

RECALL ACTION CHECKLIST

Stage One: Advance Steps

| Action | Initiated | Completed | Notes |
|---|-----------|-----------|-------|
| 1. Recall Team | | | |
| A. Select multi disciplinary team | | | |
| B. Identify outside experts, consultants | | | |
| C. Identify responsibilities | | | |
| D. Draft contact details of team | | | |
| E. Select & train team leader/spokesperson | | | |
| 2. Review Risks | | | |
| A. Review HACCP Manual Review risk / product risk assessment | | | |
| B. Recall Team identifies risks to products, reviews company procedures, facilities & customer sites. | | | |
| C. Review product traceability for receipt, processing and distribution | | | |
| D. Analyse /prioritize risks of recall to business | | | |
| E. Solicit suggestions for improvements to reduce risks. Plan risk reduction strategies | | | |
| F. Consider financial costs, and budget allowances. Consider/ review insurance cover | | | |
| 3. Create a recall plan | | | |
| A. Confirm responsibilities | | | |
| B. Confirm decision making process, | | | |
| C. Review Risk assessments, documentation and recall actions records | | | |
| D. Create current key contact list <ul style="list-style-type: none"> ▶ Recall Team Members ▶ Key staff and managers ▶ Authorities- as required by law ▶ Suppliers including logistic support, transport food disposal, communications, security, food testing insurance ▶ Key clients, wholesalers, distributors and customer contact details ▶ Recall experts -legal advice, public relations | | | |

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| <p>E. Review/ create data collection sources</p> <ul style="list-style-type: none"> ▶ HACCP controls and monitoring ▶ Food safety plan ▶ Receival documents for raw products ▶ Production records, and amounts ▶ Maintenance records ▶ Product specifications ▶ Ingredient list ▶ Label information ▶ Production codes ▶ Lot numbers ▶ Stock records ▶ Distribution records | | | |
| <p>F. Review / create notification protocols, and documents</p> <p>FSANZ coordinator</p> <ul style="list-style-type: none"> ▶ State/ Territory Authority recall officers ▶ AFGC notification protocol ▶ Major Customers ▶ Recallnet | | | |
| <p>G. Review /create logistics plan</p> <ul style="list-style-type: none"> ▶ Transport ▶ Product on Hold ▶ Retrieval ▶ Stock Take ▶ Disposal | | | |
| <p>H. Review/ create communication Plan</p> <ul style="list-style-type: none"> ▶ Complaint/ incident form ▶ Telephone script- initial contact ▶ Notification letters to customers, suppliers ▶ Instructions for recall logistics ▶ Press release ▶ Recall status report ▶ Approve templates of letters, news releases, reports, and other communication documents | | | |
| <p>4.Review Preparedness</p> | | | |
| <p>A. Conduct a mock recall</p> | | | |
| <p>B. Review effectiveness of mock recall and recall procedures</p> | | | |
| <p>C. Review timeliness</p> | | | |
| <p>D. Make modifications to recall plan</p> | | | |

RECALL ACTION CHECKLIST

Stage Two: Conduct Recall

| Action | Initiated | Completed | Notes |
|--|-----------|-----------|-------|
| 1. The recall decision | | | |
| A. Notification of the Problem | | | |
| B. Convene Recall Team <ul style="list-style-type: none"> ▶ Inform recall team of information to hand ▶ responsibilities confirmed | | | |
| C. Initial Data collection <ul style="list-style-type: none"> ▶ Other staff as appropriate briefed on problem & asked for input ▶ Other staff submit records to Team | | | |
| D. Evaluate the extent, and risk to consumers Consider product quarantine on hold whilst assessment made | | | |
| E. Decision made <ul style="list-style-type: none"> ▶ Stock recovery * ▶ Market Withdrawal * ▶ Product Recall- Trade or Consumer level? | | | |
| *Recover or withdraw stock | | | |
| F. Contact customers to withdraw stock. NB Major client requirements eg WQA for withdrawal notification | | | |
| G. Organise logistics for stock recovery / withdrawal, rework, disposal | | | |
| H. Review effectiveness of stock recovery/ withdrawal procedures | | | |
| I. Make modifications to procedures and processes | | | |
| J. Maintain records of withdrawal | | | |
| 2. Commence Recall | | | |
| Immediate Actions | | | |
| A. Stop product production | | | |
| B. Secure Product in warehouse "ON HOLD" | | | |
| C. Inform staff and reception Information to give and collect. | | | |
| D. Update website and other media with recall information and instructions | | | |
| 3. Recall Classification and Notification | | | |
| A. Recall classification Depth of Recall (either established by the authority or determined by Recall Team: -Trade recall -Consumer recall | | | |

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| <p>B. Collate information required for notification:</p> <ul style="list-style-type: none"> ▶ contact details and the product manufacturer's details ▶ product details including: name, date marking, package size and description, and any other identifying markings available including Lot/APN/EAN code ▶ a picture of the product and/or the product label ▶ any import/export information, if applicable ▶ product distribution details ▶ reason for the recall, the results of any testing corrective actions being taken | | | |
| <p>C. Notification</p> <ul style="list-style-type: none"> ▶ Authorities ▶ State or Territory health department ▶ FSANZ <p>Trade or Consumer recall- Phone FSANZ Recall Coordinator</p> <p>Document the initiation of a recall to FSANZ coordinator</p> | | | |
| <p>D. ACCC</p> <p>Trade or Consumer recall- phone / document the initiation of a recall to ACCC Minister for Competition Policy and Consumer Affairs, (2 days of commencing recall action). FSANZ will also notify ACCC</p> | | | |
| <p>E. Customers If the company supplies to major retailers, complete the AFGC's Australia and New Zealand Product Recall/Withdrawal form.</p> <p>F. Supplier / certification standards Review individual supplier requirements for recall requirements</p> | | | |
| <p>4. Communication plan implemented</p> | | | |
| <p>A. Consumer recall advertisement drafted by team member/ legal counsel. Home state recall officer may assist.</p> | | | |
| <p>B. Recall advertisement sent to FSANZ for approval</p> | | | |
| <p>C. Recall Notice placed in daily print media (from media list) for relevant locations of affected stock. Consider ethnic, regional and community newspapers</p> | | | |

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| D. News/ Media releases sent to other pertinent contacts | | | |
| E. Update and monitor website and social media with recall info | | | |
| F. Receptionists, admin briefed on what to tell incoming callers & what info to obtain from them | | | |
| G. Administration enacts accounting systems for returns and credits | | | |
| H. Dept. Managers updated about recall classification & depth | | | |
| I. Sales reps instructed on Recall procedures | | | |
| J. Wholesale distributors notified Phone email Letter | | | |
| K. Retailers notified by phone/fax/ email | | | |
| L. Point-of-sale info prepared for Sales reps to deliver to retail customers | | | |
| M. Consider online sales, direct sales channels to notify customers | | | |
| N. Consider other consumers such as institutions, hospitals etc, overseas customers | | | |
| O. Continue to update website and social medias needed | | | |
| P. Complete and submit an interim post-recall report two weeks after you notified the recall to FSANZ. This should detail progress to date on -Investigation -Communication -Recovery -Corrective actions | | | |
| 5. Stock Management | | | |
| A. Company & authority agree on: ▶ collection , ▶ rework -further process it in a way that ensures it is safe and suitable to eat -corrective action (such as relabelling ▶ disposition of product - animal feed? - Destruction of food- EHO statement of destruction | | | |
| B. Information made available refund or exchange policies | | | |
| C. Information on disposition, refund, exchange communicated to all customers | | | |
| D. Determine quantity of shipped product at each location. | | | |
| E. Determine Quantity of product unaccounted for | | | |

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| F. Warehouse prepared to receive product | | | |
| G. Warehouse isolates returned product | | | |
| H. Internal investigation begun to determine cause or source | | | |
| I. Establish use of any reworked or blemished ingredients & their suppliers | | | |
| J. Administration manages credits, returns and accounts | | | |
| K. Rework or disposal of affected stock | | | |

RECALL CHECKLIST

Stage Three: Report, Analysis and Continuous Improvement

| Action | Initiated | Completed | Notes |
|---|-----------|-----------|-------|
| 1. Recall Termination | | | |
| A. Team undertakes review of Recall investigation | | | |
| B. Root Cause analysis to be documented | | | |
| C. Officially conclude recall | | | |
| D. Notify Authority and stakeholders of Recall completion | | | |
| E. Complete and submit an interim post-recall report two weeks after you notified the recall to FSANZ (if not completed prior) This should detail progress on -Investigation -Communication -Recovery -Corrective actions | | | |
| F. Team receives written confirmation from authority of recall completion | | | |
| G. Announcement (and thanks, as needed) to customers about successful end of recall | | | |
| H. Update website; notify news and social media for follow up if necessary | | | |
| 2. Final Steps | | | |
| A. Recall Team assembles all documents | | | |
| B. Complete FSANZ Product Distribution report for each product | | | |
| C. Team decides on cause of problem | | | |
| D. Team reviews the cause of the recall relevant procedures & makes recommendations to Management | | | |
| E. Necessary corrective actions and preventative actions made | | | |
| F. Team Coordinator writes final report Nature of Problem Data used to make recall decision Extent of the product effected Effectiveness of recall % affected product recovered Communication of recall Copies of communication documents Cause of the problem Corrective actions undertaken Difficulties in recall Termination of recall and reasons Costs incurred Legal ramifications Implemented improvements to prevent recurrence | | | |

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| <p>G. Submit a final post-recall report to FSANZ approximately one month after the recall notification date. FSANZ forwards a copy to the home state and Australian Competition and Consumer Commission (ACCC) and the recall is closed.</p> | | | |
| <p>H. Prepare for legal action if required</p> | | | |

Source; Adapted from The Food Recall Manual . US Army
 FSANZ Food Industry Recall Protocol 7th ed