

Developing a Recall Plan

for Retail and Wholesale Facilities



The ability to quickly and effectively remove products from the marketplace has always been vital to retail and wholesale businesses which distribute food. It is important to understand the recall process and respond quickly. A successful response to a food product recall can help protect businesses from unnecessary economic loss and the loss of consumer confidence.

The first step is to develop and implement a strategic plan of action. There are three main areas to target when developing a recall plan – recall prevention, advance planning and decision-making, and recall implementation and assessment.

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Recall Prevention

- a. Use Hazard Analysis Critical Control Points, Good Manufacturing Practices, Good Agricultural Practices or total quality control principles to prevent recalls.
- b. Code date finished products so that they can be identified (by your company personnel) in commerce to a particular day of production.
- c. If your finished product is formulated, maintain records that tie lot numbers or code dates of your ingredients to your finished product code dating. This facilitates tracing affected product when a recall is initiated by one of your suppliers.
- d. Know your contaminants of concern such as microbial, chemical or physical contaminants.
- e. Work with the regulatory agencies to decide which 'affected product' is subject to recall. An affected product could be based on all products containing an ingredient from a single source or a finished product produced from cleanup to cleanup or during other breaks in processing.
- f. Both the contaminant and in-plant processing controls contribute to determine which product is subject to recall.
- g. Documentation is the key to limiting the scope of the recall! Firms may be able to limit the scope of a recall through use of detailed production records, in-depth cleaning procedures to establish a clean break between production lots, and validated pathogen reduction processes.

Advance Planning/Decision Making

- a. Each food producing company should have a designated person or committee for responding to contamination events (intentional or accidental) and subsequent recalls. One person should serve as the point of contact with regulatory agencies. The person, or committee, should decide before the time arises what the company policy will be in the face of a possible Class I, II or III recall. Class I recalls involve a health hazard situation where there is a reasonable probability that use of the product will cause serious, adverse health consequences or death; Class II involves a health hazard situation where there is a remote probability of adverse health consequences from use of the product; and Class III involves a situation where use of the product will not cause adverse health consequences, or the risk is negligible.
- b. The recall process should be written as a standard operating procedure, so that it can be implemented rapidly by others should key personnel not be available.

- c. Look at your shipping and receiving record-keeping system to ensure that you will be able to quickly track shipments of your products. Ensure that you have quick, up-to-date contact information for the companies that you do business with, so that you can quickly implement a recall if needed. Talk with your customers that might further distribute your product to determine their recall procedures. Develop a contingency plan to cover the possibility that your customers cannot track how product was distributed.
- d. If you do not have adequate on-site storage facilities to handle a recall, make advance plans to lease or rent secured storage locations with accessibility to only authorized personnel to store recalled product until disposition is decided. Identify employees who will be allowed access to either on- or off-site facilities. (Note: check your list of those with authorization to access on a quarterly basis to ensure the people on the list are still employed with your firm and still capable of performing the work.)
- e. Identify disposal options (such as landfills or incineration) beforehand that will prevent diversion of the recalled product and be approved by environmental protection and waste management agencies.
- f. Have a company public relations representative designated before the need arises to speak to the media about the recall, if needed. This person can also facilitate written communication to the necessary media outlets to ensure the message is accurate and timely.
- g. Look at possible outlets for reworking recalled product (if that is an option). It would be prudent to set up those possible contacts before the need arises.
- h. Have a record-keeping system set up to track and log recalled products.
- i. Consider a tabletop exercise or 'mock recall' to test effectiveness and expose possible flaws in your recall plan that can be addressed before the actual event.

Implementation of Recall/Assessment

- a. Designate company drivers, shipping and receiving personnel, and administrative clerks who can be available on short notice to carry out the physical recall.
- b. Ensure that your company provides quick, accurate recall instructions to everyone in the product distribution channel.
- c. Do a final review of your recall process noting deficiencies and making appropriate adjustments for advance planning.