Recall Program

A product recall applies when a product is found to be unsafe or otherwise in breach of regulatory requirements and is withdrawn from public sale and the consumer market is advised not to use or consume that product. Recalls may be mandatory (i.e., initiated by a regulator), retailer driven, or voluntary (i.e., initiated by the supplier).

A product withdrawal applies when a dispatched product is found not to meet safety or quality requirements, is deemed not suitable for sale and is withdrawn from the distribution chain before it has reached the consumer.

The plan should include details of how all raw materials, packaging materials and processing aids are linked through to the finished product; and should outline how the supplier accounts for the reuse of reworked product. The product trace procedure should outline how the supplier traces product to a customer and who is responsible for implementing and maintaining the product trace system.

A product recall and withdrawal procedure should be prepared, implemented and regularly reviewed to ensure everyone involved in the recall process understands their role and their responsibility in the event of a recall or withdrawal.

A Recall Team should be in place to coordinate and manage recalls. The facility should prepare a withdrawal and recall procedure describing the methods, responsibilities and procedures they implement in the event of a product withdrawal or recall.

The plan should include an up-to-date list of customers, regulators and other essential contacts that need to be notified in the event of a withdrawal or recall. Outline a communication plan to inform customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident.

It should also include an outline of the methods the supplier will implement to investigate the cause of a withdrawal or recall.

Records of any/all recalls and withdrawals should be maintained. These records may include production records, raw materials receiving records, rework records, product holds, and product storage and distribution records. The supplier should test product that has already been released so that full distribution traceability can be verified.
The supplier should also be aware of the recall targets set by retail customers. Some may require 100% identification and quarantine of affected product within hours or recall notification. Regulatory recall requirements must also be considered.

The product withdrawal and recall system should be reviewed, tested and verified as effective at least bi-annually.

The Recall Team should be cross functional including: management, production, shipping, receiving, sales, marketing, maintenance, legal advise and (if needed) outside consultants or experts.