

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: _____

Date: _____

START Time: _____

Who participated in the Mock Recall?			Comments
Name	Position	Mock Recall Responsibilities/Duties	
Mock Recall Scenario <ul style="list-style-type: none">- Specific product to be recalled- Customers/suppliers involved			Comments

Contacting Customers/Suppliers - Identify who/where product was shipped to and who/where it came from Who <u>would</u> you call to get the products back?	Comments
---	-----------------

Company	Contact	Number

List of applicable records collected/gathered (Attach all relevant forms)	Where is this information stored?	Comments
<hr/> <hr/> <hr/> <hr/> <hr/> <hr/>		

Finish Time: _____

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

