



Questions for discussion Withdrawal or Recall?

This work is licensed under the Creative Commons Attribution-NonCommercial-NoDerivatives 4.0 International License. To view a copy of this license, visit <http://creativecommons.org/licenses/by-nc-nd/4.0/> or send a letter to Creative Commons, PO Box 1866, Mountain View, CA 94042, USA



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- It *may* be withdrawn (for commercial reasons)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



Withdrawal versus recall – discussion:

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Raw milk cheese in which Salmonella has been detected but which has not yet been placed on the market could be: withdrawn?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 withdrawn?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.

