

R. How to Conduct a Mock Recall – An Example

NOTE:

NOTE: The Appendices were originally developed for Canadian operations, and provide examples only, based on Canadian and international resources. If your operation is outside of Canada, the following information may be relevant to you. It is recommended that you check whether country-specific requirements or guidance are available instead.

Periodic mock recalls should be carried out at least annually to evaluate the product recall program. All information obtained during the Mock recall is documented on the **Mock Recall Log***. Mock recalls are used to determine whether the recall procedure is capable of identifying and quickly controlling a given lot of potentially affected product and reconciling the quantities produced, quantities in inventory, and quantities distributed. Mock recalls are used to test all steps of the recall procedure, including identifying where the product went. A mock recall will identify potential problems and allow personnel to become familiar with recall procedures. Use the **Mock Recall Log to** document all corrective actions and deficiencies identified. The steps below and attached sample **Mock Recall Log** can help guide you through the mock recall process:

1. Identify and write down the mock recall scenario. Make up something fairly realistic and be specific about the customer or supplier (where the recall originated) and the specific product to be recalled. **Example:** We determined that when Bravo 500 was sprayed on our cabbage fields on July 5th (9 days ago) the third party applicator also accidentally sprayed two of our spinach fields (fields S9 and S10). Since Bravo 500 is not registered for spinach we need to recall any spinach that has been harvested and distributed from those two fields since we started harvesting on July 12th. **Example:** On August first we received notification from CFIA that their surveillance sampling program found a positive result for *Salmonella poona* on a roma tomato. The roma tomato sample was taken from a distribution warehouse and had the following pack ID: 225AR. We need to find out whose tomatoes are in the affected pack ID's, whether tomatoes from the affected product from the identified delivery date are in any other Pack ID's and where all potentially affected product went.
2. Identify and record who will be involved in the mock recall. For example: John Smith, recall coordinator, will be in charge of the mock recall with help from Jane Brown the field supervisor and Jay White the packing house supervisor. All members of the recall team should participate in a mock recall.
3. Record the time when you start the exercise.
4. Once the particular affected lot is chosen for the scenario, trace the product forward to the customers and, if applicable, back to the field or the operation. Find out how much of that particular lot or pack ID was produced, where it came from and where it was sent. Collect and gather copies of records with the supporting data such as: transportation records (Form O), packing and/or harvesting records (Forms P and Q), agronomic inputs (Forms H1 and H2). The mock recall file also should include the name, address and telephone number of customers and/or suppliers for the lot tested.
5. Keep track of everyone within your organization you contacted to collect each piece of information or where it is stored (e.g. which binder or file in which office). If records are kept electronically keep track of how reports were generated (what is the report called in the software system?) so that it is easy to repeat the process if a real recall occurs.
6. Make copies of the applicable forms from your Recall Program and record how much product was found and where it was found (e.g. 4 skids with each with 50 masters sent to Sobeys on Aug 7).
7. It is recommended that your customers are contacted to ensure that their contact information is accurate etc. At the beginning of the call you would let them know that it is a mock recall/simulation. Write down which customers you would call to get the product back and write down a mock entry. Include company, contact person and phone numbers.

8. Record the time when you finished the exercise.
9. Meet with your recall team to discuss the mock recall, and how things could be improved. Record these findings and create an action plan for continuous improvements. Other topics to discuss during the final review meeting could include what you would do to dispose of the product, media policy, communication strategy, etc.

*A sample **Mock Recall Log** is included on the following page

Ways to make your mock recall more effective and a better learning experience:

1. Timing and frequency: be unpredictable (do not tell staff ahead of time) and schedule the mock recall for busy or inconvenient times. This can give you the most realistic idea of how effective your recall process is.
2. Be Realistic: the more realistic the scenario, the better prepared you will be if something actually happens. Start with a fairly easy scenario, then in subsequent years try and make the scenario more complex.
3. Be comprehensive: include all departments and test all aspects of your recall plan. If possible involve other supply chain partners (e.g. if you pack product involve the individual operations.)

Mock Recall Log

Company Name: August's Harvest

Date: July 17th 2019

START Time: 4PM

Who participated in the Mock Recall? Matt & Tamara			Comments
Name	Position	Mock Recall Responsibilities/Duties	
Matt Ham	Project Manager	Coordinator	
Tamara Hunt	Manager, Admin Services	Recall Assistance	
Reicza Ham	General Manager	Overseeing	
Andrew Russel	Production Manager	Re-Ordering	
Mock Recall Scenario - Specific product to be recalled - Customers/suppliers involved			Comments
Customers/Suppliers Involved: Loblaws - Atlas (X-Dock) / Us: August's Harvest (August's Harvest) Freight: Ippolito Transportation Bleach spilled on Red Pearls (Lot# 374) at Men's Farming before getting shipped to us. Men's Farming doesn't notify us until product is shipped out of our production area by Ippolito Transportation PO 1248 and Invoice# 6900 is on its way to the X-Dock. (Loblaws does not receive them!)			Lot#: 374R Invoice# 6900 - Mixed Pearl Onions - Case (18 x 250gm) Hymes Total Recalled: 40 Cases of Red Pearls

Contacting Customers/Suppliers - Identify who/where product was shipped to and who/where it came from Who <i>would</i> you call to get the products back?	Comments
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Company	Contact	Number
(Supplier) Men's Farming	Domestic Team	(519) 842-7701
(Resaler) August's Harvest	Manager, Admin Services	(519) 393-5550
(Transport) Ippolito Transportation	Domestic Team (Julie Dinsdale, Robin Desjardins & John Tackels)	(905) 639-1174 Ex. 3110
(Customer) Loblaw's X-dock	Domestic Team	(844) 269-3923

Lot# 374 has been contaminated prior to receiving it at August's Harvest but not communicated until Invoice# 6900 is on route to the Loblaw's X-Dock.

List of applicable records collected/gathered (Attach all relevant forms)	Where is this information stored?	Comments
Form O - Transporting Product	-Gap Binder 2019	
Form Q	-Gap Binder 2019	
(AHI's) Bill Of Ladings & Shipper Sheet	-Quickbooks	
(MF'S) Bill Of Ladings & Bills		
(Lot #'s) Class List		

Finish Time: 6PM

Identify gaps in your Recall Program and create action plan for improvement

Gap/Flaws identified during recall:

- Contact information not obvious or easy to find

Action Plan:

- Ensuring all paperwork is being inputted into the correct places (Ex. Quickbooks & Gap Forms)
- Ensuring all contact information is being kept up to date.

S. Recall Program

NOTE:

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1. Introduction

Everyone involved in the produce supply chain must do their part to ensure that the fruits and vegetables they offer are safe for consumers. Although most fresh fruits and vegetables retain a short shelf life, it is important to establish a recall program within an operation. If a product has been implicated as the source of a problem, accurate information must be readily and easily accessible to aid in the recall process.

Users following any of the CanadaGAP manuals will have a traceability system in place whereby packaging materials have a pack ID and have been identified (name/address). However, if a problem were to occur, the person responsible requires a means to recall product, thus the need for a recall program.

2. Program Components

An effective program includes, as a minimum, the following elements:

1. Name(s) and contact information of the recall coordinator(s) and recall team.
2. Written step-by-step procedures to be followed during a recall:
 - Record the reason for the recall and the health risk (**Form 1 – Recall Information**).
 - Halt distribution of the product and isolate the quantities still within the operation.
 - Identify the product and determine the quantities involved (**Form 2 – Product Information**).
 - Identify who needs to be contacted (**Form 3 – Contact Information**).
 - Communicate with the parties concerned (**Forms 4A and 4B – Recall Notifications**).
 - Recall the product (**Form 5 – Product Retrieval**).
 - Properly dispose of all contaminated product.
 - Determine preventative plans (**Form 6 – Follow-Up Plan**).

It is very important to keep accurate and complete records during the recall process. A recall is terminated when both CFIA and the recalling person responsible agree that the recalled product has been effectively removed from the supply chain and that the proper disposition and/or corrective action(s) have been completed.

FORM 1

RECALL INFORMATION

Recall Coordinator: Mathew Ham & Tamara Hunt
Contact Information: (519) 393-5550
Date/Time: July 17, 2019 @ 6PM

Reason for Recall: Describe the reason for the recall (biological, chemical or physical contamination) and how the product deficiency was discovered.

- Received a call from Men's Farming letting us know that a bottle of bleach left on the grading line to clean the machinery was discovered tipped over, spilling on an area where they had been holding the red pearl onions. They didn't communicate measures until the next day, after which a shipment had left August's Harvest on its way to X-Docks.

- Chemical Contamination.

- Had the product reached the consumer and we are unsure of how much bleach has been contaminated the product recall would be classified CLASS 1.

-Considering the product hasn't reached the consumer, we are classifying this recall as Class 3.

Hazard Assessment: The CFIA will assess the health risk and rank according to the following classifications:

Class 1: A *reasonable* possibility of *serious adverse* health consequences.

Class 2: A *remote* possibility of *serious adverse* health consequences.
A possibility of *temporary adverse* health consequences.

Class 3: A *low* possibility of *adverse* health consequences.

** Go to the following CFIA website for complete definitions: <http://inspection.gc.ca/food/safe-food-production-systems/food-recall-and-emergency-response/food-manual/eng/1378402475724/1378403080658?chap=12>

FORM 2

PRODUCT INFORMATION

Product	Lot Number/ Code/Date	Lot Quantity	Shipped To			Quantity Shipped and Requiring Recovery
			Name/Location	Date Shipped	Quantity Left On-Farm	
Red Pearl Onions	374R	945lbs	Loblaws - Atlas	07/17/19	812.84	All 40 cases recovered
					TOTAL= 40 Cases of Red Pearl Onions	

FORM 3

CONTACT INFORMATION

Canadian Food Inspection Agency (CFIA)

When there is a potential food recall, the CFIA Area/Regional Recall Coordinators/Contacts must be notified. They will help with the recall process and will determine the recall class and course of action.

Website: www.inspection.gc.ca	1-800-442-2342
Nova Scotia, Newfoundland and Labrador, Prince Edward Island & New Brunswick	506-381-7683
Quebec	866-806-4115
Ontario	416-665-5049
Manitoba	204-797-4501
Saskatchewan	306-529-0671
Alberta	587-230-2518
British Columbia	604-292-5780

Who needs to be contacted? (Person responsible keeps a complete list of customer contacts available)

Who?	(✓ all applicable)	Why?
CFIA Contact	✓	Contact will help with recall process
Person Who Produced the Product	✓	Men's Farming - contacts AHI (notification of contamination)
Provincial/Territorial Association/Organization		
Person Who Packed the Product	✓	August's Harvest Production Team - Notify to re-do order with new product for Loblaws to ship out on next shipment.
Wholesaler		
Broker		
Certification Body	✓	GAP- Notification of recall
Retailer	✓	Loblaws Atlas - Product has yet to be delivered - Contacted notifying order for red pearls has been backordered
Foodservice		
Consumer		
Other (e.g., CanadaGAP, law enforcement, etc.)	✓	Ippolito Transportation - Notify transportation to arrange return of contaminated product

FORM 4A

RECALL NOTIFICATION – Via Phone

The following information is to aid you when contacting people to recall your product. Fill out one sheet for each group contacted.

This is Matthew Ham . I am calling from August's Havest
Name of Recall Coordinator your operation's name
to notify you that all product 374 on 7/17/19 needs to be
lot # date/time
returned
returned, destroyed, modified, etc.

I have the following questions to ask you about this recall:

1. Who do I speak to about a recall and what is their contact information?

Contact (name): Julie Dinsdale (Ippolito Transportation)

Phone Number: 1 (905) 639-1174 ex 3110

Fax Number: (905) 631-7711

Title: Domestic GTA Logistics

2. Do you have any of the product(s) being recalled? (If no, terminate questioning)

YES NO

If the answer to question #2 is YES, the product must be destroyed
returned, destroyed, modified, etc.

3. The returned & remaining of this product will be dealt with by
return, destruction, modification, etc.

Compostable Waste Disposal
action intended

4. Have you received any reports of illness or injury related to this product?

YES NO

If yes, please provide details.

Thank you for your time.

Confirmation Signature: Tamara Hunt Date: 7/17/19

FORM 5
PRODUCT RETRIEVAL

Quantity Shipped and Requiring Recovery (from Form 2)	Date/ Time (from Form 4)	Person Contacted	Quantity Recovered or Destroyed	Quantity Remaining With Contact	Action Taken and Description (e.g., picked up, returned, destroyed, etc.)	Total Quantity Recovered (should be the same as column#1)
40 cases Mixed Pearls	7/17/19 4:45pm	Julie Dinsdale	40 Cases	Zero	Destroyed	40 Cases
					TOTAL = (Total to equal the total on Form 2)	

FORM 6
FOLLOW-UP PLAN

1. Why was there a recall (i.e., what was the source of the problem)?

Bleach left to clean equipment was accidentally spilled onto product. Employee responsible for cleaning did not notify Men's Farming regarding the situation until after AHI had received product and shipped the first shipment with the the contaminated product. 40 cases of red peal onions were contaminated as a result.

2. What corrective action(s) was/were taken? (*List and describe*)

1. Following up with all contacts to ensure the product doesn't make its way to our customers
2. Men's fired empoloyee responsible for not notifying management soon enough.
3. Employee responsible (Andrew Russell) was reprimanded for not having more thoroughly inspected the product for smells, as the chlorine may have been detectable by smell.

3. What ongoing procedures did you put in place to prevent recurrence of the problem?

Created line on our PO's for vendor/supplier to sign & return stating they have assessed and inspected product, production site & cargo area of transportation for quality and contamination issues (See included example PO). Reminded employees that in receiving product they are responsible for ensuring that there are no quality issues with it. This includes issues that might only be detectable by smell or discoloration. If there is any doubt about the quality of a product management is to be notified as soon as possible.

4. Identify the person(s) responsible for ensuring the above actions and procedures are monitored and implemented.

Our suppliers - Men's Farming

Production Crew- including Chris Huggins, Susan Peters, and Susanna Janzen.

Production Manager - Andrew Russell

Matthew Ham - Project Manager & Tamara Hunt - Manager, Admin Services

Confirmation Signature: Tamara Hunt Date: 7/17/19

Other Communications

	Yes	No
Press Release		x
Public Notification		x
Other (specify):		x

SUPPLIER & INTERNAL TRACEABILITY & ORDER APPROVAL PROCEDURE SYSTEM

Lot	DOO	Active	Paid	Vend.	Category	P Detail	Via	Qty	Ordered U/W	Unit	Cont.	T/W-P	DOH/R	Rcvd By:	Status:	Quality:	Vend. Bill #	AHI PO #	Vend. S.O #	Deviation - Remediation	Further
426W	11/22/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	White Pearl Onions	AHI	2	1000	lbs	Bin	1,735.00	12/2/2019	Andrew	Rcvd	Good		1352	9145		
426R	11/22/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	Red Pearl Onions	AHI	2	1000	lbs	Bin	1,744.00	12/2/2019	Andrew	Rcvd	Good		1352	9145		
426G	11/22/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	Gold Pearl Onions	AHI	4	1000	lbs	Bin	3,697.00	12/2/2019	Andrew	Rcvd	Good		1352	9145		
430S	12/10/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	Shallots	AHI	10	1000	lbs	Bin	10,062.00	12/16/2019	Andrew	Rcvd	Good		1362	9173		
430G	12/10/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	Gold Pearl Onions	AHI	2	1000	lbs	Bin	4,040.00	12/16/2019	Andrew	Rcvd	Good		1362	9173		
430IT	12/10/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	White Pearl Onions	AHI	2	1000	lbs	Bin	1,680.00	12/16/2019	Andrew	Rcvd	Good		1362	9173		
430R	12/10/2019	<input type="checkbox"/>	<input checked="" type="checkbox"/>		Produc	Red Pearl Onions	AHI	2	1000	lbs	Bin	2,240.00	12/16/2019	Andrew	Rcvd	Good		1362	9173		
434S	12/26/2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	Shallots	AHI	10	1000	lbs	Bin	9,825.00	12/30/2019	Andrew	Rcvd	Good		1373	9188		
434C	12/26/2019	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	Cippolinis	AHI	2	1000	lbs	Bin	1,981.00	12/30/2019	Andrew	Rcvd	Good		1373	9188		
435S	1/2/2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	Shallots	AHI	5	1000	lbs	Bin	6,235.00	1/7/2020	Andrew	Rcvd	Good		1377	9196		
435W	1/2/2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	White Pearl Onions	AHI	4	1000	lbs	Bin	1,325.00	1/7/2020	Andrew	Rcvd	Good		1377	9196		
435R	1/2/2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	Red Pearl Onions	AHI	4	1000	lbs	Bin	4,040.00	1/7/2020	Andrew	Rcvd	Good		1377	9196		
435G	1/2/2020	<input checked="" type="checkbox"/>	<input type="checkbox"/>		Produc	Gold Pearl Onions	AHI	1	1000	lbs	Bin	1,289.00	1/7/2020	Andrew	Rcvd	Good		1377	9196		