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# About this Document

This document exists to provide direction for Your Organisation’s actions in the event of a recall of one of your products or a product you have bought and on-sold. In the event of a recall or withdrawal, Your Organisation subscribes to, and will use GS1’s ProductRecallNZ tool for the communication out to your supply chain. This is a companion document to support that communication process as well as the other processes that need to be undertaken to deal swiftly and safely with removal of products from the supply chain.

For extra guidance in writing this document your regulator’s Industry [‘Guidance Material’.](https://www.mpi.govt.nz/dmsdocument/22288-recall-guidance-material)

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# Introduction

Even within the best managed business, an issue involving the safety of a product may occur, and may be an issue that is banal or completely unexpected. It is important for this reason that an organisation assumes that this might occur and subsequently prepares for it. Preparation involves the creation of a process, its circulation throughout the business and it being periodically tested to ensure its robustness.

This document represents the Product Recall plan for Company Name. It discusses what a Recall is, what organisation is responsible to do in the event how that process is undertaken.

Whilst a Product Recall plan suggests a ‘product safety’ issue this document can also cover and apply to the more common ‘Withdrawal’ process.

This plan assumes you are using GS1’s ProductRecallNZ as the preferred Recall or Withdrawal Communication tool.

# Product Recall Overview

## Types of Recall/Withdrawal

### Recall (Consumer Level)

This is the removal of unsafe food from the distribution chain and extends to food sold to consumers and therefore involves communication with consumers.[[1]](#footnote-1)

### Recall (Trade Level)

This is the removal of an unsafe food from the distribution chain but does not extend to food sold to the consumer.[[2]](#footnote-2)

### Withdrawal (Retail Level)

This is the removal of product from all parts of the distribution chain up to the point of sale. It is not a removal based on an unsafe product but rather a removal based on brand reputation (i.e. Quality Issue) or logistical error (i.e. incorrect barcode).

NB: Whilst an organisation is going through the process of establishing whether their ‘product issue’ is a recall or not, they may make the business decision to remove the product regardless. In these cases the business can carry out a withdrawal **so long as they update the classification later to a recall if necessary**.

### Withdrawal (Warehouse Level)

This is the removal of product from all parts of the distribution chain excluding the point of sale. It is not a removal based on an unsafe product but rather a removal based on brand reputation (i.e. Quality Issue) or logistical error (i.e. wrong barcode).

NB: Whilst an organisation is going through the process of establishing whether their ‘product issue’ is a recall or not they may make the business decision to remove the product regardless. In these cases the business can carry out a withdrawal **so long as they update the classification later to a recall if necessary**.

## Types of potential product defects

|  |  |
| --- | --- |
| Recalls (Trade and Consumer) | Withdrawals (Warehouse and Retail) |
| * Microbiological Contamination * Chemical Contamination * Foreign Matter * Undeclared Allergen * Labelling Incorrect * Other | * Quality Issue * Labelling Issue * Short Measure * Legal Issue * Packaging Issue * Precautionary * Other |

## Our Company’s Recall Policy

[All food and consumer goods businesses should develop a product recall policy. A product recall policy is a simple, clear and unambiguous business statement on the commitment to remove product from the market that presents a risk to human health. It demonstrates a company’s commitment to protect public health. It should clearly state the objective of the product recall plan and the Senior Management’s commitment to providing the necessary resources to ensure the successful removal of unsafe foods from the market. The Product Recall Policy should be in place prior to the development of the Product Recall Plan.][[3]](#footnote-3)

# Contacting the Regulator:

Are you aware of all the requirements and actions you will need to take with respect to your regulator in the event of a Recall? For example in a food and beverage Consumer Recall you will be required to alert media using applicable templates. If you are unsure of the requirements, always contact your regulator.

For more details –

**Food and Beverage:** Ministry for Primary Industries Recall [information](https://www.mpi.govt.nz/food-safety/food-recalls/documents/) and 0800 00 83 33.

**Consumer Goods:** Trading Standards (as part of MBIE) [information](https://productsafety.tradingstandards.govt.nz/for-business/product-recalls/guidelines-for-product-recalls/)

# Testing the Recall Plan

It is important to regularly test your ‘Recall Plan’ and process – we recommend doing this on an annual basis at minimum. It will involve running through a realistic ‘Mock Recall scenario’ from start to finish, including using ProductRecallNZ’s Mock Mode to practice how you would communicate a recall notification to Trading Partners and potentially also regulators.

**For more information on conducting a Mock Notification see** [**this article**](https://gs1nz.zendesk.com/hc/en-us/articles/226132188-User-Guide-Completing-a-Mock-Notification)

# The Recall Team

The Recall Team is the made up of those individuals who are specifically assigned to the Recall Process and who will have roles to play in things like Quality Assurance or Testing.

In the event of a potential Recall, the first step for any staff is to get in touch with the Recall Coordinator, their back-up, or any other of the staff mentioned as part of the Recall team.

**John Smith** is the Recall Coordinator and **Jane Smith** his back up.

**Please note** you are not limited to two people on your recall team and it should have as many people listed as are intimately involved in the process (this includes who will be able to pull sales/customer data down from the system.

**NB: To add additional rows to the table, right click on it and select ‘Insert’, ‘Insert Rows Below’**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Name | Job | Phone Numbers | Email Address | Recall Role(s) and Responsibilities | ProductRecallNZ System? |
| John Smith | Quality Manager AND **Recall Coordinator** | (D) (04) 123 1234  (M) 021 123 1234 | qualitymanager@company.co.nz | As Coordinator, takes charge of entire process. As Quality Manager conducts any technical risk assessment of products | Yes, Initiator and Approver roles. |
| Jane Doe | CEO | (D) (04) 777 7777  (M) 027 777 7777 | *ceo@company.co.nz* | Decision making and Approver in Recall System | Yes, Approver |

# Maintaining Customer Data

In the event of a Recall or Withdrawal that involves your organisation you will potentially need to get in contact with every single customer/recipient of the affected product(s).

Please be aware that some of your customers will be on the ProductRecallNZ system as ‘recipients’ (consider Foodstuffs North and South Island, Countdown and Bidfood)

For those customers that are **NOT** on the system you must ensure details are up to date and correct. At minimum you will need to have a name, company name and email address to contact the organisation using the ProductRecallNZ ‘Non-Subscribed Recipient’ function. To ensure you can send an initial email, follow up phone call and then pick up affected product you should maintain the following details for each Trading Partner:

1. **Company** NZBN/GLN(More info [**here**](https://www.nzbn.govt.nz/?gclid=EAIaIQobChMI7MfNpeDl2QIVx0y9Ch23JAsmEAAYASAAEgKFf_D_BwE): try searching your own business) eg: 9429000000000
2. **Company Name** (Legal Name) eg: GS1 NEW ZEALAND INCORPORATED
3. **Trading Name** (If applicable) eg: GS1 NZ
4. **Name of contact(s) at that business** eg: John Doe
5. **Email Addresses** eg: [john.doe@gs1nz.org](mailto:john.doe@gs1nz.org)
6. **Phone number** eg: 0800 10 23 56
7. **Cell phone** eg: 027 445 6502
8. **Address** eg: Level 2, 158 The Terrace, Wellington, 6012

# Product Recall Process Flowchart

See the Example Process Flows with direct Steps involving ProductRecallNZ as your organisation’s communication tool. **PLEASE tailor this workflow to suit your organisation’s actual process.**

## When recall has started with another organisation

**NB: If you have your own suppliers it is possible you may be involved in a recall scenario where your organisation is contacted as a customer.**

## When recall has started with your organisation

*Please note that hyperlinks are light blue. To open a hyperlink, right click on it and select ‘Open Link’.*

1. Ministry for Primary Industries, Recall Guidance Material, Version 4, July 2015 [↑](#footnote-ref-1)
2. Ministry for Primary Industries, Recall Guidance Material, Version 4, July 2015 [↑](#footnote-ref-2)
3. Ministry for Primary Industries, Recall Guidance Material, Version 4, July 2015 [↑](#footnote-ref-3)