

PRODUCT WITHDRAWAL / RECALL



August 2017

Developing a plan

Section 9.10.1 of the NASAA 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” in the event of mis-labelling, contamination or mixing of that product.

This requirement expands on a legal requirement under the Food Standards Code¹ for manufacturers, wholesalers, distributors and importers of food to have in place a written recall plan.

Under the Code, a **food recall** removes food that may pose a health or safety risk from distribution, sale and consumption, while a **food withdrawal**, which is different from a food recall, removes food from the supply chain for reasons other than protection of public health and safety, for example, when the food is incorrectly labelled².

Product recall as denoted in the NASAA Standard, however, specifically relates to the contamination or mis-representation of organic product (which may or may not be a food item) and will be required where the integrity of certified organic product has been compromised.

Examples of where NCO may mandate a recall of organic product include the use of a prohibited processing aid which has not been authorised under the NASAA Standard or where 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.

Developing a recall plan

In preparation for any withdrawal or recall, a documented recall plan is essential and should ideally be tested for its effectiveness 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.

The Food Standards Australia New Zealand (FSANZ) website has a number of templates that can be used by food businesses including a template for a food recall plan:

www.foodstandards.gov.au/industry/foodrecalls/recall-templates/Pages/default.aspx

With relevant modifications, the templates provided can be adapted by organic operators to cover all of their products that may be the subject of a product withdrawal.

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 Standard and records are also required for all complaints received about a product, which in some instances may initiate a product recall.

¹ <http://www.foodstandards.gov.au/code/Pages/default.aspx> (Revised Code effective 1 March 2016) ² <http://www.foodstandards.gov.au/industry/foodrecalls/Pages/default.aspx>

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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.

Developing and documenting your own system to achieve these two objectives allows NCO inspectors to follow an 'audit trail'. They will be looking for 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 a 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 from your farm gate, but are 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 OC0616 might code for Organic Corn, from bin #06, which was harvested in 2016.
2. Lot No B0414316 might code for Broccoli, from field 04, harvested on the Julian Calendar date 143 (May 23), in the year 2016. 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 readily allows for identifying a potential source of contamination in the instance of a product recall.

Record and review

Attached is a list of key tasks that need to be addressed by certified NCO operators that will enable a prompt response to any product recall/withdrawal required by NCO.



This Information Sheet is developed specifically for operators certified under any of the NCO organic certification schemes. It contains information about organic protocols and procedures. The information should be read in conjunction with the NASAA Organic & Biodynamic Standards. While every effort has been made to ensure the accuracy and currency of information within this information sheet, NCO accepts no responsibility for information, which may later prove to be misrepresented or inaccurate, or reliance placed on that information by readers. For further information contact NCO Certification Officer or email to info@nasaa.com.au

The key tasks listed below will help your business to be well prepared for a product recall/withdrawal. By completing these tasks and keeping the information both up-to-date and readily accessible, your business will be able to respond quickly if a product recall/withdrawal is needed.

| TASK | PURPOSE | TASK ITEMS | PERSON/S RESPONSIBLE |
|---------------------------|--|--|----------------------|
| Product traceability | <p>To enable the business to:</p> <ul style="list-style-type: none"> > trace products and their ingredients along the chain from suppliers through to customers (i.e. tracing both forward and backwards) > identify the location of affected product in the chain at any time > quickly compile a list of all customers or businesses that have received affected product(s) | <ul style="list-style-type: none"> > Create/maintain supplier lists and other information (e.g. contact details, delivery receipts, etc.) > Create/maintain customer lists including after hours contact information > Create/maintain a list of current products in the marketplace (e.g. photos of labels, packaging details, available sizes) > Ensure receipt and distribution documents are up to date and easily accessible (for goods received and sent: e.g. shipping information, batch codes, quantities, ingredients, packaging) > Test the traceability system every 12 months or as required (e.g. by mock recalls) > Ensure traceability system works with any follow-up actions carried out and signed off by the product recall coordinator/team | |
| Staff training | <p>To ensure staff have the skills and knowledge to carry out a product recall</p> | <ul style="list-style-type: none"> > Create/review training for relevance > Train staff in the product recall system > Keep an up-to-date training register (with dates, employee names and training provided) | |
| Reviewing the recall plan | <p>To ensure the recall plan is up to date and is an effective system for recalling product that the business supplies</p> | <p>Review the recall plan after each recall (or every 12months) considering:</p> <ul style="list-style-type: none"> > Outcomes of mock (or practice) recalls > Outcomes of actual recalls and findings of post-recall reviews > Changes to the food business – including changes in products manufactured, staff or staff responsibilities, distribution networks, customers or suppliers > Feedback from recall training > Feedback from customers or changes in customer requirements | |
| Paying for a recall | <p>To ensure that the information to make payment for a recall is readily available</p> | <ul style="list-style-type: none"> > Record insurance policy information: company, policy number, etc. > Establish approval process to fast track payments as required > Ensure business is able to secure additional financing at short notice (if required) | |