

# AUSTRALIA AND NEW ZEALAND PRODUCT RECALL/WITHDRAWAL PROCESSES

These processes have been developed by ECR Australasia and endorsed by all major food and grocery suppliers, retailers and wholesalers in Australia and New Zealand for the conduct of product recalls and withdrawals.

## ABOUT THE PROCESSES

### Purpose

To facilitate the prompt recall and/or withdrawal of defective and/or unsafe products from the market place through the use of agreed procedures and common standardised information.

### Scope

All food, pharmaceutical and other consumer products sold or distributed through retail stores.

### Responsibility

Refer to FSANZ and NZFSA Protocols, TGA or other Authority Product Recall procedures for those responsible for the investigation, communication and review of all potential and actual product withdrawal/recall actions.

### Records

In the event of a product recall or withdrawal, it is recommended that records be collected, controlled and stored by the Recall Coordinator and/or Crisis Management team and kept for a minimum of 11 years in soft copy at least.

### Processes

The processes are designed to assist manufacturers, suppliers and importers to quickly and efficiently contact all Australian and New Zealand retailers, wholesalers and regulatory agencies using a common standardised, industry endorsed A&NZ Product Recall/Withdrawal Form (see separate template) for the communication and documentation of product withdrawals and product recalls. It also assists retailers and wholesalers to efficiently contact regulatory agencies.

### Reviews

The processes, template form and contact information are to be *annually* reviewed with government bodies, related industry and key stakeholders via a working group overseen by AFGC and NZFGC.

## SIX POINT SUMMARY GUIDELINE

See separate Product Recall/Withdrawal Flowchart for a detailed overview of the typical processes required. In summary...

1. Record details of non-compliant product.
2. Complete A&NZ Product Recall/Withdrawal Form (Template) as soon as possible to assist smooth communications by acting as a checklist before communicating with retailers.
3. Notifying the media:
  - If media information is not available initially upon announcing recall, this should not hold up transfer of template form to retailers.
  - Always copy retailers (if later) using finalised media page in template.
  - When notifying the media – please always review if language or ethnic press should be included in notifications to the media.
4. Ensure you reference existing retailer and manufacturer company procedures e.g. fax streaming, advertisement, internal sign-off processes and other tasks.
5. Plan re-stocking arrangements with retailer coordinators.
6. Carry out review of recall with retailers and authorities as required at least 2 to 5 days after recall and again in six weeks after recall (in some cases).

# GLOSSARY OF TERMS

## AUTHORITIES/ASSOCIATIONS INVOLVED IN RECALLS

### Agriculture Departments

#### **DAFF (Australia):** [www.daff.gov.au](http://www.daff.gov.au)

The Australian Government Department of Agriculture, Fisheries and Forestry (DAFF) is responsible for Australia's agriculture, fisheries and forestry industries. Its role in Australia is to oversee health matters in agricultural, forestry and animal feeding and animal care products.

#### **MAF (NZ):** [www.maf.govt.nz](http://www.maf.govt.nz)

The New Zealand Government Department MAF (Ministry of Agriculture and Forestry) is responsible for agriculture, horticulture and forestry, safe food, a protected environment, the wise use of the land, the creation of clean, green product and the economic success of those who produce it. Its role in New Zealand is to oversee health matters in agricultural and animal feeding and care products.

#### **AFGC** [www.afgc.org.au](http://www.afgc.org.au)

The Australian Food and Grocery Council (AFGC) is the national body representing Australia's food and grocery products manufacturers. The role of the Council is to help shape a business environment that encourages the food and grocery products industry.

#### **Consumer Affairs** [Refer Below](#)

Australian and New Zealand legislation requires that relevant consumer affairs agencies to be informed of all product recall's. They are responsible for ensuring that all consumer products available in Australia and New Zealand are of an acceptable standard.

#### **FSANZ** [www.foodstandards.gov.au](http://www.foodstandards.gov.au)

Food Standards Australia New Zealand is the statutory authority that develops food standards (i.e. Food Standards Code) for Australia and New Zealand, primarily for the protection of public health and safety and assurance that all foods produced or imported for sale in Australia and New Zealand are of an acceptable standard.

#### **NZFSA** [www.nzfsa.govt.nz](http://www.nzfsa.govt.nz)

New Zealand Food Safety Authority is a Government agency responsible for ensuring that foods products available in New Zealand comply with the Food Standards Code or other regulation.

#### **FGC (NZ)** [www.fgc.org.nz](http://www.fgc.org.nz)

The New Zealand Food & Grocery Council (FGC) represents the manufacturers and suppliers behind New Zealand's favourite food, beverage and grocery brands.

#### **Medsafe** [www.medsafe.govt.nz](http://www.medsafe.govt.nz)

New Zealand Medicines and Medical Devices Safety Authority. A business unit of the Ministry of Health and the authority responsible for the regulation of therapeutic products in New Zealand and ensure they are of an acceptable standard.

#### **TGA** [www.tga.gov.au](http://www.tga.gov.au)

Therapeutic Goods Administration is an agency within the Australian Government Department of Health and Ageing responsible for ensuring that healthcare products available in Australia are of an acceptable standard.

### Trade Measurement

#### **In Australia** [www.consumer.gov.au](http://www.consumer.gov.au)

the State Commissioners for Consumer Affairs are the responsible authorities regulating the trading environment in which consumers buy to ensure they are confident they will be treated fairly when buying goods or services. They administer the Trade Measurement Act, which relates to areas of "standards maintenance" and "trade measurement activities" respectively (e.g. weights and measures) that are undertaken to promote and achieve fair trading practices in their region.

#### **In New Zealand** [www.consumeraffairs.govt.nz](http://www.consumeraffairs.govt.nz)

the Ministry of Consumer Affairs administer the Weights & Measures Act 1987 which relates to areas of "standards maintenance" and "trade measurement activities" respectively (e.g. weights and measures) that are undertaken to promote and achieve fair trading practices in their region.

## DEFINITIONS FOR CRISIS MANAGEMENT PROCESSES

### Auditor

A person who conducts an audit.

### Corporate Brands

This refers to generic or premium branded goods that are brand names owned by retailers, which means they (the retailer) are often the primary sponsors of the product. Examples of retailer brands include - You'll Love Coles, Homebrand, Black & Gold, and IGA branded products.

### Remedial Or Corrective Action

This refers to any such action taken leading to product recall/ withdrawal procedures such as:

- Permanent removal of the unsafe products (i.e. recall) or non-compliant products (i.e. withdrawn) from the market place or from use;
- Temporary removal of the unsafe products (i.e. recall) or non-compliant products (i.e. withdrawn) from the market place, followed by rectification of the problem and a later return to the market.

### Hazard

A biological, chemical or physical agent in, or condition of, food with the potential to cause an adverse health effect.

### Recall

This refers to the 'action taken to remove food product or products from sale, distribution and consumption which may pose a safety hazard (i.e. risk of serious injury, illness or death) to consumers.

### Recall Levels

There are two Recall Levels - Trade Level Recall and Consumer Level Recall

**a) Consumer Level Recall:** This is the most extensive type of recall. It involves the disposal or recovery of the unsafe product from all points in the production and distribution network/chain\*\* including recovery from consumers (and thus includes an advertising process be put in place).

\*\* Distribution network/chain - includes but is not limited to trade outlets, retail outlets, supermarkets, grocery stores, convenience stores, service stations, health food stores, gyms, restaurant or catering facilities.

**b) Trade Level Recall:** involves the disposal or recovery of the unsafe product from distribution centres\*, wholesalers and often may also involve disposal and or recovery of product from hospitals, restaurants and other major catering establishments, and outlets that sell food manufactured for immediate consumption or food that is prepared on the premises.

\* Once a product has left the premises of the sponsor or co-sponsor, or left premises owned and controlled by the sponsor, it is effectively in a

distribution centre or wholesaler. If a sponsor's product represents a public health and safety risk and is in a distribution centre or wholesaler (as above) recovery of the product is classified as a trade recall and notification to the authorities is required.

### Sponsor

A sponsor is the firm (i.e. individual, partnership, corporation), or other entity having primary responsibility for the supply of the product in Australia or New Zealand. A sponsor will often be a manufacturer or importer. There may also be more than one sponsor (i.e. co-sponsor) for a particular product.

### Co-Sponsor

An example of a co-sponsor would be a 'corporate brand' owned by a retailer who may take part or full control of the recall and or withdrawal decisions for that corporate brand.

### Withdrawal

Refers to the removal from distribution and sale of non-compliant products for which no health risk exists. A product may be withdrawn from sale for two reasons:

- The product has a quality defect (e.g. colour or texture or squeaky) or is underweight or has labelling irregularities that does not pose a potential risk to public health and safety;
- As a precaution (i.e. **Precautionary Withdrawal**), stock may be quarantined, and or withdrawn from distribution and or sale pending further investigation or testing. *NOTE: If a risk to public health or safety is established, the product must be recalled.*

### Withdrawal Levels

There are two levels - Warehouse Level Withdrawal and Retailer Level Withdrawal

**a) Warehouse Level Withdrawal:** involves the announcing, quarantining, disposal and or recovery of the non-compliant product from key points in the supply chain such as production and distribution warehouses **before** it reaches the retail or other outlets (i.e. before consumers gain access to the non-compliant product).

**b) Retailer Level Withdrawal:** involves the announcing, quarantining, disposal and or recovery of the non-compliant product from key points in the supply chain including the production and distribution networks/chains and retailer or other outlets (i.e. where consumers may gain access to the non-compliant product) **after** it has reached them BUT does not typically include recovery of product from consumers.