

## **V. CONDUCTING A RECALL – RECALL INITIATED BY YOUR SUPPLIER**

The most typical situation will arise when your supplier or manufacturer identifies a problem – either brand name drugs or private label products. If your company receives a recall or market withdrawal request from a supplier, the supplier is the recalling firm. Your responsibilities are limited to identifying and locating any recalled product within your control and following the recalling firm’s instructions to properly identify, segregate and dispose of that product.

### **A. Receiving a Recall/Market Withdrawal Request**

Recall requests or notices from suppliers will usually be received at corporate headquarters, or possibly at an individual retail store. A sample recall notice is attached to this Manual as Exhibit A. Employees should be instructed to notify the Recall Coordinator of any recall request they receive and to forward a copy of the request. Similarly, if a recall request is received at the corporate level, it should be forwarded to each in-store Recall Manager at the retail level.

In some cases, a supplier may contact you about a problem with a product that it has not yet determined will require a recall. The supplier may request that you locate and hold the product until a determination can be made. You should always comply with such requests and hold suspect product until you receive further instructions from the supplier.

### **B. Preparing to Implement the Recall**

Upon receiving a recall request, the Recall Coordinator should immediately convene the appropriate employees. The Recall Coordinator should assemble the records discussed in section III.C of this Manual and compare them to the recalling firm’s product identification to determine whether you carry the product. The Recall Coordinator should communicate with the individual retail stores about which products to remove from the store’s shelves, and should closely follow the recalling firm’s instructions for handling and either returning or disposing of the product.

If the recall notice does not specify how to handle the recalled product, the Recall Coordinator should contact the recalling firm to obtain instructions. This will be a very important step in order to ensure prompt and proper reimbursement for the product.

### **C. Implementing the Recall**

In responding to a recall request, you are responsible for locating the suspect product, removing it from sale to the public, and returning it to the supplier or manufacturer. You should follow the recalling firm’s instructions to the letter in performing these tasks. All drug recalls will be based on lot number and the applicable NDC number; you should take care to pull all product carrying the same number as that specified in the recall request.

Often, a recall will apply only to one product within a product line and to only certain lot or code numbers of a product. It would be wasteful to remove products that are not actually subject to the recall, so care should be taken to remove only those products specifically described in the recall request.