



Australian Government
Department of Industry,
Innovation and Science

Business
Entrepreneurs' Programme



Food Allergen Series: Product Labelling and Recalls

**Presented by
The Allergen Bureau**

Hosted by the Department of Industry, Innovation and Science Entrepreneurs' Programme in collaboration with Food Innovation Australia Limited.



Australian Government
Department of Industry,
Innovation and Science

Business
Entrepreneurs' Programme



Entrepreneurs' Programme

The Entrepreneurs' Programme is the Australian Government's flagship initiative for business competitiveness and productivity. It forms part of the Australian Government's National Innovation and Science Agenda.

The Entrepreneurs' Programme offers support to businesses through four elements:

- Accelerating Commercialisation
- Business Management
- Incubator Support
- Innovation Connections

For more information on the Entrepreneurs' Programme and business support services, please visit www.business.gov.au



Australian Government
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Food Innovation Australia Limited (FIAL)

FIAL is the not-for-profit organisation leading the government's Food and Agribusiness Growth Centre.

FIAL works to help businesses grow through:



**SHARING
KNOWLEDGE**



**BUILDING
CAPABILITY**



**CREATING
CONNECTIONS**

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informing the food industry

Product Labelling & Recalls

Presented by The Allergen Bureau



informing the food industry

Food Allergy & Allergen Management Webinars

Webinar 1 – Food Allergen Fundamentals
Thursday, 22 March 2018

Webinar 2 – Industry best practice for the identification, control and management of food allergens
Thursday, 19 April 2018

Webinar 3 – Product Labelling & Recalls
Thursday, 24 May 2018

Declaration of allergens on a product label	Lisa Warren The Allergen Bureau
Overview of the recall system	Lorraine Haase FSANZ
Actioning a food recall – a Regulator’s perspective	Alan Edwards NSW Food Authority



informing the food industry

Allergen Bureau Introduction

Lisa Warren

VITAL Support, The Allergen Bureau

Who is the Allergen Bureau?

- The Allergen Bureau is the **peak industry body** representing food industry allergen management in Australia and New Zealand.
- The Allergen Bureau is a **membership based** organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients and manufactured foods.
- Established 2005, **pre-competitive**, 'not-for-profit', industry volunteer board.

Full Members



The Allergen Bureau – Our Vision and Mission

Vision

The Allergen Bureau is a globally recognised and supported industry organisation promoting best practice food industry allergen management, risk review and consistent labelling to facilitate informed consumer choice.

Mission

To facilitate a globally accepted, consistent, science-based approach to food allergen risk assessment, management and communication that:

- guides **industry** best practice
- assists allergen sensitive **consumers** to make informed choices based on label information

When food is unsafe, the food business must remove it from distribution, sale and consumption to protect public health and safety.

This process is known as a food recall.

Some reasons for undeclared allergens

- Not identified when reviewing ingredients
- Not identified as a cross contact source during manufacture
- Added to the batch by mistake
- Not printed on the label
- Wrong label on wrong product

Importing and exporting products and ingredients

Some considerations

- Allergen regulation varies from country to country
- Some jurisdictions allow exemptions (e.g. highly refined ingredients) others don't.
- Translation challenges
- Different criteria for claims like 'gluten free'



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Webinar 3: Product Labelling & Recalls

- The importance of appropriate allergen labelling
- Precautionary Allergen Labelling and the VITAL Program
- Impact of a product recall
- How to recall a product



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Declaration of allergens on a product label – mandatory requirements & industry guidance

Lisa Warren

VITAL Support, The Allergen Bureau

Allergen declarations are usually in ingredient list but not always

Some examples where an ingredient list may not be appropriate:

- Individual portion packs with an outer carton
- Foods in small packages
- Unpackaged foods
- Food where the name of the food is the allergen
- Foods not required to bear a label

Allergen declaration is still required



Food standards that are most relevant to allergen labelling

Australia New Zealand Food Standards Code	
Standard 1.1.2	Definitions used throughout the Code
Standard 1.2.1	Requirements to have labels or otherwise provide information
Standard 1.2.3	Information requirements – warning statements, advisory statements and declarations
Standard 1.2.4	Information requirements – statement of ingredients
Schedule 10	Generic names of ingredients and conditions for their use
	User Guide to the Food Standards Code

Always use the most current version of the Food Standards Code

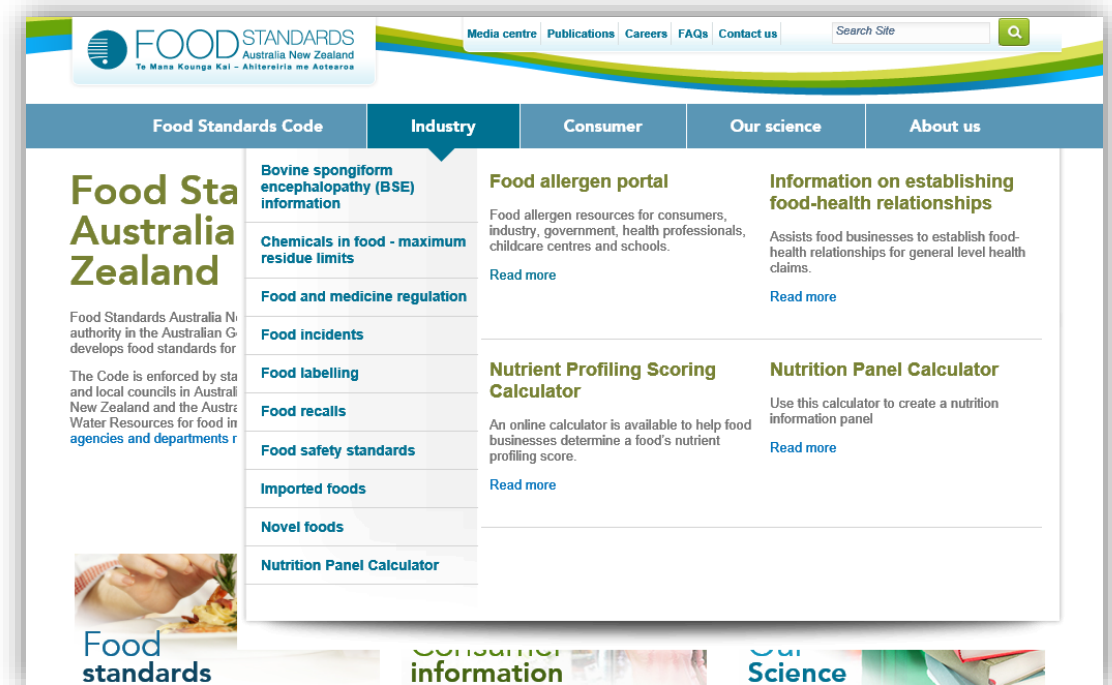
Chapter 1: Introduction and standards that apply to all foods	Chapter 2: Food standards	Chapter 3: Food safety standards (Australia only)	Chapter 4: Primary production standards (Australia only)	Schedules
PART 1.1 Preliminary				
Standard 1.1.1 Structure of the Code and general provisions				
Standard 1.1.2 Definitions used throughout the Code				
PART 1.2 Labelling and other information requirements				
Standard 1.2.1 Requirements to have labels or otherwise provide information				
Standard 1.2.2 Information requirements – food identification				
Standard 1.2.3 Information requirements – warning statements, advisory statements and declarations				
Standard 1.2.4 Information requirements – statement of ingredients				
Standard 1.2.5 Information requirements – date marking of food for sale				
Standard 1.2.6 Information requirements – directions for use and storage				
Standard 1.2.7 Nutrition, health and related claims				
Standard 1.2.8 Nutrition information requirements				
Standard 1.2.10 Information requirements – characterising ingredients and components of food				
Standard 1.2.11 Information requirements – country of origin labelling requirements				
Standard as at 1 July 2018 – unofficial compilation				
PART 1.3 Substances added to or present in food				
Standard 1.3.1 Food additives				
Standard 1.3.2 Vitamins and minerals				
Standard 1.3.3 Processing aids				
PART 1.4 Contaminants and residues				
Standard 1.4.1 Contaminants and natural toxicants				
Standard 1.4.2 Agvet chemicals [applies in Australia only]				
Standard 1.4.4 Prohibited and restricted plants and fungi				
PART 1.5 Foods requiring pre-market clearance				
Standard 1.5.1 Novel foods				
Standard 1.5.2 Food produced using gene technology				
Standard 1.5.3 Irradiation of food				
PART 1.6 Microbiological limits and processing requirements				
Standard 1.6.1 Microbiological limits in food				
Standard 1.6.2 Processing requirements for meat [applies in Australia only]				

Chapter 1: Introduction and standards that apply to all foods	Chapter 2: Food standards	Chapter 3: Food safety standards (Australia only)	Chapter 4: Primary production standards (Australia only)	Schedules
Schedules				
Schedule 1 RDIs and ESADDIs				
Schedule 2 Units of measurement				
Schedule 3 Identity and purity				
Schedule 4 Nutrition, health and related claims				
Schedule 5 Nutrient profiling scoring method				
Schedule 6 Required elements of a systematic review				
Schedule 7 Food additive class names (for statement of ingredients)				
Schedule 8 Food additive names and code numbers (for statement of ingredients)				
Schedule 9 Mandatory advisory statements				
Schedule 10 Generic names of ingredients and conditions for their use				
Schedule 11 Calculation of values for nutrition information panel				
Schedule 12 Nutrition information panels				
Schedule 13 Nutrition information required for food in small packages				
Schedule 14 Technological purposes performed by substances used as food additives				
Schedule 15 Substances that may be used as food additives				
Schedule 16 Types of substances that may be used as food additives				
Schedule 17 Vitamins and minerals				
Schedule 18 Processing aids				
Schedule 19 Maximum levels of contaminants and natural toxicants				
Schedule 20 Maximum residue limits [applies in Australia only]				
Schedule 21 Extraneous residue limits [applies in Australia only]				
Schedule 22 Foods and classes of foods				
Schedule 23 Prohibited plants and fungi				
Schedule 24 Restricted plants and fungi				
Schedule 25 Permitted novel foods				
Schedule 26 Food produced using gene technology				
Schedule 27 Microbiological limits for foods				
Schedule 28 Formulated caffeinated beverages				
Schedule 29 Special purpose foods				

FSANZ Food Allergen Portal

Provides information and resources

- Food industry (manufacturers & retailers, food service and importers)
- Consumers
- Childcare centres and schools
- Health professionals
- Government organisations
- Current food recalls



www.foodstandards.gov.au

Allergen labelling best practice* provides a consistent approach

- Plain English language
- Unambiguous & easily identifiable
- Associated with or near the ingredient list
- In association with the VITAL[®] Program



*where no contrary regulation exists

Six steps for composing a statement of ingredients with clear allergen status

1. Obtain product formulation/recipe including amounts of each ingredient
2. Obtain product information forms and/or specifications
3. Identify allergens in product
4. Compose ingredient list and declare allergens
5. Conduct a VITAL risk assessment
6. Confirm all components are correct

MUFFIN RECIPE

500g	<u>Wheat</u> Flour
175g	Sugar
100g	<u>Butter</u> (<u>Milk</u> , Salt)
70g	<u>Egg</u>
2g	Raising Agents (339,341,450)
2g	Vanilla Flavour

Baking tins sprayed with soy oil

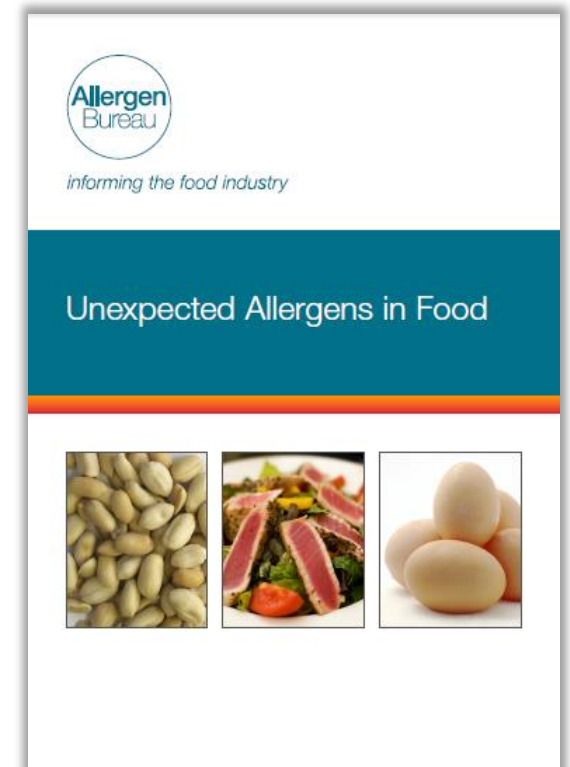
Step 2: Obtain product information forms and/or specifications

- Australian Food & Grocery Council's Product Information Form (PIF) is an industry-agreed questionnaire
- Excellent document to understand the allergen status of each ingredient
- Usually more comprehensive than ingredient specifications
- Provided by ingredient suppliers



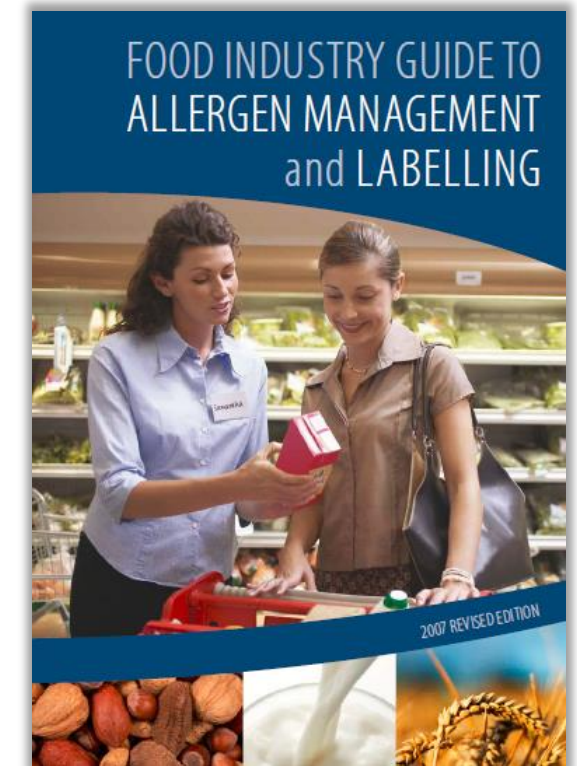
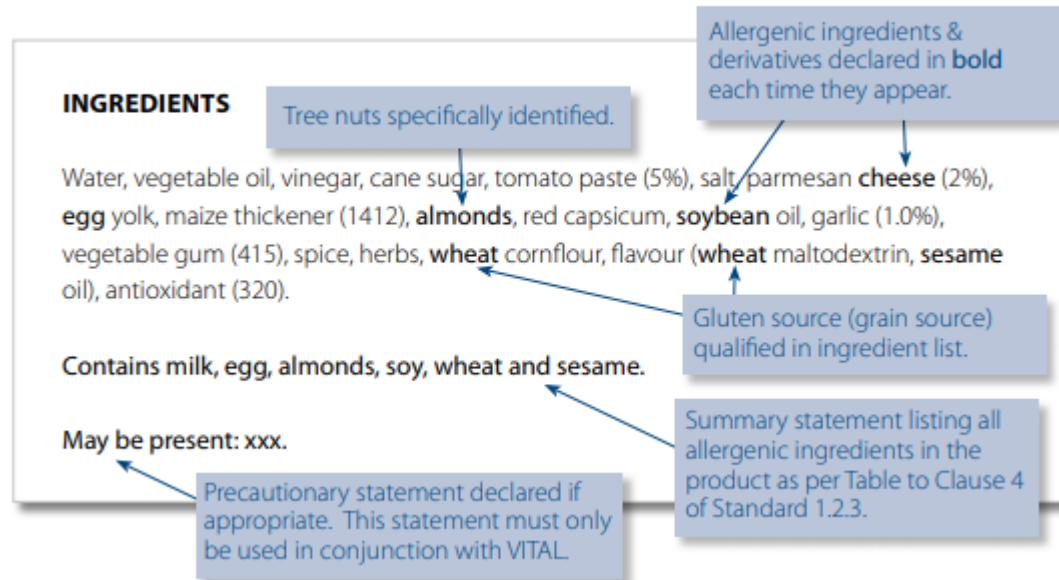
Step 3: What allergens are in my product?

- Cross-check the PIF information with this document
- Ask the supplier to clarify anything you are uncertain about
- Store your PIFs and your conclusions about the allergen status in a centralised location

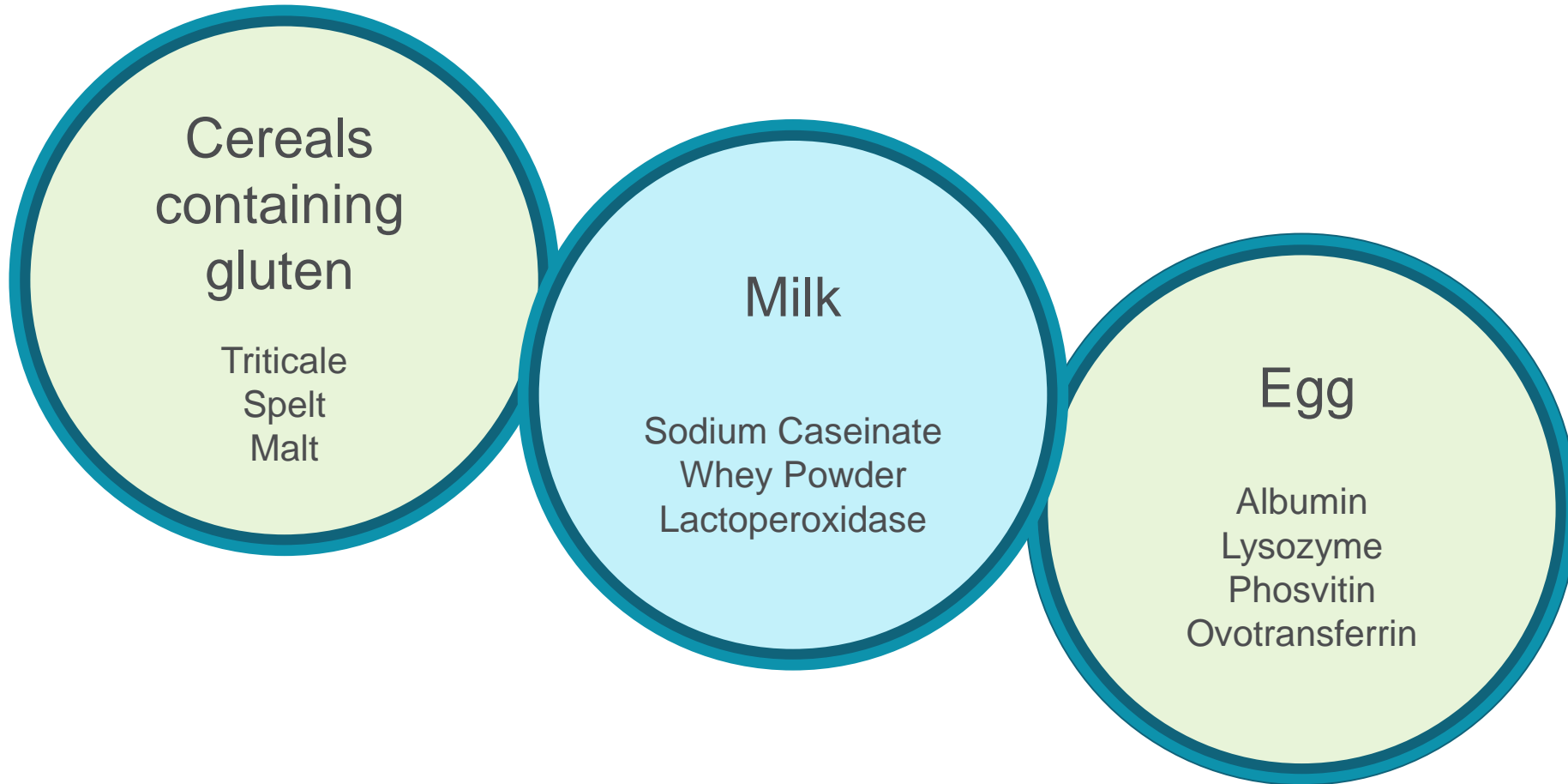


Step 4: Compose ingredient list and declare allergens

RECOMMENDED LABELLING FORMAT EXAMPLE.



Some ingredient names where the allergen is not obvious

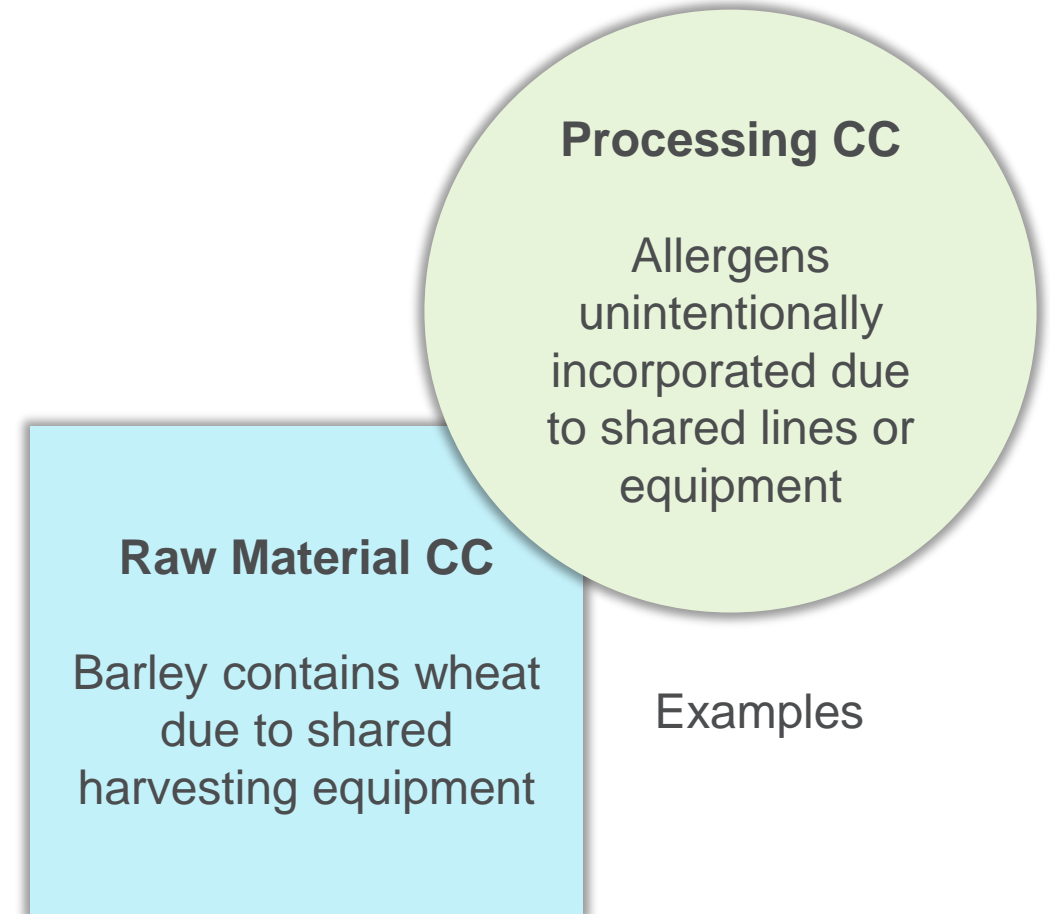


Precautionary Allergen Labelling (PAL)

A voluntary statement declaring the food allergens present as a result of cross contact.

Cross contact allergen

A residue or other trace amount of an allergenic food that is unintentionally incorporated into another food.



A Precautionary Allergen Statement (PAL)

Communicates to the purchaser, or the consumer, that the food has the potential to contain one or more allergens, which are not intentionally added as ingredients in the product.

Frozen Fish Fillets

Ingredient: Fish

May contain: Nuts, Gluten, Peanuts, Sesame, Soy, Milk, Egg

Cross contact statements need to be consistent

- People with allergy confused and taking risks
- Clinicians unable to provide consistent advice
- Consumers think PAL used for manufacturer's legal protection

PAL is only of value to consumers and industry...

- If used correctly
- After applying good Allergen Management Practices (allergens are identified and controlled)
- Cross Contact allergens are reduced or eliminated wherever possible
- After a thorough risk assessment

If there is no allergen cross contact, a precautionary allergen statement is not needed.

PAL can be expressed in many ways

INGREDIENTS: WHEAT FLOUR, VEGETABLE OIL (CONTAINS ANTIOXIDANT (319)), SUGAR, RAISING AGENTS (503, 500, 341), INVERT SYRUP, SALT, EMULSIFIER (SOY LECITHIN).

ALLERGEN STATEMENT: CONTAINS WHEAT AND SOY. MANUFACTURED ON EQUIPMENT THAT ALSO PROCESSES PEANUT, SESAME, EGG AND MILK.

INGREDIENTS: WATER, FLOUR (36%), (WHOLEMEAL WHEAT FLOUR, VITAMINS (FOLIC ACID, THIAMINE)), FLOUR (WHEAT FLOUR, GLUTEN, VITAMINS (THIAMINE, FOLIC ACID)), VEGETABLE FATS & OILS (ANTIOXIDANT (320 OR 306 DERIVED FROM SOY)), HUMECTANT (422), GRAIN MIX (2.7%) (KIBBLED WHEAT, KIBBLED CORN, KIBBLED RYE, MALTED WHEAT FLAKES, LINSEED), CANOLA OIL, DEXTROSE, IODISED SALT, BAKING POWDER (EMULSIFIERS (339, 341, 450), RAISING AGENT (500)), EMULSIFIERS (472e, 481), THICKENER (412), PRESERVATIVES (282, 200), ACIDITY REGULATOR (297), ANTIOXIDANT (300).

CONTAINS WHEAT, RYE AND SOY. MAY CONTAIN TRACES OF MILK, EGG AND SESAME.

PASTA 77% - WHEAT FLOUR, WATER, COLOUR (BETA-CAROTENE). CHICKEN FLAVOURED SAUCE POWDER 23% - MILK SOLIDS, MALTODEXTRIN (FROM MAIZE), VEGETABLE OIL (CONTAINS ANTIOXIDANT (306)), THICKENER (1442 (FROM TAPIOCA)), SALT, SUGAR, NATURAL FLAVOUR, YEAST EXTRACT, GLUCOSE, MALTODEXTRIN (FROM TAPIOCA), FOOD ACIDS (270, 341), ONION POWDER, ANTI-CAKING AGENT (551), EMULSIFIER (471), CHICKEN FLAVOUR (CONTAINS MILK), MINERAL SALTS (339), PARSLEY, HERBS AND SPICES, COLOUR (ANNATTO).

ALLERGEN STATEMENT: CONTAINS MILK AND WHEAT. MANUFACTURED ON EQUIPMENT THAT PROCESSES PRODUCTS CONTAINING EGG.

CAPITALS

Title Case

Bolding

No bolding

Allergen Statement

May contain traces

Made on equipment

Manufactured on equipment

May contain

Contains

May be present

Our ingredients...

When reconstituted: noodles (50%) (**wheat** flour, **wheat** gluten), vegetables (15%) (onion, carrot), corn starch, creamer [vegetable oil (contains **soybean** derivative), glucose syrup (from **wheat**), **milk** protein, mineral salts (339, 450)], maltodextrin, sugar, salt, flavours (contain **wheat** and **milk** derivatives), parsley, flavour enhancers (621, 635), hydrolysed corn protein, vegetable oils (**soybean**, sunflower), food acid (malic), colours (turmeric, carotene, caramel IV), spice extract.

Any allergies?

Contains wheat, soybean and milk products.

Made on equipment that also processes products containing peanut, egg, sesame, fish and crustacea.

INGREDIENTS

Sugar, **wheat** flour, vegetable fats and oils [emulsifiers (471, 477), antioxidant (307)], raising agents (450, sodium bicarbonate), tapioca starch, salt, natural flavours (contain **milk**), colour (annatto).

Contains wheat and milk.

May be present: soy and tree nuts.

INGREDIENTS: CEREALS 68% (**WHEAT FLOUR** 10%, **WHOLEGRAIN CEREALS** 58% (**MALTED RYE FLAKES** 21%, **OAT FLAKES** 18%, **WHOLEGRAIN WHEAT FLOUR** 17%, **WHOLEGRAIN SPELT FLOUR** 1.0 %, **WHOLEGRAIN BARLEY FLOUR** 1.0%)), SUGAR, VEGETABLE OIL, SWEETENED DRIED CRANBERRIES 7.5% (SUGAR, CRANBERRY PIECES (33%), HUMECTANT (GLYCEROL), FOOD ACID (330), SUNFLOWER OIL), BUCKWHEAT, INVERT SUGAR, RAISING AGENTS (500, 503), SKIM **MILK POWDER**, SALT, EMULSIFIERS (472e, **SOY LECITHIN**), FLAVOUR, MINERAL SALT (450). **ALLERGEN STATEMENT: CONTAINS WHEAT, OAT, RYE, SPELT, BARLEY, MILK AND SOY. MAY CONTAIN TRACES OF EGG, PEANUT, HAZELNUT AND SESAME.**

Voluntary Incidental Trace Allergen Labelling

The VITAL[®] (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry.

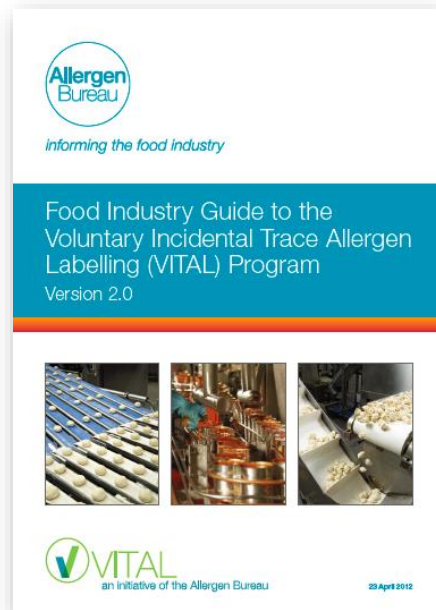


The VITAL precautionary statement is:

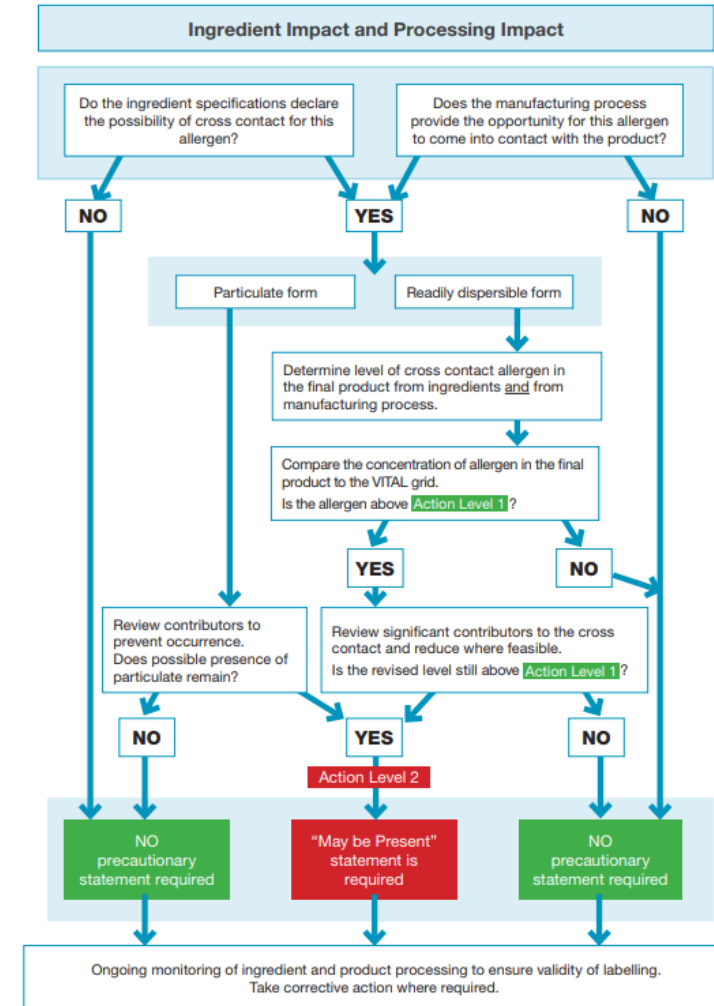
May be present: [insert cross contact allergens]



VITAL® Decision Tree



ii. VITAL Decision Tree for Cross Contact Allergens



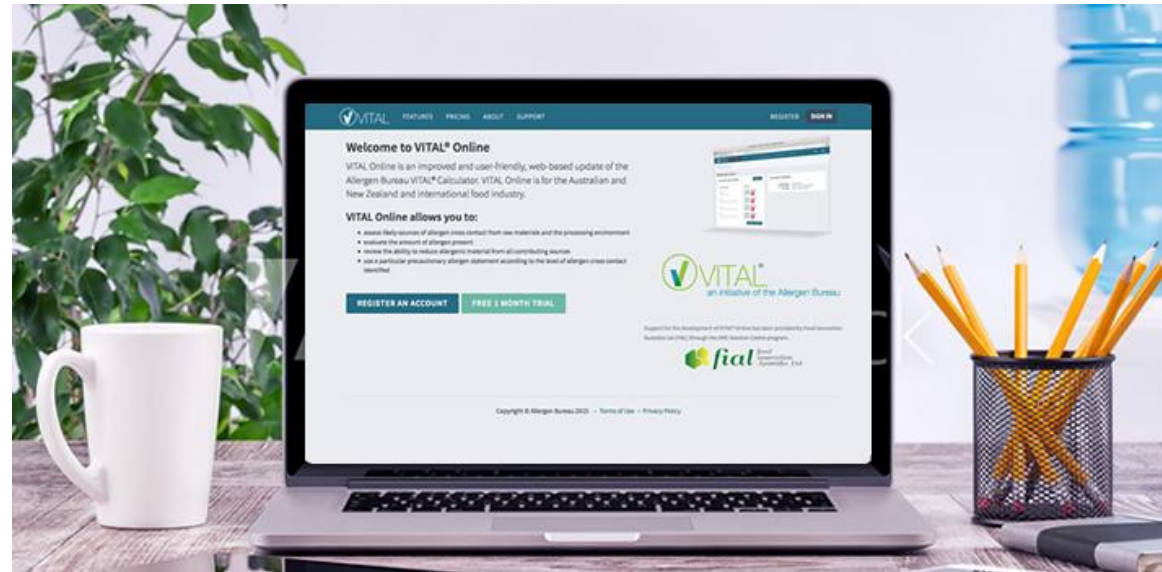
The VITAL[®] Program Tools

- VITAL Procedure
- Decision Tree
- Interactive VITAL Action Level Grid
- VITAL Online (calculator)
- VITAL training materials
- Guidance documents & FAQs



VITAL® Training – 19 endorsed Training Providers

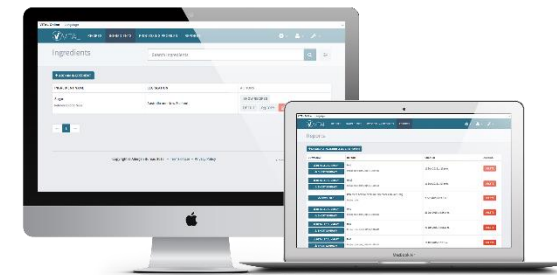
- Australia and New Zealand
- North and SE Asia
- Pacific region
- Africa
- Europe
- USA & Canada
- Mexico & South America



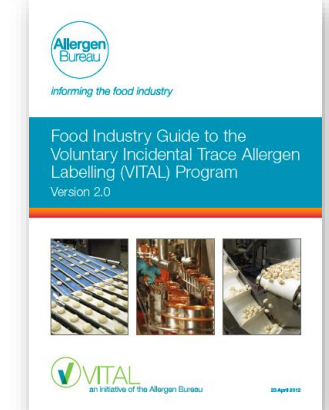
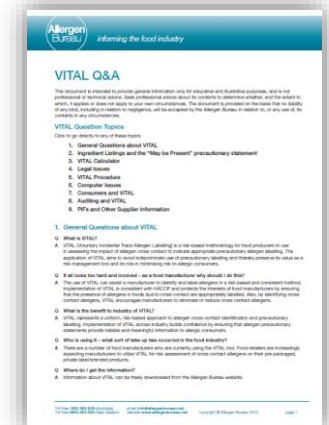
Step 5: Conduct a VITAL[®] risk assessment

Carrying out a VITAL risk assessment using the tools provided ensures a food company understands:

- The allergen status of its ingredients
- Impact of allergen cross contamination from processing
- The allergen status of its finished products



www.allergenbureau.net



Example of a VITAL[®] Online Labelling Outcome Summary

VITAL labelling outcomes will appear like this

Table : Summary of labelling outcomes
Reference amount or serving size: 80g

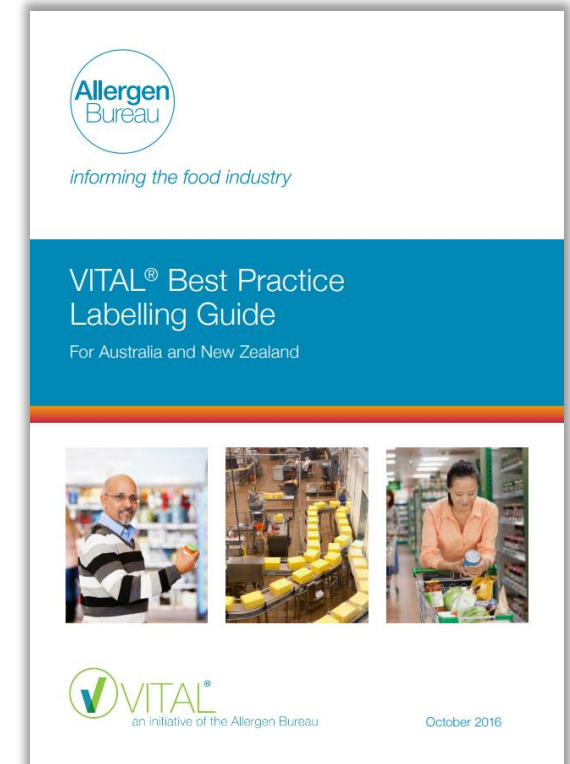
Substances	Reference dose (mg)	Action level 1	Action level 2	Cross contact amount		Labelling outcome
				Particulate	Readily dispersible (ppm)	
Celery						
Cereals containing gluten (Total)	1	< 12.5 ppm	≥ 12.5 ppm			
Barley	1	< 12.5 ppm	≥ 12.5 ppm			
Oats	1	< 12.5 ppm	≥ 12.5 ppm			
Rye	1	< 12.5 ppm	≥ 12.5 ppm			
Spelt						
Wheat	1	< 12.5 ppm	≥ 12.5 ppm			
Crustacea	10	< 125 ppm	≥ 125 ppm			
Eggs	0.03	< 0.375 ppm	≥ 0.375 ppm			Intentionally added
Finfish	0.1	< 1.25 ppm	≥ 1.25 ppm	24		Action Level 2
Lupin						
Milk	0.1	< 1.25 ppm	≥ 1.25 ppm		0.9	Action Level 1
Mustard						
Other						
Peanut	0.2	< 2.5 ppm	≥ 2.5 ppm	yes		Action Level 2
Sesame	0.2	< 2.5 ppm	≥ 2.5 ppm			
Shellfish/Molluscs						
Soy	1	< 12.5 ppm	≥ 12.5 ppm			Intentionally added
Sulphites						
Tree nuts (Total)	0.1	< 1.25 ppm	≥ 1.25 ppm			

Source: VITAL Online

Examples of allergen labelling using the VITAL[®] Program

Five worked examples

- Wholegrain Soup
- Snack Bar
- Fish Sauce
- Mayonnaise in a sachet
- Pork and Prawn Curry Rice



Six steps for composing a statement of ingredients with clear allergen status

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Summary ~ Regulation, Resources & Guides



Ingredient List (Food Standards Code)



Bolding (AFGC Guide)



Allergen Summary Statement (AFGC Guide)



Precautionary Statement (VITAL)

INGREDIENTS

Wheat Flour, Sugar, Butter (**Milk**), **Egg**,
Raising Agents (339,341,450), Flavour

Contains cereals containing gluten, milk, egg

May be present: almond

Not providing accurate labelling may have a direct impact on business profit

- Customer and consumer relationships – trust, confidence
- Costs to the business
 - Compliance with legal requirements
 - Adherence to a best practice model that addresses consumer needs
- Getting it wrong can be costly – unsafe product, brand damage, product recalls

Overview of the recall system

Lorraine Haase

Manager of Communications and Stakeholder Engagement

Food Standards Australia New Zealand

Food regulation system and recalls – Who does what?

WHO RECALLS FOOD IN AUSTRALIA?

FSANZ can't order or force a food recall. Only Australian states and territories have enforcement powers to mandate, order or force a recall if necessary.

FOOD BUSINESSES

Must notify their business customers and local food enforcement agency that a food recall is needed.

Must provide information to FSANZ about the recalled food.

Must notify the public of the recall



ENFORCEMENT AGENCIES

Confirm that a recall is needed and work with the food business to recall the food.

Check that the business is effectively recalling the food.



FSANZ

Coordinates the recall with the relevant jurisdiction and food business.

Informs government, industry and international government contacts of the recall and advises consumers via the FSANZ website and social media platforms.



Who are you going to call?

- Once you've talked with your enforcement authority and identified the need for a recall, you can the FSANZ recall coordinator
- 02 6271 2610 between 9am-5pm, Monday-Friday or 0412 166 965 after hours



The screenshot shows the Food Standards Australia New Zealand website. The top navigation bar includes links for Media centre, Publications, Careers, FAQs, and Contact us, along with a search bar. The main navigation bar has tabs for Food Standards Code, Industry, Consumer, Our science, and About us. The breadcrumb trail indicates the path: Home > Industry > Food recalls > State and territory contacts. On the left, a sidebar menu lists various topics, with 'State and territory contacts' highlighted. The main content area is titled 'State and territory food recall contacts' and provides information on how to contact local food enforcement agencies. It includes a map of Australia and New Zealand with an arrow pointing to the ACT region.

State and territory food recall contacts

Consumers should contact their local food enforcement agency if they have a food complaint.

Industry can download the [food recall action officer list \(pdf 52kb\)](#) | (word 207kb) or select a state or territory from the below drop down menu to display details.

Please note there are two sets of contacts for Queensland. For food recalls involving food products produced or processed by businesses accredited by Safe Food Production Queensland (SFPQ), please contact SFPQ. SFPQ's accreditation register is available at www.safefood.qld.gov.au. For all other food products manufactured or imported in Queensland, please contact Queensland Health.

www.foodstandards.gov.au/industry/foodrecalls/statecontacts

Number of recalls coordinated by FSANZ

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	Total
Undeclared allergen	10	17	13	24	17	16	27	39	33	34	230
Microbial contamination	15	28	14	13	25	12	26	13	20	8	174
Foreign matter	15	7	10	18	12	7	14	8	7	10	108
Biotoxin	2	1	2	4	1	2	3	15	6	4	40
Chemical / contaminant	4	1	10	5	1	0	1	0	1	1	24
Labelling	2	1	1	1	2	2	0	2	2	2	15
Other	3	0	3	2	2	3	5	4	3	10	35
Total	51	55	53	67	60	42	76	81	72	69	626

FOOD RECALLS IN 2017



That makes a total of **69 recalls** in a market that caters to over **24 million** people.

For more information on food recalls in Australia visit www.foodstandards.gov.au/foodrecalls

EXCLUSIVE NATIONAL VICTORIA HEALTHCARE

THE  AGE

Hospitals must report allergic reactions after food labelling error kills child

By Aisha Dow

14 November 2017 – 5:49pm



A devastating food labelling error that led to the death of a 10-year-old Melbourne boy has prompted the Victorian government to make it mandatory for hospitals to report cases of anaphylaxis.



The Sydney Morning Herald

EXCLUSIVE NATIONAL HEALTHCARE

Child aged 10 dies after drinking coconut drink as importer admits label charges

By Tim Barlass

Updated 4 October 2015 – 3:18am, first published at 12:00am

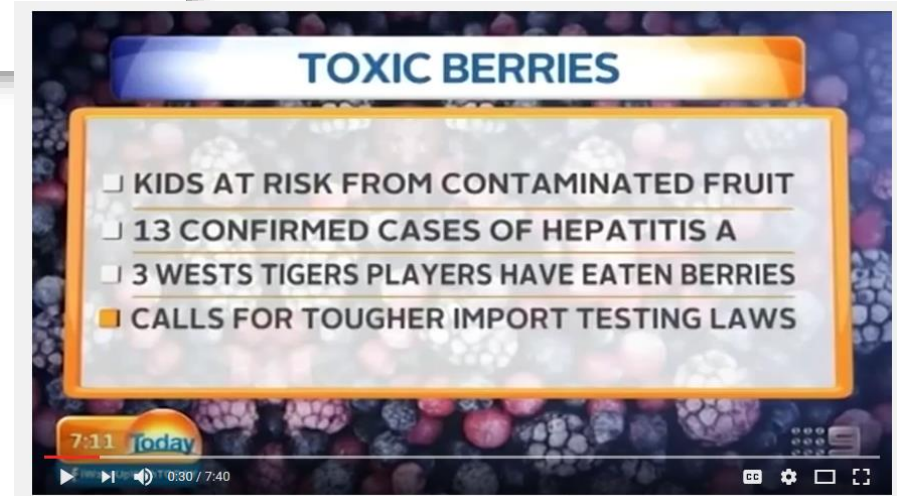
A 10-year-old child died from an allergic reaction after drinking a "natural" coconut drink imported by a Sydney firm.

Reputation Damage

The Sydney Morning Herald

The Nanna's and Creative Gourmet brands were trapped in the chute of a PR disaster - and falling. CEO of Patties Foods Steve Chaur tried his best. "There are still no facts. We're working very hard with the health department to actually prove that there's actually a direct link (of hep A) with these berries," he said.

(SMH January 2016 – a year after the incident)





Food Standards Australia New Zealand (FSANZ) added a

new photo to the album Food recalls.

Published by Hootsuite [?] · 17 January ·

Recall Alert: George Weston Foods has recalled a range of frozen and chilled garlic breads from Woolworths, Aldi, FoodWorks, Foodland and IGA nationally due to the presence of foreign matter. Consumers should not eat this product and can return it to the place of purchase for a refund. More info available here: <http://ow.ly/U0yI30841PI>



439,992 people reached

Boost post

195

870 Comments 2k Shares

Like Comment Share

439,992 People Reached

5,610 Reactions, comments & shares

941 Like 153 On post 788 On shares

5 Love 0 On post 5 On shares

8 Haha 0 On post 8 On shares

120 Wow 30 On post 90 On shares

33 Sad 8 On post 25 On shares

21 Angry 4 On post 17 On shares

2,274 Comments 1,405 On Post 869 On Shares

2,209 Shares 2,098 On Post 111 On Shares

47,522 Post Clicks

5,767 Photo views 3,202 Link clicks 38,553 Other Clicks

NEGATIVE FEEDBACK

86 Hide Post 31 Hide All Posts

0 Report as Spam 0 Unlike Page

Reported stats may be delayed from what appears on posts

Impact

Costs and impact

Being prepared and having good QA and recall systems in place can save lives and your business.

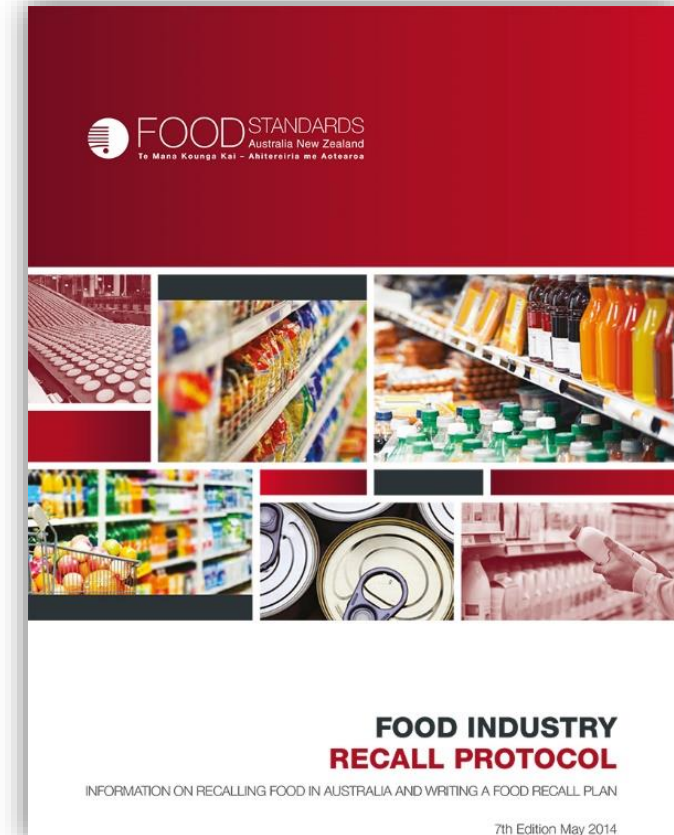
It's vital that you understand potential risks relating to food and know that:

- Even with the best QA processes in place, sometimes things go wrong
- The worst case scenario can and does happen
- When this happens you need to be ready to act

Resources

FSANZ has a range of resources for food businesses including:

- The Food Industry Recall Protocol
- Food recall templates
- FAQs for food businesses



www.foodstandards.gov.au/industry/foodrecalls

Culture



Actioning a Food Recall – A Regulator's Perspective

Alan Edwards

Senior Food Incident Response & Complaints Coordinator

Biosecurity & Food Safety Compliance

NSW Department of Primary Industries

4:30 on a Friday, probably before a long weekend

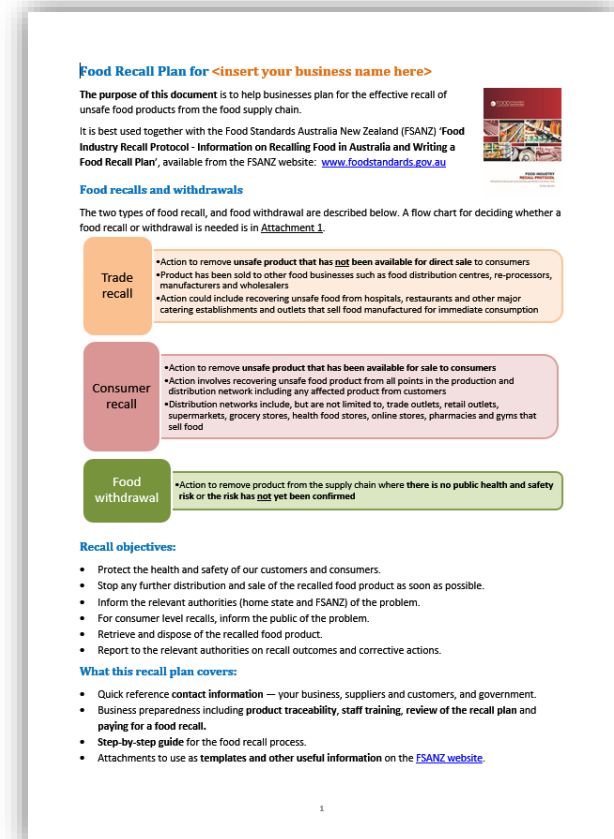
“I’ve just got a call from some guy in the Health Department, he says somebody is in hospital...”

“...something to do with an allergic reaction...”

“...and a problem with your product labelling.”

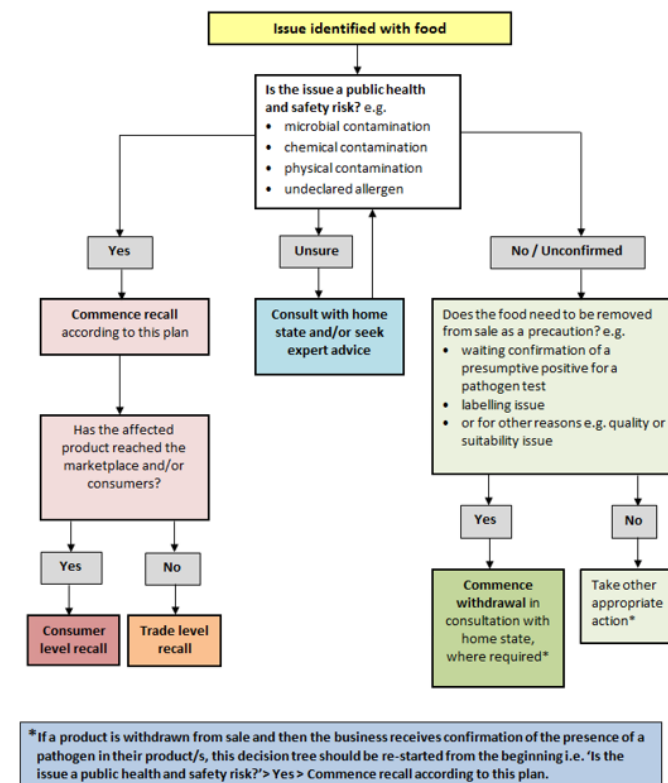
Hint 1 – Be prepared

- Develop a **simple and easy** to use recall plan
- Make sure everyone that need to use it **understands it**
- Make sure it is **up to date** and **relevant** to what you do



Recall steps

1. Identify the **problem**
2. Collect relevant **information**
3. Decide whether you **need** to recall the product
4. Decide what **type** of recall is required
5. **Recall** the product
6. Take corrective action to **prevent** the problem
7. **Report** on the recall



Step 1: Do I need to recall my product?

- What is the hazard or risk?
- How do you make this decision?
- Who can you contact if in doubt?

Hint 2 – Importance of information

- Ingredients
- Product
- Customers

Understanding of risk

Recall action officers

- Every Australian State and Territory has two recall action officers
- Can assist by confirming whether a recall is needed
- Work with businesses to recall the food
- Will monitor the recall

Step 2: What type of recall do I need?

Withdrawal

A food withdrawal is different from a food recall. It involves removing food from the supply chain where there is no public health or safety issue (e.g. the product is underweight or has a quality defect)

Trade Level Recall

A trade recall that recovers food that has not been sold directly to consumers. It involves recovering the product from distribution centres and wholesalers and may also include hospitals, restaurants or other catering establishments.

Consumer Level Recall

A consumer recall is the most extensive type, recovering from all points in the production and distribution chain, including from consumers.

Hint 3 – Bare minimum

To action the recall as quickly as possible the bare minimum you need is:

- A description of the product – e.g. ‘supermunchies’ lemon flavour; 100g packet; plastic container
- A description of the problem – e.g. undeclared allergen
- A photograph of the product
- A distribution list

Step 3: Actioning the recall

Follow your food recall plan. It is important to stop the distribution and sale of the product as soon as possible.

- Let your customers know about the recall and what they need to do (remove product from sale)
- Notify your local food enforcement agency and confirm what level the recall should be (consumer or trade)
- Call the FSANZ recall coordinator and provide them with information about the recall. Call 02 6271 2610 between 9am-5pm, Monday-Friday or 0412 166 965 after hours.
- Decide how you will notify the public. This might be the local newspaper, your website or social media. This can be discussed with your [food enforcement authority](#).

Step 3: Actioning the recall

The following [timeline](#) provides a simple checklist of what to do and when.

You will need to fill out the [Food Recall Report](#) and email (food.recalls@foodstandards.gov.au) as soon as possible.

The FSANZ recall team can help you through the process.

For more information, visit our webpage on How to Recall Food, which explains the steps involved and provides links to useful templates.

Ref: <http://www.foodstandards.gov.au/industry/foodrecalls/Pages/default.aspx>

FOOD RECALL TASKS AND TIMELINE FOR FOOD BUSINESSES

LET YOUR CUSTOMERS KNOW

- ☐ stop the product's distribution and sale: **identify your customers** (who you have supplied the product to)
- ☐ **advise** your customers of the recall and what they need to do (i.e.: remove product from retail sale)
- ☐ confirm instructions in **writing**, including all information about the product and a photo if possible

- ☐ confirm arrangements for **retrieving** the recalled product from the market place

- ☐ keep **records** of how much product was recovered

NOTIFY GOVERNMENT

- ☐ notify your **local food enforcement agency** - confirm whether a recall is needed and what level is needed
- ☐ notify **FSANZ** - call the recall coordinator and provide recall information
- ☐ fill out the **Food Recall Report** (available on FSANZ website) and email to food.recalls@foodstandards.gov.au
- ☐ include details on the product, the problem, where it was manufactured and sold, etc.
- ☐ provide FSANZ with a **distribution list** of all customers (with names, contact details, addresses)
- ☐ provide a draft **recall notice** or press advertisement to FSANZ to check before going public

- ☐ confirm with food enforcement agency arrangements on how recalled product will be **disposed** of

- ☐ provide **interim recall report** (2 weeks' post-recall) to FSANZ
- ☐ provide **final recall report** (4 weeks' post-recall) to FSANZ

LET THE PUBLIC KNOW (for consumer-level recalls)

- ☐ decide **how to communicate** to the public (media release, website, social media, point of sale notice, etc.)
- ☐ organise a **media contact person** to handle enquiries
- ☐ develop a **Q&A** sheet if appropriate
- ☐ set up a **hotline** or brief reception to answer public or media enquiries
- ☐ **rehearse** answers to tricky questions
- ☐ **post** communication contacts on website/social media

- ☐ **Place press advertisement** in relevant newspapers
- ☐ **place point-of-sale notice** in store(s)
- ☐ **post social media and website** notices

ASAP

2-4 hrs

24 hrs

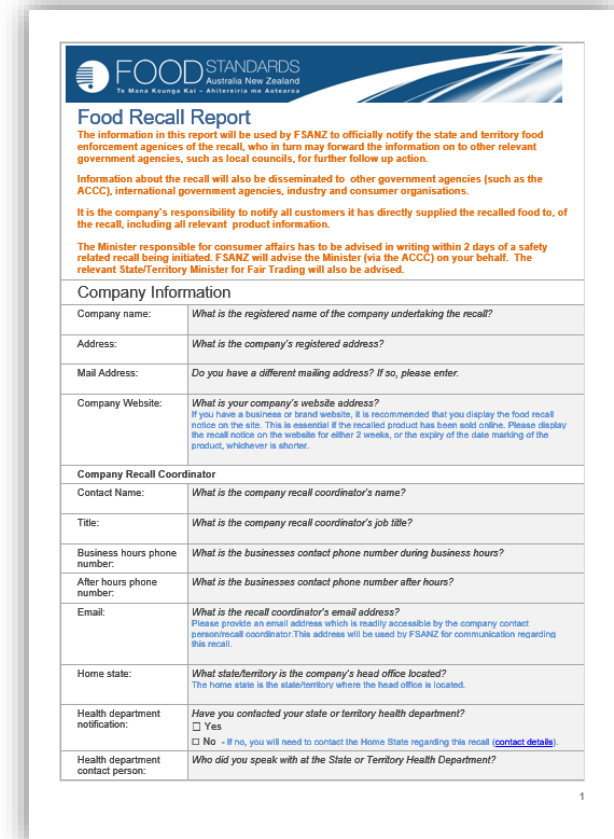
Post recall

Step 4: After the recall

You will need to fill out the **Food Recall Report** and email (food.recalls@foodstandards.gov.au) as soon as possible.

The FSANZ recall team can help you through the process.

For more information, visit our webpage on How to Recall Food, which explains the steps involved and provides links to useful templates.



FOOD STANDARDS
Australia New Zealand
Te Mana Kounga Kai - Ahiteroria me Aotearoa

Food Recall Report

The information in this report will be used by FSANZ to officially notify the state and territory food enforcement agencies of the recall, who in turn may forward the information on to other relevant government agencies, such as local councils, for further follow up action.

Information about the recall will also be disseminated to other government agencies (such as the ACCC), international government agencies, industry and consumer organisations.

It is the company's responsibility to notify all customers it has directly supplied the recalled food to, of the recall, including all relevant product information.

The Minister responsible for consumer affairs has to be advised in writing within 2 days of a safety related recall being initiated. FSANZ will advise the Minister (via the ACCC) on your behalf. The relevant State/Territory Minister for Fair Trading will also be advised.

Company Information	
Company name:	What is the registered name of the company undertaking the recall?
Address:	What is the company's registered address?
Mail Address:	Do you have a different mailing address? If so, please enter.
Company Website:	What is your company's website address? If you have a business or brand website, it is recommended that you display the food recall notice on the site. This is essential if the recalled product has been sold online. Please display the recall notice on the website for either 2 weeks, or the expiry of the date marking of the product, whichever is shorter.
Company Recall Coordinator	
Contact Name:	What is the company recall coordinator's name?
Title:	What is the company recall coordinator's job title?
Business hours phone number:	What is the businesses contact phone number during business hours?
After hours phone number:	What is the businesses contact phone number after hours?
Email:	What is the recall coordinator's email address? Please provide an email address which is readily accessible by the company contact person/recall coordinator. This address will be used by FSANZ for communication regarding this recall.
Home state:	What state/territory is the company's head office located? The home state is the state/territory where the head office is located.
Health department notification:	Have you contacted your state or territory health department? <input type="checkbox"/> Yes <input type="checkbox"/> No - If no, you will need to contact the Home State regarding this recall (contact details).
Health department contact person:	Who did you speak with at the State or Territory Health Department?

1

www.foodstandards.gov.au



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