

COMMUNICATION

Food Recall Plan Guidance

To: Food businesses

A food recall is action taken by a food business to remove unsafe food from distribution, sale and consumption. This document provides guidance for food businesses on what a food recall is and how to create a recall plan.

Purpose of recalls

The purpose of a recall is to:

- > Protect the health and safety of consumers.
- > Stop any further distribution and sale of the recalled food product as soon as possible.
- > Inform SA Health's food recall coordinator, Food Standards Australia New Zealand (FSANZ)* and the public for consumer level recalls of the problem.
- > Retrieve and dispose of the recalled food product.

[Standard 3.2.2 Clause 12](#) of the Food Standards Code states all food business engaged in the wholesale supply, manufacture or importation of food must have a recall system in place.

It is important to contact SA Health's food [recall coordinator](#) to help assess the risk, they can also guide you through what action must be taken. FSANZ helps to coordinate the administration of the recall that includes providing required documents, informing government, industry, and the public of the recall, and assisting in drafting recall notices.

When are recalls required?

Food recalls are required when unsafe food needs to be removed from the marketplace. They can be triggered by a report or complaint from another food business, government, a consumer, or from any other way that the business identifies that something is not right with the product

Recalls are classified according to the potential issues such as:

- **Microbial** - Contamination with pathogenic bacteria, viruses, parasites
- **Chemical** - Presence of residual cleaning chemicals, pesticides or other agrichemicals
- **Foreign matter** - glass particles, metal, insects, plastic pieces or any material not part of original food.
- **Biotoxin** – Shellfish toxins, ciguatoxin, Scombroid or histamine poisoning
- **Labelling** - Incorrect ingredients list or date markings.
- **Allergens** - Undeclared allergens on the product labelling or cross contamination of food with allergens due to poor allergen management in production environment.
- **Others** - Processing or packaging fault that results in contamination of food or potential injury e.g. glass bottle or can exploding due to excessive fermentation or excess gas filled in carbonated beverages. Glass particles in product due to damaged flagon mouth on some wine bottles.

If you're unsure whether a recall is required, contact SA Health's food [recall coordinator](#) for advice.

Types of Food Recalls

Trade recall

- > Action to remove unsafe product that has not been available for direct sale to consumers
 - E.g. product was sold to other food businesses such as distribution centres, re-processors, manufacturers or wholesalers and the food has not reached the retailer/consumer
- > Action could include removing unsafe food from hospitals, restaurants, other major catering establishments and outlets that sell food manufactured for immediate consumption

Consumer recall

- > Action to remove unsafe product that has been available for sale to consumers
- > Action involves removing unsafe food product from all points in the production and distribution network including any affected product from customers
- > Distribution networks include, but are not limited to, trade outlets, retail outlets, supermarkets, grocery stores, health food stores, online stores, pharmacies and gyms that sell food

Food withdrawal

- > Action to remove product from the supply chain where there is no public health and safety risk (e.g. the product is labelled with incorrect weight) or the risk has not yet been confirmed

Mandatory recall

In some rare cases, when a food product is at risk to public health and safety, and the food business is not voluntarily recalling the product from distribution, sale and/or consumption, a mandatory food recall will occur. This type of food recall is ordered by the Commonwealth or State or Territory government agency. The special provisions related to mandatory food recall orders are outlined in Food Act 2001.

Contents of a Recall Plan

Your food recall plan should detail:

- > the actions required for each step of a recall,
- > who is responsible for undertaking the actions; and
- > what documentation/forms are required.

Food recall plans should contain a quick reference contacts list including contact information for SA Health's [recall coordinator](#) and all of your business contacts.

The [Food Industry Recall Protocol \(FSANZ 2023\)](#) contains detailed information on what you should include in your recall plan and how to conduct a recall. This can be used as a guide when creating your own food recall plan.

FSANZ has a recall plan template available on their website ([Recall templates](#)) that details the actions required to undertake a recall effectively. The template can be adapted to suit your business needs.

The Food Recall Process

The following steps outline the recall process:

1. Identifying and assessing a food safety issue - this may include contacting SA Health's recall co-ordinator for advice
2. Deciding to recall or withdraw food
3. Identifying the distribution of affected product(s)
4. Notifying SA Health and your business contacts of the recall (and consumers if a consumer level recall is required)
5. Retrieving and disposing of food
6. Monitoring the recall's effectiveness*
7. Closing the recall*
8. Post-recall reporting*

* steps 6 – 8 are supported by FSANZ



Keys to a successful recall

To successfully conduct a recall, your business needs to:

- > Maintain traceability records to identify where each batch of food product (from incoming raw material to the finished food products) has been distributed to, and the quantity that has been distributed.
- > Have in place arrangements for recovering food products that are returned by customers (including record keeping).
- > Keep foods for disposal/food under investigation clearly identified and separate from other foods.
- > Adequately train staff to ensure they can conduct an effective recall.

It is recommended that annual mock recalls are conducted to review the effectiveness of the recall plan.

Mock Recalls

A mock recall helps you and your business identify that you have the right systems in place if you need to do a recall. It is recommended that you conduct a mock recall regularly (e.g. every 6-12 months) to test the effectiveness of the recall plan. When testing the recall plan, consider these points:

- > Does the recall identify where all affected stock was distributed to?
- > Can recalled stock be easily returned/destroyed?
- > Are records and templates available to quickly gather and distribute information? (e.g. production lists, distribution lists, media releases)
- > Are all contacts (e.g. suppliers, businesses, SA Health recall coordinator, FSANZ) up to date?

After the mock recall the plan should be updated to address any issues encountered during the mock recall.

Resources

Additional information and resources can be found here:

- > Food Industry Recall Protocol, FSANZ 2023 [Food Industry Recall Protocol | Food Standards Australia New Zealand](#)
- > Source: Youtube. Food Recall Video, FSANZ 2019
<https://www.youtube.com/watch?v=cFT2M6WoYeE&t=5s>
- > Recall templates, FSANZ March 2017
<https://www.foodstandards.gov.au/industry/foodrecalls/recalltemplates/Pages/default.aspx>
- > Food Recalls, FSANZ February 2018
<https://www.foodstandards.gov.au/industry/foodrecalls/pages/default.aspx>

For more information

**Food Standards Surveillance
Health Protection & Regulation
SA Health**
Telephone: 8226 7100
Email: healthfood@sa.gov.au
www.health.sa.gov.au