AFDO RECALL SURVEY 2010

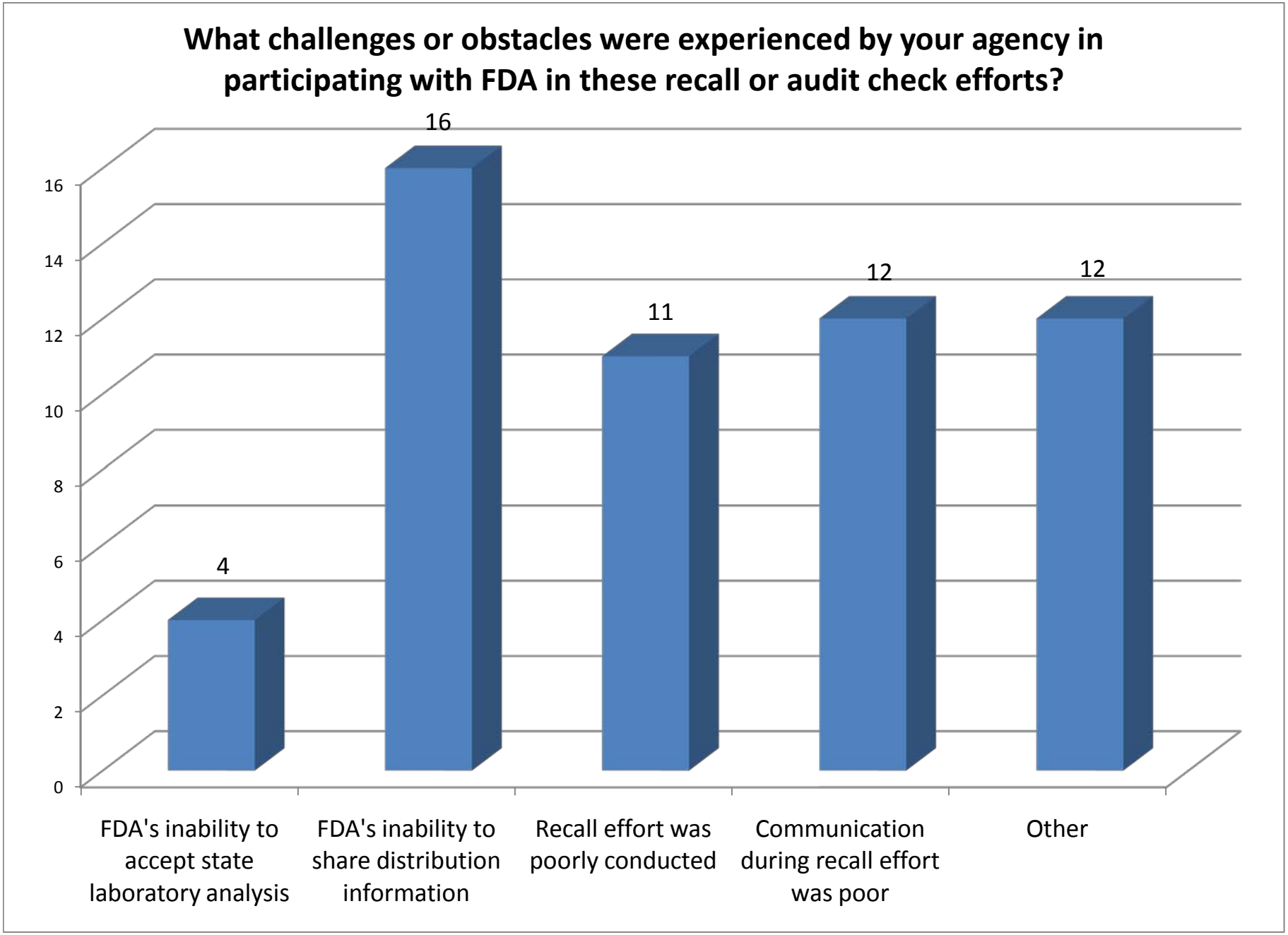
In response to the question **"What challenges or obstacles were experienced by your agency in coordinating these recalls"**, state agencies indicated the following:

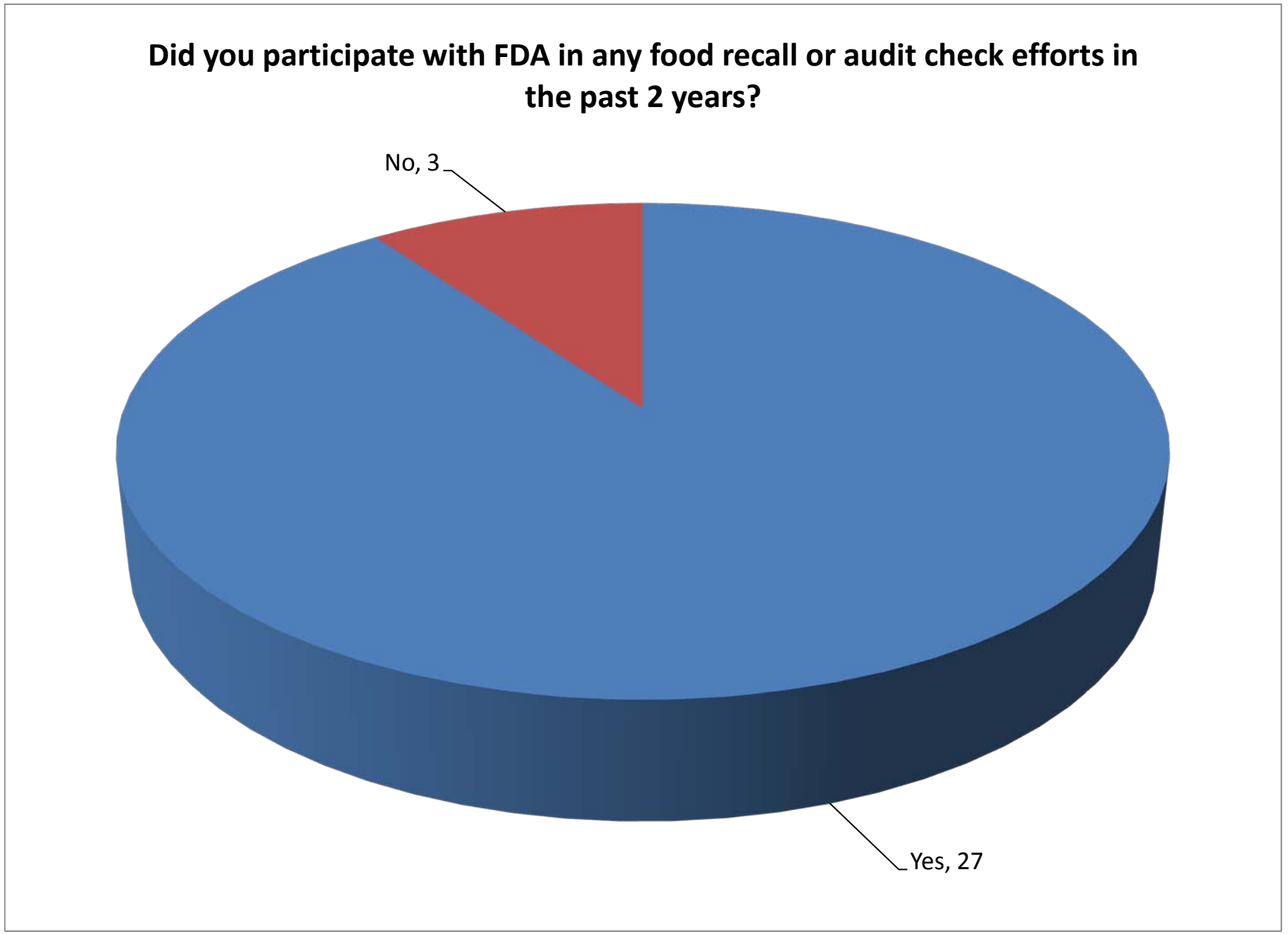
- 12 indicated the agency lacked adequate resources
- 7 indicated the agency lacked adequate training to conduct recalls
- 4 indicated the agency lacked adequate authority
- Other specific statements and responses were as follows:
  - Some recalls are in-state issues or small operations with limited intrastate movement
  - Recalls are voluntary
  - Human capacity: for quick turnaround and inspection schedules/number of people available
  - Working in conjunction with the recalling firm and FDA we failed to include enough product in the first announcement which resulted in an expanded recall announcement.
  - Lack of staff to assist FDA on one recall in past year or so
  - Incomplete information on states associated with recall
  - Lack of strong cooperation with USDA/FSIS
  - Cost
  - Time commitment for restoration
  - Impact on normal surveillance programs
  - FDA posted misinformation for one of our recalls in 2009
  - Obtaining distribution info in a timely manner
  - Retail distribution lists of consignees too general or none at all. Need specific consignees by state
  - Effectiveness check issues: small stores not notified of recalls by secondary distributors, or purchasing products from cash 'n carries or club type stores
  - Diverts staff from other important inspection/investigation work
  - Timely coordination with other state and federal agencies to decide who was doing what
- 27 of the 30 state agencies indicated they participated with FDA in a food recall or audit check effort in the past 2 years.

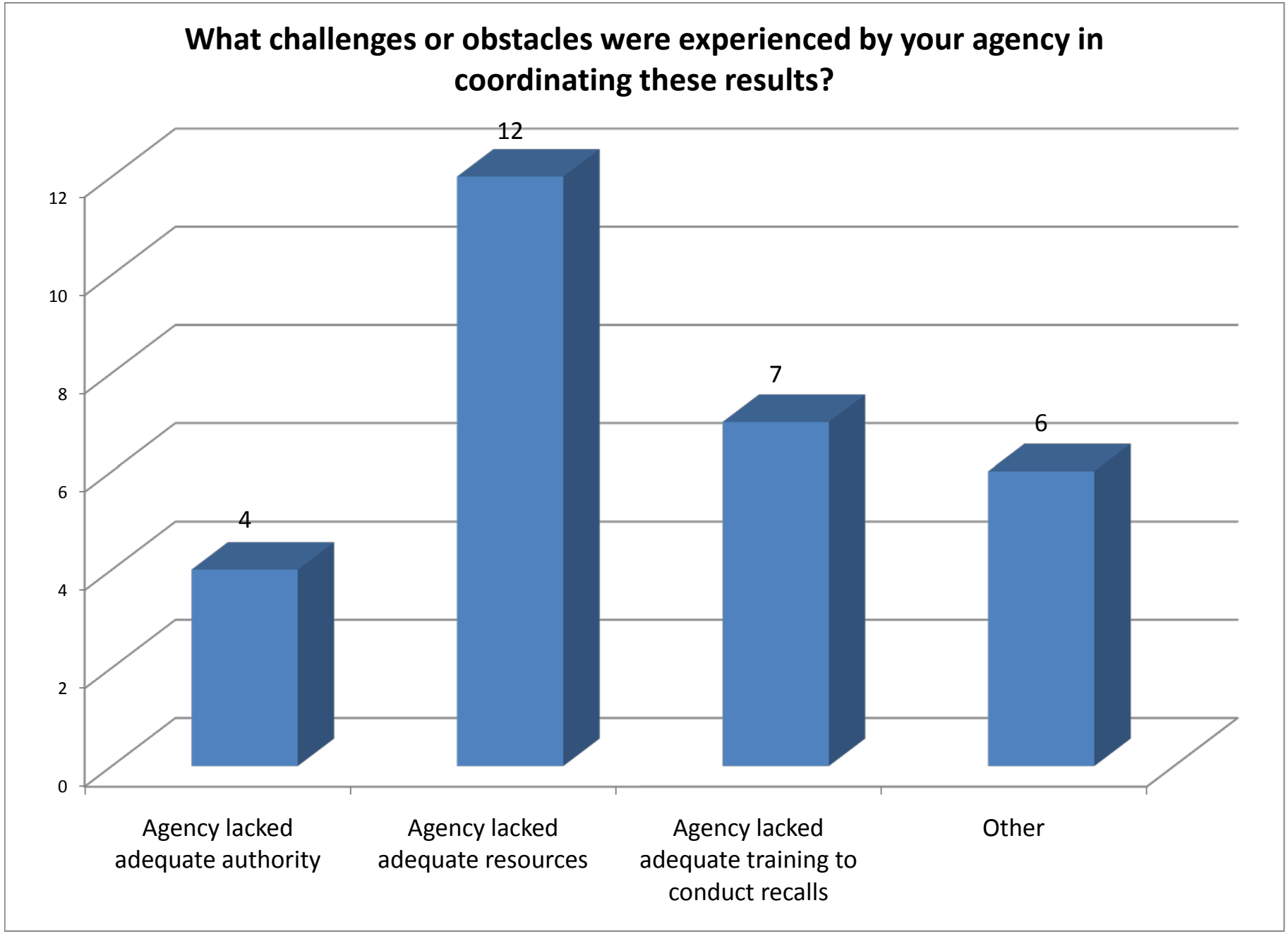
AFDO RECALL SURVEY 2010

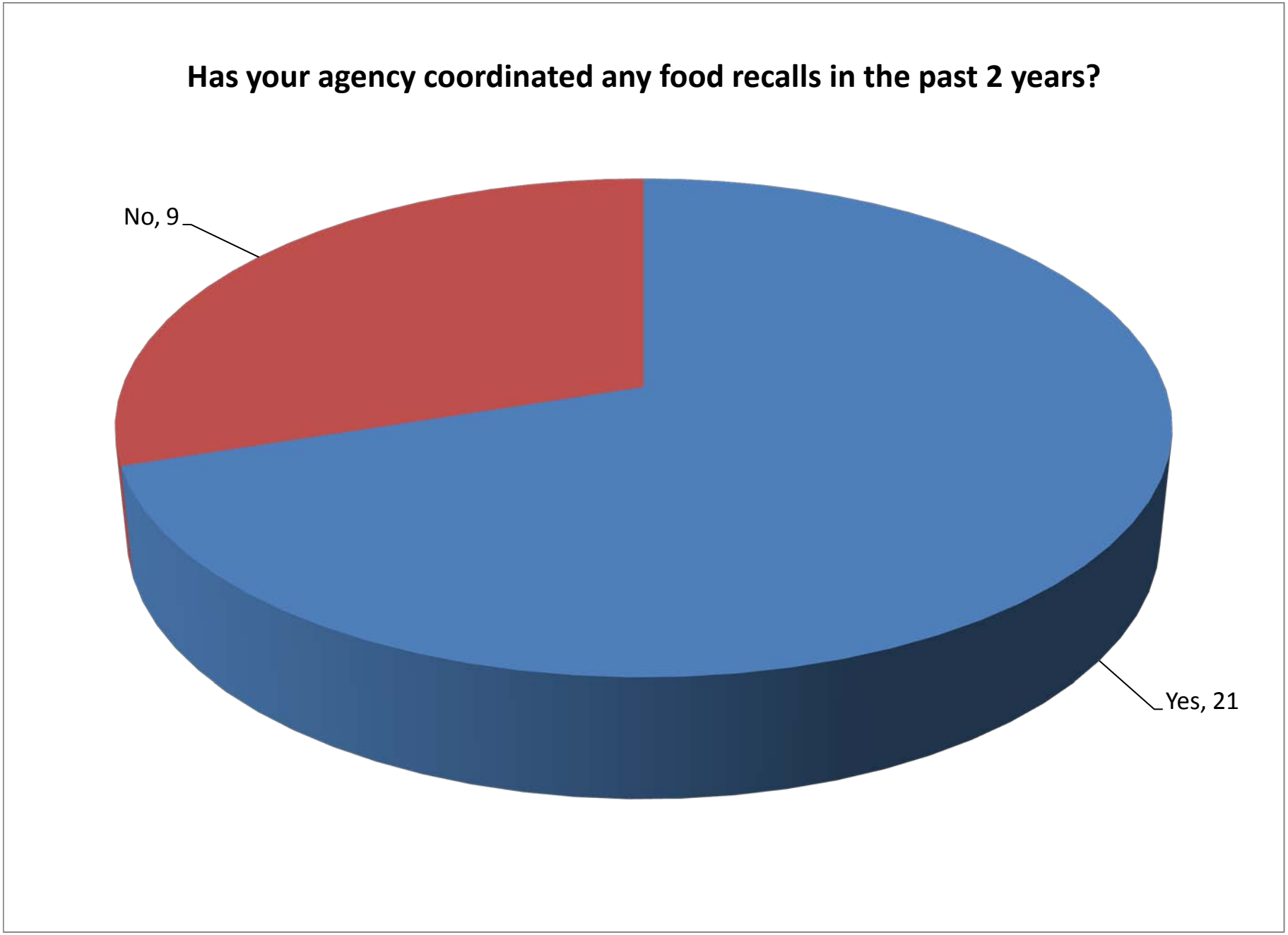
In response to the question **"What challenges or obstacles were experienced by your agency in participating with FDA in these recall or audit check efforts"**, state agencies indentified the following:

- 16 agencies identified FDA's inability to share distribution information
- 12 agencies identified poor communication
- 11 agencies indicated the recall was poorly conducted
- 4 agencies indicated FDA's inability to accept state laboratory analysis
- Other specific statements and responses were as follows:
  - Poor communications often led to investigators showing up at establishments already audited
  - Language barriers
  - State sample resulted in recall however FDA wanted enumeration for L. mono.
  - FDA tried to take over recall and exclude the state
  - State and federal inspectors showing up at same facilities within a few days
  - There is no response/instruction from FDA when the recalling firm has done an inadequate job of contacting those within its distribution chain. States could utilize this information to better focus resources
  - Communication is slow from FDA to states, especially coming from other districts or offices. Recalls are expected to be "expedient"
  - FDA's Recall Effectiveness Audits were difficult to complete by state and local authorities - it uses FDA jargon
  - Lack of staff/time resources
  - It would be nice to have some training available as "just in time" training. Since we are not often asked to participate in these events it is easy to forget all the necessary steps and information. Even if it was something on ORA U that staff can watch and then print out to use as reminders at that time. The training could show a video of someone conducting an audit check and demonstrate the how to find out the requested information.
  - Louisiana finished the recall before FDA ever responded.
  - Not all suspect products were recalled by the out of state firm
  - Lack of staff and regulatory authority
  - The recent recalls involving multiple products have made it very difficult for staff to follow up on when the number of products recalled is changing and the information is not being relayed in a timelier manner
  - Distribution information was 'shared' with state as part of a work assignment. State was provided with the names of firms FDA wanted the state to visit.
  - FDA audit form needs updating/reformatting (we used our own forms)
  - State submitted audit reports to FDA as part of a work assignment
  - FDA audit information was not shared with state and some duplication of visits occurred
  - FDA focus is on distribution, states must also monitor effectiveness at retail. When consumers find recalled product at retail they call the state, or the media, who calls the state
  - Inadequate notice of (instruction/procedure laden) work assignments with unreasonable response expectations
  - We have experienced substantial communication and information-sharing difficulty when trying to work with USDA on meat/poultry recalls
  - Lack of timeliness - generally the recall notice is sent to states long after the company has issued a press release.


What challenges or obstacles were experienced by your agency in participating with FDA in these recall or audit check efforts?
16
11
12
12
4
0
2
4
6
8
10
12
14
16
FDA's inability to accept state laboratory analysis
FDA's inability to share distribution information
Recall effort was poorly conducted
Communication during recall effort was poor
Other


Did you participate with FDA in any food recall or audit check efforts in the past 2 years?
No, 3
Yes, 27


What challenges or obstacles were experienced by your agency in coordinating these results?
12
10
8
6
4
2
0
4
12
7
6
Agency lacked adequate authority
Agency lacked adequate resources
Agency lacked adequate training to conduct recalls
Other


Has your agency coordinated any food recalls in the past 2 years?
No, 9
Yes, 21