



Weathering a Food Safety Recall: Are Your Records Ready?

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Forty-one days after our company launched its first products, we received an urgent recall from Starwest Botanicals, a supplier of organic herbs and spices, due to salmonella contamination of organic celery seed, 1 pound size, lot number 40302, shipped between June 29, 2011, and November 29, 2011. We were instructed to examine our stocks immediately and discontinue use and distribution and recall any product we had distributed with the contaminated seed.

We had received Starwest organic celery seed on September 19 and put it into inventory, removing it from its original packaging. The lot number was not on the new storage container. With no record of the lot number, in accordance with good manufacturing processes and in the best interest of consumer safety, we assumed that the celery seed we received was contaminated. Our company continued with the recall process.

Every product prepared in our steam kettle

We had 394 grams of celery seed in inventory, 60 g less than the 454 g (1 pound) we had received. We needed to account for 60 g of potentially contaminated celery seed in our manufactured products.

receives a batch number, and we maintain batch logs that identify the batch number, date, product manufactured, number of units produced, ingredient sources and notes (e.g., pH or final temperature). Two of our licensed products, a pickled vegetable and a vegetable relish, contain organic celery seed.

From the batch log history, I calculated that 387 jars of product had been manufactured with celery seed. The last that may have contained contaminated seed was manufactured on October 26, 2011. The run was for 47 jars of the pickled vegetable, Batch # 1126101, with a pH of 3.75. From the recipe, I determined that we used 51 g of celery seed in the production.

Once product has been manufactured, jars are labeled and marked on the bottom with the batch number, are then placed in cases that are also marked with the batch number, and are stored in a warehouse room. We keep

records of the batch numbers of all products distributed to our retail partners and to our winter shareholders. The identified, potentially contaminated manufactured product had not yet been distributed; all 47 jars were in the warehouse.

This analysis accounted for all but 9 g (about 1 Tbsp.) of the potentially contaminated celery seed. Was this much seed spilled in the transfer to a new container, or could it have contaminated other products?

Salmonella control focuses on adequately cooking food. We heat our product before bottling to 100 C (212 F). In accordance with the FDA Good Manufacturing Practices, we maintain a minimum fill temperature of 190 F for product going into the last jar of a batch. After a discussion with Jason Bolton, food safety specialist for the University of Maine Cooperative Extension Service, we determined that with our manufacturing processes, no microbiological food safety issue existed with any remaining products.

We notified Starwest Botanicals that we had located the contaminated seed and manufactured product. They instructed us to destroy both and compensated us for both.

The National Organic Program details record keeping by certified operations in NOP 205.103. Based on these and this food-safety recall, we realized that our records for tracking incoming ingredients needed additional components. We are developing processes to track produce from our certified organic suppliers, and herbs, seeds and ingredient from other suppliers. Future individual manufacturing runs will have a recipe batch sheet that tracks all ingredients, including lot numbers.

In licensing our product, Dr. Al Bushway, the food processing authority for Maine, had recommended that we develop a recall plan. The state recommends that all records be maintained for at least three years, while the NOP requires that all organic records be kept a minimum of five years.

For our small start-up company, the potential recall of almost 400 jars of product may have required that we contact 40 shareholders, 20 retail partners, and dozens of individual consumers. Fortunately, our records helped us weather the storm and improve our processes for future production.

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