

FEATURES

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What to Do in a Recall

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No grower wants to think about recalls, but being prepared for this dreaded possibility can make the actual experience more manageable and help reduce its negative impact. There are measures you can take now to prepare, steps to follow during a recall and considerations to keep in mind throughout the process.

Before a recall

Now, before the pressure of a high-stress situation, do as much pre-planning as possible. Form a recall team consisting of the people within your organization who would need to be involved and could help to oversee the action steps of the recall.

Develop a written recall plan. Identify as many potential conditions as possible that would prompt a recall. Determine the information you'll need to collect quickly to account for all affected products, customer

details, product descriptions or model numbers, batch/lot numbers, dates, etc. Gather information needed for effective communication such as phone numbers and email addresses for the outside agencies you must contact. Use all of this information to create a form that would guide your actions and help you to document an actual recall. ([FSPCA has a template available online that can be customized to your needs](#)).

Trish Jarmon, Food Technical Manager for EAGLE Certification Group, advised that you also define the methodology for root cause analysis (such as "Five Whys" and "Fishbone Method") as part of your recall plan.

"A true root cause will be essential to defining the corrective actions and preventative actions that will need to be implemented after a recall," Trish stated.

Practice it

Mock recall exercises are the best way to prepare for an actual recall—that's why so many food safety certification schemes require them at set intervals. When conducting a mock recall, imagine every aspect: What might have caused the need for a recall? Can you track down every affected shipment to every customer? What do you do with any affected product that hasn't been shipped yet? How could you rectify this with your consumers?

Trish said, "Examine the following in your mock recall: 'What is the hardest item to trace? Is the recall team prepared? Are the members of the recall team knowledgeable of their responsibilities during the recall? And

are you able to see everywhere in your operation that is impacted by the recall?"

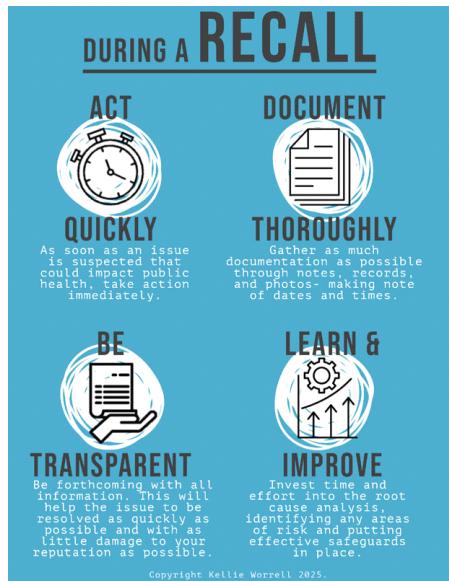
Recall steps

If circumstances arise that necessitate a recall, the only thing that will provide comfort is knowing that you've prepared for this and know what to do. First and foremost, stop! Quit producing and distributing everything until you can complete the next step. Identify the issue and what's being affected.

Only after you know exactly what the problem is and what portion of production has been affected can you potentially resume other production activities. You need to gather all vital information, such as the affected products, dates, quantities, lot/batch numbers, customers, etc. Next is the painful, but absolutely necessary, part: communicate this issue to relevant regulatory agencies, customers/consumers and your certification bodies.

Vegetable growers must notify the FDA (there are Recall Coordinators by region). Distributors, retailers and consumers should be contacted, using large bold print, "URGENT: FOOD RECALL." If you hold a valid food safety certification, contact your certification body (CB) as well. This is likely required by your certification standard and the CB can be an ally for you, helping you through the process.

Another good resource can be your local government agencies such as Extension. For practical steps of dealing with the recall, you must establish a way for the affected product to be returned to you or disposed of. Also, how will you make your customers whole? Do refunds or replacements need to be offered? How you handle this can be the first step to rebuilding trust with your customers.



During a recall

There are some key guiding principles to keep in mind as you go through the recall process. First, act quickly. Even if you don't have all of the details yet, be as proactive as possible. This helps to minimize potential harm to customers and shows that you're being forthcoming.

Along that same vein, be transparent! Don't withhold any information that could potentially be relevant. Being transparent always trumps appearing to hide something, no matter how small.

Next, document, document, document. Take pictures, save emails and make notes about conversations. Retain any and all documentation that could be related to the recall and affected product, and make sure each has the date and time noted.

Lastly, learn and improve

Accidents or missteps happen, but when we know better, we must do better. Dig into the root cause (or even causes) of the issue.

Trish said, "Your CB can provide support during a recall, such as reviewing root cause analysis and corrective actions and letting you know what may be missing to fully address the reasons for the recall and ensure it will not happen again."

It's vital that you put safeguards in place to prevent re-occurrence. Examine what similar weaknesses your operation might have that could cause issues. If you emerge from your recall with redoubled commitment to food safety, customers will recognize that. **IG**

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