Definitions

IFS

Product recall - Any measure aimed at achieving the return of a dangerous product that has already been supplied or made available to consumers by the producer or distributor. (IFS)
Product withdrawal - Any measure aimed at preventing the distribution, display and offer of a product dangerous to the consumer.

BRC

Product recall Any measures aimed at achieving the return of an unfit product from customers and final consumers.
Product withdrawal Any measures aimed at achieving the return of out-of-specification or unfit products from customers, but not from final consumers.

GlobalGAP

Recall – Is the process by which a product is removed from the supply chain and returned to the producer/handler. In some cases, consumers are advised to take action, such as returning or destroying produce items.
Withdrawal – is the process by which a product is removed from the supply chain prior to it reaching the end customer

FAO/WHO

Food recall - The action to remove food from the market at any stage of the food chain, including that possessed by consumers.

Process for Handling Recalls and Withdrawals

Step 1. Reporting of the Recall/Withdrawal by certified company

Customers are required to report recalls/withdrawals within 3 working days to Certima as stated in the Certification Protocol and Regulations.
Reporting can be done by e-mail to the local Certima contact person or to recall@certima.org .

Purpose of this first information:

- Make Certima aware of the incident
- Agree how further communication shall take place

Recalls and withdrawals that shall be reported comprise all products produced or handled on your site. Recalls on products out of scope (exclusions) shall also be reported as the cause may have a relation with products in scope.
Recalls on traded products do not need to be reported (unless the certification is based on a Broker standard). We appreciate a notification in this case, but will not start further investigations.

Step 2. Information gathering

Certima will ask the customer to supply the necessary information to be able to judge whether the status of the certificate can be maintained. In order to get consistent information, partner will send the “Notification Form Recall/Withdrawal”.
This form has to be completed and returned to the Certima **within 2 weeks**.
Should the recall manager feel that more urgency is required, these time-lines can be shortened. Reasons for this could be involvement from government, press, standard-owner etc. In those cases, the Scheme manager needs to be informed immediately.
Should the customer need more time to finish the report, this shall always be communicated by the customer and approved by Certima. We shall determine the need for interim reporting. Where deemed necessary the Scheme Manager shall be consulted.

In case of a withdrawal, the Recall Manager may decide to close the case after receiving the report, depending on the reason and size of the incident. It is recommended that for withdrawals concerning food safety, the full recall procedure is followed.

The recalls and withdrawals as well the process of communication are to be registered in Recall Withdrawal Register, stored in the server.

S:\11. Management System\Recall withdrawal register

The recall manager (the person appointed to deal with the Recall/Withdrawal) is responsible to fulfill the register.

All data related with each Recall Withdrawal is stored in a folder having the name of the ID number of the Recall Withdrawal as registered in the register.

Step 3. Review and evaluation of information

Partner shall appoint one person (Recall manager) who is owner of the process of managing the communication with the auditee and reviewing the technical information. This may be the competent auditor (preferably the auditor who has done the last audit). This person is responsible for reviewing and evaluating customer input, requiring additional information if necessary and completing the forms.

Step 4. Recommendation and final decision

The Recall manager sends the completed form with their recommendation to auditor and Certification manager. Auditor and CM shall reply within 5 working days with the final decision.

Step 5. Communication, record keeping and confidentiality

All information will be treated strictly confidential but may be shown to standard-owners or accreditation bodies at their request. Incidents having a major impact on public safety and/or generating a lot of media interest have to be reported pro-actively to standard owners at the discretion of the scheme manager.

The Notification Form, once completed, will be stored in the customers electronic folder.

A copy of the final form may be sent to the auditee.

BRC requires:

-The certification body must notify BRCGS of all incidents (including product recalls) using the report located at https://form.jotform.com/92262739251964.

-Initial notification to BRCGS must be made within 24 hours of the site notifying the certification body.

- If there is a significant delay between notification of the incident and completion of root cause analysis (which is probable with many incidents), the certification body should provide BRCGS with a summary of the available information, completing as much of the report as possible, within the 24 hours mentioned above. The remaining information (e.g. the root cause and subsequent preventive actions) can be added to the report at a later date, using the link that is included in the confirmation email.

This update must be completed within 3 weeks.

-CBs to give quarterly overviews of all recalls/withdrawals reported. This is managed by Scheme managers.

Details on the process steps and decision criteria

Step 1. Reporting of the recall/withdrawal by auditee

If the recall/withdrawal is not reported in time, or not at all, this will result in an NC in the next audit. Please note that there are differences between the standards (BRC only requires reporting of recall, IFS requires both recall and withdrawal to be reported). For IFS, the clause on Management of

incidents shall be used (5.9.1 for IFS Food). A reference to the Certima Certification Protocol can be used in the motivation.
Customers shall be alerted in case they do not report a recall to Certima.

Step 2. Information gathering

It is important that we get a complete view of the recall/withdrawal, i.e. reason, type of product, amount of product, who else was notified. Communication of the recall is an important part of the information we need to review. Do not forget that when the cause is a raw material, that the company must inform their supplier.

Step 3. Information review

The role of Certima is to ascertain that the company is still "certificate worthy". Our approach here is to help the customer demonstrate this. After all we have certified them.

Review of information shall be done using following criteria:

a) completeness of information.
b) content of the information:
   - was the recall/withdrawal handled efficiently (i.e. did the companies recall procedure work)
   - is the root cause analysis sufficient
   - are corrective actions and time frame appropriate
   - is communication well managed

If required, a re-audit or visit can be organized to assess the information.

Step 4. Recommendation and final decision

After receiving and judging the documentation provided by the customer (plus extra information of visit if applicable) the auditor and certifier are convened. A decision on certifier should be taken.

Step 5. Communication, record keeping and confidentiality

All information will be treated strictly confidential but may be shown to standard-owners or accreditation bodies at their request. BRC requires CBs to give quarterly overviews of all recalls/withdrawals reported.

Follow-up in next audit

The Notification Form, once completed, will be stored in the electronic folder of the Customer, under the Recalls folder. At the Contract Review step, recalls and withdrawals shall be considered when determining the audit duration.

At the next audit the auditor shall always perform a full review the recall. Minimum to investigate is implementation and effectiveness of corrective actions. Observations shall be written in the audit report.
It is the partners responsibility to ensure that the auditor performing the next audit is aware of the recall/withdrawal details.

If during the audit, the auditor finds out that there was a non-reported recall or withdrawal, a non-conformity will be issued.

References

IFS food Standard
BRC food standard
FAO/WHO guide for developing and improving national food recall systems
Certification protocol and regulations
Procedure Suspending, withdrawing or reducing the scope of certification