

Food Industry Recall Protocol

A GUIDE TO WRITING A FOOD RECALL PLAN AND
CONDUCTING A FOOD RECALL

5th Edition June 2004



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Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa

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Executive summary

It is now a legal requirement under Chapter 3 of the *Food Standards Code*, Volume 2 (Food Standards Code) for manufacturers, wholesalers, distributors and importers of food to have in place a written recall plan. It is noted that this legal requirement applies to **Australia only** and does not cover New Zealand. The purpose of a recall plan is to enable a food business to recall unsafe food from the market place and consumers in order to protect public health and safety.

The purpose of this Recall Protocol (Protocol) is to:

- a) guide food businesses on how to conduct a food recall; and
- b) help food businesses develop a written recall plan so that they comply with the food recall requirement of *Standard 3.2.2-Food Safety Practices and General Requirements* contained in the *Food Standards Code* (Food Safety Standard 3.2.2).

This Protocol also sets out in a stepwise process how to conduct a recall, including:

- convening the recall committee;
- hazard/risk assessment;
- determining the level of recall;
- who should be notified of the recall;
- the mechanics of notification and recovery; and
- post recall reporting.

This Protocol also sets out the responsibilities of businesses and governments when a recall is necessary.

In addition to this, the Protocol offers an example of a written recall plan for a food manufacturing business, which may be used as a template or illustration of what a working plan needs to entail.

The attachments are a ready reference for essential action and include:

- contact details for the Australian and State and Territory coordinators of food recalls;
- contact details for Commonwealth and State and Territory Ministers responsible for consumer affairs and fair trading;
- examples of letters, advertisements and media releases etc that should form part of a written food recall plan; and
- examples of worksheets and work instructions that could be used as part of a written recall plan.

Chapter 1 – Definitions, Obligations and Responsibilities

Introduction

Unfortunately there is no magic formula that can guarantee that your firm will never be faced with a product recall. But a basic desire to produce high quality products and a willingness to do your best for consumers who purchased or use your products should pay dividends in your day to day business – as well as making a product recall less likely.

A recall may be initiated as a result of reports referred to sponsors or coordinators from any one of a number of sources, eg. a manufacturer, wholesaler, retailer, medical practitioner, government agency (for example, the police or a health authority) or a consumer. A recall of goods manufactured overseas may also be initiated by reports appearing in overseas bulletins and similar publications of health authorities or as a result of information received directly from such authorities. Where a public health and safety risk exists State and Territory legislation can require that the product in question be recalled and that public warning statements be issued.

If you are a manufacturer, wholesaler, distributor or importer of food, an up-to-date food recall plan is essential for your business if it is to comply with **Food Safety Standard 3.2.2**.

As noted above, the information contained in this Protocol only applies to recalls within Australia. Food recalls conducted in New Zealand are coordinated and monitored by the New Zealand Food Safety Authority (contact details for the New Zealand Food Safety Authority are on page 34).

The food industry and Commonwealth and State and Territory health authorities have agreed to this Protocol.

Purpose

The purpose of this Protocol is to inform food businesses what is required when conducting a food recall and to provide guidance on how to write a recall plan.

Scope

A food recall is conducted to protect public health and safety, whereas a food withdrawal is undertaken for quality or similar reasons, or as a precautionary measure before an official recall. This Protocol explains what should be done when a food recall is required.

Having an up-to-date recall plan is a legal requirement for all food businesses engaged in the wholesale supply, manufacture or importation of food. This guide is not intended to replace an individual food business' recall plan, which should be tailored to the individual needs of the business nor should it be a replacement for legal advice. It is imperative that you seek your own independent advice (including legal advice) as to how the *Food Standards Code* applies to your business.

Clause 12 in Food Safety Standard 3.2.2 provides:

- A food business engaged in the wholesale supply, manufacture or importation of food must:
- (a) have in place a system to ensure the recall of unsafe food;
 - (b) set out this system in a written document and make this document available to an authorised officer on request; and
 - (c) comply with this system when recalling unsafe food.

Food retailers, such as a supermarket, are not required to have a recall plan unless they are also engaged in the wholesale supply, manufacture or importation of food.

Food businesses within the food service sector, such as restaurants and takeaways would normally not be required to have a recall plan. While these businesses 'manufacture' food, the food will be eaten shortly after it has been made. Therefore, if a problem were to occur with this food, the food will have been consumed before it can be recalled.

While food retailers and businesses within the food service sector would not normally need a recall plan, they may be part of another business' recall. For example, they may need to remove recalled stock from shelves and return it to the manufacturer, importer or wholesaler. If a business is required to remove recalled stock from sale, the business must follow the 'food for disposal' requirements within the Food Safety Standards. This requires a business to ensure that food that is subject to a recall is separated and identified from other food until it is disposed of in accordance with the instructions provided as part of the recall (*This usually means ensuring the disposal of food so that it cannot be used for human consumption*).

A recall plan must be available in written form and available to an authorised officer on request. Authorised officers are officers with powers under State or Territory legislation to enforce the food safety standards. For example, Environmental Health Officers employed by local councils to enforce food and other public health legislation.

The recall plan may be kept electronically but the business must be able to provide a printed copy to an authorised officer on request.

The business is required to comply with the plan it has developed when it recalls unsafe food.

Legal obligations under other legislation

The *Trade Practices Act 1974* requires persons responsible for initiating a safety related recall to notify the Commonwealth Minister responsible for consumer affairs in writing within two days of initiating the recall. There may also be obligations to notify your State or Territory Minister responsible for consumer affairs. Advice and contact details on how to notify these Ministers is contained in *Attachment 4* of this Protocol, as well as on the Food Standards Australia New Zealand (FSANZ) website at <http://www.foodstandards.gov.au>. In addition, the FSANZ recall coordinator can help your company contact the relevant authorities. Contact details for the relevant authorities are outlined in *Attachments 1-4*.

The FSANZ recall coordinator can also provide a 'one stop notification shop' for all of the relevant authorities.

Definitions

Withdrawal

A product may be withdrawn from sale for two reasons:

- the product has a quality defect (eg. colour or texture) or is underweight or has labelling irregularities that does not pose a potential risk to public health and safety;
- as a precaution, stock may be withdrawn from distribution and/or sale pending further investigation — if a risk to public health and safety is established, the product must be recalled.

Withdrawals do not require notification to statutory authorities or media.

Recall

For the purposes of this Protocol a recall is defined as ‘action taken to remove from sale, distribution and consumption foods which may pose a safety hazard to consumers’.

Such action may be taken if there is a reasonable possibility that use or consumption of the food would cause adverse health consequences or even death. Examples of when these circumstances might exist include when there is the presence of *Clostridium botulinum*, *Salmonella spp.*, *Listeria monocytogenes*, Hepatitis A, toxic chemicals and harmful foreign bodies. Action may also be taken if the product has serious defects that pose a potential health risk. Examples of when these circumstances might exist include when there are goods that are incorrectly labelled (eg. such as an allergen) (eg. peanuts, milk or milk products not being declared on the label, or incorrect/insufficient cooking instructions).

There are two alternatives for remedial action:

- permanent removal of the unsafe products from the market or from use;
- temporary removal of the unsafe products from the market, followed by rectification of the problem and a return to the market.

A recall involves notification to statutory authorities.

Trade recall

A **trade** recall involves recovery of the product from distribution centres* and wholesalers and may also involve recovery of product from hospitals, restaurants and other major catering establishments, and outlets that sell food manufactured for immediate consumption or food that is prepared on the premises.

* Once product has left the premises of the sponsor, or premises owned and controlled by the sponsor, it is effectively in a distribution centre, or wholesaler. If a sponsor's product represents a public health and safety risk and is in a distribution centre or wholesaler as described above, recovery of the product is classified as a **trade recall** and notification to the relevant authorities is required.

Consumer recall

A **consumer** recall is the most extensive type of recall. It involves recovery of the product from all points in the production and distribution networks/chains** including any affected product in the possession of consumers.

** Distribution network/chain includes but not limited to trade outlets, retail outlets, supermarkets, grocery stores, health food stores, gyms.

FSANZ coordinator

The FSANZ coordinator is a Commonwealth officer of Food Standards Australia New Zealand (FSANZ).

State and Territory coordinators

A State or Territory coordinator is the senior food officer (or their deputy) of the health authority in the State or Territory. The State or Territory where the product has been manufactured or into which the product has been imported is referred to as the **Home State or Territory**.

Sponsor

A sponsor is the firm, (eg. individual, partnership, corporation), or other entity having primary responsibility for the supply of the product in Australia. A sponsor will often be a manufacturer or importer. There may be more than one sponsor for a particular product.

The term *sponsor* in this Protocol is used interchangeably with the term firm.

Recall Plan

A Recall Plan is a written document that explains in detail the procedures a sponsor will follow when conducting a recall.

The Recall Plan should ensure the objectives of this Protocol are met as outlined in Section 1 'Conducting a product recall' however *how* the objectives are met is the responsibility of individual business.

Conducting a product recall

There are three primary objectives in any food recall:

- stop the distribution and sale of the affected product;
- inform the statutory authorities (all recalls) and the public (consumer recalls only) of the problem; and
- effectively and efficiently remove from the marketplace any product, which is potentially unsafe.

The key steps in conducting a successful recall are:

1. convening of a recall committee;
2. hazard/risk assessment;
3. determining the level of the recall;
4. determining who should be notified of the recall;
5. determining the mechanics of notification and recovery; and
6. post recall reporting.

1 Convening the recall committee

Senior management personnel should be nominated to represent the principal areas involved in a recall. Typically, a recall committee would have the following members:

- the recall coordinator (ideally the firm's senior technical executive);
- the managing director;
- the head of public relations;
- the head of manufacturing;
- the head of warehousing and distribution;
- the head of purchasing;
- the head of sales and/or marketing; and
- the firm's legal representative.

It may be the case for small firms that the committee may consist of just one or two people, each having a number of the above responsibilities.

The responsibilities of each committee member in regard to a recall should be clearly defined in a product recall plan. For example, the recall coordinator is to notify the FSANZ coordinator; the head of public relations is to prepare a media statement; and so on (see *Attachments 10 to 14*).

2 Hazard/risk assessment

A product recall has ramifications for industry, government and consumers. It is critical that all the necessary information is obtained and thoroughly analysed before a decision is made to initiate a recall. The decision is made in consultation between the sponsor, the FSANZ coordinator and the Home State or Territory coordinator.

The following information is required to assist in conducting an effective recall. That information is as follows.

The problem

- nature of the problem (type of hazard and assessment of risk); and
- results of tests and other investigations on suspect sample or other samples.

The product

- product brand name and description, including package size and type;
- lot identification (batch or serial number);
- 'use-by date', 'packed on' date, or 'best before' date where relevant (may also be the lot identification);
- Australian sponsor and contact telephone number (including after hours number.);
- quantity of the batch manufactured, and the date and the amount released;
- distribution within Australia; and
- overseas distribution of any exported product.

Other relevant information

- name and telephone number of the person reporting the problem;
- date of the report;
- number of similar reports received (eg. customer complaints);
- availability for investigation of suspect sample or other samples;
- action proposed by the sponsor; and
- proposed recall level.

Expert advice may be needed to determine the seriousness of the hazard.

Sponsors should also consider the possibility of the same problem or type of contamination occurring in different package sizes of the same line, in product with a different use by date, in a different product line all together or same or similar product packaged under a generic label.

If the hazard/risk is found to be one or more raw materials supplied to the sponsor, then the supplier of the raw materials and their customers need to be notified and the affected supply chain alerted.

Early and comprehensive notification to the FSANZ coordinator will assist in a speedy and efficient recall.

3 The level of food recall

There are two levels of food recalls, a **trade** recall or a **consumer** recall.

The level of recall should be in accordance with the definitions outlined on page 6 and determined in consultation between the sponsor, the FSANZ coordinator and the Home State or Territory coordinator.

In determining the recall level, the principal factors to be considered are:

- the channels by which the goods have been distributed (eg. product destined only for catering purposes); and
- the extent of distribution (eg. has the product reached the retail chain).

4 Who should the sponsor notify about the recall

Notification has three aspects:

- notifying statutory authorities;
- notifying the distribution network/chain and trade customers; and
- notifying the public (in the case of a consumer level recall).

5 The mechanics of notification

Statutory Authorities

Authorities and parties that need to be notified of a recall include:

- FSANZ;
- Home State/Territory coordinator; and
- Commonwealth Minister responsible for consumer affairs and the State or Territory Ministers responsible for consumer affairs and fair trading (depending where the food was distributed).

Information on how to notify FSANZ and State and Territory coordinators is listed in *Attachment 2*. Information on how to notify relevant Commonwealth and State or Territory Ministers responsible for consumer affairs is listed in *Attachment 4*.

FSANZ needs to know because it is responsible for coordinating recalls nationally as required by Food Standards Australia New Zealand Act 1991, and keeping health authorities informed of potential food-related public health and safety issues in their jurisdictions. Ministers responsible for consumer affairs are required to be notified under either the Commonwealth Trade Practices Act 1974 or the equivalent State and Territory legislation. However, under current Queensland and Tasmanian fair trading legislation there is no requirement for notification, but it is advisable that those Ministers are notified.

Distribution network

Procedures for notifying the distribution network and trade customers should detail methods for stopping distribution and sale, for storing the recovered product safely, and for isolating and disposing of the product.

A trade recall requires notification to the distribution network/chain and trade customers.

Firms should maintain current contact lists (including contact person, telephone, fax and email details) for suppliers, distributors, wholesalers and retailers.

Notifying the public is not required for a trade recall.

Information on how to notify distribution networks/chains and trade customers for a recall is listed in *Attachment 5*.

As part of a recall, customers may be advised to return the food to the place of purchase. This may be retail premises rather than the wholesaler, manufacturer or importer. A recall plan should detail how a sponsor will inform the business receiving returned goods on how it should dispose of that food. Any business that has food returned to it, as part of a recall, is obliged to comply with the food disposal requirements contained in Food Safety Standard 3.2.2 (see *Attachment 7*). In addition, the Home State/Territory may oversee disposal and issue a statement that the product has been destroyed to its satisfaction (see page 17).

Public

In the case of notifying the public of a consumer level recall, the procedure should detail which forms of media are to be used and how contacts are to be informed. Public notification is essential if the product in question is offered for sale to the consumer. Information on how to draft paid advertisements and media releases, along with examples are listed in *Attachment 6*.

6 Post recall reporting

A recall plan should include a recording system for logging food that has been returned in order to ensure that all food is retrieved. The effectiveness of a recall is assessed on the basis of the amount of product returned as a proportion of the amount of product that left the sponsor, while taking into account the retail turnover of the product.

In addition to assessing the effectiveness of a recall, it is necessary to follow up by investigating the reason for the recall and taking action to prevent a recurrence of the problem.

FSANZ requires post-recall reports following a recall. These requirements are set out in *Attachment 8*.

7 Forward planning

Other procedural documentation that will assist in a recall should include essential reference information such as the following:

- a list of telephone contacts for firm personnel, Commonwealth and State and Territory health authorities and media contacts;
- overseas agents;
- a list of telephone contacts for suppliers, distributors and trade customers;
- blank press advertisements and media releases, also an example of a completed press advertisement and media release; and
- the Food Recall Notification Form — *see Attachment 1*.

Important: telephone contacts should include 'after hours' numbers. An up-to-date list of State and Territory health authority telephone contacts can be found on the FSANZ food recall web page <http://www.foodstandards.gov.au>

Mock Recalls

In preparation for any recall, a recall plan is essential and should ideally be tested by simulation exercises based on current products. The recall plan should be thought of as an emergency procedure, similar to an evacuation plan in case of fire. By putting your plan into practice there is an opportunity to rectify any problems prior to a genuine recall.

Staffing a Recall

It is worth considering whether you would need help to manage a recall. This could mean employing extra staff to enable permanent staff to deal with the recall. Specialist help may also be required to draft and deliver your recall message. Most importantly it is necessary to prepare thoroughly prior to facing a real emergency.

Using a consultancy or an agency

Many firms involved in previous recall campaigns have felt the need to ask for specialist advice from an external agency. There are consultants who specialise in every type of marketing communication – from advertising and direct mail, to public relations and corporate communications. There are also many agencies that can give all-round advice. If your firm already employs an agency, you can ask what experience it has in dealing with food recalls.

Firms may not need to retain a consultancy in case of future recalls, but having some relevant companies' details on file may be useful. Agencies may be listed with various trade associations or listed under 'advertising agencies' or 'media information &/or services' in the telephone directory. The Public Relations Institute in each State or Territory may be able to provide a list of consultants to choose from.

Paying for a Recall

A recall will cost money. Just as it makes sense to agree with your suppliers and business customers in advance about who should organise a recall if it is needed, you should also decide who would pay for what. Insurance may cover the cost of carrying out a recall and any loss of profits related to it. It is worth finding out if you already have this cover under any existing business catastrophe or disaster insurance policy. If not, you may want to consider taking out a specialist policy.

8 Responsibilities of a sponsor when a recall is necessary

As previously mentioned a sponsor is the firm, (eg. individual, partnership, corporation), or other entity having primary responsibility for the supply of the product in Australia. A sponsor will often be a manufacturer or importer. There may be more than one sponsor for a particular product.

Sponsors have the following general responsibilities in relation to food recalls:

- to maintain records and establish procedures that will facilitate a recall. Records should be in a form that can be quickly retrieved;
- to have a written recall plan; and
- to initiate the action for implementing a recall.

A flowchart of sponsor responsibilities is at *Figure 1*.

Product tampering/extortion

Food products can be the target of isolated, post-production or post-sale contamination. This may be accompanied by extortion demands or it may be intended to cause adverse publicity or economic harm to a supplier or retailer. In these circumstances any decision to recall the product should be made only after full consultation with the police, the relevant health authorities and the manufacturer, supplier or retailer of the products. Widespread recall may not be appropriate or necessary.

The relevant authorities to be advised in the event of a product tampering or extortion incident are the police, Commonwealth agency responsible for consumer affairs and the health authority located in the State or Territory where the actual incident took place rather than the Home State or Territory.

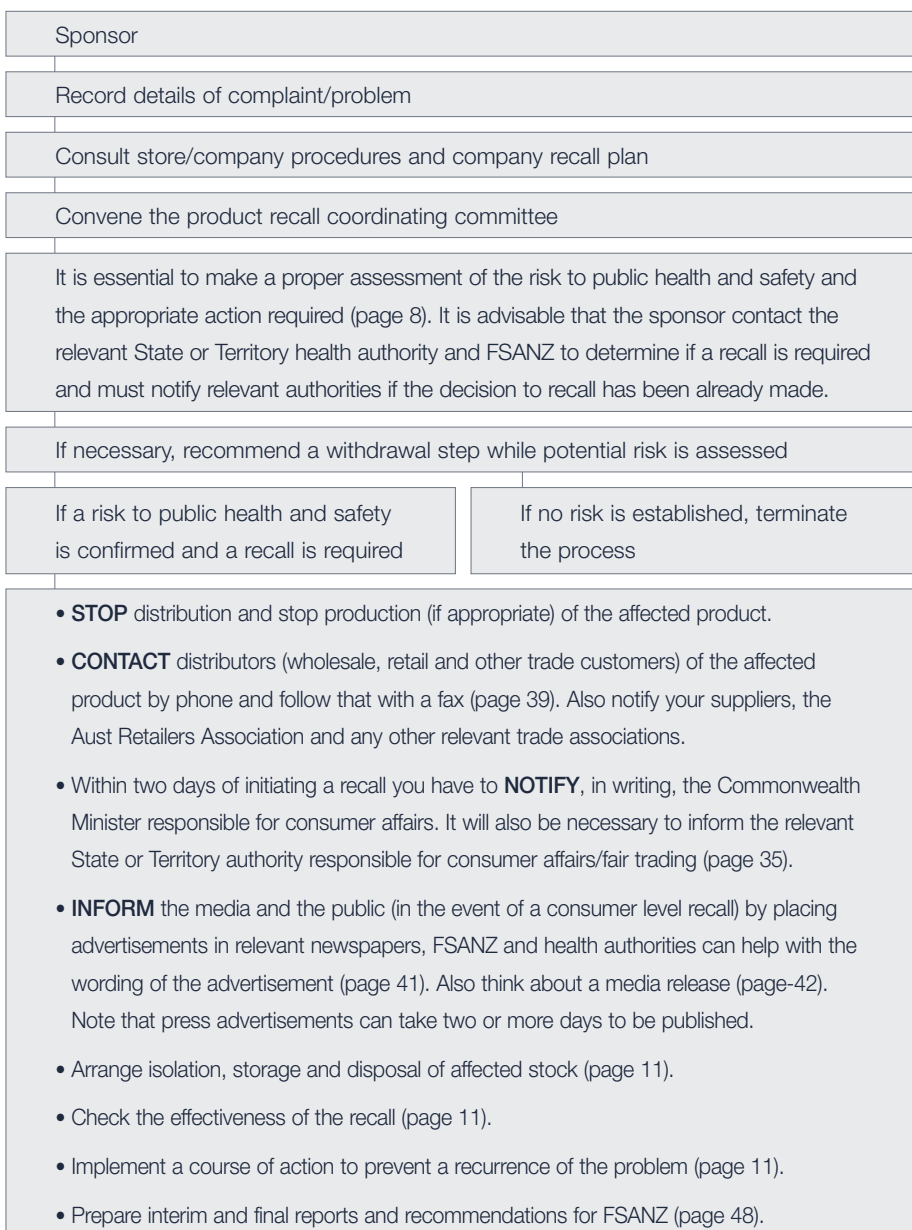
FSANZ's role in a product tampering incident is solely to co-ordinate and monitor if a recall results.

Figure 1: Responsibilities of sponsors when recalling food

A potential recall situation may first come to the notice of any of the following:

The sponsor, retailers, health officials, the police or consumers.

It is essential to notify the sponsor BEFORE any recall action is decided.



9 Records

To expedite a recall, records as detailed below should be made that are easy to follow and kept readily available.

In accordance with the principles of good manufacturing practice, sponsors should keep records for the products they manufacture. The records should:

- contain complete and up-to-date histories of all batches of products, from starting materials to the finished products;
- allow for determination of the use and disposal of all raw materials and bulk products; and
- provide adequate details of customers to whom the end product has been sold or distributed.

Complete records relating to the manufacture of food products should be kept for at least one year after the shelf-life of the batch. If foods have a shelf-life of two years or more, complete records relating to manufacture should be kept for at least five years after the date of manufacture.

All sponsors should maintain records of complaints received about a product. Competent personnel should assess complaints and suitable action should be taken. Such action may include a recall. The assessment of each complaint and the action taken should be shown in the sponsor's records.

Distribution Records

Distribution records are an important part of the recall process.

It is therefore strongly recommended that sponsors have a system in place that is able to produce up-to-date lists of distributors and retailers when needed.

As most standard reports from existing electronic financial and stock control systems have to be manipulated to include the required information for a recall, a specific recall report should include the capability of sorting distribution information by state and suburb to avoid unnecessary delays.

Because many sponsors use intermediate distributors the sponsor is not often in a position to provide distribution information further down the distribution chain.

Sponsors should check with their distributors that they have a similar ability to quickly produce a list of retail outlets receiving product and a means to quickly notify retailers.

Sponsors' recall procedures

As noted, sponsors must have developed procedures for recall action that are tailored to their own operations. It is a requirement of Food Safety Standard 3.2.2 to have a written recall plan.

All senior personnel should be familiar with their responsibilities in connection with a recall and with the records system for products.

Pre-recall

Where assessment of a food product suggests that a recall may be necessary, the sponsor is encouraged to initially contact FSANZ or the Home State or Territory health authority.

10 Recall

The sponsor has prime responsibility for implementing the recall and for ensuring compliance with the recall procedure.

Where ever possible, no recall, regardless of level, should be conducted without consultation with the relevant authorities (FSANZ and Home State/Territory health authority) and without agreement on the recall strategy.

In cases of serious potential risk to consumers, firm personnel may need to immediately disseminate information about the recall. This may include telephone advice to quarantine stock pending recall or possible recall.

Such advice should be based on the agreed text of the recall letter, fax or telex, which must always be sent as confirmation of oral advice (see *Attachment 5*).

Firm representatives (technical and sales representatives) may be used to recover stock that is subject to recall, providing the requirements of State and Territory food regulations are met and suitable recall letters are sent.

For a consumer level recall, the sponsor should insert, as quickly as possible, a paid and approved advertisement(s) in the relevant daily newspaper(s) of each State and Territory in which distribution may have occurred. The sponsor should also prepare a recall letter for distribution to wholesalers and retailers after discussing the text with the FSANZ coordinator. A recall can involve wholesalers and distributors in considerable time and expense in issuing credit notes, handling returned stock and forwarding replacements.

Sponsors are also required to notify overseas businesses of recall actions that affect them.

As outlined in *Attachment 8*, the sponsor should provide the FSANZ coordinator with an interim report and a final report of the recall.

11 Responsibilities of Manufacturers, Wholesalers and Importers

As mentioned previously a sponsor is the firm, (eg. individual, partnership, corporation), or other entity having primary responsibility for the supply of the product in Australia. A sponsor will often be a manufacturer or importer. There may be more than one sponsor for a particular product.

Sponsors who are manufacturers, wholesalers or importers have the following general responsibilities in relation to food recalls:

- to maintain records and establish procedures that will facilitate a recall. Records should be in a form that can be quickly retrieved (refer to page 15 – Distribution Records);
- to have a written recall plan;
- to initiate the action for implementing a recall; and
- contact overseas supplier/manufacturer when initiating recall action.

12 Responsibilities of Distributors

Distributors play an important role in food recalls. The sponsor is dependent on the assistance and cooperation of these bodies to ensure the effectiveness of the recall process.

Distributors should also develop procedures for recall action that are tailored to their own operations. All senior personnel should be familiar with their responsibilities in connection with a recall and with the records system for products.

Distributors have the following general responsibility in relation to food recalls:

- to maintain distribution records and establish procedures that will facilitate a recall (refer to page 15 – Distribution Records). Records should be in a form that can be quickly retrieved.

13 Product Recovery

Products may be recovered by returns to supermarkets, returns via distribution chains or direct returns from consumers.

The recovered product should be returned to a central site or, in the case of a widely distributed product, to major recovery sites.

The recovered product must be stored in an area that is separated from any other food products.

Accurate records must be kept of the amount of recovered product and the lot identification details of that product.

After recovery, a product may be corrected or reprocessed so it is fit for human consumption. Corrective action or reprocessing should only be conducted after full consultation with the Home State or Territory health authority. If it is unfit for human consumption and is stored in an isolated country area it may be destroyed or denatured under the supervision of the store management or the local health authority. If the product is stored in a metropolitan area it should be destroyed or denatured as directed by the State or Territory health authority.

14 Responsibilities of FSANZ when a recall is necessary

The responsibilities of the FSANZ coordinator in relation to a food recall are as follows:

- notify and consult with the sponsor before initiation of any recall action;
- liaise with the coordinator in the State or Territory health authority of manufacture of a product subject to recall and liaise with and inform the other State or Territory coordinators of the recall;
- liaise with the sponsor and provide advice and assistance in relation to letters, advertisements and recall strategies. Sponsors will be informed of actions being taken by the coordinator in advising third parties (such as the Australian Defence Force, the Australian Retailers Association and the Australian Food and Grocery Council);

- in recalls involving consumers, and where warranted, liaise with the sponsor and relevant State and Territory coordinators to prepare a media release for immediate use by the media (possibly including ethnic and regional media). This is done to bring the problem to consumers' attention as quickly as possible since there may be a delay of several days in newspapers' publication of paid advertisements. Media releases are worded so as to minimise public alarm;
- where necessary, liaise with officers of the Competition and Consumer Policy Division of the Department of the Treasury and officers of the Department of Agriculture, Fisheries and Forestry Australia,
- where exported Australian-made foods are subject to recall, liaise with the sponsor in order to determine
 - the recall strategy for the exported goods;
 - the form of advice about the recall to be given to health authorities in the importing countries; and
- forward copies of sponsors' recall reports and related papers to the Consumer Affairs Division of the Department of the Treasury during the recall campaign.

General responsibilities of the FSANZ coordinator include:

- provide copies of the Food Industry Recall Protocol to all food sponsors on request;
- in the case of imported foods, the coordinator will liaise with the importer of the goods and the Australian Quarantine and Inspection Service (AQIS). AQIS will further liaise with the importer and/or exporter where necessary. A risk assessment will then be made by a panel consisting of members of Food Standards Australia New Zealand and the Australian Quarantine and Inspection Service and other parties including the sponsor as necessary.
- maintain detailed records of individual recalls and an electronic database containing summaries of recalls; and
- prepare summaries of all recalls for review at meetings of Food Standards Australia New Zealand.

15 Commercially sensitive information

Firms providing information to Food Standards Australia New Zealand may regard it as commercially sensitive or private in nature. If this is the case, the Authority should be advised. The exception to non-disclosure of such confidential information would be section 39 of the *Food Standards Australia New Zealand Act 1991*, which authorises the disclosure of information deemed to be 'confidential commercial information', as defined in section 3 of that Act, is maintained by the Authority in certain circumstances.

Because Food Standards Australia New Zealand is a Commonwealth authority it is subject to Commonwealth government administrative laws, which means that its actions are open to public scrutiny. The Freedom of Information Act 1982 makes provision for public access to

certain documents in the Authority's possession. The Authority is required to provide access to documents in its possession unless the documents sought are exempt.

Similarly, State and Territory health authorities are subject to government administrative laws and requirements. If these authorities are a sponsor's first point of contact the sponsor should inform them if it is supplying 'confidential commercial information'.

16 Responsibilities of a State or Territory Health Authority when a recall is necessary

The State and Territory health authorities are responsible for monitoring the efficiency of food recalls.

State and Territory health authority coordinators are responsible for passing on product reports and recall action information to the FSANZ coordinator, for liaising with the FSANZ coordinator on recalls proposed in their State or Territory, and for supervising and monitoring the effectiveness of recalls.

Any matter reported to a State or Territory coordinator should be notified to the FSANZ coordinator without delay if, in the opinion of the State or Territory coordinator, recall may be a possibility. Sponsor's advice on a proposed recall must also be forwarded (preferably by telephone) to the FSANZ coordinator.

State and Territory coordinators are to provide details of consumer-level recalls to other relevant organisations in their jurisdiction.

In addition, the Home State or Territory coordinator in which the head office of the sponsor is located will check regularly to determine the proportion of affected goods recovered or corrected and to obtain details of any further concerns.

At the conclusion of a recall, the local health authority may be asked to oversee the destruction of the recalled product and issue a statement certifying that the product has been destroyed to the satisfaction of the State or Territory health authority.

Chapter 2 - Writing your own company recall plan

What is the aim of a food recall plan

A recall plan must set out in writing how a sponsor will go about ensuring that unsafe food is recalled.

To do this, the recall plan must contain the procedures the sponsor needs to follow on:

- 1) determining whether a recall is necessary and if it is:
 - 2) what type of recall is needed i.e. trade or consumer;
 - 3) how to inform relevant government authorities;
 - 4) how to stop further distribution and sale of unsafe product;
 - 5) how to inform businesses that have received food that is to be recalled of the recall;
 - 6) how to inform the public of the recall;
 - 7) how the FSANZ recall coordinator will be provided with interim and final reports on the recall and;
 - 8) outline the role and responsibilities of recall committee members with respect to the tasks that need to be carried out by the sponsor when conducting a food recall.

This chapter is designed to provide assistance to food firms on how to write these procedures.

Developing the food recall plan

When developing a food recall plan the sponsor must consider the following steps:

Step 1

Does my business need a recall plan?

Decide that your business needs to comply with the Standard because you are a distributor, importer, wholesaler or manufacturer of food and if so proceed to step 2.

Step 2

Who is going to develop and document the system or document your existing plan?

Decide who is going to develop and write the plan and whether they will need assistance and what type of assistance may be required.

Step 3

Write the document

Develop and document the plan following the framework below. The system may be part of an Emergency

Management Plan or Crisis Management Plan. It may be a part of a Quality Assurance Plan or it may stand alone.

Step 4

Train staff

Ensure all your staff that have a role in the recall are clear on what that role is.

Step 5

Carry out a mock recall within the confines of your business

This will give you the opportunity to familiarise your staff with the procedures, identify any problems in practice and amend the plan. Make sure that everyone in your business understands that the recall is a 'trial' and not the real thing. If you are sending faxes to other companies, make sure it is clear that it is a 'trial'. In this case faxes should not be sent to FSANZ.

Step 6

Review the plan

Regularly review the plan, particularly if you change the products you manufacture, sell or import, change staff or staff responsibilities, change distribution networks or there are changes to your legal obligations. You should also review your plan if your company carries out a recall to assess whether the plan was effective or whether changes need to be made.

Example of a recall plan

Following is an example of a recall plan for a medium sized food business that sells potentially hazardous products to the retail sector. It incorporates what a documented recall system could entail for a business this size.

This recall plan is intended to be an example only and is indicative of the elements that should be included when a business writes such a plan. The plan sets out in detail the procedure the business will follow in the event that a product recall is to take place.

Smaller sized food businesses

The plan also describes the roles and responsibilities of individual recall committee members for a medium sized business. However, in smaller size businesses the recall committee may consist of one or two individuals (eg. the owner), having responsibility for several or all aspects of the recall.

Businesses can follow this example as a template or may choose to write their recall plan in another format that best suits their particular needs.

EXAMPLE RECALL PLAN

Company Objective, Details And Contacts

Introduction

Under the Food Safety Standards, wholesalers, manufacturers and importers must have a system to recall unsafe food.

[Insert company name] has in place a documented recall system that must be followed in the event that a product recall is necessary.

Company objective and purpose of the recall plan

The purpose of this recall plan is to outline the requirements and steps that must be taken in the event that one or more of *[insert company name]* products need to be recalled on the grounds that the product is unsafe. It can also be used when recalling or withdrawing foods for other reasons.

The aim of this plan is to:

1. stop the distribution and sale of the affected product;
2. effectively notify *[insert company name]* management, customers and appropriate authorities of the recall;
3. effectively and efficiently remove from the marketplace any product that is potentially unsafe;
4. effectively retrieve product from customer warehouses, retail stores and / or consumers;
5. effectively dispose of the unsafe recalled food;
6. conduct a post recall analysis and report on the outcome and effectiveness of the recall and provide the appropriate authorities with an interim and final report on the recall; and
7. implement corrective and preventative action plan to prevent a recurrence of the problem.

Following the completion of the recall, the company will conduct a post recall meeting to evaluate the effectiveness of the recall.

Scope

This procedure will be applied in the event it is necessary to recall or withdraw stock from customer warehouses, retail stores or consumers.

Responsibility

The ultimate responsibility for ensuring the correct application of this recall plan rests with the *[insert person responsible]* (eg: General manager) - Recall Coordinator. In the event that *[insert company name]* needs to initiate a recall it is the responsibility of the *[insert person responsible]* (eg: General Manager) to convene the recall committee and to conduct the recall following the procedures outlined in this plan.

Recall Committee

The recall committee consists of the following people.

[insert the names of people delegated on the recall committee]

For example this may include:

- General Manager
- Quality Assurance Manager
- Sales Manager
- Production Supervisor
- Purchasing Manager
- Administration Assistant
- Insurance, legal, technical and media advisors contracted where appropriate

(Note- For further examples of details required and responsibilities of members of a recall committee see Attachments 9 to 14)

The recall committee is responsible for co-ordinating all aspects of a product recall and ensuring all procedures are carried out thoroughly, and effectively.

1 Is a food recall necessary? – Convening the recall committee

Initial Information

The company may be informed of a problem with any of its products via the following mechanisms:

1. internal quality assurance testing indicates that there may be a potential problem with a particular product or batch (eg. microbiological results are outside acceptable limits);
2. customer complaints / feedback (eg. phone call or letter informing sales department of a potential problem by a customer or wholesaler);
3. a supplier of a raw material that is used by the company in making its products informs management that there is a problem with an ingredient; and
4. government authorities, such as the police, local council or health departments indicate that there may be a problem with the particular product.

Responsibility

If any person within the company is informed of a potential problem with a product they must inform the *[insert person responsible]* (eg: General Manager) as soon as possible.

The *[insert person responsible]* (eg: General Manager) in conjunction with the *[insert other team members names if applicable]* (eg: Quality Assurance Manager) will be responsible for assessing whether a recall is necessary and if it is what type of recall is needed as well as convening the recall committee.

Convening the recall committee

If a product is deemed unsafe or potentially unsafe then the *[insert person responsible]* (eg: General Manager) must initiate the recall plan, and as soon as possible convene the recall committee.

The recall committee should treat all actions outlined in this recall system with haste and diligence. *[insert Company name]* has a duty of care under the *Trade Practices Act 1974* to act responsibly in the event of a product recall and that public health and safety should be at the forefront of all decisions made by the committee at all times.

(Note- In smaller sized businesses the recall committee may consist of fewer people having responsibility for several aspects of the recall)

2 Hazard / Risk Assessment

Hazard Risk / Assessment

The recall committee will conduct a hazard / risk assessment of the product(s) in question and co-ordinate all aspects of the product recall and ensure all procedures are carried out thoroughly and effectively.

The “Product Hazard / Risk Assessment” form (*see Attachment 15*) should be filled in using information gathered from external sources as well as consulting production and despatch records regarding the product and batch code in question.

(Note-These forms must be completed thoroughly as all the information will be used in the event of the recall going ahead).

Initial assessment of the problem

This initial assessment will also take the following objectives into account:

- identify the potential problem with the food and assess whether a risk to food safety exists;
- determine whether additional information is needed such as further testing or expert advice (this may include FSANZ, the Home State or Territory coordinator or scientific experts), in order to make a final decision;
- determine whether the food may need to be withdrawn from the marketplace while the extent of the problem is being assessed. Note – a ‘withdrawal’ can only be conducted if the risk to public health and safety has **not** been established; and

- make a decision as to whether a recall is needed (trade or consumer) having regard to the severity of the problem and how widespread it may be.

If there is any doubt as to the safety of the product the FSANZ recall co-ordinator should be contacted for further advice on ph. (02) 6271 2222.

Determine if a recall or withdrawal is necessary

Responsibilities

It is the responsibility of the recall committee to closely examine the distribution records of the product in question in order to determine whether a trade or consumer level recall is required. The *[insert person responsible]* (eg QA Manager) should discuss the need for a trade or consumer level recall with the FSANZ recall coordinator. The "Product Hazard / Risk Assessment form is designed to help decision making in this process (see Attachment 15).

The FSANZ recall coordinator will confirm the type of recall required under the circumstances. The definitions of the types of recalls that can be invoked in this procedure are outlined on page 6 of this document.

Examples of the types of problems that may be encountered with *[insert Company name]* products and the type of recall that would be required under the circumstances are outlined below.

PRODUCT	PROBLEM	DISTRIBUTION	STATUS
<i>(insert the name of product here)</i>	<i>(insert an example of the type of problem a given product may exhibit)</i>	<i>(insert whether the product has been distributed to consumers at the trade or retail level)</i>	<i>(insert whether recall or withdrawal would be initiated and the reason)</i>

(for example, a company producing fresh pasta products for the retail market may include the following)

PRODUCT	PROBLEM	DISTRIBUTION	STATUS
All fresh filled pasta products	High Total Viable Count (TVC), Microbiological results indicate the presence of pathogens	Product has been distributed at retail level	Consumer Level Recall Product Food poses a safety risk. Results indicate under processing has occurred and the cook step has not reduced bacteria numbers allowing pathogens to persist or contamination has occurred after processing
All fresh filled pasta products	Wrongly labelled Best Before date (Best Before Date accidentally set too far ahead and not to product specification)	Product has been distributed at retail level	Withdraw Product the best before date of the product is inaccurate due to mislabelling
Pasta Sauces	Blown Packaging (High TVC) or Faulty vacuum seal on packaging container	Product has been distributed at retail level (withdrawal only).	Withdraw Product (Due to Low pH, product will not support pathogen growth hence
Pasta Sauces containing peanuts	Ingredient listing does not mention peanuts	Product has been distributed at retail level	Consumer Level Recall (Food may pose a safety risk to allergenic consumers)
All Product Types	Foreign object complaint (eg. metal contamination)	Product has been distributed at retail level	Consumer Recall Product (Food may pose a safety risk)
All product types	Underweight packaging	Product has been distributed at retail level	Withdraw Product (Trade Practices breach - food does not pose a safety risk)

3 Informing the relevant government authorities that a recall is or may be necessary

FSANZ Notification

Responsibilities

If a trade or consumer recall is considered necessary under Section 2 it is the responsibility of the *[insert person responsible]* (eg: Quality Assurance Manager) to inform firstly by phone and then in writing the FSANZ coordinator and the Home State or Territory coordinator that the company is going to initiate a recall.

The FSANZ recall coordinator in conjunction with the Home State or Territory recall coordinator will confirm this decision.

The *[insert person responsible]* (eg: Quality Assurance Manager) in the event of the recall proceeding will also inform in writing the Commonwealth Minister responsible for consumer affairs and the State or Territory Ministers responsible for consumer affairs in those states in which the product has been distributed (except for Tasmania and Queensland).

(An up to date list of all relevant contact numbers for the abovementioned authorities as well as examples of the appropriate notification forms are found in Attachments 1 to 4 or on the FSANZ website at <http://www.foodstandards.gov.au>. These notification forms should be included in your recall plan).

4 Trade Recall - Stopping further distribution and sale of the food being recalled

Responsibilities

In the event of a trade level recall it is the responsibility of the *[insert main team members]* (eg: General manager, Quality Assurance Manager and the Sales Manager) to coordinate this type of recall.

Determining Distribution of affected Product.

The *[insert person responsible]* (eg: Sales Manager) is responsible for determining which States and/or Territories the product has been distributed to, whether the product has been exported and if so to which countries as well as other customers that may be affected. This information can be obtained via customer invoice sheets that also note the lot identification details and batch numbers of all distributed products sold to individual customers. These sheets should be traced back to when the first delivery of the affected code took place.

The *[insert person responsible]* (eg: Sales Manager) is also responsible for contacting all affected customers by phone informing them of the problem with the product and then following this action up by facsimile. (For details on information required see *Attachment 5*).

In the event that the affected product may have been on-sold, for example via a distribution centre or warehouse it is the responsibility of the *[insert person required]* (eg: Sales Manager) to inform any customers that are likely to have done this and to request that these customers examine their own distribution records and provide the *[insert person responsible]* (eg: Sales Manager) with details as to where the products have been distributed. An example of a forwarding letter that distributors may use to inform their own customers in the event of a company recall is also detailed in *Attachment 5*.

The contact names and numbers for all the company's customers and distribution centres are in the customer register located in *[insert location]*(eg: the sales department procedures folder).

Determining the quantity produced

The *[insert person responsible]* (eg: Sales Manager) in conjunction with the *[insert person responsible]*(*insert other relevant committee members eg: Production Supervisor*) must also determine the total quantity of the batch in question, which can be derived from the production records relating to the batch code and subsequent day of production.

The *[insert person responsible]*(eg: Production Supervisor) is also responsible for conducting a stock take of the in-house storage facilities and isolating any remaining stock that relates to the affected batch. This stock must be placed on "HOLD", be clearly identified as well as isolated so that accidental distribution cannot occur.

Note - No stock is to be disposed of without clearance from the *[insert person responsible]* (eg: QA manager / General Manager).

The *[insert person responsible]* (eg: Sales Manager) should collate the above information on the Recall Distribution Register (see *Attachment 16*) and copies given to the *[insert person responsible]* (eg: General Manager and QA Manager).

5 Consumer recall - Informing the public about the recall

In the event that it is necessary to conduct a consumer recall all the steps outlined in section 4 above should be followed. In addition to this, the general public will need to be informed via a written press advertisement(s) placed in the relevant daily Australian newspaper(s) in each State or Territory in which the products have been distributed.

Responsibilities

The *[insert person responsible](eg: Sales Manager)* will provide the *[insert person responsible](eg: General Manager)* with a copy of the distribution register listing the States and Territories that the product has been distributed to.

It is the responsibility of the *[insert person responsible](eg: General Manager)* in this case to draft the pending press advertisement. A contact number for *[insert Company name]* must be included in this advertisement to allow consumers access to further information.

(An example as to the style and wording of such a press advertisement as well as a list of contact numbers for relevant daily Australian newspaper(s) is given in attachment 6).

The *[insert person responsible](eg: General Manager)* must also ensure that that any press advertisements clearly instruct the consumer what to do with the product (i.e. return the product to place of purchase for a full refund) or how to safely dispose of the product.

Note: The wording and format of the advertisement(s) should be submitted to the FSANZ recall coordinator and the Home State or Territory recall coordinator for approval prior to publication.

The *[insert person responsible](eg: General Manager)* will ensure that press advertisements are placed in the daily print media of each State and Territory in which the food has been distributed.

Wherever possible the advertisement should appear in the front pages of the daily print media. If this is not possible it should appear in the first half of the newspaper (early general news). The recall notice is not to be placed in the classifieds.

The advertisement should be double column in width and 10 centimetres deep and should be enclosed with a diagonally hatched boarder and preferably with the internationally recognised safety triangle in the top left hand corner. *(An example of the type of press advertisement required is given on page 43).*

Media Release

If the identified problem with the product poses an immediate or serious risk to public health and safety and where there may be a delay in the release of a press advertisement the Home State or Territory coordinator may require a media release to be issued. The FSANZ recall coordinator will inform the company if this is to be done and will help facilitate this process. Media releases are issued to ensure rapid and wide dissemination of information.

Responsibilities

The media release should contain the same information as the paid advertisement and should be developed jointly by the *[insert person responsible](eg: General Manager)* in consultation with the FSANZ recall coordinator.

In the case of both press advertisements and media releases the company should give consideration to informing ethnic and regional media and whether expert advice from a medical practitioner or other specialist may be required. It is the responsibility of the *[insert person responsible](eg: General Manager)* to check whether there may be a delay in the publication of a paid advertisement.

In addition to this the *[insert person responsible](eg: General Manager)* should select a company contact person to liaise with the media and to ensure that their contact details are included on the media release to allow access to further information.

6 Retrieving the recalled product and product disposal

Retrieval

Wherever possible *[insert person responsible](insert Company name)* will take all reasonable measures to retrieve stock in the market place and have it returned to the company.

Responsibilities

It is the responsibility of the recall committee in conjunction with the FSANZ recall coordinator and the Home State or Territory recall coordinator to decide how the recalled food is to be retrieved from the distribution chain and disposed of.

The *[insert person responsible](eg: Sales Manager)* is responsible for coordinating company sales representatives to retrieve affected stock from customers, warehouses and distribution centres and to encourage cooperation from all links in the distribution chain to ensure the recall is effective.

Products may be recovered by returns to supermarkets, returns via distribution chains or direct returns from consumers. Records of the product lot identification details and the amounts of products returned from customers and distribution centres must be kept (see *Attachment 16*). If the distribution is widespread the *[insert person responsible](eg: Sales Manager)* is responsible for establishing collection sites across the network in order to maintain control over the recalled goods and for ease of collection and return of affected product.

Disposal of non-returned product

Responsibilities

The *[insert person responsible](eg: Sales Manager)* must discuss the disposal of the non-returned product with the Home State or Territory coordinator before any advice as to product disposal is issued.

If the recall committee in conjunction with the Home State or Territory coordinator decide that the return of distributed product to the company is not feasible, it is the *[insert person responsible]*(eg: Sales Manager's) responsibility to instruct customers in the course of notification as to how to safely dispose of the product so that it cannot be used for human consumption in accordance with this procedure.

In this case where product is disposed of at market level, the *[insert person responsible]*(eg: Sales Manager) is to ensure that correct quantities of product have been obtained and recorded from customers, wholesalers and distribution centres prior to product disposal.

This information is to be recorded on the Recall Distribution Register (see Attachment 16) so that it can be used to assess the overall effectiveness of the recall.

All senior company representatives should be familiar with this recall procedure and with the records system for product distribution.

Returned Food

Responsibilities

The *[insert person responsible]*(eg: Quality Assurance manager) is responsible for carrying out any further testing of the returned product if required as well as ensuring any returned stock is clearly identified with a label and that this stock is held in a separate area to prevent accidental redistribution. No stock is to be disposed of unless clearance to do so is given by the *[insert person responsible]*(eg: General Manager or QA Manager).

Disposal of recalled food

Responsibilities

The *[insert person responsible]*(eg: Quality Assurance manager) in conjunction with the Home State or Territory recall coordinator will assess the disposition of the recalled product and decide the best method of disposal or reworking of the product as the case may be.

Recalled product that is being held, prior to disposal or possible reworking, must be separated from other food and clearly identified as 'recalled food' and not to be used subject to further advice.

The *[insert person responsible]*(eg: Quality Assurance manager) must determine which of the following options is appropriate for the recalled food eg.

- destroyed or otherwise used or disposed of so that it cannot be used for human consumption. If large amounts of food are to be destroyed in this manner the QA manager should seek advice from the Home State or Territory recall coordinator and the FSANZ recall coordinator as to the best method of disposal and obtain certificates of disposal if required (eg. land fill by local council, incineration or other method of disposal, through an authorised waste disposal company);
- further processed in such a way as to ensure its safety and suitability; and
- ascertain the returned product to be safe and suitable (eg. physical inspection in the case of faulty vacuum seals).

See Attachment 7 for the definition of food disposal.

7 Providing FSANZ coordinator with interim and final reports on the recall

Responsibilities

The *[insert person responsible](eg: Quality Assurance manager)* will provide the FSANZ coordinator with an interim and a final report on the effectiveness of the recall. These reports will be requested by FSANZ and are to contain the information FSANZ requires within the timeframe stipulated.

These reports are to give information to the recall coordinator regarding the effectiveness of the recall and what corrective actions have been taken both with respect to the recall and to prevent a recurrence of the problem in the future. It is the *[insert person responsible](eg: General Manager)* responsibility to ensure all members of the recall team in the course of their duties retain accurate records of relevant information such as amounts of returned stock, amounts of stock unaccounted for, copies of press releases, corrective actions taken, etc.

Post recall meeting

As soon as is practical the *[insert person responsible](eg: General Manager)* will convene the recall committee to discuss the effectiveness of the recall and to outline and put into effect strategies and preventative measures that will prevent the problem from recurring again. Items that will need to be addressed in this meeting include:

- conducting an audit of the process to identify hazards that have contributed to the cause of the problem in the product – Responsibility *[insert person responsible](eg: General Manager, Production Manager, QA Manager)*;
- changes that will need to be made to production and processing systems in order to prevent a recurrence of the problem – Responsibility *[insert person responsible](eg: Production Manager, QA Manager)*;
- reviewing, up-dating and revision of written company processes and procedures and ensuring that these changes are communicated to all staff – Responsibility *[insert person responsible](eg: QA Manager, General Manager)*;
- reviewing and revising staff training policies and procedures – Responsibility *[insert person responsible](eg: QA Manager, General Manager, Production Manager, Sales Manager)*; and
- updating production manuals and documented procedures to reflect these changes – Responsibility *[insert person responsible](eg: QA Manager)*.

In the event of a product tampering recall:

- reviewing company security systems and product packaging in order to prevent possible tampering of the product – Responsibility *[insert person responsible](eg: General Manager)*.

Attachments

Attachment 1 - Notification of recall to FSANZ

On the following page is a blank urgent food recall notification form. This form is to be filled in when a recall is to take place.

Upon receipt of this form, FSANZ will be in contact to request additional information so that any necessary government action can be initiated.

Urgent food recall notification form

Please complete and fax to FSANZ'S food recall coordinator on 02-6271-2278

Date _____

Sponsor

Firm name _____

Firm contact _____

Address _____

Phone _____ fax _____

After hours phone _____ fax _____

E-mail _____

Food Product Description

Food type _____

Brand name _____

Product size _____

Lot Identification/Batch Code _____

Where is the lot Lot Identification/
Batch Code located on the product _____

Date marking/Use by date/

Best before _____

APN/EAN or TUN _____

Quantity of product affected _____

Nature of Hazard Description

What is the hazard? _____

Has any testing been done? _____

If yes, what are the results? _____

Level of Recall

please tick Trade Consumer

Distribution

please tick Australia Overseas identify country _____

please tick ACT NSW NT QLD SA TAS VIC WA

Action proposed and action taken

Disposal of product (What do you want done with the affected product?)

Other relevant information

Attachment 2 - Contact details for the Australian and State and Territory coordinators

- The Food Recall Coordinator
Food Standards Australia New Zealand
PO Box 7186
CANBERRA BC ACT 2610
tel 02 6271 2222 fax 02 6271 2278
website: www.foodstandards.gov.au
- Environmental Health Services
Department of Health,
Western Australia
PO Box 8172
PERTH BC WA 6849
tel 08 9222 4222 fax 08 9222 4046
website: www.health.wa.gov.au
- NSW Food Safety Authority
PO Box 6682
SILVERWATER NSW 1811
tel 02 9741 4731 fax 02 9741 4898
website: www.foodauthority.nsw.gov.au
- Environmental Health Unit
Department of Health and Human
Services
GPO Box 125B
HOBART TAS 7001
tel 1800 671 738 fax 03 6222 7407
website: www.dchs.tas.gov.au
- Food Safety Victoria
Department of Human Services
GPO Box 4057
MELBOURNE VIC 3000
tel 1300 364 352 fax 03 9637 5212
website: www.foodsafety.vic.gov.au
- Program Directorate, Environmental
Health
Territory Health Services
PO Box 40596
CASUARINA NT 0811
tel 08 8999 2400 fax 08 8999 2700
website: www.nt.gov.au/nths
- Food Section
Environmental Health Branch
South Australian Department
of Human Services
PO Box 6 Rundle Mall
ADELAIDE SA 5000
tel 08 8226 7107 (24 hrs)
fax 08 8226 7102
website: [www.health.sa.gov.au/pehs/
Food/food-section.htm](http://www.health.sa.gov.au/pehs/Food/food-section.htm)
- ACT Health Protection Service
ACT Dept of Health
Locked Bag No 5
WESTON CREEK ACT 2611
tel 02 6205 1700 fax 02 6205 1705
website: www.health.act.gov.au
- Food Services
Environmental Health Unit
Queensland Department of Health
GPO Box 48
BRISBANE QLD 4001
tel 07 3234 0111 fax 07 3234 1480
website: www.health.qld.gov.au
- New Zealand Food Safety Authority
PO Box 2835
WELLINGTON NEW ZEALAND
tel 0011 64 4 463 2500
fax 0011 64 4 463 2501
website: www.nzfsa.govt.nz

Correct as at 25 May 2004

Up to date contact information is available
at the FSANZ Food Recall website [http://
www.foodstandards.gov.au](http://www.foodstandards.gov.au)

Attachment 3 - Notification to the relevant Commonwealth and State and Territory Ministers

Commonwealth Minister

Safety-related recalls, as defined in this document, involve the risk of death, illness or injury to a person or people. Section 65R of the *Trade Practices Act 1974* requires Sponsors voluntarily recalling products for safety-related reasons to notify the Commonwealth Minister responsible for consumer affairs in writing within two days of initiating the recall. Refer to draft letter to Minister on page 37.

The notification must state that the goods are subject to recall and set out the nature of the defect in, or dangerous characteristic of, the goods. The notification should be addressed to:

Parliamentary Secretary to the Treasurer,
Department of the Treasury
Langton Crescent
PARKES ACT 2600
tel 02 6263 2747 fax 02 6263 2830

A person who fails to notify the Minister, if convicted of a breach of section 65R, is fined up to 30 penalty units or \$3,300.00.

Section 65F(7) of the Act provides that, where goods which have been exported are recalled, a firm is required to notify in writing, as soon as practicable, overseas recipients of the recalled stock. That notification must state that the goods are subject to recall and, if the goods contain a defect, have a dangerous characteristic or do not comply with a prescribed consumer product safety standard, set out the nature of the problem or, in the last case, the nature of the non-compliance.

The sponsor must provide a copy of the overseas notification letter(s), fax(es) or telex(es) to the Minister responsible for consumer affairs within 10 days of sending them. The penalties for breaches of section 65F are the same as those for breaches of section 65R.

Section 65F(1) of the *Trade Practices Act 1974* empowers the Minister responsible for consumer affairs to order a supplier to recall goods which will or may cause injury to any person if it appears to the Minister that the sponsor has not taken satisfactory action to prevent the goods causing injury. The Minister's recall order will stipulate the manner and timing of the recall.

The Minister may also require that the sponsor inform the public and clients of the defect in or dangerous characteristic of the goods, of the circumstances in which the use of the goods is dangerous, and of safe procedures for disposing of the goods. If appropriate, the Minister may also order the sponsor to repair or replace the goods or provide refunds to consumers and clients within a specified period.

If goods create an ‘imminent risk of death, serious illness or serious injury’, section 65L of the *Trade Practices Act 1974* allows the Minister to order an immediate recall of the goods. If the safety risk is not imminent, the sponsor has the opportunity to discuss the Minister’s order at a conference before the Australian Competition and Consumer Commission.

It is a criminal offence for a sponsor to continue to supply goods subject to a compulsory product recall order made by the Minister responsible for consumer affairs under section 65F(1) of the *Trade Practices Act 1974*, or to otherwise breach the conditions of a compulsory product recall. The penalties are severe: a corporation can be fined up to \$200,000; and an individual can be fined up to \$40,000.

Inquiries about the recall provisions of the *Trade Practices Act 1974* should be directed to the Manager, Safety Policy, at the Competition and Consumer Policy Division of the Department of the Treasury — phone 02 6263 2747.

In order to advise the Minister that a recall has been completed satisfactorily, Food Standards Australia New Zealand, may conduct a food recall audit. Sponsors should therefore ensure that adequate documentary evidence and other written records are maintained in connection with recalls.

State and Territory Ministers

It is also necessary to notify the Minister responsible for fair trading in the States and Territories where the product was distributed except for Queensland and Tasmania. For further information, contact the Competition and Consumer Policy Division, of the Department of the Treasury (refer to contact details on page 38).

Letter to the Minister

The draft letter on page 37 provides a guide as to how to inform the Commonwealth Minister responsible for consumer affairs and the relevant State and Territory Minister of a recall – it should be faxed. (refer to page 10 – The mechanics of notification).

Commonwealth Minister Responsible for consumer affairs
[and State or Territory Minister responsible for fair trading if necessary]

Dear Minister

RE: NOTIFICATION OF FOOD RECALL

In accordance with section 65R of the *Trade Practices Act 1974*, we wish to inform you of a food recall.

Nature of food

[Provide information that will help identify the food — for example, food name, and size, lot identification (batch and code numbers), and use-by date, packed on date, or best before date, type of food such as confectionery, meat or milk]

Nature of the defect

[Say what the problem is; for example, bacteria or foreign matter.]

Action taken or proposed

[Say what you have done or are going to do. For example.

- We have notified the manufacturer of the food and relevant government authorities.
- We have notified all retailers known to have purchased the food.
- We are in the process of recovering the food from identified outlets and consumers.
- We are going to do a consumer-level recall.
- We have scheduled press advertisements to appear in the (name of newspaper or newspapers) on (date).]

Should you require any further information please contact us on [telephone number].

Yours sincerely

[YOUR FIRM NAME AND ADDRESS]

[DATE]

Attachment 4 - Contact details for relevant Commonwealth and State and Territory Ministers (usually the Minister responsible for consumer affairs or fair trading)

- Parliamentary Secretary to the Treasurer
Competition & Consumer Policy
Division
Department of the Treasury
Langton Crescent
PARKES ACT 2600
tel 02 6263 3997 fax 02 6263 2830
- State Minister for Consumer Affairs
Office of Consumer & Business Affairs
PO Box 1719
ADELAIDE SA 5001
tel 08 8204 9777 fax 08 8204 9769
- State Minister for Fair Trading
NSW Office of Fair Trading
PO Box 972
PARRAMATTA NSW 2124
tel 02 9895 0111 fax 02 9895 0222
- State Minister for Fair Trading
Office of Consumer Affairs
GPO Box 1244J
HOBART TAS 7001
tel 03 6233 4555 fax 03 6233 4882
- State Minister for Consumer Affairs
Consumer Affairs Victoria
GPO Box 123A
MELBOURNE VIC 3001
tel 03 96276000 fax 03 9627 6007
- Commissioner of Consumer Affairs
Consumer and Business Affairs
GPO Box 1722
DARWIN NT 0801
tel 08 8999 1999 fax 08 8999 7657
- State Minister for Consumer Affairs
Department of Consumer &
Employment Protection
Locked Bag 14
CLOISTERS SQUARE WA 6850
tel 08 9282 0777 fax 08 9282 0850
- State Minister for Fair Trading
ACT Office of Fair Trading
GPO Box 158
CANBERRA CITY ACT 2601
tel 02 6207 0400 fax 02 6207 0424
- State Minister for Fair Trading
GPO Box 3111
BRISBANE QLD 4001
tel 07 3246 1500 fax 07 3246 1504
- Minister for Consumer Affairs
Ministry of Consumer Affairs
PO Box 1473
WELLINGTON NEW ZEALAND
tel 0011 64 4 474 2750
fax 0011 64 4 473 9400

Correct as at 25 May 2004

Further information can be obtained
from the National Consumer Website:
www.consumer.gov.au

Attachment 5 - Recall letters, faxes and telexes to distribution centres, wholesalers, and customers

Initial notification for recalls should be done by telephone and followed up with written communication. Recall letters to be sent to distributors and wholesalers and overseas importers should include a factual statement of the reasons for the recall of the product, plus specific details that will allow the product to be easily identified.

The text of the recall letter should be agreed with the FSANZ coordinator before the letter is sent. The letter, which may be sent by mail, fax or telex should be sent as soon as possible after negotiation with the FSANZ coordinator; it must be sent within 48 hours of initiating the recall (example is set out on next page).

Heading

The heading should be 'Food Recall'.

Composition of text

The text of the letter should provide information about each of the following:

- the name of the product;
- the package size and a description of the packaging;
- the lot identification (batch or serial number);
- 'use-by date', 'packed on' date, or 'best before' date where relevant;
- other details necessary for fool-proof identification;
- the reason for the recall, nature of the hazard and the effects of consumption;
- the need to identify and quarantine the product;
- the method of recovery (or disposal, if appropriate) or product correction to be used;
- a request to retain the letter in a prominent position for one month in case stock

is in transit;

- distribution of the product; and
- firm contacts, including telephone and fax numbers.

If recalled stock has been distributed to a limited number of retailers or distributors and there is reason to believe that the product may have been further distributed to other distributors or retailers, the recall letter should include the following statement:

"If any of the recalled stock has been further distributed by you to other distributors or retailers please immediately let those distributors or retailers know of the recall. Please then telephone the nearest firm office shown below so that we can make contact with the distributors or retailers supplied by your firm.

Notification to Distributors and Customers

PLEASE CONTACT BY PHONE AND FAX ALL YOUR DISTRIBUTORS AND CUSTOMERS AND GIVE THEM THE FOLLOWING INFORMATION

Distributor's name and address

FOOD RECALL

[Your firm name] is conducting the following food recall.

The food involved is ***[name of the food, size of the food, use-by date, batch code and all other information that will identify the food]***.

Consumers are being advised that the above food is being recalled because ***[the reason for the recall]***.

As a precaution we are recalling all supplies of the food with the above identification.

Consumers have been asked to return the purchased food. They will receive a refund.

If any of the recalled stock has been distributed by you to other distributors or retailers please immediately inform those distributors or retailers of the recall. Then telephone our office (shown below) so that we can make contact with the distributors or retailers supplied by your firm.

Please hold the recalled food in an isolated and secure area pending further advice.

We apologise for the inconvenience.

[YOUR FIRM NAME, ADDRESS AND CONTACT NUMBERS]

[DATE]

Attachment 6 - Paid advertisements and Media releases

Paid advertisements

If the recall is to the consumer level, advertisements paid for by the sponsor are to be placed in the relevant daily print media of each State and Territory in which the product may have been distributed.

Choice of print media

The choice of print media should be made in consultation with the FSANZ coordinator and the coordinators in the appropriate State and Territory health authorities. The FSANZ coordinator has a list of the main newspaper(s) in each State and Territory. In addition, consideration should also be given to placing press advertisement in relevant ethnic, regional and community newspaper(s).

Size

Double-column and 10 centimetres deep is the minimum size for advertisements, which should be enclosed in a diagonally hatched border, preferably with the internationally recognised safety triangle in the top left-hand corner. (*Note*- consideration should be given to the appropriate font size and style to be used in the advertisement so as to ensure the printed text is easily readable).

Position

It is important that, wherever possible, recall advertisements appear in the front pages of the chosen daily print media. If this is not possible they should appear in the first half of the newspaper (early general news). The classifieds section is not suitable.

Text

The text of the recall advertisement should be submitted to the FSANZ coordinator for comment and confirmation before it is sent for publication.

Heading

The heading should be 'Food Recall'.

Composition of text

The text of the recall advertisement should provide information about each of the following:

- the name of the product;
- the package size and a description of the packaging;
- 'use-by date', 'packed on' date, or 'best before' date where relevant;
- any other details necessary for fool-proof identification;
- the reason for the recall;

- the need to identify and quarantine the product;
- the method of recovery (or disposal, if appropriate) or product correction to be used;
- where appropriate a description of possible symptoms and/or advice to consult a medical practitioner should be included (eg. symptoms of ciguatera poisoning include; tingling and numbness in fingers, toes and mouth etc.);
- firm contacts including telephone and fax numbers.

Media release

To ensure the widest possible dissemination, and to cover both electronic and print media, sponsors undertaking a voluntary recall should also consider issuing a media release. The media release should contain the same information as the paid advertisement and should be developed jointly by the sponsor, the FSANZ coordinator and the relevant State or Territory coordinator. Again, consideration should be given to informing ethnic and regional media. Expert advice from a medical practitioner or other specialist may be required.

The sponsor should identify a company contact person to liaise with the media and to ensure that their contact details are included on the media release to allow access to further information.

Media releases are intended to bring the problem to consumers' attention as quickly as possible: there may be a delay of several days in the publication of a paid advertisement.

Figure 2 Example of a food recall advertisement

Food Recall (1)

**PETE'S PASTA PRODUCTS
FRESH FILLED
CANNELLONI PASTA 500g PACK.
USE BY DATE 25/06/02** (2)

Pete's Pasta Products Pty Ltd is conducting a voluntary recall of the above product as a precautionary health measure. Tests have detected abnormally high levels of E.coli bacteria. (3+4)

Pete's Pasta Products Pty Ltd is working with health authorities on the problem.

The recall applies only to the product with the nominated size and use by dates. Customers should not consume the product. Any consumers concerned about their health should contact their doctor (5+6)

Customers are asked to return the product to the point of purchase for immediate full cash refund. (7)

We apologise for any inconvenience.

For further information please call 1800 808 966. (8)

Pete's Pasta Products Pty Ltd.
13 Wattle Avenue Canberra ACT 2600

(1) Type of recall (2) Name, size and description of product (3) Reason for recall
(4) Hazard (5) Identify (6) Quarantine (7) Disposal (8) Company contact details

Major Australian Newspapers

National

The Australian	tel 02 9288 3000	fax 02 9288 2396
The Australian Financial Review	tel 02 9282 3415	fax 02 9282 2484

Canberra (ACT)

The Canberra Times	tel 02 6280 2173	fax 02 6280 4884
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Sydney (NSW)

The Sydney Morning Herald	tel 02 9282 2833	www.smh.com.au
The Sun Herald	tel 02 9282 2277	fax 02 9282 3332
The Daily Telegraph	tel 02 9288 3606	fax 02 9288 3729
Sunday Telegraph	tel 02 9288 3000	fax 02 9288 3729

Melbourne (VIC)

The Age	tel 03 9601 2014	fax 03 9670 1329
Herald Sun	tel 03 9292 2739	fax 03 9292 2141
Sunday Herald Sun	tel 03 9288 1347	fax 03 9292 2100

Perth (WA)

The West Australian	tel 08 9482 3578	fax 08 9482 9091
Sunday Times	tel 08 9326 8383	fax 08 9325 3360

Brisbane (QLD)

Courier Mail	tel 1300 304 020	fax 07 3666 6687
Sunday Mail	tel 13 22 02	fax 07 3666 6689

Adelaide (SA)

The Advertiser	tel 08 8206 2000	fax 08 8206 3622
Sunday Mail	tel 08 8206 2711	fax 08 8206 3611

Hobart (TAS)

The Mercury	tel 03 6230 0665	fax 03 6230 0766
The Examiner	tel 03 6336 7111	fax 03 6334 7327

Darwin (NT)

Northern Territory News	tel 08 8944 9801	fax 08 8981 8392
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You should also consider the need to inform ethnic, regional and community newspapers. The FSANZ coordinator has a list of these newspapers in each State and Territory.

To place advertisements simultaneously – in a telephone directory you will find, listed under ‘advertising agencies’ or ‘media information &/or services’, companies that can:

- help you with placing your advertisement.
- help you with acquiring a short-term, emergency 1800 number.

(as at 25 May 2004)

Attachment 7 Clause 11 of Standard 3.2.2 (Food Safety Practices and General Requirements)

11 Food disposal

- (1) A food business must ensure that food for disposal is held and kept separate until it is:
 - (a) destroyed or otherwise used or disposed of so that it cannot be used for human consumption;
 - (b) returned to its supplier;
 - (c) further processed in a way that ensures its safety and suitability; or
 - (d) ascertained to be safe and suitable.
- (2) In subclause (1), 'food for disposal' means food that:
 - (a) is subject to recall;
 - (b) has been returned;
 - (c) is not safe or suitable; or
 - (d) is reasonably suspected of not being safe or suitable.
- (3) A food business must clearly identify any food that is held and kept separate in accordance with subclause (1) as returned food, recalled food, or food that is or may not be safe or suitable, as the case may be.
- (4) A food business must not sell food that has been already served to a person to another person unless the food was completely wrapped when served and has remained completely wrapped.

Attachment 8 - Post-recall reporting

One month and two months after the implementation of a recall the sponsor should provide the FSANZ coordinator with an interim and a final report respectively on the recall. The reports are to contain the following information:

- a copy of the recall letter (or fax) to customers;
- the circumstances leading to the recall;
- the action taken by the sponsor, including any publicity, with names of newspapers in which advertisements appeared;
- the extent of distribution of the relevant batch in Australia and overseas;
- the result of the recall (quantity of stock returned, corrected, outstanding, and so on);
- the method of disposal or otherwise of recalled stock, with certificates of destruction;
- action proposed for the future to prevent a recurrence of the problem;
- any difficulties experienced in conducting the recall; and
- details of written information provided by government agencies or industry organisations that assisted the recall.

This information can be used for modifying recall procedures and practices.

The interim and final reports give information about the effectiveness of the recall and form the basis of reports to State and Territory coordinators and to the Consumer Affairs Division of the Department of the Treasury. If the reports are unsatisfactory, further recall action may have to be considered.

Where the nature of the problem and appropriate remedial action are not apparent, Food Standards Australia New Zealand may investigate and, in some cases, might audit the recall process. The sponsor will receive advance notice of this so that it can assemble the relevant records.

The Food Standards Australia New Zealand may take action in response to the audit. This might involve for example, a review of the product.

Attachment 9 - Recall Team Personnel (Example Only)

(Insert Company name) **RECALL PLAN**

Company name: _____

Address: _____

Phone No. _____

Products produced _____

RECALL TEAM PERSONNEL

PETE'S PASTA PRODUCTS:

Name (insert names in this column)	Title (insert titles in this column)	Contact details (insert phone, fax, mobile & AH number)
	(eg: General Manager,)	
	(eg: Quality Assurance Manager)	
	(eg: Sales Manager)	
	(eg: Production Assistant)	
	(eg: Production Supervisor)	
	(eg: Purchasing Manager)	

Administration Support

	(eg: Secretary)
	(eg: Administration staff on shift)

Public Affairs (if applicable)

	On-call Media Advisor (if applicable)
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Insurance (if applicable)

	Manager Insurance
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Consultants (if applicable)

	(eg: Microbiological laboratory)
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FSANZ FOOD RECALL CO-ORDINATOR

	Food Recall Coordinator
	Commonwealth Minister responsible for consumer affairs
	State Health Agency

Attachment 10 - Responsibilities - General Manager (Example Only)

RECALL PLAN

General Manager

1. Liaise with Senior Management and responsible for coordinating the recall team with respect to other members activities
2. In consultation with the QA manager determine if a recall is necessary or whether further information and advice is needed in order to make a final decision. Assess risks with QA Manager Sales Manager and Production Supervisor
3. Identify and define the potential problem as per the FSANZ Food Industry Recall Protocol where the classification of what constitutes a recall is defined in the introduction. After consultation with FSANZ Food Recall Co-ordinator, decide recall classification Trade or Consumer
4. Notify Public Affairs and Insurance /Legal
5. Collate information. (see Attachments 1, 5 & 6)
6. Provide Sales Manager with wording of telex notification for customers
(see Attachment 5)
7. Approve with the assistance of the QA manager and FSANZ recall coordinator all draft correspondence sent to government ministers, authorities and the media.
(see Attachments 2, 4, 5 & 6)
8. Determine if and what staff resources may need to be deployed in order to help facilitate the recall or to cover staff that are on the recall committee. Ensure business continuity
9. Co-ordinate action to be taken
10. Check effectiveness of recall
11. Prepare final report and recommendations
12. Undertake post recall reporting and chair the meeting of the recall committee with respect to corrective action that will be undertaken to prevent a recurrence of the problem

Attachment 11 - Responsibilities – Quality Assurance Manager (Example Only)

RECALL PLAN

Quality Assurance Manager

1. Assess potential risks with General Manager, Sales Manager and Production Supervisor

2. Complete 'Product Assessment' form (see *Attachment 15*) and help determine whether a recall is necessary

3. Provide technical advice and support to the Recall Committee. Complete the FSANZ Urgent Food Recall Notification Form and fax to the FSANZ Food Recall Coordinator (see *Attachment 1*)

4. Within 48 hours of initiating the recall draft a letter to the Commonwealth Minister responsible for consumer affairs and once approved by the General Manager notify the Minister by fax. (see *Attachment 3*).
In addition to this, the Minister responsible for fair-trading in the States and Territories where the food has been distributed (except TAS & QLD) must also be contacted using the format of the letter described above. (see *Attachment 3* for contact details)

5. Assist the Sales manager in drafting the Customer Advice Notification letter. (see *Attachment 5*)

6. If applicable, liaise with the contracted laboratory on microbiological issues and to arrange to sample implicated food items and carry out environmental swabbing. Reporting on test results of suspect samples

7. Prepare media statement for approval (see *Attachment 6*)

8. In conjunction with the FSANZ recall coordinator determine method of disposal of recalled product (eg. sterilise, land fill etc.), ensure record of destruction

Attachment 12 - Responsibilities – Sales Manager (Example Only)

RECALL PLAN

Sales Manager

1. Notify internal departments

2. Assess potential risks with General Manager, QA Manager and Production Supervisor and determine the level of recall required

3. Collate all information Re: distribution of affected product(s) and report to General Manager

4. Determine with the aid of the Production Supervisor the total amount of affected product produced and assist in the location of any stock that may be present in storage facilities in-house

5. Obtain complete list of all customers that may have received affected stock and inform them of the problem by telephone and follow up the advice by fax

6. Advise customers of method of disposal / retrieval and obtain information as to how much affected stock is held by all customers. Keep records of this advice. (see *Attachment 5*)

7. At completion of recall determine the quantity of stock retrieved / disposed of vs. quantity of stock that is unaccounted for. This advice will need to be included in the final report regarding the effectiveness of the recall

8. Ensure replacement stock is available for affected customers to continue business continuity. Any alternative product must be approved by the QA manager prior to dispatch

9. Arrange for Sales representatives to pick up any affected stock from customers in the event that the product needs to be returned to the company for further investigation / destruction. (note – this must be done in accordance with Standard 3.2.2 Clause 11) or alternatively instruct the customer to dispose of the product in a manner that prevents it from being used for public consumption in accordance with the above clause

Attachment 13 - Responsibilities – Production Supervisor (Example Only)

RECALL PLAN

Production Supervisor

1. Assist Senior Management with recall

2. Isolate affected stock still in the holding room. Confirm stock is held segregated and clearly marked as on HOLD where staff have no access.
NOTE - NO STOCK IS TO BE DISPOSED OF WITHOUT APPROVAL FROM THE QA MANAGER – IN CASE IT IS NEEDED FOR TESTING

3. Liase with Sales manager re: potentially affected customers and assist with the notification procedure. Update General Manager as required

4. Liase with Union regarding Food Production Staff undergoing testing if required

5. Issue memo to Staff re direction of telephone calls to the administration assistant

6. Collect all information and give to Sales Manager for collation

7. Issue hard copy instructions to Food Production

8. If applicable, once the contracted laboratory has completed swabbing, arrange cleaning of food production

9. Ensure all food production areas, utensils, aprons, machinery, conveyor belts, cool rooms etc thoroughly cleaned and Sanitised

Attachment 14 - Responsibilities – Purchasing Manager / Administration (Example Only)

RECALL PLAN

Purchasing Manager

1. Assist Sales Manager and QA manager where necessary

2. Liase with manufacturers / suppliers if problem relates to raw materials.

3. If applicable organise suitable replacement raw materials (to be approved by QA manager)

4. If applicable, arrange for Contract Cleaners to carry out full sanitising of food production areas and follow up swabbing once it has been confirmed that in-house cleaning has been completed

Administration Assistant

1. Provide administrative support

2. Maintain an updated list of recall committee contact details as well as contact details of the relevant State and Territory government recall coordinators and FSANZ recall coordinator (*see Attachments 2 & 4*)

Attachment 15 - Product Assessment (Example Only)

RECALL PLAN

Product Hazard / Risk Assessment Form

Collection of Information about the product and problem

Product name and description,
including pack size and type

Batch or serial number

Best before date or Use - by Date:

Manufacturer/and contact telephone number:

Quantity of the batch date produced:

The Problem:

Name and telephone number
of the person reporting the problem:

Date of the Report:

Nature of the problem:
(eg food poisoning, foreign object or chemical
contamination, packaging problem etc)

Is the problem related to a fault with
a raw material used in the product?
(If so state the manufacturer of the raw
material and contact details, telephone no. etc.)

Number of similar reports received:

Results of tests and other investigations
on suspect or other samples:

Any other relevant factors:
(eg: Police informed etc)

Other Relevant Information:

Are samples available for investigation and
have they been taken (Note date and time etc):

Type of problem and
possible reasons for occurring:

Action proposed by [inset company name]

Proposed recall level:

FSANZ Australia

PO Box 7186
Canberra Mail Centre
ACT 2610 Australia
tel: 02 6271 2241
fax: 02 6271 2278
email: info@foodstandards.gov.au

FSANZ New Zealand

PO Box 10559
Wellington
New Zealand
tel: 02 473 9855
fax: 04 473 9855
email: nz.reception@foodstandards.gov.au



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