

NW Green Farm Recall Program

Contents

Handling Customer Complaints	2
Customer Complaint Investigation:	2
Recall Committee.....	3
Recall Decision Phase:	3
Recall Actions:.....	4
First 24 Hours:.....	4
Product Recovery and Disposal:	4
Recall Actions: Termination of Recall:	5
Recall Effectiveness Checks:	5
Testing the Recall Plan:.....	5
Appendix A – Customer Complaint Form	6
Appendix B – Agency Contacts	7
Appendix C – Telephone Script.....	8
Appendix D – Written Recall Notification.....	9
Appendix E – Press Release	10
Appendix F – Recall Effectiveness Check.....	11

Handling Customer Complaints

Use the Customer Complaint Form to gather and record all the pertinent information regarding a customer complaint (see Appendix A for Customer Complaint Form). Filling out the form helps guarantee you will ask all the right questions, gather all the data you need to resolve the issue, limit the scope of your customer's complaint and follow up to satisfy your customer.

Handle each complaint as though it was the first time you learned of a serious product defect. If that turns out to be the situation, you will want to have a written record documenting the time you first became aware of the problem.

The most important part of satisfying any customer complaint is a quick response. If the customer left a recorded message, make every effort to get back to them *as soon as possible*. Letting the customer know you take their complaint seriously is the first step in strengthening your relationship.

If the complaint involves a physical issue – such as a foreign object or packaging problem - ask the customer to email you a photo showing the issue as well as a photo of the product date code.

Follow up: be sure to document any follow up conversations with the customer regarding the incident. Use email when appropriate – it documents and date stamps your response.

Customer Complaint Investigation:

- Ensure that all products that may have been affected are investigated by a fully trained person or by a qualified outside agent.
- Have results of the investigation emailed to you.
- Keep all records of the investigation including person's name, date, and investigation discoveries.
- Take action based on investigation conclusions:
 - Determine if the complaint is a single, isolated event that would be relevant to *only* this customer;
 - If the cause of the complaint is traceable to an adulterated ingredient or defective packaging materials, immediately contact the supplier/producer of the product with your findings;
 - If the product is being used by another company as an ingredient in their products, immediately notify the company that their product may be adulterated.

If the answer to any of the following questions is “yes,” a product recall may be needed:

1. If the complaint is due to a foreign object - is it possible that an entire production batch could have been contaminated?
2. If the complaint is due to illness - is there a possibility of adverse health consequences if product is consumed by others?
3. Is the complaint due to failures of packaging or pasteurization?
4. Is the complaint due to an undeclared allergen or labeling problem?

Recall Committee

A Recall Committee should be organized in case **Generic Farms** is ever involved in a recall event. In-house specialists should be named and trained so they understand the role they will undertake and are prepared to handle their responsibilities immediately. Outside companies should be lined up to handle specific roles that are beyond the expertise of in-house employees – such as media communications or legal counsel.

The **Contact List Coordinator** is _____, and he/she is responsible for developing and updating the contact list for employees, customers and suppliers.

The **Recall Coordinator** is _____, and he/she has full authority to involve and delegate responsibilities to other employees as needed to address the issues at hand. The following list indicates the name and responsibilities of the Recall Team:

Quality Assurance: _____. This person is responsible for gathering and analyzing appropriate company documents of production monitoring and quality tests.

Technical Advisory: _____. This person is responsible for providing independent testing of food samples, assisting the Generic Farms Quality Assurance Manager with determining Root Cause, and providing technical support and advice to the Recall Team.

Media Communication: _____. This person is responsible for representing Generic Farms and interfacing with customers and the media.

Complaint Investigation: _____. This person is responsible for performing Root Cause Analysis to determine the scope of the recall.

Contacting Customers: _____. This person is responsible for contacting all customers who may have purchased product that is at risk and ensuring that the unsafe foods are contained and either destroyed or rendered safe.

Legal Counsel: _____. This person is responsible for mitigating the Generic Farms and farmer's financial risk and advising the Recall Coordinator in managing the event.

Recall Decision Phase:

Generic Farms will collect and analyze all information and data it has regarding the product that may be recalled. The range and accuracy of production and quality control records will determine the scope and depth of product that should be recalled (amount and type of product).

Levels of recall depth are:

Wholesale level: Product has been distributed to a warehouse or distribution center and is not under the direct control of **Generic Farms**.

Retail level: Product has been received by retailers for sale to household customers.

HRI level: Product has been received by hotels, restaurants, and institutional customers.

Consumer level: Product has been sold directly to consumers.

Recall Actions:

First 24 Hours:

Generic Farms has the responsibility to recall product in a clear and timely manner, and will make all reasonable efforts to remove affected products from commerce. Any products that are still in our control (inventory, in transit or in offsite distribution) will be detained and segregated. Identification codes and quantities will be documented by the Recall Committee to assist in the reconciliation or product amounts. **Generic Farms'** Recall Committee is responsible for determining whether the recall is effective and will verify that all customers have been notified.

The Recall Coordinator will notify the appropriate regulatory agencies.

The Recall Committee will prepare a customer distribution list indicating where recalled product was shipped. The Recall Coordinator will copy WSDA and/or FDA on the distribution list.

The Recall Committee will notify all customers that received recalled product(s). The method of notification of customers will be determined by the severity of the recall. The quickest way to reach customers is by telephone. A telephone script (see Appendix C) will be prepared for the callers to use that provides clear information on the product, the problem and what actions customers should take. Written recall notice (email) will be provided to all customers who received recalled product(s). See Appendix D for Written Notice of Recall Template. Confirm receipt of the Notice of Recall with all accounts. The recall coordinator will copy WSDA and/or FDA on any communications to customers.

If necessitated, the Recall Committee will notify consumers of the recall. This may include a press release (see Appendix E for Template) and a Food Safety notice. Communication methods may include posting notification on social media sites, web sites and in stores in a location where product is sold. The Recall Coordinator will copy WSDA and/or FDA on any press releases sent to media outlets.

For situations where the recalled product may pose a significant health hazard, the recall coordinator will file Reportable Food Registry (RFR) at

<http://www.fda.gov/food/complianceenforcement/rfr/default.htm>

Product Recovery and Disposal:

The Recall Committee will control all affected product. Any returned product will be clearly marked not for sale or distribution and will be stored in an area that is separate from any other food products.

Any disposition or reconditioning of product may need to be documented and/or approved by WSDA or FDA.

The Recall Committee will also work with the appropriate local health jurisdictions agencies to determine a safe way to dispose of product.

All quantities and identification codes of disposed items will be recorded.

The Recall Committee will reconcile the volume of recalled product produced with the volume of recalled product on hand and returned.

Recall Actions: Termination of Recall:

Termination of the recall is considered after all reasonable efforts have been made to remove the recalled product from commerce, including reconciliation, recall effectiveness and disposition. The Recall Coordinator will issue a report to identify the reason for the recall and the corrective action steps to prevent this from happening again.

Recall Effectiveness Checks:

Generic Farms is responsible for determining whether the recall is effective. We will verify that all customers have received notification and that they have taken appropriate action. We will confirm receipt of the Notice of Recall with all accounts. **(See Appendix F for Template)**

Testing the Recall Plan:

Generic Farms will conduct a mock recall on an annual basis use to test our recall plan procedures.

For the test, a product from our actual production records, with lot numbers and production dates, will be selected. The lot should be recently produced with some stock still on site or storage and some in the marketplace. This will allow **Generic Farms** to test internal and external ability to account for product.

The Recall Committee should convene and “work the plan.” In all communication, however, we will stress the fact that this is a mock exercise designed strictly for emergency preparedness and that nothing is wrong with the actual product. The mock recall should involve a review of company records.

The goal of a mock recall is to prove that **Generic Farms** can effectively trace all raw materials through receiving, production, packaging, storage and determine the locations to which all product has been shipped.

Drafting a communication plan to make sure that recall/market removal notices are relayed to the responsible employees should also be part of the recall plan.

Testing the plan will quickly point out any shortcomings, which can then be revised to work better. The date and results of each mock recall should be documented in writing.

Appendix A – Customer Complaint Form

Generic Farms

Customer Complaint

Date of initial contact by customer: _____ Time: _____

Name of personnel taking this complaint: _____

Date of customer interview: _____ Time: _____

Customer's Name: _____

Customer's Address: _____

Customer's Home Phone: _____ Email: _____

Complaint Details: _____

Degree of injury or trauma suffered by the customer: _____

Product (including package type and size): _____

Date and farm where the product was purchased: _____

Can customer send a photo (include original box & label)? _____

Product Date Code: _____

How the customer stored and handled the product: _____

How was product prepared and served? _____

Name and age of person affected: _____

Symptoms: _____. Does person have illness or allergies? _____

Has persons seen a doctor for this problem, etc. _____

Has the complaint been referred to anyone else? (Public Health, FDA, CFIA, FSIS, etc.)

Appendix B – Agency Contacts

Agency Recall Contacts

Updated 7/9/2014

Food and Drug Administration (FDA) oversees recalls involving all food products (including egg products) with the exception of meat and poultry.

Food Safety Inspection Service (FSIS) is responsible for safety of meat, poultry and egg products.

Washington State Department of Agriculture

Recall Coordinator

Susie Baptista

Office: (360) 902-1961

Personal cell phone: (360) 480-2425

Washington State Department of Agriculture Food Safety Manager

(360) 902-1876

After you develop your recall strategy, and *before you implement it* notify the **USDA Recall Coordinator**:

FDA Recall Coordinator: (425) 302-0403

U.S. Food and Drug Administration, 24-hour emergency line (301) 443-1240.

Email FDA Recall Coordinator: orasearecalls@fda.hhs.gov

Sending an email documents the date and time when you notified FDA!

Anh Trinh Nguyen

Lead Recall Coordinator

US Food and Drug Administration

22201 23rd Drive SE

Bothell, WA 98021-4421

Desk: (425) 483-4891

Fax: (425) 483-4915

Appendix C – Telephone Script

Generic Farms

Product Recall Telephone Script

Date: _____

Company: _____

Company Contact: _____ Telephone Number: _____

Email address for follow-up: _____

Good morning / afternoon:

This is _____ calling from **Generic Farms** to notify your company that we are voluntarily recalling one of our products. Do you have a pen and paper handy to write down some information? Great. The product brand is _____. The packaging is _____ (size or weight) _____. The product code is _____. The recall date code is _____. The codes are located _____ (describe where on the packaging).

The reason for the recall is _____. The product might not meet our copy quality standards, and MAY represent a _____ (small/ moderate/serious (choose appropriate word) _____ health or safety threat to people who use it.

At this point, there are a few things we'd like you to do right away. First, determine if any of the product in YOUR inventory carries the recall date codes(s). If you have any of it in your inventory, please immediately discontinue sale or distribution, and put the product ON HOLD for now. We will contact you with further instructions. In the meantime, DO NOT dispose of this product. When a final decision is made about what to do with the product in inventory, we will contact you to take care of all issues associated with this recall.

We will also send you written confirmation of this recall notification. Would you like to receive it by fax, regular mail or e-mail? _____. Let me make sure I have the right contact info (verify above information).

If you have any questions, please call _____ at _____. You can also check for updates to this situation on our website, at _____. We certainly regret any inconvenience that may be caused by this recall and thank you for your assistance.

Appendix D – Written Recall Notification

(Put on company letterhead)

URGENT!

FOOD RECALL NOTIFICATION

Date: _____

Generic Farms is voluntarily recalling _____ (product name) due to _____ (reason for recall) . It may not meet our copy quality standards, and MAY represent a _____ (small/ moderate/serious (choose appropriate word) _____ health or safety threat to people who use it.

PLEASE FOLLOW THESE INSTRUCTIONS TO ENSURE A SUCCESSFUL RECALL:

- Immediately discontinue selling or distributing your existing stock of _____ (brand name, code of product, package size, etc.) _____.
- Inform us of the quantity of product you have on hand by completing the bottom portion of this form. Sign the form and return it by FAX to _____ (fax number) as soon as possible.
- DO NOT dispose of this product! Instead: (choose one of the two options)
 - Wait for further instructions from _____ OR
 - Return the recalled product to _____ as soon as possible.

IF YOU HAVE DISTRIBUTED ANY OF THE RECALLED PRODUCTS, PLEASE IMMEDIATELY:

- Contact your consignees by telephone and in writing to advise them about the recall.
- Instruct them to return their unused, undestroyed stock to _____.
- Instruct them to also notify any of their consignees, which may have received the recalled product.

Thank you for your cooperation! If you have any questions regarding this recall, please feel free to contact _____ at _____ (phone) _____.

Sincerely,

Customer Name: _____

Quantity on hand: _____ Cases / Cans / Packages (Circle One)

Owner's Name – Please Print

Owner's Signature

Appendix E – Press Release

(Put on company letterhead)

FOR IMMEDIATE RELEASE

Date: _____

Contact: _____(Person's name)_____

Phone: _____

GENERIC FARMS RECALLS “Snackies” DUE TO POSSIBLE HEALTH RISK

Generic Farms of Burlington, Washington is recalling its 5 ounce packages of “Snackies” food treats because they have the potential to be contaminated with *Salmonella*, an organism which can cause serious and sometimes fatal infections in young children, frail or elderly people, and others with weakened immune systems. Healthy persons infected with *Salmonella* often experience fever, diarrhea (which may be bloody), nausea, vomiting and abdominal pain. In rare circumstances, infection with *Salmonella* can result in the organism getting into the bloodstream and producing more severe illnesses such as arterial infections (i.e. infected aneurysms), endocarditis and arthritis.

The recalled “Snackies” were distributed nationwide in retail stores and through mail orders. The product comes in a 5 ounce, clear plastic package marked with lot #555666 on the top and with an expiration date of 12/12/16 stamped on the side.

No illnesses have been reported to date in connection with this problem.

The potential for contamination was noted when routine testing by the company revealed the presence of *Salmonella* in some 5 ounce packages of “Snackies.” Production has been suspended while the company continues its investigation into the source of the problem.

Consumers who have purchased 5 ounce packages of “Snackies” are urged to return them to the place of purchase for a full refund. Consumers with questions may contact the company at 1 (800) 555-1212.

Representatives of the news media may obtain more information about Generic Farms as well as any updates on this recall notification on our website: www.genericfarms.com or by contacting __ (person's name)___ at the number listed above.

Appendix F – Recall Effectiveness Check

Generic Farms

Recall Effectiveness Check

Date: _____

To: _____ (Cosignee name and address)_____

Reference: _____ (Recall product name, product code, date code, FDA or FSIS Recall Number)_____

The following checklist has been sent to you as part of a required Recall Effectiveness Check. Please complete this checklist, sign and date it and mail or fax it to:

Generic Farms, 123 Main Street City, State Zip Code

1. Did your company receive notification from **Generic Foods** that the above listed product was being recalled? YES NO
2. Did your firm receive shipments of the recalled product? YES NO (If NO, please sign this letter and return.)
3. Do you have any of the recalled product in your current inventory? YES NO
4. If the answer to #3 is YES, do you plan to return the recalled product as requested to **Generic Farms**?
 YES Please list quantities and expected return delivery date: _____
 NO Please explain your intentions: _____
5. Have you received illness or injury reports related to the recalled product?
 YES Provide details: _____
 NO
6. Did you ship the recalled product to other distributors, retailers or consignees? YES NO
7. If the answer to #6 is YES, did you send the consignee a recall notice? YES NO
8. If the answer to #7 is YES, did the consignee have any product on hand? YES NO

Thank you for your cooperation. Please sign and date your signature below.

Signature

Title

Date

Company