managing a recall

f you have not had to manage a recall lately, it is just a matter of time. A Food Recall can be triggered from several sources including the CFIA (Canadian Food Inspection Agency), Public Health, trading partners and your own quality assurance department.

How can you prevent long-term brand damage from recall recoil? A properly managed recall prevents avoidable damage and actually builds your reputation with trading partners and inspection agencies.

The most effective way to manage a recall is to prevent one from happening. However sometimes we inherit a recall from outside of our area of control. The second most effective way to manage a recall is to limit the scope of the affected products and act quickly to contain the situation. No one wants to deal with a recall. The easier you can make it for your trading partners, the better off you will be.

Before the necessity of a recall takes place it is important to identify standard recall operating procedures. Mock recalls will proactively identify what is missing in the recall plan before a real recall happens. This is a valuable opportunity to confirm that all of the data requirements exist and can be effectively communicated when the time times. Performing mock recalls is another way to satisfy trading partners and certification bodies that you are meeting their standards.

Who is responsible? Every production plant needs a recall manager. This person will receive notification

How to avoid your worst nightmare.

Avoiding Recoi

By: June Nicolay

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from Government bodies, vendors, trading partners, and the QA department that a recall needs to be conducted. This person will act on behalf of the plant to ensure that all elements of the recall have been satisfied.

The steps on how to conduct and manage the recall will be based on the class of the recall and how it was initiated. In any recall situation, you will be relying on the accuracy of your inventory control systems to determine how widespread the recall will be and what procedures need to be followed. If standard operating procedures have been established and mock recalls have been performed, it makes the task much easier.

Class I recalls are High Risk with the possibility of causing serious health problems and death occurring if the tainted product is consumed. Class II recalls are triggered if a food product would create a moderate risk of short-term illness or non-life threatening issues. Class III recalls are triggered if the products do not meet a regulation but there is little risk of causing illness. Recalls may be initiated because of wrong packaging, erroneous nutritional labels and other pack-off errors, which need to be fixed.

A public announcement is often made if tainted product is already in consumer reach. This is the hardest type of recall to manage, as product has been distributed to many locations. It is the responsibility of each manufacturer to produce safe food and protect the consumer. A recall process is designed to assist with this responsibility when something goes wrong.

How do I Identify the Products?

Let's assume that the tainted product came from a vendor. Each product that has been received, stored, consumed through production, disposed of or sold needs to be identified. The product recall information provided will usually include the brand, product code, UPC, description, and a date. The date may be a production date, best before date or date range. In some cases it may also include the method of delivery, packaging, and further unit numbers, which would limit the scope of the recall.

If product on the recall notification has been received, it must now be found and contained. When detailed inventory information is not available, a broader group of products may have to be taken out of inventory to satisfy the recall. If vendors provide GS1 standard barcode labels, it makes it easier to capture the date, lot and product data upon receiving products into inventory. Digital data is always easier to look up than flipping through paper logs.

All products that are part of the recall are immediately pulled out of inventory and put into a HOLD section to be dealt with for removal or return. Label the product with DO NOT USE signs. Find and remove raw material products that have been allocated for production. There may be product in tempering rooms, de-box areas and assigned to work stations. If many vendor lots were combined into totes, equipment or work-inprogress steps, it is harder to isolate a tainted or affected lot. It may be necessary to pull out the whole container of mixed lots. Standard operating procedures to record lot level detail will eliminate the need to recall unknown batches of mixed lots.

Where is the Data?

Routine meetings need to be held to ensure that the QA department is up to date with all regulatory practices to satisfy all levels of traceability, certification and trade. Data capture is not only a requirement; it's your brand's lifeline. Without having accurate data how can you find out who or what has potentially been affected by the non-compliant or tainted product(s)?

Quick and precise communication with trading partners and customers will preserve brand reputations and standing loyalties. Make it as easy as possible for the recall team to quickly identify and notify all parties where product has been shipped. All lot and date data can be captured when shipping out goods by scanning GS1 compliant labels. Date ranges can be used if no lot numbers are available.

Make sure your customer contact information is up to date so that you know who to contact and how to reach them. If you are not sure who to contact a lot of valuable time can be wasted finding the right person and product may be sold and consumed. Who is going to work with your customer to make sure their needs are taken care of? Can you replace the recalled products with another delivery? The easier it is for your customer to deal with the recall the better chance you have of retaining loyalty.

Pick-up services or shipping arrangements need to be arranged. Where does the product get shipped? If you are receiving product back into the production facility make sure it is contained and inspected before it is handled. Safely dispose of product in a sustainable method. Make sure that all of your customers and trading partners understand that you are there for them. Take advantage of the opportunity to solidify relationships and learn from each recall. Food safety is a supply chain responsibility but you can take the lead!

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