

Central Production Unit Food Safety & Quality Management System

Product Withdrawal and Recall

Terminology

Product withdrawal: A withdrawal is when unsafe food is removed from the supply chain before it has reached consumers.

Product recall: A recall is when unsafe food is removed from the supply chain and consumers are advised to take appropriate action, for example to return or dispose of unsafe food.

Purpose

An effective emergency plan must be in place so that if, at any stage, an incident occurs that impacts food safety, authenticity, legality, or quality, it will be managed effectively. The incident may be directly related to the product or may include the disruption of key services such as power and water, cyber-attack, or environmental influences such as fire and flood.

In the event of a food safety incident, removing product from the supply chain quickly and effectively is vital. For this reason, the Central Production Unit has a written action plan that is routinely tested and evaluated to ensure its efficiency in removing unsafe product from the supply chain.

Scope

The scope of this document covers the procedure of product withdrawal from the supply chain in the event of an incident. (The procedure for handling emergency situations is detailed in the Business Continuity Plan).

Responsibilities

Responsible Person (s)	Responsibility
Site Manager	<p>Routinely tested to ensure the effectiveness of the withdrawal or recall process</p> <p>To ensure this procedure is fully understood and in the event of a food safety incident any member of the senior management team can take control and effectively manage any potential withdrawal or recall</p> <p>To ensure that all of the site team understand the traceability procedure and can quickly and efficiently locate and segregate any affected product</p>
Supply Chain	To ensure an up-to-date list of suppliers and customer contacts is maintained and can be easily accessed

Procedure details

It is the responsibility of the Central Production Unit leadership team to make customers aware of any issues with products supplied. Effective management of food safety incidents enables appropriate and timely decisions and communications to be made, resulting in the protection of the customers, the product and the brand.

Product withdrawal or recall

A food safety incident is defined as an incident that has occurred within the supply chain, the production process and/or the distribution chain and raises concerns around the safety, authenticity, legality, or quality of food. If the product were to remain on sale it might give rise to

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the product being unfit for human consumption, illegal or has a major deviation from the agreed quality specification.

Examples of that could initiate a Recall or Withdrawal are;

- Notification from a supplier that a raw material is out of specification and could cause harm to the customer
- A food safety warning from external bodies such as the FSA
- Discovery or potential of physical contaminant in the process
- Discovery of a chemical contaminant in the process
- Temperature abuse at site or during transit
- Malicious contamination of the product
- Incorrect labelling of the product
- Undeclared allergens

In the event of a food safety incident and after full investigation and risk assessment if a product withdrawal or recall is required, the following steps should be followed.

1. Identifying the concern.
 - Identifying all affected products and its location
 - Segregating and placing on hold any affected products that are in the control of the site
 - Identify how much stock is affected, and where the stock is located. All stock identified on site must be placed on hold and adequately segregated from other stock
2. Assembling a withdrawal team, comprising members of the site leadership team
 - Assess Risk Level and define actions, roles, and responsibilities
3. Notifying distributors / customers and informing them of what to do with the affected product.
 - Where product has been dispatched, all customers who received deliveries of the affected product will need to be identified and communications sent to the affected customers / sites with clear communication and instructions of the nature of the withdrawal or recall, and the actions to take
 - Customers / sites should be asked to confirm via return email how many products they have on site to allow for credit to be raised and to confirm safe disposal of any affected product
4. Notifying regulatory agencies (Food Standards Agency (FSA) / Primary Authority)
 - The FSA should be notified at the time of the incident for critical situations, for example a product recall. Primary Authority should be engaged through contact with the Central Production Unit HSE Sector lead

Communications

In the event of a significant food safety incident, resulting in a product withdrawal or recall, all communications sent out to customers must be agreed by the site manager, in consultation with the Vendor Assurance team, the relevant sector HSE lead and Brakes if applicable. All formal communications to clients and / or customers will be drafted by the site manager and their team and must be approved by Compass Communications Team prior to sending.

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Review and corrective actions

A full review of the incident including the handling of the situation to be conducted and where required, corrective actions implemented.

Testing the withdrawal and recall procedure

The product withdrawal procedure shall be tested, at a minimum annually, to ensure the effectiveness of the operation procedure. Results of the mock test will be fully detailed and retained.

A mock withdrawal aims to test the full procedure and provide assurance that;

1. The system works effectively
2. Highlights any gaps in the process where improvements are required
3. Demonstrates how quickly the required information can be collected, and thereby corrective action being taken, for example materials being isolated and quarantined, and customers contacted
4. Acts as a training exercise for personnel to ensure clear roles and responsibilities are understood and enacted in the event of a real withdrawal or recall

A withdrawal or recall would act as a substitute for a mock withdrawal and recall test.

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