SMALL SCALE FOOD PROCESSOR ASSOCIATION SUPPORTS INDEPENDENT FOOD PROCESSORS & GROWERS	Document No: HUB.R.POL.89 Effective Date: 01-August 2022 Revision Date: New
RECALL POLICY / PLAN	Revised By: NRoss Approved By: MDaskis Reason for Revision: New

OBJECTIVE:

The objective of the Recall policy is to identify what a recall is, how it is employed, when, and the communication interactions with regulatory agencies and other members of the food product chain, such as suppliers and customers, and to locate suspect product, and organize the withdrawal and / or disposal of suspect product.

SCOPE:

In a Hub where there are multiple Hub Users within the same facility, a recall process can involve a single Hub user or can potentially encompass other Hub Users' products as well.

The recall may be required when a single shared ingredient or contaminated physical space or equipment affecting multiple finished products resulting in an actual or potential hazard to the consumer. For these reasons, it is critical that operational and cleaning processes are conducted between products and ingredients that are used in common by members of the Hub are from reputable suppliers and lot tracking of raw materials, packaging, finished goods, and validation of cleanliness is conducted for each production run.

Developing a RECALL TEAM to identify the risk, collect the necessary information for the recall, and to communicate with the regulatory and industry contacts as needed, and test the corrective and preventative actions. The members of this team will include a core group of the company or facility. As the product or risk has been identified, additional industry or subject experts may be recruited for assistance.

DEFINITIONS:

Customer Complaint: A response from a customer of a product that is generally negative regarding the product attributes, specifically food safety, quality, or preference. In the event the complaint indicates a medical or physical hazard to the consumer and the risk is anticipated to involve more than a single household or consumer, the product may require to be removed from the trade and distribution to prevent other consumers from consuming or using the suspect product. This would lead to a Recall of the product.

Customer Comment: A response from a customer of the product that can be positive or negative. If negative the comment is generally not related to Food safety or quality attributes and the customer may not request that action be taken such as further response from the product manufacturer.

Recall Procedure: The response to and actions when a hazard is present in a product and could cause harm to the consumer. The response involves communication with various groups depending upon the distribution of the suspect product, the level and possible urgency of removing product from marketplace.
The procedure will identify the cause(s) of the hazard, the risks to the consumer and then the action required to retrieve, dispose, or rework the product. During the recall (retrieving the product), the communication with consumers, regulatory agencies, and the location(s) where the product is located is initiated with the objective to identify and confirm the locations of the suspect product and reconcile the amount outside of the control of the

producer with that which was produced to ensure 100% reconciliation for appropriate action to remove the product from the marketplace.

Reworking the product: Reworking a hazardous product would require in-depth testing and assessment of the process to rework. An example of reworking a recalled product could be the case of an inaccurate label being applied where an allergen that is intentionally included within the product but was not included on the label. Recalling the product and after testing and confirming that the absence of the allergen on the label is the only risk, with a corrected label the product may be suitable to re-enter the marketplace. In this case, it would be necessary to ensure that **all** of the original product was accounted for to ensure any re-labelled product is the only product that would be in the marketplace. Confirmation with CFIA may be required prior to release of the product to distribution.

CFIA – Canadian Food Inspection Agency – this regulatory agency would be notified of any recall of product that would directly and potentially cause harm to the consumer when ingested. It is recommended that the local contact name and number for the CFIA Recall Coordinator is included in the Recall Plan.

Product Withdrawal - This process occurs when Product is withdrawn from the marketplace without a hazard being the cause and is generally initiated by the manufacturer. The reasons are typically due to an esthetic or flavour variance from the standard product. Examples include: if an incorrect paprika was added but does not affect the healthfulness of the product but will provide a variance in colour from the original product. Another example could be a defect in the printing of a label where the photo is incomplete or unattractive. It does not misrepresent the product to the degree where the consumer could purchase the product in error or it could cause harm.

Root Cause Analysis: The investigation and actions that occur to identify the multiple contributing factors that could result in the reason for the failure of the product. This generally involves investigating all possible contributing factors that resulted in the product failure. Even when the factors are identified they must be tested to confirm if they were the factors such as using production documents, testing results, comments during production, and if a retention sample of the product is available, it can be used to compare and/or also identify if it too has the defect.

Corrective Action: This is the immediate action taken to eliminate access to the suspect product and to evaluate and analyze the cause of the non-conformance, where it occurred and how it occurred. Based on the root cause analysis, the corrective action may involve no action or closer scrutiny during a subsequent production run**,** review of key ingredients and/or if suppliers or ingredients were changed/substituted, or any other adjustment such as inadequate training of employees and determining the scope of the retraining required.

Preventative Action: From the corrective actions identified, the preventative actions are listed and put into action ensuring or predicting that the product will be successful each time. These actions may include adjustments or changes in processes, ingredients, training, instructions for use, etc. Preventative actions must be tested to prevent the problem from recurring as confirmation that those actions are correct and effective.

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Recall Team: This group of people are selected based on their experience, expertise, interaction with the product either through product development, operational and distribution activities, and communication interactions with suppliers and/or customers. Ideally, they have responsible positions within the company to investigate, obtain data regarding the potential solutions, distribution, contacts for relevant suppliers and customers and will collaborate to participate in the investigation, solutions, communication and retrieval and disposition of the physical products. Other contractors with expertise may be added subject to the nature and scope of the suspect harm and/or distribution of the products.

Response to Customer if illness or injury occurs: If the complaint resulted in an injury or illness, the details of the incident are required in more detail, see the Complaint Investigation For Illness or Injury Form. In the case of a product Recall, coordinating the response with CFIA is advisable to confirm what and when to respond.

PROCEDURE:

1. A product that could potentially harm a consumer could be identified by the manufacturer during routine testing, by a supplier who identifies an ingredient that was supplied, that itself is being recalled by the manufacturer, or by a consumer who has directly contacted the manufacturer or contacted the local Health Agency to report an food borne illness or foreign material in the product. Further investigation of the potential risk may require a full public recall of the products affected.
2. Prior to issuing a public recall, a quick investigation of the potential cause is required, and contact with CFIA would be initiated to confirm with them if the hazard warrants the specific level of Class recall. Retaining a log of all conversations with regulatory agencies, customers, distributors is essential to ensure clear and accurate information is communicated.
3. Even when recalling product through a product withdrawal, accurate and clear communication is critical to ensure the reason for or type of recall is provided and that dates and people with whom communication is made is retained for future follow-up, if necessary.
4. Always record the **customer's name and contact information**, particularly an email address for correspondence. If the initial communication is by telephone repeat the information the customer has provided to confirm accuracy. Confirm the name of the product(s) of concern, label description, and the lot number and UPC. This will confirm that it is **your** product. If the customer can provide a photo of the product that is preferable.
5. Ensure all of the correspondence is recorded with the date, who was speaking, and a summary of the pertinent details and any actions taken. This should be recorded directly on the **relevant investigation form** or on a separate sheet that can be attached to the **investigation form.**
6. **Always** follow-up with the customer, either by writing (email or mail), or by telephone. If they state they don't want to receive any follow-up, please respect their wishes. Be truthful and courteous in all communication as the customer is relying on you to allay any concerns they may have if they have ingested any of the product.
7. CFIA may request details of the investigation as to the cause, the efficacy of the recall during the process as well as the final report with corrective and preventative actions and their dates of implementation.

8. The investigation of the cause of the hazard must be recorded from test results whether from external labs or internal laboratory evaluation as well as through production and potential ingredient warehouse inventory and contact with suppliers, if relevant. Record the resolution on the appropriate investigation form.
9. Identifying and correcting the cause of the non-conforming or non-compliant product must be conducted and tested to assure that the true cause has been identified.
10. Following up with communication to regulatory agencies that were involved, possibly the consumer if the product issue was identified though a customer compliant, as well as the distribution channel contacts to assure them that the risk has been identified, corrected, and that new product will be acceptable and compliant (risk free).
11. If product that has been returned is not saleable and must be destroyed it is critical that the product is assembled, contained, and all accounted for prior to disposal in the appropriate manner to eliminate the potential of people or animals consuming the defective product unintentionally.

DEVIATION PROCEDURES:

1. When a customer complaint is unintentionally forgotten, it is best to contact the customer and indicate that you are following up. Be clear with the reason(s) if they question the time delay.
2. If a distributor, retailer, or supplier is not cooperating with a recall, notify the CFIA contact for assistance.
3. If the corrective actions or preventative actions are not resulting in the expected outcome, it is imperative that a review is conducted to identify why and to possibly ask for external assistance, if technical or operational, and internal resources are insufficient.

RELATED DOCUMENTS:

HUB.R.SOP.90	Customer Complaint SOP
HUB.R.REC.99	Customer Complaint Form
HUB.R.WI.88	Recall Procedure, includes Recall Plan and Forms

REVIEW:

Annually or as changes occur.

Updating and confirming the Contact at the local Health Authority / CFIA office should be conducted annually or if they have a contact list for notification if the contact changes it is advisable that you are on that list.