Questions for discussion
Withdrawal or Recall?
Issue identified with product

Does this issue pose a food safety risk?

• **No**, the issue does not pose a food safety risk  
  - e.g. underweight, quality defect (like texture or colour), breach of process hygiene microbiological criterion 
  → Product is safe

• **Yes**, the issue poses a food safety risk  
  - e.g. breach of food safety microbiological criterion, chemical contamination, allergen not declared 
  → Product is unsafe
Issue identified with product

→ Product is safe
  • It may be withdrawn (for commercial reasons)
  • Follow guidance of Non-Conformity Management

→ Product is unsafe
  • Follow decision tree (Section VIII of the Guide)
    - Unsafe product is still under control of producer: suspend distribution
    - Unsafe product has not yet reached final customer: withdrawal
    - Unsafe product has reached final customer: recall
  • Follow guidance of Non-Conformity Management
A cheesemaker making a pasteurised, long-aged hard cheese identifies Listeria monocytogenes at less than 100cfu/g after the product has been placed on the market. Additional samples confirm the presence of Listeria below 100cfu/g.

• What action should be taken? Withdrawal? Recall? No Action?
Withdrawal versus recall – discussion:

Raw milk cheese in which Salmonella has been detected but which has not yet been placed on the market could be: withdrawn? recalled?
Withdrawal versus recall – discussion:

Milk used to make a dairy product is discovered to be contaminated with antibiotics. What action should be taken if:

i) the product has been placed on the market
ii) the product is not yet on the market
Withdrawal versus recall – discussion:

Dairy products which are unsafe but not yet on the market should be ... withdrawn? recalled?
Withdrawal versus recall – discussion:

True or false?
... a dairy product which breaches a process hygiene criterion must be recalled if it has already been placed on the market.