

B. 10 Do s and Don ts of Recalls

1. Prevent Recalls Before They Happen
It s best to avoid having a recall in the first place. Prevent recalls by complying with Good Manufacturing Practices (GMPs), instituting your own sanitation program using standard operating procedures (SOPs), establishing procedures for investigation of customer complaints, and ensuring that your suppliers adhere to high standards.
2. Be Prepared for a Recall
Be ready for a recall before it happens. At a minimum, that means appointing a Recall Coordinator and selecting a Recall Team, designating a recall contact person at each plant/warehouse/store, selecting a reputable outside laboratory, coding your product and knowing where it is in the distribution chain, and conducting mock recalls. You may also wish to adopt a written plan that will describe the procedures you will follow if a recall becomes necessary.
3. Stay Calm
If a problem arises, remain calm, logical, and methodical. Many companies have survived major recalls, and yours can too.
4. Get All the Facts
When you first learn of a potential recall situation, obtain all the facts and define the scope of the problem. Verify who has complained about the product, what is the nature of the complaint, whether the complaint is valid, whether it is a product sold by you that caused the problem, and, if so, how much of the product may have the problem and where the problem product is located.
5. Take Charge of the Situation
If the problem occurred at your facility, you are the recalling firm. The recalling firm is responsible for planning and implementing the recall. If the problem occurred at your supplier, your supplier is the recalling firm, but your company still must follow the supplier s instructions regarding removing, correcting, and/or disposing of the product.
6. Coordinate Your Actions
One individual, the Recall Coordinator, should coordinate all actions related to the recall. Because a recall can involve many parts of your company, it is important to have central coordination.
7. Create a Paper Trail
Maintaining good records is critical before and during a recall. Accurate records can help narrow the scope of a recall and aid traceback to the source of the problem. A company should have accurate records of all product received (including ingredients), processed, and sold. During a recall, create a paper trail of all actions and communications with suppliers, customers, and government regulators.
8. Be Clear and Precise in Communications
In all communications with suppliers, customers, government regulators, and the press, be clear, concise, and to-the-point. Do not speculate.
9. Cooperate with Regulatory Officials
During a recall, refusing to cooperate with government regulators will only make matters worse for your company. You should always cooperate fully with any reasonable and lawful government request.
10. Do a Post-Recall Assessment
After a recall, review your recall procedures to make sure they are effective. Identify and correct all internal problems that led to the recall.