

Lessons Learned From Recent Recalls

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Article Review:

In a recent report by the Centers for Disease Control (CDC), foodborne illnesses kill over 5,000 people annually. There were 77 million cases of foodborne illness recorded and 350,000 people hospitalized this year. The cost has been dramatically increased to over 25 billion dollars a year. This article contains information on the most recent food recalls and discusses how the food industry can safeguard our food against future contaminations and more recalls.

The Peanut Corporation of America's (PCA) recall was the largest food recall in American history. The recall began in the fall of 2008 and was worth millions of dollars. It recalled millions of dollars worth of peanuts and peanut ingredients contaminated with Salmonella. The foodborne outbreak made more than 700 people sick and killed nine. This outbreak affected 46 states. The recall led to federal investigations and several Congressional hearings. The PCA filed for bankruptcy protection while being charged with knowingly introducing contaminated peanut products into U.S. interstate commerce.

After the loss of human life, huge health care costs and disruption of hundreds of food processing facilities, the food industry is trying to safeguard against future contaminations and recalls. Federal investigations and Congressional hearings into the recall, has helped to determine what caused the contamination and come up with ways to prevent it from reoccurring.

The first thing that has been suggested is for industries to know their suppliers. The Office of Inspector General (OIG) at the Department of Health and Human Services conducted investigations into traceability in the food supply chain to gauge compliance with the FDA's records maintenance requirements, enacted pursuant to the Bioterrorism Act. This type of investigation of the records requires food manufacturers to maintain records that would identify the immediate previous source, immediate subsequent recipient, and transporter(s) of the products.

Although the maintenance requirements were in effect for over three years, the OIG found that most of the food manufacturers and distributors that were investigated could not identify the suppliers or recipients of their products. The investigation found that 59% of facilities in the

study did not comply with the FDA's record maintenance requirements. One quarter of the food facilities involved in the study were not even aware that they were supposed to be able to trace product from their suppliers. The investigation also revealed that of the 40 selected food products traced through the supply chain; only five could be traced all the way through the supply chain at each stage.

The findings of the OIG investigation help to explain why some food firms, especially smaller firms were not aware of compliance obligations under the FDA's rules, continued to conduct recalls associated with PCA product well into the spring of 2009.

Knowing the supplier, helps the food processor's ability to identify the ingredient source quickly is essential to identifying potentially contaminated product. This will also help in situations in which firms source bulk ingredients from several suppliers-ingredients that are then commingled into a common bin. The investigation found one key factor that hindered the ability to trace product through the supply chain was the mixing of product from several suppliers. The FDA's records maintenance requirements clearly state that the source of each shipment that enters a common bin must be recorded.

The second suggestion was for companies to audit their suppliers. The most common practice is to hire a third party auditor to conduct periodic investigations and audits of the supplier's facilities and operations. Another way to ensure product quality and safety is to sample and test incoming shipments. This testing and sampling should occur before the product is introduced into the manufacturing facility so that if testing reveals a tainted sample, the defective product can be segregated and prevented from contaminating the production lines and finding its way into the finished product.

The third suggestion was to audit the auditors. This method of audits should not be the sole source for ensuring the safety of supplied product. PCA indicated that they had relied on the third party audits, rather than conducting their own independent inspections. Executives from Kellogg's Corporation relied on audits performed by the American Institute of Baking International (AIB), the world's largest food inspection firm, to confirm the safety of PCA products. AIB conducted several inspections of PCA's facilities and never identified any serious problems. They were also awarded a "certificate of achievement" and gave them a "superior" rating. Nestle's USA dispatched its own inspectors to inspect the company and identified sanitary problems at the Georgia and Texas facilities. Although, Kellogg and Nestle' took additional steps to ensure the safety of their supplier's operations and ingredients, it was not sufficient to ensure the safety of supplier facilities.

Another suggestions made was to test the finished product. One of the best ways a food processor can ensure that it will not ship any unsafe product to downstream customers is to randomly sample and test finished product before it every leaves the facility. This process may not allow processors control in dealing with the issue before compromising the downstream supple chain and creation conditions that could lead to a recall.

The last suggestion made was to consider recall insurance. Most food companies operate with a net profit margin of approximately two to five percent, a recall costing hundreds of thousands of dollars that could easily force a firm out of business. These food companies should investigate to determine if recall insurance is an option for them. These companies should keep in mind that insurance must be comprehensive and should be tailored to meet specific needs of the company. In most cases, the firm should not look to see if they can afford to obtain additional coverage but whether it can afford not to obtain the coverage. The firm should keep in mind to purchase coverage that the lost value of the defective product from the supplier, but the cost of replacing that product and cost associated with it. The article lists a number of important things that should be included in the coverage of the insurance.

With the additional government resources allocated toward addressing food safety issues, the food industry must take the responsibility for ensuring the safety of the food supply. Some of the recommendations outlined in this article will not prevent food contamination and recalls from occurring but they may help to safeguard against occurrences or at least help to contain them from spreading through the entire food supply chain.

Food safety is clearly on the minds of the consumers. When consumer confidence in food safety reaches the lows we see today, something has to be done. The Food Protection and Food Handler's Programs are dedicated to help fight foodborne illness through educating the consumers about what they can do to protect themselves as well as others. Our inspection team spends thousands of hours in establishments educating the business owners, managers and staff in how they can prevent foodborne illnesses from happening in their establishments. As we continue to concentrate on these preventive measures, we may see decrease in recalls.