



PET FOOD RECALLS

# HOW TO STAY PROTECTED AND PREPARED

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## INTRODUCTION

Pet food recalls pop up in headlines all over the world but they are still a topic scarcely discussed in detail in business meetings. Our conversations with pet food brands rightly focus on the **extensive precautions we take** to prevent recalls from happening. But behind the scenes, no matter how confident our operations, we must plan to perform whatever actions necessary to protect our clients' brands as well as the health and safety of pets and pet parents.

- ▶ In this e-book, we are “breaking taboo” and pulling back the curtain on recalls: why they happen, how to prevent them and what needs to be done should one be initiated for your product.

## PART ONE

### PARTNERING WITH A QUALITY-FOCUSED MANUFACTURER

A robust food safety program and SQF certification will reduce the likelihood of product issues, but quality-focused manufacturers go a step further to protect pets' health and safety in the event of recall.

Although the possibility of a recall might not be on your mind until after your product has been manufactured, recall preparedness should be considered early as it runs along the entire supply chain. That's why recalls should be top of mind when selecting your pet food manufacturer. Make sure to discuss the following with any potential manufacturing partners.

#### RECALL HISTORY

The question of recall history should be among the first posed to a potential manufacturing partner. If a Class I or Class II recall has occurred, it's better to have this information as early as possible. If the manufacturer has had a Class III recall or market withdrawal event, you can ask about how they've adapted their procedures since the incident. Even in the case of a spotless record, you want to ensure that your manufacturing partner's processes and systems protect you and your customers moving forward.

#### MOCK RECALLS

Per industry standard, pet food manufacturers should be performing a mock recall at least every six months. A mock recall ensures the manufacturer's **food safety program** and traceability systems are functioning correctly should an actual recall be initiated.

For instance, during a mock recall exercise related to an adulterated ingredient, the manufacturer should go through the steps of an actual recall, identifying the ingredient lot and affected finished product lots and producing a list of product SKUs, pallet tag numbers and shipping destinations.

This sounds like a comprehensive check, but as a customer, it is wise to learn more about the manufacturer's mock recall standards. As industry best practices, rules and regulations often change, it is worthwhile to ask:

- ▶ How often are standard mock recall exercises reevaluated?
- ▶ What separates a successful mock recall from an unsuccessful one?
- ▶ If issues are noted during the execution of a mock recall, are corrective actions implemented to bring the facility into compliance?

The answers to these questions will help differentiate between manufacturers who view mock recalls as a box to be checked and those who use them as a valuable tool in fortifying the integrity of their processes.

## RECALL PLAN

A pet food recall involves several moving parts and a step-by-step procedure that must be carried out swiftly. The effectiveness of a recall largely depends on the systems in place to ensure its execution as well as the knowledge of those carrying out the recall. What can you do to gauge whether a manufacturer is truly prepared for a recall?

### WHAT CAN YOU DO TO GAUGE WHETHER A MANUFACTURER IS TRULY PREPARED FOR A RECALL, OR JUST CLAIMS TO BE?

Per the FDA's Food Safety Modernization Act (FSMA) Preventive Controls for Animal Food Rule, if a manufacturer has identified a hazard that needs preventive control, then a recall plan is required. Before partnering with a pet food manufacturer, we ask about the company's written recall plan and its components.

The plan should outline not only the steps involved but also the roles and responsibilities of those at the company to carry out the recall. For example, it should designate a recall coordinator and recall team, along with backups for each individual. In addition to the step-by-step procedures to be followed during a recall, it should detail the training and the traceability exercises that will be used to get the team and facility primed for an actual recall.

Finally, contact information for all team members, customer(s), regulatory agencies, legal counsel and expert advisors should be present and up-to-date. If the pet food manufacturer has a current and comprehensive recall plan, that is good sign that they understand what's needed to be compliant and put pet parents and pet safety first no matter the circumstances.

## SECTION SUMMARY

Quality and food safety are two terms you are bound to hear when interviewing pet food manufacturers. Maintaining a robust food safety program and **SQF certification** will reduce the likelihood of product issues. Recalls are also a part of protecting customers when the first line of defense fails. Your manufacturer bears significant responsibility in safeguarding the health and safety of pets and pet parents – hold them to it.



## VETTING YOUR SUPPLIERS

Get ahead of your risk for recall by working with trusted suppliers who have invested in – and are transparent about – these three safety protocols.

There are hundreds of potential sourcing partners all over the globe. Duck from France, lamb from Australia, green-lipped clams from New Zealand. Today's pet parents are asking us to reach to the ends of the earth for ingredients. Beyond bringing ingredients home and preparing a unique formulation, what can we do to help ensure the final product is safe for our four-legged customers?

Carefully vetting your suppliers is a critical step. When considering partners throughout your pet food manufacturing process, we recommend looking for these three things to ensure their food safety standards are up to snuff.

### 1 SQF Certification

SQF Certification stands for “safe quality food” in the pet food industry. Combined with the **Food Safety Modernization Act (FSMA)**, which establishes an industry minimum for food safety, SQF certification reduces variation in product quality by encouraging manufacturers to build controls into their processes and to prioritize compliance and continuous improvement in their operations. Additionally, it serves as an indicator to pet food brands, regulators and consumers about how much suppliers and manufacturers have invested into food safety.

The Edition 8 SQF Code, which went into effect in 2018, outlines three levels of SQF certification:

- ✓ **Food Safety Fundamentals:** This certification is an “entry level” certification for new businesses.
- ✓ **Food Safety Code:** This certification focuses primarily on meeting industry standard Food Safety requirements.
- ✓ **Quality Code:** This certification centers on the Food Safety and Food Quality Plan, but takes a harder look at maintaining quality products by focusing on Statistical Process Control to monitor, identify and reduce process variation.

Be sure to ask your supplier which level they have achieved and what their plans are for future certification.

### 2 Audit Results

During the supplier vetting process, one of your first steps should be to request documentation related to previous audits, including details of non-conformance, to show that the supplier has been following the rules of their regulatory or authoritative body (which will vary from country to country).

In addition to audits performed by regulatory or certification bodies, we recommend only working with suppliers whose facilities have been audited either by you or a trusted third-party auditor. If selected, the supplier should undergo regular audits at least every 2-3 years to ensure standards continue to be met.

Furthermore, an analysis should be conducted to ensure the ingredient you are using contains everything it should contain with no adulterant present. To accomplish this, start with a sample, specification sheet and certificate of analysis for each lot. We recommend obtaining a full moisture-protein-fat-ash breakdown for meat products and running an assay for vegetables and grains to view vitamin/mineral makeup. Auditing both the facility and the product provides some assurance that you have done your due diligence.

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### **3 Robust Food Safety Program**

Reputable pet food suppliers should have a formal **Food Safety Program** that includes several components:

- ▶ The **supply chain** should be managed through several controls to ensure the integrity of the final product, including specs for all ingredients and ongoing supplier verification activities, as previously discussed.
- ▶ The **sanitary transportation** of the ingredients and finished products should be dictated by established practices that are monitored and verified.
- ▶ Effective prerequisite programs such as **cGMPs** (Current Good Manufacturing Practices) and **SOPs** (Standard Operating Procedures) should be in place to comply with FSMA's **Final Rule for Preventive Controls for Animal Food**.
- ▶ The manufacturing facility should maintain a **HACCP (Hazard Analysis and Critical Control Points)/food safety plan** that identifies potential and significant biological, chemical and physical hazards at each step in the process, and puts appropriate control measures in place.
- ▶ Both **internal and third-party audits** should be performed at the facility, with reports available upon request.

In addition to checking these boxes, talk to your supplier about the culture at the company. Does the organization have **employee training and policies** related to food safety? Is quality a prevalent part of the company's operating philosophy?

When vetting your supplier, it is not enough to rely reputation or referral alone. Ask the tough questions now, before there is even the potential for a recall — so regulatory authorities won't have to later.

## WHAT TO EXPECT DURING A RECALL

What will be expected of your company and your manufacturing partners during a live recall?

Recalls are never an ideal scenario. It means your systems have failed and you have released a product that should not have been introduced to the market. However, there are several reasons for recalls, ranging from minor offenses to serious risks. While the details will be unique to each situation, the overarching process is fairly uniform.

### WHY RECALLS HAPPEN

Through the FDA Food Safety Modernization Act (FSMA), recalls can now be initiated by FDA/state request or by an FDA/state order under statutory authority; however, there are circumstances under which pet food manufacturers may voluntarily recall products themselves.

Sometimes pet food manufacturers must conduct a recall when it is discovered a product has entered commerce with the potential to cause human/animal health issues due to a deviation involving an ingredient, packaging material or finished product. If released product presents only a minor violation that is not subject to legal action, then a market withdrawal would be initiated. For example, a product may be withdrawn from the market due to tampering without evidence of manufacturing or distribution problems.

Industry best practice calls for manufacturers to follow a positive release program, by which product is only released once analytical or microbiological test results have become available and are acceptable. Should a manufacturer not have or fail to follow such a program, the risk for recall would increase. In this case, if test results are outside acceptable limits (e.g., contamination) and corrective actions (including preventing the affected product from entering the market) were not taken, then a recall must be initiated if the affected product might lead to any of the following situations.

### ► According to the FDA, there are three classes of recall:

#### CLASS I RECALL

A situation in which there is a reasonable probability that the use of or exposure to a violative product will cause serious adverse health consequences or death.

#### CLASS II RECALL

A situation in which use of or exposure to a violative product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote.

#### CLASS III RECALL

A situation in which use of or exposure to a violative product is not likely to cause adverse health consequences.

An up-to-date list of recalls can be found on the [FDA website](#). Filter by “Animal Health” to view pet food product recalls.

## RECALL PROCESS

Once a recall has been initiated, the parties involved need to act swiftly. Several key players are required to carry out a recall, ranging from those on the production floor to the head of the company. Although one hopes to never use it, a thoughtful recall plan (detailed in section 1) – which is now required under certain circumstances per FSMA legislation – is critical to executing a recall in a prompt, orderly and efficient manner.

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### ONCE A RECALL HAS BEEN INITIATED, THE PARTIES INVOLVED NEED TO ACT SWIFTLY.

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During a recall, a company official – typically the president/CEO or designee – would determine if a recall is needed and consult the company's recall team and legal counsel. A designated recall coordinator would manage the investigation, interpret the data and inform the company officials of results. This is also the individual who would act as the contact for regulatory agencies (e.g., FDA recall coordinator and state coordinator) throughout the recall process.

Production and inventory data would then be gathered from the operations team. Quality assurance (QA) would place existing inventory on hold to investigate and report on the incident. Shipping data would also be gathered for lot(s) of finished product involved in the recall to facilitate reconciliation of quantity recovered versus the total produced throughout the recall.

Receiving also needs to gather data related to any deviation (i.e., ingredients, packaging materials) and secure or segregate any remaining affected lots involved in the recall (including raw ingredients, if applicable); QA would then place a hold on these materials. Sales would be responsible for contacting clients and liaising with the president/CEO or designee on how to return or dispose of the product at hand.

The recall coordinator should hold regular meetings and status updates throughout this process and deliver a final report. Together with their affected customers, the manufacturer would track the amount of product recovered versus the amount of product shipped to determine whether the recall was effective.

## CONCLUSION

With appropriate controls in place to avoid potential hazards, recalls are largely preventable; but that does not mean we can turn a blind eye to the possibility that one may need to be initiated someday. Pet parents depend on us to keep them and their pets safe, and we must be prepared to do whatever is necessary to uphold that promise. So, file this information away, but keep it top of mind – and ensure your manufacturing partners are doing the same.

## MEET AMERICAN NUTRITION

American Nutrition is a family-owned pet food and treat manufacturing company headquartered in the scenic mountain town of Ogden, Utah. Since 1972, we have made it our mission to make high-quality, healthy and nutritious products that unfailingly exceed our customers' expectations.

Our passion for pets and dogged determination to be the pet food provider of choice to our loyal customers has earned us a sterling reputation for superior products – and service – with a continued focus on innovative, nutritious and delicious pet foods and treats that surpass even the strictest AAFCO and FDA requirements. With over four decades in the pet food business, American Nutrition offers its formulation expertise, marketplace intelligence and turnkey production capabilities as a service to many leading retailers, and pet food and treat brand owners looking for best-in-class products, facilities and services. With three world-class, SQF level 3 production facilities strategically located across the USA to service our domestic and international customer base, American Nutrition is the premier choice for your pet food and treat manufacturing needs.

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