

INFO SHEET No. PO06

This Info Sheet contains information about the management of records and systems and procedures for product recall. The information should be read in conjunction with the NASAA Organic Standard.

For further Information contact Certification Officer or email to certification. standards@nasaa.com.au

Product Recall

NASAA is often asked about the reasons for which certified organic product might be recalled (withdrawn) from the marketplace, and what systems and procedures operators are obligated to have in place as a risk management strategy should a violation of organic practices necessitate a product recall.

Section 9.10.1 of the NASAA Organic Standard states that the processor or handler must have a system of product recall with clearly designated procedures and protocols to ensure that recall of a NASAA labelled product can be quickly and effectively carried out.

There are two clear implications for organic operations emphasised within the Standard 1. That effective record keeping ensuring product traceability is maintained as a fundamental part of the operation and 2. That a documented plan is in place to implement an effective product recall. The purpose of this Info Sheet is to concentrate on the first issue, exploring the relationship between records, which enable trace-back of product, and the voluntary or mandatory recall (withdrawal) of certified organic product.

Establishing a Clear Audit Trail

An organic record keeping system must seek to meet two objectives:

1. To ensure that products can be traced as certified organic from the raw ingredients to final sale, and
2. To verify the input-output balance of organic ingredients and organic products, including current inventory.

Collectively, these two objectives identify the 'audit trail', i.e. the documentation necessary to determine the source, movements and transfer of ownership of any organic product.

A complete and thorough audit trail allows a processed product - a bag of organic corn chips, for example - to be traced back to the farm and fields from which the corn was harvested.

The concept of audit trail can also be extended to include production records and inputs, which serve to demonstrate that the producer is farming organically. Whilst producers might not be directly involved in implementing a product recall, their records can have a large impact on the success (speed of response and associated cost) in the event of product withdrawal.

A farm production operation may incorporate lot numbers as an important part of their audit trail. Lot numbers are codes assigned by producers to link products to the fields of origin and the year or date in which they were produced. Lot numbers may not be necessary if you sell direct farm gate, but can be essential if you sell into wholesale markets, or to food manufacturers.

A good lot numbering system is logical and can readily be decoded. The following examples provide guidance in relation to common systems in place;

1. Lot No OC0601 might code for Organic Corn, from bin #06, which was harvested in 2001.
2. Lot No B041431 might code for Broccoli, from field 04, harvested on the Julian Calendar date 143 (May 23), in the year 2001. In the Julian Date Calendar, each day is assigned a number in sequence from 001 through 365 (366 in a leap year).

The Julian System is commonly used for product coding and is essential for identifying a potential source of contamination in the instance of a product recall.



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Developing a Recall Plan

In line with section 9.10.1 of the NASAA Organic Standard, it is a legal requirement under Chapter 3 of the Food Standards Code, Volume 2 (Food Standards Code FSANZ) for manufacturers, wholesalers, distributors and importers of food to have in place a written recall plan.

Product *recall* is defined by FSANZ as "action taken to remove from sale, distribution and consumption foods, which may pose a safety hazard to consumers." The legislated mandate for a recall plan is related to food safety and associated risks and is conducted to protect public health and safety.

Product recall as denoted in the NASAA Organic Standard, however, specifically relates to the contamination of organic product (which may or may not pose a food safety risk). The recall of product, as defined in section 9.10.1 of the NASAA Standard relates to violations to the integrity of certified organic product (ie violations of the NASAA Organic Standard).

NASAA may mandate a recall where organic product is found to include the use of a prohibited processing aid, which has not been authorised for use by NASAA. NASAA may also mandate a recall if a product has been incorrectly labelled as 'certified organic' when constituent ingredients are only certified 'in-conversion'.

Product recall may incorporate a *trade* recall, which involves the recovery of the product from distribution centres and wholesalers; and/or a *consumer* recall which is the most extensive type of recall. A consumer recall involves recovery of the product from all points in the production and distribution networks/chains including any affected product in the possession of consumers.

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.

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

Remember that records will need to be maintained for five years under the NASAA Organic Standard and records are also required for all complaints received about a product, which in some instances may be assessed and initiate a product recall.



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Developing a Recall Plan (cont'd)

Some simple questions can be asked to assist in the establishment of a recall plan:

- *Does my business need a recall plan?*
You will need to develop a recall plan if your company is involved in the distribution, importation, wholesale or manufacture of food products.
- *Who is going to develop and document the system or document your existing plan?* Allocate a responsible individual or team to satisfy this requirement.
- *Write the recall document.*
Develop and document the plan, which may form part of an Emergency Management Plan or Quality Assurance Plan.
- *Train staff*
Ensure that all staff are aware of their responsibilities
- *Carry out a mock recall (confined to your business)*
This provides the opportunity to identify any problems in practice and amend the plan accordingly.
- *Review the plan*

To provide an example of a recall plan for a company producing fresh pasta:

PRODUCT	PROBLEM	DISTRIBUTION	STATUS	ACTIONED BY
All fresh filled pasta products	Microbial results indicate the presence of pathogens	Product has been distributed at retail level	Consumer Level Recall Product as food poses a safety risk as a result of inadequate cooking of pasta product.	FSANZ
All fresh filled pasta products	Wrongly labelled as "organic" when ingredients "in conversion"	Product has been distributed at retail level	Consumer Level Recall as food is incorrectly labelled as "organic"	NASAA
Pasta Sauces containing prohibited processing aid	Processing aid used in pasta sauce that has not been approved by NASAA	Product has been distributed at retail level	Consumer Level Recall as food is incorrectly labelled as "organic"	NASAA



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Further Information NASAA recommends that operators contact Food Standards Australia New Zealand (FSANZ) who have published a document 'Food Industry Recall Protocol – A Guide to Writing a Food Recall Plan and Conducting a Food Recall' 5th Edition June 2004". This document can be obtained from the FSANZ website at www.foodstandards.gov.au

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