FOOD RECALLS:
2021 TRENDS AND WHAT THEY MEAN FOR YOU
Recalls declined but our food isn't necessarily safer

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EXECUTIVE SUMMARY

There were 270 food and beverage recalls in 2021 from the U.S. Department of Agriculture Food Safety and Inspection Service (USDA FSIS) and the Food and Drug Administration (FDA). That marked a 27 percent decrease from 2020. But fewer recalls doesn’t necessarily mean safer food.

While the leading causes for food recalls have stayed consistent in recent years, the pandemic has continued to wreak havoc on the food system. The concern is whether disruptions mean that food safety issues aren’t getting noticed, reported and communicated to consumers.

Our food system should be a well-oiled machine. The recall process relies on consumers, producers and regulators to sound the alarm when something is wrong. When that doesn’t happen, unsafe food can slip through the cracks unnoticed.

As the food industry and all of its moving parts continue to adapt to the current state of things, there are ways the food producers, retailers and government agencies can continue to improve the safety of our food system. When it comes to food safety, prevention is key. Swift communication about problems is a close second.
WHY RECALLS HAPPEN

Food recalls happen for a few reasons. When there is an outbreak of food-borne illness like Salmonella or E. coli, the Centers for Disease Control and Prevention (CDC) investigates the source of the outbreak. Once the source is identified, that food item may be recalled. Two nationwide Listeria outbreaks last year were eventually linked to packaged salads. As a result, several brands of packaged salads were recalled.

Sometimes, a consumer complaint can trigger a recall. In December 2021, for example, a customer sent a complaint to Dianne’s Fine Desserts after noticing that a tray of brownies contained pecans even though the label didn’t say anything about pecans. As a result, 1,480 trays of brownies were recalled.

Food recalls can also stem from a self-reported problem. Food producers either test their products themselves or submit samples of their products to state agencies for quality and safety testing. Sometimes a breakdown in production, a contamination risk or a labeling error is identified within the production plant and, as a result, the company issues a recall.

In an ideal world, recalls would never need to happen. However, recalls that go into effect before someone gets sick or injured are better than a recall following an illness outbreak or serious injury.

Failure to comply with inspection requirements can also result in a recall. Twelve recalls in 2021 were because food items were produced or imported “without benefit of inspection.” The USDA FSIS inspects producers of meat, poultry and egg products, while the FDA inspects other food processors. They check to make sure that a production facility’s sanitation procedures, construction, layout and equipment are good enough to ensure the consistent production of a safe product. Food produced without the benefit of inspection is sort of like driving without a license. If the safety and cleanliness of a food production facility can’t be guaranteed, foods made at that facility may be recalled.
FOOD RECALLS IN 2021

There were a total of 270 food and beverage recalls reported by the FDA and USDA in 2021. The majority of food recalls are issued voluntarily by the company or distributor of the food item in question. The FDA can also mandate a food recall under certain circumstances, such as when a food safety issue is especially dangerous and the company responsible refuses to issue a recall itself. (The FDA has wider authority to recall infant formula.)

Undeclared allergens
Undeclared allergens were the leading cause for recalls in 2021, making up 44.1 percent of all food recalls. According to the FDA, the eight major food allergens are milk, eggs, fish (e.g., bass, flounder, cod), crustacean shellfish (e.g., crab, lobster, shrimp), tree nuts (e.g., almonds, walnuts, pecans), peanuts, wheat and soybeans. These major food allergens make up 90 percent of food allergic reactions in the United States. When a food product contains one of these major allergens, the nutrition label on the food item needs to say so. That way, people with allergies can avoid foods that could make them sick. When a food product fails to list an allergen on the ingredient list, it can become subject to a recall.

Listeria
The No. 2 reason for food recalls in 2021: possible Listeria contamination, coming in with 18.9 percent of food recalls. *Listeria monocytogenes* is a disease-causing bacteria. Listeria comes from animal feces, contaminated water and soil. Sometimes, contaminated runoff from animal farms makes its way into the water that other farmers use to grow crops. Manure that is used as fertilizer can also be the source of contamination. Last year we saw several recalls of queso fresco and other cheese products due to possible listeria contamination. The CDC says that soft cheeses made with unpasteurized milk may be 50 to 160 times more likely to cause Listeria infection than cheeses made with pasteurized milk.

When people eat food contaminated by Listeria, they can develop a disease called listeriosis. According to the FDA, for most people, listeriosis can produce short-term food poisoning symptoms including fever, headache, stiffness, nausea, abdominal pain and diarrhea. Listeriosis can be much more dangerous and even fatal for young children, immune-compromised or elderly people and can cause miscarriages and stillbirths among pregnant women.

Salmonella
The No. 3 reason for food recalls in 2021: possible Salmonella contamination, making up 13 percent of recalls. The CDC says that Salmonella contamination most commonly comes from trace amounts of animal feces. The contamination isn’t visible to the naked eye and only a small amount is enough to make you sick. Produce can get contaminated with Salmonella due to cross
contamination at a processing facility or from contaminated water.

Eating foods contaminated with Salmonella can make you sick with a disease called salmonellosis. Most people who suffer from salmonella infection experience typical food poisoning symptoms, including fever, diarrhea (which may be bloody), nausea, vomiting and stomach pain. The CDC estimates that there are about 1.35 million cases of salmonellosis every year, leading to 26,500 hospitalizations and 420 deaths in the United States. Most of these illnesses are caused by food.

**Foreign materials**

Next, 8.9 percent of recalls in 2021 were due to foreign materials found in foods. As awful as food poisoning can be, chunks of blue plastic in your food, like the Butterball ground turkey recall last fall, are pretty gnarly. The most common foreign materials that show up in food are plastic, metal fragments, glass, rubber and rocks.

There were nine recalls last year because of plastic pieces. Bits of plastic, metal or glass in food are not only a choking hazard but can also cause dental damage and obstruction or damage to internal organs. Most of this sort of contamination happens during processing, when items used in processing plants like nitrile gloves, hydraulic fluid or sanitizers accidentally make their way into food products.
Some notable recalls of 2021

Last year saw more than 1,000 people get sick from food that was eventually recalled. Here are a few of the most significant recalls.

In October, onions from ProSource Produce LLC and Keeler Family Farms were recalled for potential Salmonella contamination. These onions were linked to a nationwide Salmonella outbreak that spanned 38 states and led to 892 illnesses and 183 hospitalizations.

In August, uncured antipasto trays from Fratelli Beretta were linked to a Salmonella outbreak spanning 17 states that caused 40 illnesses and 12 hospitalizations. 862,000 pounds of the Italian-style meats were recalled.

In December, packaged salads made by Dole and Fresh Express were each linked to two different Listeria outbreaks. Recalled salads by Dole were linked to 16 illnesses, 12 hospitalizations and two deaths. The Fresh Express salads were linked to 10 illnesses that all resulted in hospitalization and one death.

In January 2021, Pepperoni Hot Pockets by Nestlé were recalled after four consumers complained about pieces of glass and plastic; 762,615 pounds of Hot Pockets were recalled.
We saw a total of 373 food recalls in 2020. The leading causes of food recalls and their shares of the total were roughly the same. Undeclared allergens made up the majority, accounting for 56 percent of all food recalls.

Meanwhile, 16.4 percent were due to possible Salmonella contamination and 11.3 percent were because of Listeria. Only 2.9 percent of 2020’s food recalls were because of foreign materials ending up in our food.

**Why were there fewer food recalls in 2021?**

In 2021, there was a 27 percent decrease in the number of food recalls compared with 2020. In a statement to **NPR**, an FDA spokesperson explained that "the number of recalls in any given year can fluctuate for a variety of reasons; we have not determined a specific reason for the decrease." A spokesperson for the USDA FSIS told NPR that the decline in recalls was largely because fewer incidents were being reported to the agency. Again, consumer complaints and self-reported problems lead to a significant portion of food recalls. In addition to conducting their own inspections, both the USDA and FDA rely on food producers and consumers to sound the alarm when there’s an issue with a certain food product. If fewer incidents are reported, it makes sense that fewer recalls would be issued.
Another, more hopeful reason that could explain the decline in reported recalls is the ongoing rollout of the Food Safety Modernization Act (FSMA). Although the law was passed in 2011, key components of the legislation have gradually gone into effect over the past 10 years. FSMA aims to shift the focus from foodborne illness response to prevention, and identifies clear and specific ways that all of the different players in the food supply chain can work to prevent contamination.

The pandemic could also have something to do with it. On top of their duties for ensuring the safety of our food, both the USDA and FDA were called in to address the unprecedented public health crisis. Reorganizing staff and priorities only got more complicated as labor shortages took a toll on just about all businesses, including our regulatory agencies.

The Omicron variant has led to more food inspectors calling in sick. Paula Soldner, chair of the National Joint Council of Food Inspections Locals, said, “The Delta variant didn’t have a whole lot of impact on the workforce, but Omicron is nailing us.” Inspectors across the country are in short supply, with vacancies as high as 35% in some regions. Fewer inspections could mean fewer problems noticed and reported, potentially leading to fewer recalls.

In addition, people suffering from food-borne illnesses in 2021 may have been more likely to stay home to avoid crowded hospitals filled with COVID. The CDC reported a decrease in the number of food-poisoning cases when the pandemic hit in 2020, saying “a higher than usual proportion of infections might have been undetected because factors such as changes in health care-seeking behaviors, and broader use of telehealth might have limited the number of stool specimens tested.” With hospitals still experiencing crowding due to COVID last year, people suffering from food poisoning may still be staying home more, which could still be skewing outbreak numbers the CDC uses to track pathogen contamination in food.

It’s not yet clear how these factors may have affected the food recall system. Until we know for sure, it is safe to say that these numbers may not paint a complete picture of what’s really going on in the food system.
WHAT CAN BE DONE TO PREVENT RECALLS

As the food industry and all of its parts find a new normal, there are ways the food producers, retailers and government agencies can continue to improve the safety of our food system.

Undeclared allergens
As the leading cause for food recalls, undeclared allergens often result from a labeling issue. Sometimes, one type of food is made and then is packaged and labeled as a different food. Other times, the allergen is simply left off of the nutrition label.

As restaurants closed during the pandemic, some food producers switched from packaging bulk quantities of food to smaller amounts for grocery stores and individual consumers. This meant changing the way that food was packaged and labeled.

In March 2020, in order to make it easier for food producers to make the switch from supplying restaurants to selling directly to consumers, the FDA temporarily relaxed some of the rules for labeling. Food that was intended for restaurants could be repackaged for consumers without including a formal Nutrition Information label. It is possible that the rapid change in the production process could have resulted in more labeling errors. Hopefully, as things eventually get back to normal, this will no longer be a risk.

The Food Labeling Modernization Act, introduced in August 2021, includes a provision that requires food producers to submit key information to the FDA including the nutrition information and ingredients list, including food allergens. More accountability could mean that food producers take better care to ensure food is labeled correctly. And fewer incidents of mislabeling could mean fewer recalls.

Pathogens like Salmonella and Listeria
Sometimes, random testing can identify the risk of pathogen contamination. Oftentimes that means that a recall can take effect before an outbreak of food-borne illness happens. But sometimes it goes the other way around.

When there is an outbreak of Salmonella, Listeria or other foodborne pathogen, the CDC opens an investigation to figure out what is making people sick. First officials have to figure out whether all the sick people ate the same food. Then they have to figure out where that food came from. From there, they can determine where else in the food system that contaminated food could be so that it can be recalled before more people get sick.

This whole process takes time, all the while more people could become infected.

Let’s look at one of 2021’s big outbreaks:
- On Sept. 17, the CDC opened an investigation into a nationwide Salmonella outbreak.
- The first illness eventually connected to the outbreak was reported on May 31.
• On Oct. 20, the CDC reported that the outbreak was linked to onions.
• The following day, the FDA announced a recall of nine brands of onions.
• Between Oct. 221 and Nov. 15, six more onion recalls were issued.
• The final onion recall was issued two months after the CDC opened an investigation. Unfortunately, 240 illnesses were reported during that time.

This points to a need for better traceability. The way food is tracked and cataloged is outdated in some sectors of the food industry, making it difficult to efficiently find the source of an outbreak and issue the necessary recalls.

Tech-enabled traceability is the first of the four pillars of the FDA’s New Era of Smart Food Safety. Announced in 2020, the blueprint provides a 10-year roadmap for modernizing approaches to food safety using new technologies that can connect every step of the food supply chain so that people can be alerted about a food safety issue before they consume something that could make them sick. So, instead of pouring over hard-copy ledgers to track down contaminated food, that tracking information could be digitized and accessed at the click of a button, meaning the time between identifying a problem and pulling all the affected foods off of grocery shelves could happen in a matter of days rather than months.

Another initiative coming out of the FDA is a proposed addition to the Food Safety Modernization Act that deals with produce safety. The new Produce Safety Rule would set new standards for farmers for water testing and quality, animal handling, compost and manure, equipment and employee health and hygiene with a goal of preventing pathogens like Salmonella and Listeria. According to the FDA “this is all about keeping food safe for consumption.”

Foreign material
There are several steps along the way from farm to table. Debris, broken equipment or human error at any point in the food supply chain can lead to foreign material getting into our food. While there are measures in place to prevent this, including safety procedures, testing, employee training, metal detectors and X-rays, sometimes a problem goes undetected.

While it’s too soon to pinpoint exactly why there were more recalls due to foreign material contamination in 2021, it’s safe to assume that the shock to the supply chain that the pandemic caused may have had something to do with it. Food Safety Magazine surveyed 240 food processors to look at the pandemic’s impact on the food industry. They found that supply shortages meant that “suppliers needed to rely on riskier and lower-quality sources to try to meet demand.” As a result, two companies they surveyed reported seeing “more foreign materials” in their food products.

As we approach the two-year mark of the pandemic, food producers are still dealing
with labor shortages, supply chain
disruptions and increased consumer
demands driven in part by ongoing remote
work and changed lifestyles. But meeting
demand by sacrificing the quality and safety
of our food doesn’t cut it.

When it comes to food safety, prevention is
always key. By taking a preventative stance
on foreign material contamination, food
producers can predict the most common
sources of contamination and use the
appropriate screening tools and technologies
to address them.

There is no 100-percent foolproof solution,
but stopping contamination before it
happens is always the best approach.