

Part of the
TEXAS PRODUCE CONVENTION 2011



Texas
FOOD SAFETY
Traceability & Recall
Pre-Convention Workshop



 **AUGUST 17, 2011, 1:30 - 4:30 PM**
ISLA GRAND BEACH HOTEL & RESORT
SOUTH PADRE ISLAND, TX 

Recall Mode

Steps to Conducting an Effective Recall

1. Incident investigation
2. Recall Preparation
3. Recall Implementation
4. Effectiveness
5. Close Out

Steps to Conducting an Effective Recall

1. Incident investigation
2. Recall Preparation
3. Recall Implementation
4. Effectiveness
5. Close Out
- 6. Litigation**

Steps to Conducting an Effective Recall

- Incident Investigation
 - Consumer complaint
 - Quality Control, etc
 - Regulatory investigation
 - Examination of evidence
 - Determine if there is a potential risk
 - Positive test result
- Stop or Go

Steps to Conducting an Effective Recall

- Recall Preparation
 - Pull together Recall Team
 - Determine affected products
 - What is in your control
 - What is in market place or distribution
 - Determine distribution (if any)
 - Determine recall classification
 - Reportable Food Registry
 - Is it reportable?

Steps to Conducting an Effective Recall

- Recall Preparation
 - Product disposition
 - Contact regulatory agency
 - Prepare Recall Communications
 - Recall Press Release
 - Letter to industry of those not receiving product
 - Did not ship but...
 - Consumer communication
 - Website
 - Communication to employees
 - Communication to regulatory agency

Steps to Conducting an Effective Recall

- Start Recall Action Implementation
 - Contact Lists
 - Start recall communications
 - Direct Consignees
 - Phone
 - Fax
 - Email
 - Press Release
 - Customers who did not get receive product directly
 - Consumer Communication
 - Website
 - Call Center

Steps to Conducting an Effective Recall

- Has the recall been effective?
- Have your consignee taken action as directed.
 - Stop selling
 - Issued recalls
- How much product has been Identified...
 - Warehouses
 - Retail or Food Service
- Disposal Verification
- Store checks for verification

Steps to Closing Out Recall

- Status Report to Regulatory Agency
- Close Out Request
 - Recall Notice
 - Distribution Information
 - Product information
 - Amount produced
 - Amount on hand
 - Amount in Marketplace

Steps to Closing Out Recall

- Effectiveness checks
 - Number of checks completed
 - How
 - Third Party
 - Amount of Recalled Product identified
 - Means of disposal and verification
 - Number confirmed customer complaints
 - Root cause analysis
 - Request a close out of the regulatory agency

Potential Litigation

- Do you have a Company Record Retention Policy?
- Recall Record Retention
- Check with your legal advisor

Recall Recap

- Review what happened
- What worked well?
- What did not work?
- How do we improve our process?

Common Recall Problems

- Contact Lists
 - Company
 - Supply
 - Customer base
 - Expertise list
- Traceability
 - Limited
 - Marginal
 - Errors

Common Recall Problems

- Multiple recalls
 - Affected products not accurately identified
 - Lot code information
 - Case and Package code do not match
 - Product lot code not accurate
 - Different lot codes from different production lines
 - Recall notice does not list action step
 - Stop Selling
 - Do not consume
 - If you handle – conduct a recall
 - If you procured other than directly

Recall Tools

- FDA Website
 - FDA 101: Product Recalls
 - 21 Code of Federal Regulations Chapter 1 Part 7
 - Recalls
 - FDA Model Press Releases
 - District Recall Coordinators

What Does the Retailer Need for an Effective Recall

- Brand
- Product Name/ Identity
- Size and Case Pack
- UPC/PLN#
- Code/Lot#/Exp Date
 - Consumer
 - Case
- Location of Codes
- Picture of package
 - Including code
- Reason
- Classification
- Product Disposition
- Regulatory Agency
- Manufacturing/Labeler
- Supplier Contact Info
 - Daytime and after hours
- Media Contacts
- Consumer Hot - line

Good Luck!

Gale Prince

Gale@galeprince.com

513-236-6264

