. internal
- b. food/ supply Chain (where applicable)
 1. suppliers
 2. distributors
 3. wholesalers
 4. retailers
 5. caterers
- c. the Authority
- d. consumers

Stage 1.7.1 Notifications to the food supply chain

Notification of the supply chain includes communications up the food chain to customers and down the food chain to suppliers. Procedures for notifying the distribution chain should contain detailed methods for stopping product distribution, retail sale or catering usage. However, it is also important to notify suppliers in situations where their products are affected or in situations where they have potentially supplied unsafe ingredients/packaging.

In addition to the general legal requirements on food business operators to withdraw/recall unsafe foods, there are specific legal requirements for certain food business operators relating to their obligations to withdraw unsafe foods from sale within their businesses and cooperate with and facilitate product recalls.

These legal obligations recognise the pivotal role that retailers and wholesalers play in the distribution of food and hence, the efficient and effective recall of unsafe food.

Particular attention must be paid to the supply of food to catering businesses, who may use affected product either whole or as part of meals served to consumers. These businesses are very different to retailers and wholesalers and may require special consideration to ensure that the methods for product recall work for the catering customer.

Stage 1.7.2 Notifications to the Authority

Regulation No. 3 of the year 2008 – requires food business operators to inform ADFCA in all cases when they are withdrawing/recalling an unsafe food from the market. It does not specify exactly when this should happen other than implying that this should be sometime before the withdrawal/recall occurs. In contrast, if a food business operator has reason to believe that a food it has placed on the market is potentially injurious to health (whether it has reached the consumer or not) it must inform ADFCA immediately. Experience has demonstrated that food business operators can make incorrect risk assessments and fail to identify that a food is potentially injurious to health. This may lead to prosecution. Therefore, food business operators are strongly advised to consult ADFCA immediately in all cases when a food is either injurious to health or otherwise unfit (“unsafe”).

Support and advice from the Authority will be advantageous to the food business and will help when dealing with the media and the public. Companies should ensure that they supply the following information to the competent authorities:

- a. name of the company and contact details plus alternative contacts;
- b. name of the product;
- c. batch identification codes;
- d. product details including packaging size and type;
- e. ‘use by date’ or ‘best before date’;
- f. amount of unsafe product on the market;
- g. distribution details (is the product exported? Food distributed to other Emirates is classified as exported);
- h. names of the companies/outlets selling to the consumer;
- i. nature of the food safety risk;
- j. results of any investigations or tests;
- k. the type of product recall being considered i.e. - recall or withdrawal;
- l. plans for public communications; and
- m. timings for product recall and communication.

Food business operators should complete the food incident notification form (see appendix 3) and send it to ADFCA. Food business operators should be clear when communicating with ADFCA about information that is commercially sensitive. Food business operators should continue to update ADFCA throughout the product recall and formally close the product recall with ADFCA by notifying it in writing.

Stage 1.7.3 Notification of consumers

Procedures for notifying consumers should detail which methods are to be used. Some examples are provided in Appendix (2).

- a. If foods are being recalled because they are potentially injurious to health and have reached the consumer then notification of consumers should be via in-store means and appropriate media channels in consultation with the Authority.
- b. If foods are being withdrawn because they are potentially injurious to health but have not reached the consumer then notification of consumers should be conducted via in-store notices or other appropriate means in consultation with the Authority.
- c. If foods are being recalled when they are not injurious to health but they are otherwise unfit and have reached the consumer then notification of consumers should be conducted by appropriate means in consultation with the Authority.
- d. If foods are being withdrawn because they are not injurious to health but they are otherwise unfit but have not reached the consumer then no consumer notification is necessary.

Stage 1.8: Guidelines for preparing publicity material

All publicity material should include the following information:

- a. a clear description of the product, including the name, make, model, distinguishing features, batch or serial number;
- b. a drawing or photograph of the product if available;
- c. clear identification of the supplier, including logo, trademark or letterhead, street, postal, e-mail and web site address, fax and telephone number;
- d. a statement of the hazard and the associated risk;
- e. dates when the product was available for sale;
- f. what immediate action consumers should take (eg, cease use, store safely);
- g. who consumers should contact to receive a refund or have the product repaired or replaced (eg, manufacturer, wholesaler, agent or retailer);
- h. business and after hours telephone numbers for further information, preferably toll-free

Stage 1.9: Reviewing and testing the Product Recall Plan

The product recall plan should specify the periods for review and the names of the people responsible for the review. In most cases this will be the product recall team. The plan should be examined for errors, particularly in the contact lists or in light of any changes in the food business operator's product recall policy or trading status. It is recommended that the product recall plan is reviewed at least twice a year following a documented procedure which is held as part of the product recall plan itself.

It is essential that a product recall plan is periodically tested using a 'trial' run or product recall exercise. This can be viewed as a verification of the product recall plan. This procedure should also be documented and held as part of the product recall plan itself.

It is easier and more cost effective to alter a product recall plan when the food safety incident is part of an exercise without the pressures of the 'real' situation. It is recommended that product recall plans should be verified on an annual basis or more frequently if appropriate. Once the test is completed, a review should be carried out with the relevant product recall team members to correct and improve the process where necessary and update the plan.

Stage 2: Managing product recall

Product recall should be managed by a single individual who could be the product recall co-ordinator. The product recall should involve the product recall team. The product recall should follow the product recall plan.

Stage 2.1: Identification of unsafe food

The most difficult part of the management of a product recall for any food business operator is the initial phase that leads to the identification of an unsafe food that triggers the decision to recall. It is important that food business operators take the precautionary approach to public health protection. This involves adoption of the assumption that the food is potentially injurious to health and is in the possession of consumers before working to amass evidence to disprove this assumption.

Stage 2.2: Sources of information

The product recall team should always get their facts first hand. The information that is collected concerning the problem, the product details, the likely distribution and the extent of the problem is vital to good decision making. There is a high probability that information gathered in the early stages of an investigation will be incomplete. However recall of food should not be unduly delayed for want of complete information especially if the food is potentially injurious to health.

Consultation with the Authority at the early stages of information collection is essential.

Initial information on a potential food safety incident can come from a variety of sources but in the first instance it is likely to come to the attention of only one or two individuals in an organisation. The customer complaints system should be linked into the product recall plan so that trends in complaints that may indicate an unsafe food is on the market are identified quickly and trigger efficient product recall.

The product recall team should aim to collect the following minimum data set on a suspected food or feed safety incident:

- 2.2.1 Product name;
- 2.2.2 Product description;
- 2.2.3 Batch codes involved;
- 2.2.4 Quantity of product implicated;
- 2.2.5 Distribution details;
- 2.2.6 Whether the product has been sold to the final consumer; and
- 2.2.7 Nature of the product fault

These data should be verified and fed into the risk assessment process that in turn informs a risk management decision on the level of product recall, the need to inform the authorities and the urgency/resources required.

Stage 2.3: Science-based Evidence

Product recall is a risk management decision that requires food business operators to be able to identify a potentially unsafe food. In addition a food business operator must be able to decide if the unsafe food is potentially injurious to health, irrespective of whether it has reached consumers or not. Risk assessment will achieve this aim and also determine the level of any adverse health effect, if any, and the affected population profile and size, if any.

Food business operators should document their risk assessment and supporting evidence to inform future review of the incident.

It is recommended to follow an accepted model for risk assessment, only when necessary, otherwise the food business management needs to base their decision on scientific evidence from best international sources, including the Codex Alimentarius and ensure maintenance of full documentation to support its decision.

Stage 2.3: Managing the product recall

Food business operators should effectively and efficiently ensure that unsafe food is removed from the market and that consumers and the Authority are kept fully informed, in compliance with their legal obligations.

It is recommended that the recall team should keep an incident log of the actions taken during the product recall as it proceeds. The incident log should consist of a list of communications including phone calls, names, dates and times, and brief details of each communication. Notes should be maintained of any actions and decisions made by the team and any supporting information. All product recall team members should be responsible for completing the incident log but the product recall co-ordinator should review the log each day to verify that this is happening. The incident log is useful in 3 ways:

- 2.3.1 it will serve as a reference if facts need to be checked;
- 2.3.2 it will serve as a means by which the recall can be reviewed;
- 2.3.3 it may serve as a legal document should it become necessary.

The sequence of events and actions taken will be very important in the review and should not depend on human memory.

Immediate notification of the Authority is essential in the case of food that is potentially injurious to health and in other circumstances notification should be made before executing the product recall and not after it has been completed. The food business operator is responsible for this notification.

The product recall team should attempt to reconcile recovered stock against known volumes of affected food distributed. In this way it is possible for the recall team to monitor the progress of the recall and decide when it is over. Recalled or withdrawn food should be appropriately labelled to distinguish it from unaffected stock. If the food business operator needs to physically regain control over unsafe food from other food business operators then it must also ensure that the affected food is clearly marked "not for consumption" and segregated from safe food pending stock reconciliation and destruction if necessary.

Some food business operators may choose not to physically regain control of affected stock and may require their customers or the consumer to destroy the product. In such circumstances, the food business operator should ensure that systems are in place with other food business operators as necessary, to ensure that the destroyed product is accounted for in the overall stock reconciliation. If unsafe food is recovered either by direct returns from consumers, returns to retail outlets, returns via the distribution chain or product already in stock, then the following considerations are important:

- a. The food should be returned to one central site or, in the case of a widely distributed product, to major recovery sites;
- b. The recovered food must be stored in an area that is separated from any other food products;
- c. Accurate records must be kept of the amounts of recovered product and the codes of that product;
- d. If the recovered food is unfit for human consumption, it may be destroyed or denatured under the supervision of the company management and/or the Authority where legally required; and
- e. If the food safety risk can be safely removed from the recovered food through re-labelling or reprocessing this may be done once it is clear that public health will be protected and the Authority permissions are obtained.

Stage 2.5: Closing the product recall

The product recall team should decide on the basis of stock reconciliation and monitoring of the progress of the recall, whether all unsafe food has been removed from the market and consumers (where applicable). A product recall must be formally closed so that it is clear to all parties that the incident has ended. It is recommended that this is done by the product recall co-ordinator in consultation with senior managers. Food business operators should also notify the Authority in writing when a product recall is closed.

Stage 2.6: Reviewing the Lessons Learned

Every product recall should be viewed as an opportunity to learn and improve the systems used in the food business. The recall co-ordinator should initiate a formal review procedure involving the product recall team and any key personnel who were involved. These could be external contacts such as a retailer or caterer. It is suggested that the review procedure should be documented as part of the product recall plan but should be sufficiently flexible to be useful.

Some of the elements that should be included in a review are:

- 2.6.1 the cause of the issue, identification of the real issue (not the symptoms) and immediate and long term actions that will rectify the problems;
- 2.6.2 company policy, procedures and actions to update them in light of the issue;
- 2.6.3 training plans to improve awareness of the problem and ensure it is not repeated;
- 2.6.4 management structures, if reporting or lack of clarity on responsibilities contributed to any problems with the product recall; and
- 2.6.5 investigations and analysis carried out on product returns of stock reconciliation.

Examples of relevant review questions:

- a. was the product recall effective?
- b. did the product recall plan drive the recall?
- c. what problems were encountered?
- d. how effective was the internal and external notification to customers and ADFCA?
- e. was the media coverage of the incident accurate and did we do anything to affect the coverage?
- f. did the customer care line work, was it overloaded, did it cope or crash?
- g. what was the true cost of the product recall; product, time, recall message costs, lost sales?
- h. did the product recall team work efficiently and were their roles in keeping with the plan?
- i. how did the team work together?
- j. was ADFCA satisfied with the actions taken?

2.7: The Effectiveness of Product Recall

To be effective, the product recall notification must reach as far as the product has been distributed. The effectiveness of the product recall is assessed on the basis of the amount of product returned as a proportion of the amount of product that left the manufacturer or distributor, while taking into account the retail turnover of the product. During the product recall, progress must be reviewed so that its success can be monitored. If it can be concluded that the risk to the public has been reduced to the lowest possible level, the product recall can be judged to have been a success and brought to an end. However, if there have been few returns or little consumer or customer response to a high-risk problem without obvious reasons, e.g. food out of date, the product recall procedure should be assessed for its effectiveness. The product recall may then have to be repeated using different methods to reach the consumer.

2.8 Final Reports and Recommendations

The final report should include the following:

- 2.8.1 A copy of the product recall notification;
- 2.8.2 The circumstances leading to the product recall;

- 2.8.3 The action taken by the business including any publicity, with names of newspapers in which advertisements appeared;
- 2.8.4 The extent of distribution of the relevant batch in the Emirate of Abu Dhabi and overseas;
- 2.8.5 The method of disposal or otherwise of recalled stock, with certificates of destruction;
- 2.8.6 Action proposed for the future to prevent a recurrence of the problem; and
- 2.8.7 Any difficulties experienced in conducting the product recall.

It is recommended that the final report is signed off by senior management who should ensure that any recommendations are acted upon within an appropriate timescale.

2.9 Common problems with recalls, potential impacts and recommended solutions

Listed below are some common problems, potential impacts and recommended solutions associated with some of the steps in the Recall Procedures.

2.9.1 Press release and notice of recall

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • the hazard is not clearly described • the urgency of the recall is not clearly stated • the key message is obscured by other information, e.g., advertising • instructions to consumers are not clear 	<ul style="list-style-type: none"> • distributors, retailers and consumers may not understand the seriousness of the hazard • hazardous product may not be removed from sale or distribution in a timely manner • consumers may use the recalled product before they are aware of the hazard • the recalling firm may have to issue a second press release 	<ul style="list-style-type: none"> • state the hazard clearly e.g., Undeclared (Allergen) in (Product name) • put the word URGENT in the title of the notice • be brief and to the point, do not include promotional information • tell consumers what to do with the product e.g., destroy, return to the store for a refund

2.9.2 Preparation of the distribution list

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • the list is not provided to the ADFCA within 24 hours after the firm is notified of the classification of the recall • key information in the distribution list is missing e.g. contact names, addresses, phone numbers • the list is not readable e.g., the print is too small or letters are not clear • the list includes customers who did not receive the recalled product(s) 	<ul style="list-style-type: none"> • recalled product which has not been removed from sale is not identified in a timely manner • consumers may purchase and use the recalled product • verification of the effectiveness of the recall may be significantly delayed 	<ul style="list-style-type: none"> • develop the ability to identify customers who received specific codes of product quickly • develop the ability to prepare an accurate, complete distribution list within 24 hours

2.9.3 Informing the Authority of a recall

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • ADFCA is not notified of the recall • ADFCA is notified days or weeks after the problem is identified by the manufacturer 	<ul style="list-style-type: none"> • hazardous product may not be removed from distribution and sale in a timely manner • consumers who purchased the product may use it before they are aware of the hazard 	<ul style="list-style-type: none"> • notify ADFCA immediately if you suspect a product that your firm has manufactured and sold may pose a risk to the health of consumers

2.9.4 Identification of product(s) to be recalled

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • all of the sizes, lot codes, brands of affected product are not identified • other products affected by the recall are not identified 	<ul style="list-style-type: none"> • hazardous product may not be removed from distribution and sale in a timely manner • consumers may use the recalled product before they are aware of the hazard • ADFCA or the recalling firm may have to issue a second press release • the firm may have to conduct a second recall 	<ul style="list-style-type: none"> • determine and include all of the product manufactured from the time the problem started to the time the problem was resolved • consider other products manufactured on the same line or using a similar process

2.9.5 Notification of Customers

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • the firm decides to remove the product from the retail level without informing customers of the recall • the notice of recall is not written, the firm has no record of what was said to customers • the notice of recall is mailed to customers • customers are not notified until days after the recall was classified • customers are not notified 	<ul style="list-style-type: none"> • distributors, retailers and consumers may not be aware of the hazard • distributors, retailers and consumers may not understand the seriousness of the hazard • hazardous product may not be removed from sale or distribution in a timely manner • consumers may use the recalled product before they are aware of the hazard • ADFCA or the recalling firm may have to issue a second press release 	<ul style="list-style-type: none"> • inform all customers of the recall immediately and in writing

2.9.6 Control of the recalled product

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • recalled product is accidentally shipped to customers • recalled product is sold to consumers 	<ul style="list-style-type: none"> • retailers may sell the recalled product • consumers may purchase and use the recalled product 	<ul style="list-style-type: none"> • segregate and clearly mark recalled product(s) • take precautions to ensure that the product is not accidentally released

2.9.7 Verifying Recall effectiveness

Problems	Potential Impacts	Recommended Solutions
<ul style="list-style-type: none"> • the recalling firm does not verify that the notice of recall was received and action was taken • the recalling firm does not check to determine if the recall was effective 	<ul style="list-style-type: none"> • recalled product which has not been removed from sale is not identified in a timely manner 	<ul style="list-style-type: none"> • implement the "Recall Effectiveness Procedures"

APPENDIX 1 - Examples of product Recall Documentation

Figure 1: Example of a Recall Plan Roles and Responsibility Chart

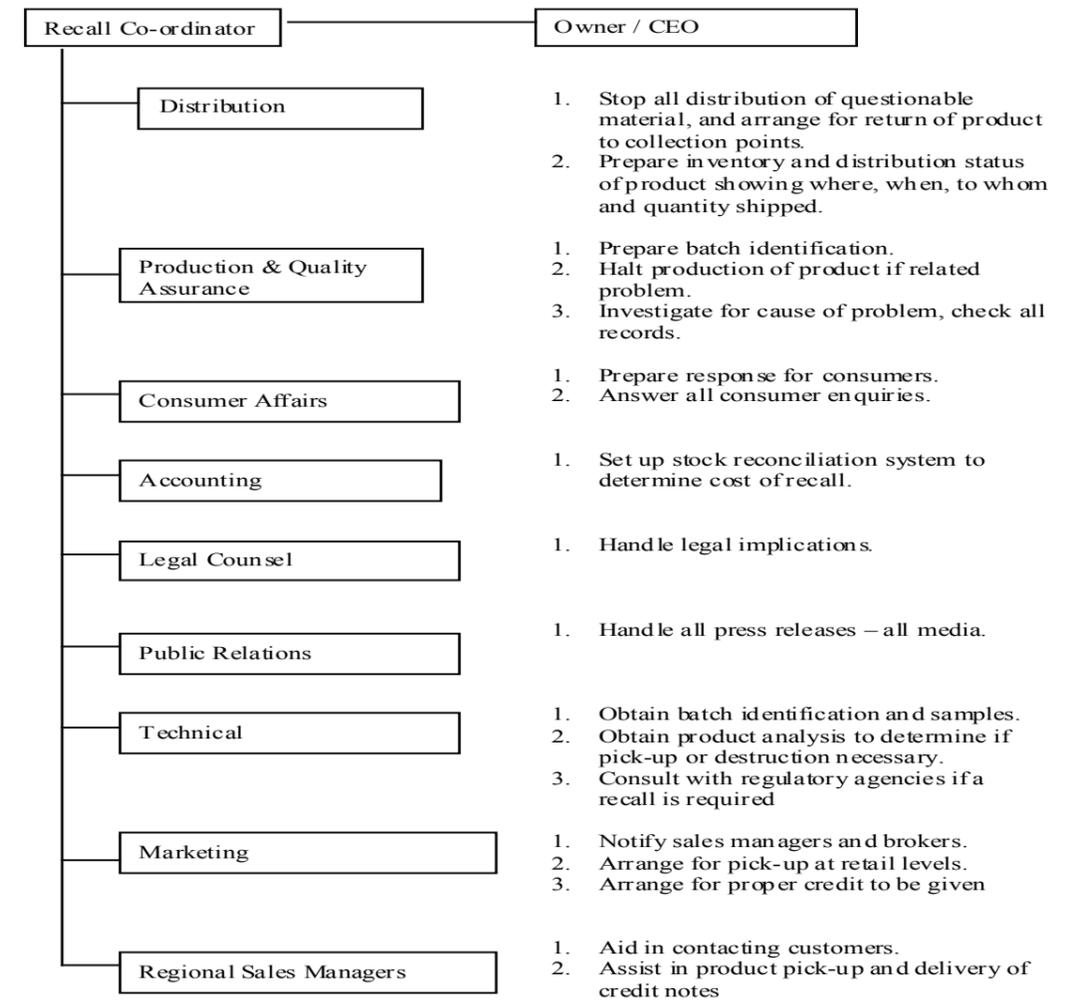
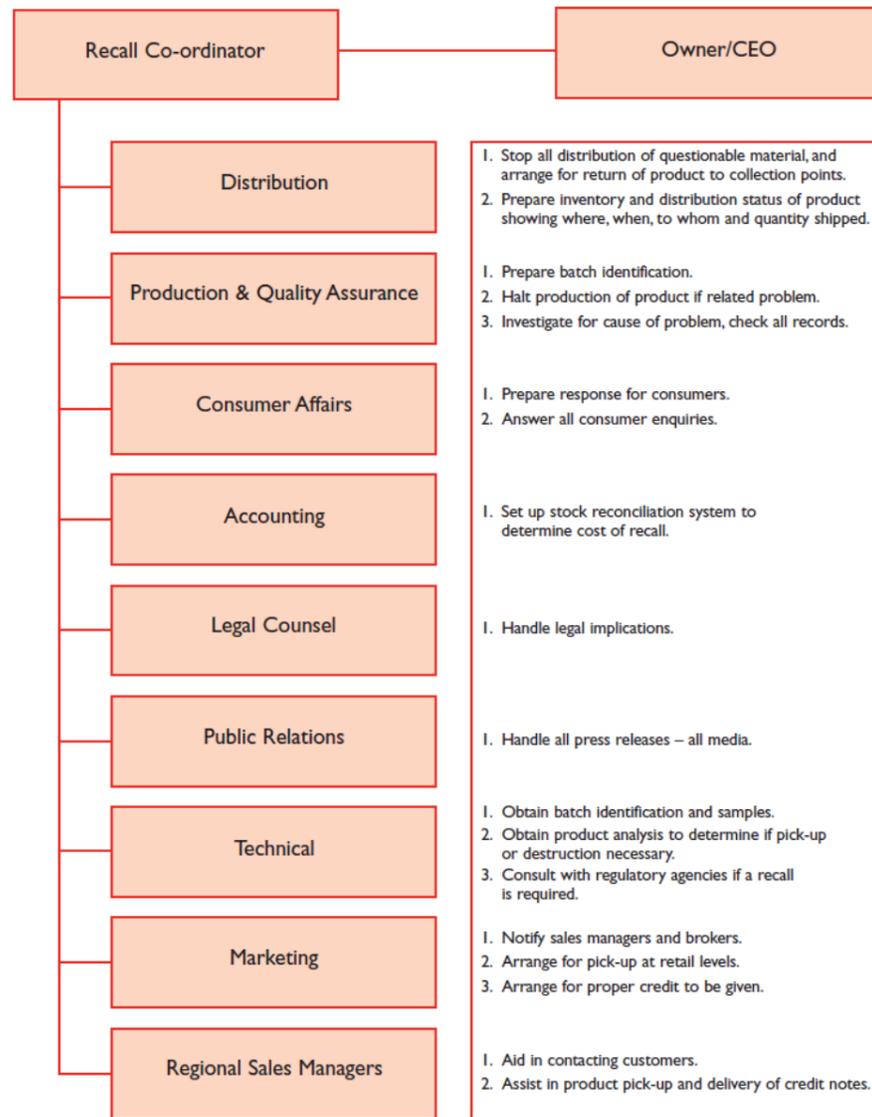
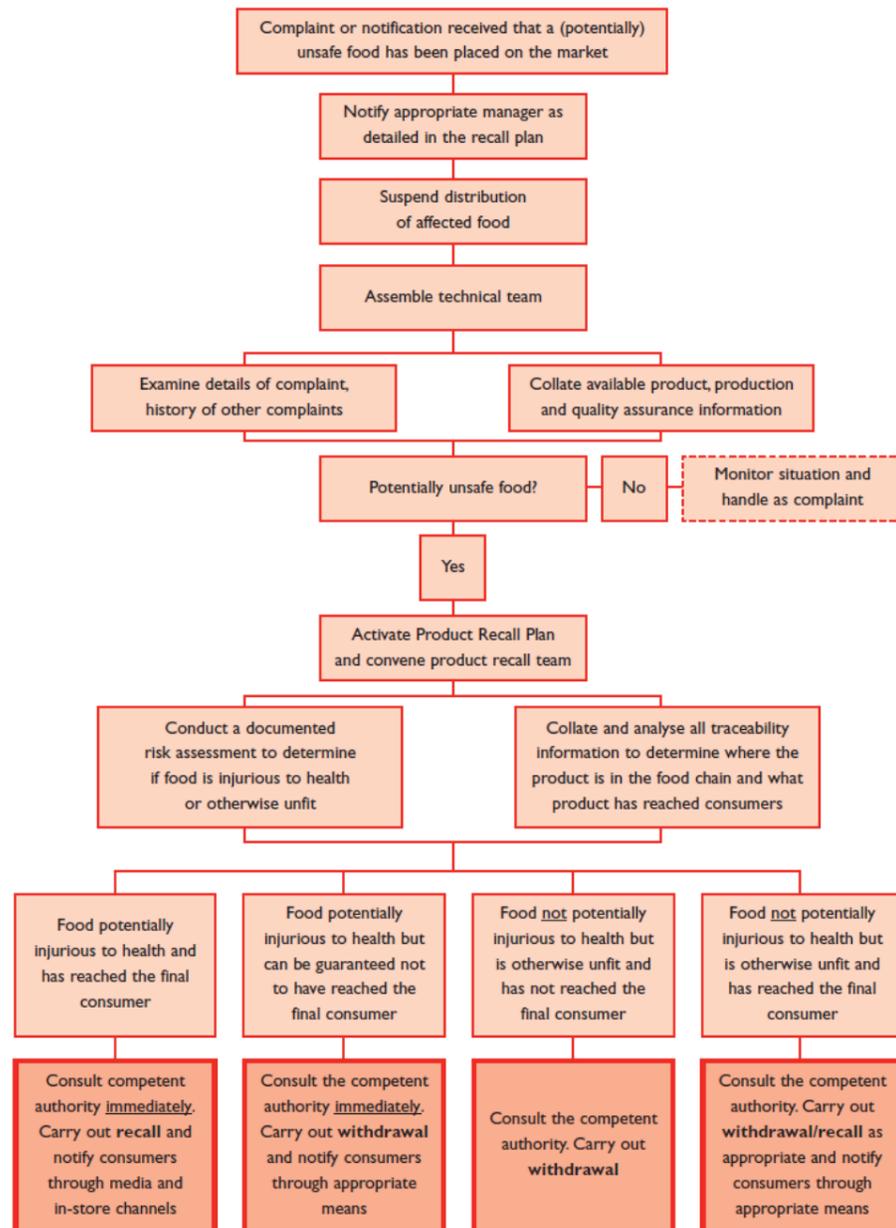


Figure 2: Example of a Product Recall Decision Tree



APPENDIX 2- Notice of Recall (Template)

URGENT - RECALL OF <Name of Food product>	
<Name & Address Of Company>	
<Date>	
Dear Customer, or Attention: <Name of Customer Contact>;	
<Your Company Name> is recalling the products listed below because they may contain <State the problem>	
<Name of Food product> <Brand of Food product> <Size of Food product> <Code/ Production date of Food product>	
Please discontinue selling these products IMMEDIATELY by removing them from display, counting the amount in your inventory and storing them in a secure place.	
Please contact all accounts to which you sell this product immediately and inform them of this recall	
<Your Company Name> staff will credit you for the recalled product. Please mark the product "RECALLED" and <Your Company Name> staff will call you to arrange pick up	
IMPORTANT Please record the time and date you received this Recall Notice and acknowledge receipt by signing and faxing this document to <Your Company Name> at <Your Company Fax No.>.	
Date / Time Received:	
Signature	
Name of store / Distributor:	
Thank you for your cooperation. (Signature) (YOUR COMPANY'S CONTACT, THEIR POSITION, YOUR COMPANY NAME)	

APPENDIX 2 - Press Release (Industry Template)

For Immediate Release	
ALLERGY ALERT - UNDECLARED	
<Name of Allergen> IN <Name of Food product>	
CITY	
DATE	
COMPANY NAME	
<Location> is warning consumers not to consume < Brand name, Product name> because it may contain <Name the Allergen> which is not declared on the label	
The product being recalled is: <Describe food product including Brand name, Product name, Packaging, Size(s), Lot No.>	
The product is distributed in <Name the Emirate> or across UAE	
<Product name> may cause a serious or life-threatening reaction in persons with allergies to <Name the Allergen>	
Consumers should <Tell consumers What to do with the recalled product> e.g., return to point of sale for a refund	
There have been <Number> of reported illnesses associated with this food product	
Consumers can contact <Company Name> by calling <Phone Number>	
For more information, media please contact	<Company contact Name> <Company Name> <City, Emirate, Country> <Phone Number>

APPENDIX 3 - Food Incident Notification Form

Report Date	DD/MM/YYYY	Contact numbers		
Notified by Type	Manufacturer Processor	Telephone Line 1	Telephone Line 2	Fax No.
	Distributor Retailer			
	Consumer			
Contact Name		Country	E-mail	
Position				
Organization				

Details of Incident

Nature of Problem	
What Action Has Taken Place or Planned?	
Distribution Details	
Illness details (Type, symptoms, numbers of consumers affected)	
Details of Local Authority notified (if any)	
Any Additional Information	

Product Details (products affected)

Type of Product		Country of Origin	
Product Name		Expiry date	
Brand Name		Manufacturing date	
Batch Code(s)		UAE Importer/Distributor	
Description of Packaging		Manufacturer Details	
Pack Size		Additional information	

Once completed please send to ADFCA Fax: +97125886778
This form is available electronically at: fat@adfca.ae

References

1. Ireland Food Safety Authority www.fsai.ie
2. UK Food standard agency www.food.gov.uk
3. New Zealand Food Safety Authority / www.nzfsa.govt.nz
4. US Food and Drug Administration www.fda.gov
5. Canadian food inspection agency www.inspection.gc.ca

