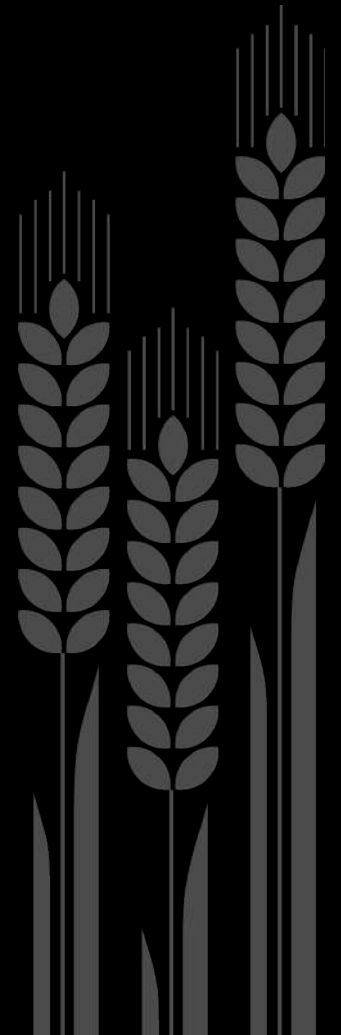




BEER RECALL INFORMATION PACK

July 2024



SCOPE



This document has been prepared for members of the Independent Brewers Association ('IBA') to provide guidance on food recall processes and regulations in Australia. It is designed to be read in conjunction with the Food Standards Australia & New Zealand (FSANZ) [Recall Guidelines](#).

This document contains information about recall planning and preparedness and applies **only** to products sold within Australia. Recalls of exported products may have additional requirements which are not included in this document, speak to your [state and territory food enforcement agency](#) for further information.



INTRODUCTION



Food recalls remove unsafe food from sale to protect consumers. Food can be recalled for a range of reasons, including product contamination, undeclared allergens and labelling errors.

All food businesses must be able to quickly remove food from the marketplace to protect public health and safety. FSANZ coordinates and monitors food recalls in Australia however FSANZ cannot order or force a recall because it has no enforcement powers. These powers rest with [local food enforcement agencies](#).

Most recalls are initiated by food businesses however a food business can be ordered to recall a product by government authorities, this is known as a mandatory food recall. This will only occur when a business has failed to implement a voluntary recall. Failure to do so may attract significant penalties.

The four **primary objectives** of a food recall are to:

1. Stop the distribution and sale of the product as soon as possible.
2. Inform the government, food businesses and retailers that have received the affected product and where applicable the public of the issue.
3. Effectively and efficiently remove unsafe product from the marketplace.
4. Appropriately dispose of, or rectify the food safety issue with, the recalled product.

GLOSSARY



Food: Beer and other alcoholic beverages are considered 'Food', and all breweries must comply with the food recall requirements.

Food Recall: A food recall is an action taken by a food business to remove unsafe food from distribution, sale and consumption. Recalls fall into **two categories:**

1. **A Consumer Recall:** The most extensive type of recall, a consumer recall is conducted when unsafe food has or may have been supplied to the general public and involves recovering food product from all points in the distribution network including any affected product in the possession of consumers,
2. **A Trade Recall:** Recovers food that has not been sold directly to the general public but has been supplied to other food businesses. It involves recovering the product from distribution centres and wholesalers and may also include restaurants and other catering establishments.

See FSANZ for further information on [Food Recalls](#).

A Withdrawal: Different from a food recall. A food withdrawal is action taken to remove food from the supply chain where there is **no** food safety risk.

Recall Plan: All food manufacturers, importers and wholesale suppliers must have a written food recall plan in place to ensure unsafe food can be quickly removed from the food supply chain. Clause 12 of Standard 3.2.2 Food Safety Practices and General Requirements, requires Australian food businesses to have a written food recall system.

Food Incident: A food incident is a situation within the food supply chain where there is a possible or confirmed risk associated with the consumption of a food. A food incident can also relate to an issue that could, or is expected to, impact on multiple government jurisdictions. See FSANZ for further information on [Food Incidents](#).

Due Diligence: Demonstrating you've taken all reasonable precautions to prevent the manufacture and distribution of unsafe food. Due diligence simply put is showing you've done your best to keep food safe. In terms of food recalls it means acting promptly and effectively to minimise risk to consumers.

ROLES AND RESPONSIBILITIES



FOOD RECALL: ROLES & RESPONSIBILITIES



The food business with primary responsibility for the supply of a food product initiates recall action.



Australian state and territory food enforcement agencies and the Australian Consumer Law Minister can order food recalls.



FSANZ does not have the enforcement power to order, force or mandate a recall.

FOOD BUSINESSES

- Notify the home jurisdiction food enforcement agency that a recall is needed.
- Develop a recall communication plan with the home jurisdiction.
- Notify trade customers and the public about the recall (for consumer recalls).
- Notify FSANZ and provide relevant information.
- Monitor the recall's effectiveness and keep appropriate records.

HOME JURISDICTION FOOD ENFORCEMENT AGENCY

- Determine if a trade or consumer recall is needed and advise the food business.
- Establish a recall communication plan.
- Monitor the food business to ensure it is effectively recalling the product(s).

FOOD STANDARDS AUSTRALIA NEW ZEALAND

- Liaise with the food business and home jurisdiction enforcement agency to collate all necessary information.
- Develop the Food Recall Notice at the request of the food business.
- Disseminate recall information to state and territory governments, other government bodies (including the ACCC).
- Disseminate recall information to food industry (consumer recalls only).
- Publish consumer recalls on the FSANZ website and social media.

ROLES AND RESPONSIBILITIES



The decision to implement a food recall should be made in consultation with your **local food enforcement agencies**.

Your local enforcement agency will guide you; the food businesses (*officially termed “The Sponsor”*) through the recall process. However, prior to any recall, to be a compliant food manufacturer the following responsibilities must be undertaken:

- Ensuring a written food recall plan is in place and that it is followed in the event of a food recall,
- Identifying the food safety issue and gathering all necessary information about the unsafe food,
- Notifying your local food enforcement agency to determine if a recall is needed, and consulting with them to determine the type of recall (consumer or trade).

Your **local enforcement agency** has designated [Food Recall Action Officers](#) who are responsible for assisting food businesses in the following areas:

- Where appropriate, providing technical advice to the sponsor to help with assessing the food safety issue,
- Advising the food business on whether a recall/withdrawal of food product is needed, determining need for trade/consumer recall, and establishing communication plans for the recall,
- In the event a recall is needed, advising the business on recall actions and requirements – this may include how the recalled food product is to be collected and disposed of, and corrective actions needed,
- Initiating contact about the recall with local government if required,
- Monitoring the effectiveness of food recalls in their jurisdiction and if any issues with a recall are identified, notifying the food business.

ROLES AND RESPONSIBILITIES



Once the decision to recall has been made, the food business must notify the FSANZ Food Recall Coordinator.

The role of the **FSANZ Food Recall Coordinator** include:

- Liaise with the food business about the food recall and guide them through the food recall process,
- Classify the food recall. For example, secondary fermentation will be classified under 'microbial',
- If requested, provide assistance with drafting the [point-of-sale notification](#) (food recall notice) for consumer recalls,
- Approve the recall communication material generated by the food business including the recall notice, where applicable,
- Disseminate the official food recall notification to state and territory governments, the Australian Government (including the ACCC and the Department of Agriculture, Fisheries and Forestry (DAFF)) and food industry contacts (including major Australian retailers, manufacturers, and food industry associations). *This does not replace the food businesses requirement to contact all their customers.*
- For consumer recalls, publishing the recall on the [FSANZ consumer recalls webpage](#), FSANZ social media accounts (including Facebook, Twitter and Instagram), and notify FSANZ Recall Alert subscribers.

CONSEQUENCES OF NON-COMPLIANCE



Australia does not have a single national Food Act. Instead, each state and territory has its own legislation, though they all reflect a shared goal: **ensuring food safety**. These Acts typically align with the national [Food Standards Code](#), developed by FSANZ.

So, while the specific wording of each Act might differ slightly, all businesses across Australia that handle food are subject to similar recall obligations.

Food businesses in Australia that fail to properly recall unsafe products face a hefty price tag, both financially and reputationally. Here's a breakdown of some potential consequences:

Category	Description	
	Corporate	Individual
Fines	Can range from thousands of dollars for minor infractions to around \$500,000	Can range from thousands of dollars for minor infractions to around \$100,000
Imprisonment		In serious cases, individuals can be imprisoned for up to 2 years.
License Suspension or Cancellation	Depending on the severity and compliance history, authorities can suspend or cancel a food business's license.	
Public Damage	News of a botched recall can spread quickly, damaging reputation and leading to loss of consumer trust.	Can severely damage an individual's reputation, leading to public scrutiny, loss of industry trust.
Lawsuits	If consumers become ill, the business and individuals alike may face lawsuits for damages.	

REASONS FOR RECALLS



Food can be recalled because of a report or complaint from manufacturers, wholesalers, retailers, government or consumers. It might also result from a food business's own internal testing and auditing.

Recalls are classified according to the problem with the food. These problems can include:

Hazard	Description	Example
Microbial	Contamination with microorganisms that can cause secondary fermentation which can lead to increased alcohol and exploding cans and bottles. In the case of low/ non-alcoholic products, pathogenic bacteria can be present and make consumers sick.	Increased alcohol levels, exploding cans/bottles. Toxin producing moulds and their byproducts. Pathogenic bacteria in Low/ No-Alcohol products.
Labelling	Non-compliant alcohol labelling, incorrect food ingredients on the ingredient list, incorrect date markings or other food labelling errors.	Incorrect alcohol declaration.
Foreign Matter	Contamination with material such as glass, metal or plastic.	Glass shards in beverages. Parts of machinery and equipment.
Chemical and Other Contaminants	Contamination with substances such as cleaning chemicals, pesticides, machine oil. Food ingredients which can cause non-allergen related health effects e.g. sorbitol causing diarrhoea.	Cleaning chemicals such as caustic. High sorbitol in cider & perry.
Undeclared Allergens	Due to incorrect labelling, incorrect packaging or contamination of the product by an allergen. Common brewing industry allergens include lactose (milk product), nuts, sulphur dioxide (sulphites) and lupins.	Undeclared lactose.
Packaging Fault	Where a fault in the food packaging results in contamination (presence of glass/metal etc).	Over crimping of crowns leading to broken rims.

TAMPERING & ADULTERATION



If there is evidence, or a suspicion, that a food product has been tampered with, the police and the relevant state or territory authority should be notified immediately. All subsequent actions should then be taken in consultation with, and on advice from, the police and the home jurisdiction.

In Queensland, it is mandatory to immediately report when there is a reasonable suspicion that food has been intentionally contaminated, without waiting for confirmation or analysis of evidence, by phoning the hotline number 13 HEALTH (13 43 25 84) when calling within Queensland or 13 QGOV (13 74 68) when calling from outside Queensland.

IDENTIFYING A FOOD SAFETY ISSUE



Food safety issues can present themselves to a food business in several ways. This may include:

- Consumer or customer complaints,
- Internal testing,
- Notification from raw materials/packaging suppliers,
- Alerts from local food enforcement agencies and health departments.

Having a robust consumer and customer complaint handling procedure is integral to identifying issues early. Consider the following:

- Have you made it simple and straightforward for consumers and customers to alert you to an issue?
- Have you provided several means to communicate an issue e.g. phone line, social media, email?
- Who is the person allocated to monitoring, collating and managing these communications?
- Is the above person adequately trained to identify which complaints could indicate a food safety issue and a risk to the public?

IDENTIFYING A FOOD SAFETY ISSUE



It is good practice to allocate incoming complaints a risk rating. For example, the following 3 categories could be used in a brewery:

Category 1 – Food safety complaint i.e. direct contamination/ foreign object, secondary fermentation, allergic response.

Category 2 – Quality complaint e.g. oxidisation, flat, hazy.

Category 3 – Packaging related complaint e.g. underfilled, leaking, dented.

As another good practice it is recommended to report all **Category 1** complaints to leadership, particularly operations/ brewery leadership who can advise if further steps are to be taken e.g. contacting local health authorities for advice.

RISK ASSESSMENT



Risk assessment should incorporate the four steps of risk assessment:

1. **Hazard identification:** Description of what is occurring e.g. presence of micro-organisms
2. **Assess the severity of the hazard:** The outcome of exposure to the hazard e.g. allergic reaction, choking
3. **Evaluate exposure to the hazard:** How likely are people to be exposed to the hazard and at what level e.g. level of caustic contamination in a product of which 2% of total batch is affected
4. **The likelihood of the hazard occurring:** Once you understand the severity and exposure, you can determine the likelihood of the hazard occurring e.g. rare due to the consumer being able to visibly identify the issue prior to consumption

Where possible a risk assessment should be based on scientific data and use any available quantitative information. However, a risk assessment may also consider relative qualitative information.

Risk assessments should be based on realistic exposure scenarios, with consideration of different situations such as method of consumption e.g. drink directly from the container, consideration of susceptible and high-risk population groups and cumulative and/or combined adverse health effects e.g. carcinogenic, toxic health effects.

RISK ASSESSMENT



Why You Should Document Your Risk Assessment?

There are several reasons to document your risk assessment for food safety issues. Here are two key reasons:

- **Due Diligence Defence:** In the event of a food safety incident, documented risk assessments can serve as evidence that you took reasonable steps to identify and mitigate hazards. This can be helpful in defending against legal claims or regulatory action.
- **Improved Food Safety Practices:** The process of conducting a risk assessment can help you identify areas where your food safety practices can be improved.



RISK ASSESSMENT



How to Document Your Risk Assessment:

There is no single prescribed format for documenting a food safety risk assessment. However, it should typically include the following elements:

- **Date of Assessment:** This captures the timeframe of the issue and allows for future reference if needed.
- **Product:** Identifying the specific product/s helps pinpoint the potential source of the hazard.
- **Hazards Identified:** Documenting the specific hazards relating to the issue.
- **Severity of Each Hazard:** Evaluate the potential consequences of the hazard based on the issue.
- **Likelihood of Each Hazard Occurring:** While the reporting of a consumer complaint suggests a possibility, assess the likelihood considering control measures and past occurrences. This may include the likelihood of more affected product being out in the supply chain.
- **Potential Impact on Other Products:** Analyse if the hazards identified could also be present in other products that share similar ingredients, processing steps, or packaging materials.
- **Control Measures:** Document any existing controls in place to mitigate the identified hazard.
- **Monitoring Procedures:** Outline how you will verify the effectiveness of the control measures to prevent future occurrences.

RISK ASSESSMENT



Risk assessment prioritisation using a risk matrix

A risk assessment matrix is a valuable tool for prioritising the potential food safety hazards identified during an assessment. This matrix considers two key factors: likelihood of occurrence and severity of consequence.

Each hazard is assigned a score based on a scoring system. These scores are then multiplied together to generate a risk score. The higher the risk score, the more serious the hazard. Using this process assists food businesses to identify when an issue should be escalated and where to focus their ongoing efforts to resolve and mitigate hazards to the food safety of their products.



RISK ASSESSMENT MATRIX

		Probability				
		1. Rare	2. Unlikely	3. Possible	4. Likely	5. Almost Certain
Impact	1. Insignificant	Very Low 1	Very Low 2	Low 3	Medium 4	Medium 5
	2. Minor	Very Low 2	Low 4	Medium 6	Medium 8	High 10
	3. Significant	Low 3	Medium 6	Medium 9	High 12	Very High 15
	4. Major	Medium 4	Medium 8	High 12	Very High 16	Extreme 20
	5. Severe	Medium 5	High 10	Very High 15	Extreme 20	Extreme 25

- Probability**
1. Rare – The event is not expected to occur, or its occurrence is highly improbable.
 2. Unlikely – The event may occur, but it is not expected to happen frequently.
 3. Possible – The event has a moderate chance of occurring
 4. Likely – High probability of occurring, and it may happen more than once.
 5. Almost certain – The event is highly probable and almost certain to occur.

- Impact**
1. Insignificant – Unlikely to cause severe injuries or illnesses.
 2. Minor – Can cause injuries or illnesses, only to a mild extent
 3. Significant – Can cause injuries or illnesses requiring medical attention with limited treatment.
 4. Major – Can cause irreversible injuries or illnesses necessitating ongoing medical care.
 5. Severe – Can result in fatality

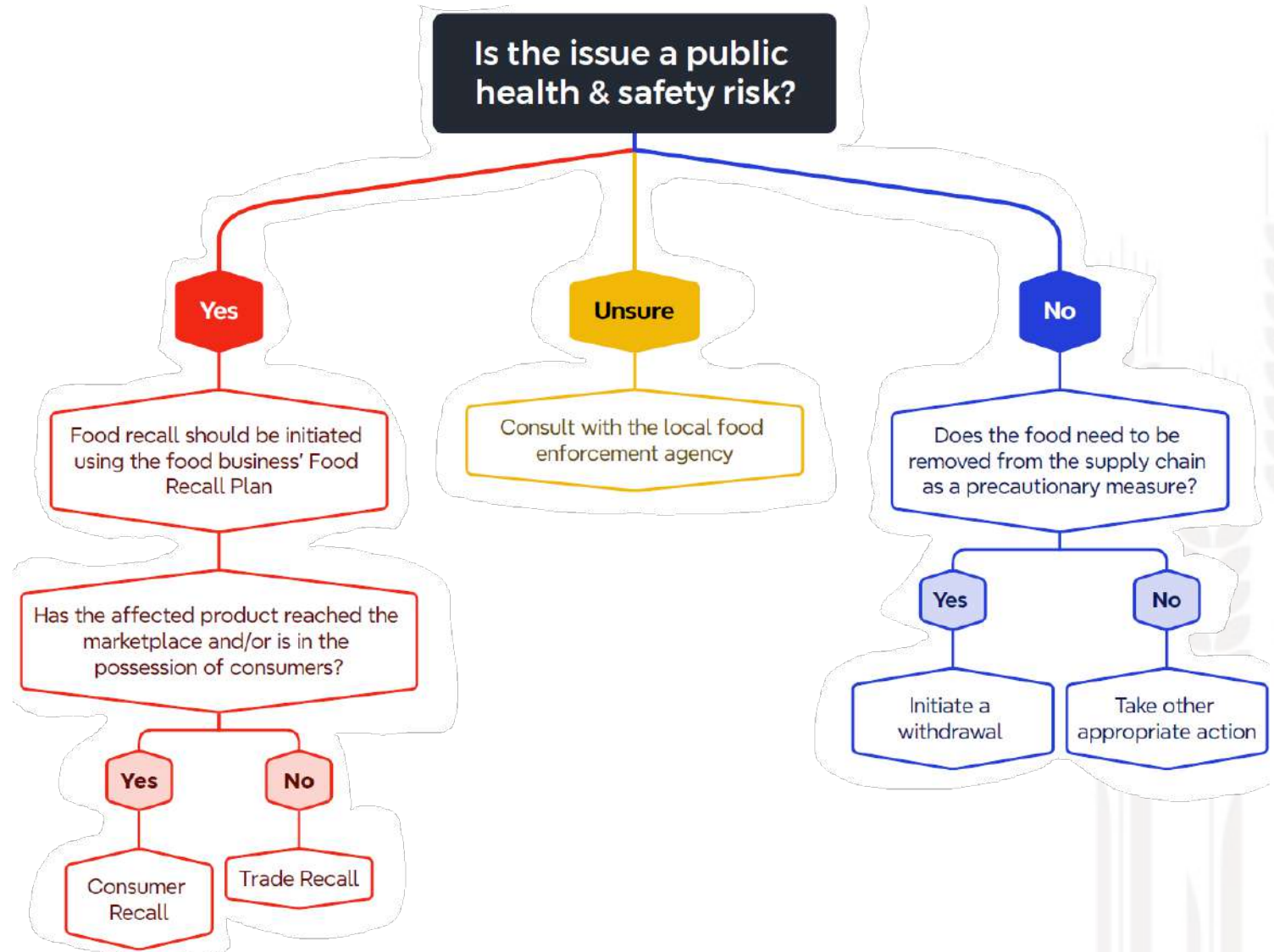
Very Low & Low	No additional action required; maintain control measures.
Medium	Evaluate necessity for additional analysis.
High	Review and implement effective improvement measures.
Very High & Extreme	Cease activity and take immediate action to manage and reduce risk prior to resuming.

DECIDING WHETHER TO RECALL OR WITHDRAW



In Australia, food should only be recalled if a food safety risk is identified, and the food is deemed 'unsafe'.

A withdrawal should be used if the issue relates to quality, ethical or suitability issues, or the food safety risk has not been confirmed:



PRE-RECALL PREPAREDNESS



Product Traceability

Traceability is the ability to track a food through all stages of production, processing, and distribution. Traceability includes trace-back and trace-forward:

- **Trace-back:** Backwards traceability is crucial for identifying the source of a contamination or quality issue. This process involves tracing the product's history back through the distribution channels, production processes through to raw material suppliers. It helps in pinpointing where the problem originated, ensuring that corrective actions can be taken at the source to prevent recurrence and limit the scope of the recall.
- **Trace-forward:** Forwards traceability is essential for identifying where a contaminated or defective product has been distributed and sold. This process involves tracking the product from the point of production through the supply chain to the final customer. It helps in efficiently managing recalls by quickly identifying and notifying all affected parties, thereby minimising potential harm to consumers and limiting the scope of the recall.

PRE-RECALL PREPAREDNESS



Product Traceability

In the context of a food recall, the objectives of traceability are to:

- Identify specific batches and trace them forward.
- Trace batches back to suppliers.
- Enables swift corrective actions to target the issue and minimise disruption.
- Protects consumers by isolating contaminated products.

Ensure the traceability of your products through the following batch code-linked records:

- Supplier information: Contact details, materials provided, and delivery receipts for each batch.
- Customer information: Contact details, including after-hours information, for those who received the batch.
- Product details: Photos, packaging specifics, and available sizes for all products with the batch code.
- Distribution documents: Shipping information, batch codes, quantities, ingredients, and packaging details for each batch movement.



EXAMPLES OF GOOD PRACTICE BATCH CODING



Including a time and/ or lot number is helpful when several batches of liquid or tanks of the same SKU are packaged on the same day.



Including a code to identify specific product lines, fill heads, seamers or date coders is helpful when multiple identical pieces of equipment are used to produce the same batch e.g. two date coders.



For on-glass batch coding ensure the ink used is both highly visible and smudge proof when chilled.



Including a code for/ the name of the production site is helpful when the same SKU is being produced at 2 or more locations.

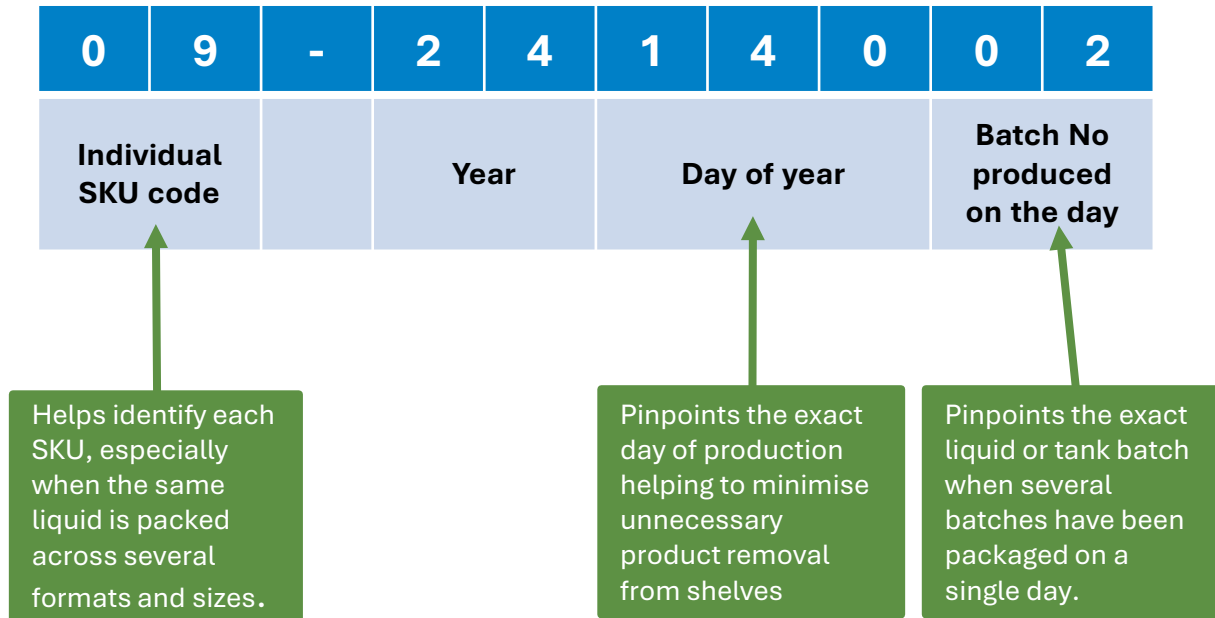


For breweries with varying shelf lives across their products, a production date is useful for tracking batches.

PRE-RECALL PREPAREDNESS

Julian Coding

One popular method for ensuring food traceability is Julian coding. Unlike best-before dates, Julian coding uses a numerical system to represent the exact day of the year a product was manufactured.



Julian Date Calendar for Year 2024

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	1	32	61	92	122	153	183	214	245	275	306	336
2	2	33	62	93	123	154	184	215	246	276	307	337
3	3	34	63	94	124	155	185	216	247	277	308	338
4	4	35	64	95	125	156	186	217	248	278	309	339
5	5	36	65	96	126	157	187	218	249	279	310	340
6	6	37	66	97	127	158	188	219	250	280	311	341
7	7	38	67	98	128	159	189	220	251	281	312	342
8	8	39	68	99	129	160	190	221	252	282	313	343
9	9	40	69	100	130	161	191	222	253	283	314	344
10	10	41	70	101	131	162	192	223	254	284	315	345
11	11	42	71	102	132	163	193	224	255	285	316	346
12	12	43	72	103	133	164	194	225	256	286	317	347
13	13	44	73	104	134	165	195	226	257	287	318	348
14	14	45	74	105	135	166	196	227	258	288	319	349
15	15	46	75	106	136	167	197	228	259	289	320	350
16	16	47	76	107	137	168	198	229	260	290	321	351
17	17	48	77	108	138	169	199	230	261	291	322	352
18	18	49	78	109	139	170	200	231	262	292	323	353
19	19	50	79	110	140	171	201	232	263	293	324	354
20	20	51	80	111	141	172	202	233	264	294	325	355
21	21	52	81	112	142	173	203	234	265	295	326	356
22	22	53	82	113	143	174	204	235	266	296	327	357
23	23	54	83	114	144	175	205	236	267	297	328	358
24	24	55	84	115	145	176	206	237	268	298	329	359
25	25	56	85	116	146	177	207	238	269	299	330	360
26	26	57	86	117	147	178	208	239	270	300	331	361
27	27	58	87	118	148	179	209	240	271	301	332	362
28	28	59	88	119	149	180	210	241	272	302	333	363
29	29	60	89	120	150	181	211	242	273	303	334	364
30	30		90	121	151	182	212	243	274	304	335	365
31	31		91		152		213	244		305		366

PRE-RECALL PREPAREDNESS



GS1 Recall System

[GS1 Australia Recall](#) is a standardised, industry-driven communication tool. It enables organisations of any size including manufacturers, wholesalers, retailers and importers to efficiently share product recall and withdrawal notifications with FSANZ and their trading partners. FSANZ receives recall information from companies who use the GS1 Australia Recall platform. There is no requirement to complete a FSANZ food recall report.

Some of the advantages of using the GS1 system may be:

- **Faster Recalls:** Quickly identify and remove unsafe products.
- **Reduced Costs:** Saves time and money compared to manual recalls.
- **Improved Control:** Track progress and make informed decisions.
- **Seamless Integration:** Works with existing GS1 systems for easy use.
- **Brand Protection:** Minimises reputational damage from food safety issues.

GS1 Also have a collection of great recall related resources and articles on:

- [Recall User Guide](#)
- [YouTube](#)
- [LinkedIn](#)
- [Recall - Year in Review Report](#)



The information provided is for informational purposes only. Each brewery should assess its individual needs and resources to determine if the GS1 Australia Recall system is the right fit for their business.

PRE-RECALL PREPAREDNESS



Establishing a Crisis Management Committee

The craft beer industry thrives on reputation. A single product safety incident, negative publicity, or even a production delay can have a significant impact on your business and the wider industry. To navigate these challenges effectively, establishing a crisis management committee is crucial.

Why a Multi-Skilled Team?

A well-rounded committee leverages diverse expertise to address crises from various angles. Here's who should be considered both in house and where required, externally:

- **Production:** Provides insight into potential product safety issues and production disruptions.
- **Sales & Marketing:** Manages communication with media, distributors and customers.
- **Quality Assurance:** Provides insight on product safety and can advise on recalls if necessary.
- **Finance:** Helps assess the financial impact of a crisis and guides resource allocation.
- **Legal:** Provides guidance on legal compliance and potential liability issues.

PRE-RECALL PREPAREDNESS



What Incidents Warrant Committee Action?

The committee should be brought in to address a variety of situations, including:

- Product safety concerns: Contamination, quality issues, or potential health risks.
- Public relations crises: Negative media coverage, social media backlash, or brand reputation issues.
- Production disruptions: Equipment failures, ingredient shortages, or supply chain problems.

By having a pre-established committee with clear roles, your brewery can respond to crises swiftly and effectively, minimising damage and protecting your reputation.

The food recall plan must always be accessible. If the food recall plan is electronic, then it should be able to be accessed by the Crisis Management Committee and Recall Coordinator when they are off-site. If the food recall plan is only available as a hard copy, every committee member should have a copy.

PRE-RECALL PREPAREDNESS



Key personnel and responsibilities

A food business should nominate a person to be Recall Coordinator in the event a food recall is needed. The Recall Coordinator and those who will be involved in enacting a recall should undertake training to ensure they are familiar with the food recall plan and know their role should a recall be required.

The responsibilities of each person involved in the recall should be clearly defined in the food recall plan.

In general, the responsibilities in relation to recall action may include:

- Liaison with local food enforcement agency and FSANZ, including notification and reporting,
- Liaison with customers, including method of retrieval/disposal,
- Preparing a food recall notice, media advertisement, or other methods of consumer notification (if required),
- Reporting on the distribution of the food product,
- Determining and implementing corrective actions,
- Post recall reporting, including assessing the effectiveness of the recall (how much product was returned).

Staffing a recall: It is worth considering, particularly for smaller businesses, whether additional help will be required to manage a food recall. This may include activities such as answering enquiries received via phone, email, company website or through social media. This could also mean employing extra staff to enable permanent staff to deal with the recall. Specialist help may also be required, for example, to draft and deliver any publicity material.

PRE-RECALL PREPAREDNESS



Writing a food recall plan

The purpose of a food recall plan is to set out how the business will implement a recall. It should detail all the necessary procedures, arrangements, staff responsibilities and records as required.

Key elements of a food recall plan include:

- Undertaking a risk assessment of a food safety issue
- Documenting the decision and process for determining if a recall is required
- Internal procedures and staff responsibilities for conducting a food recall
- Contact details and procedures for notification
- Distribution and other records that will help identify and retrieve the recalled food
- Arrangements and procedures for food retrieval and assessing the recalled product returns.

Food recall plan templates

Templates and related tools recommended for writing a food recall plan are available via the following agencies websites:

- [FSANZ Website Recall Templates](#)
- [ACCC Recall Tools and Guidelines](#)

PRE-RECALL PREPAREDNESS



Recall Readiness: Training and Drills

A well-oiled recall team is your brewery's best defence against food safety incidents. Here's why training and regular mock recalls are essential:

- **Importance of Training:** Equip your team with the knowledge and skills to execute a recall effectively. Training should cover procedures, communication protocols, regulatory requirements, and crisis communication strategies.
- **Mock Recalls vs. Mock Traceability:** While both exercises test your systems, a mock recall goes a step further. A mock traceability exercise focuses on tracing a product through the supply chain, ensuring you can locate specific batches. A mock recall, however, simulates a real-world scenario. In addition to tracing, it tests your communication with distributors, retailers, and consumers, practicing media relations, and managing the overall crisis response.

Why Mock Recalls Matter

- **Sharpened Skills:** Drills allow your team to practice procedures in a controlled environment, identifying weaknesses and areas for improvement.
- **Improved Coordination:** Mock recalls test communication and collaboration between departments, ensuring a smooth and unified response when a real crisis hits.
- **Faster Response Times:** Through practice, your team can react quickly to identify affected products and initiate a swift recall, minimising risk.
- **Enhanced Confidence:** Successfully navigating a mock recall builds confidence and reduces potential panic during a real incident.

It is recommended that food businesses conduct a forwards and backwards mock recalls annually.

PRE-RECALL PREPAREDNESS



Mock recall tips

- **Realistic Scenario:** Start with a plausible scenario, like a supplier notifying you of a potential contaminant in a raw material batch or a consumer complaint for a foreign object.
- **Internal Focus:** Simulate all internal procedures for identifying affected products, notifying relevant departments, and documenting the process.
- **No Retailer Contact:** NEVER contact actual retailers or distributors during a mock recall. This could trigger unnecessary disruption and potentially lead to retailer fines.
- **Verify Contact Information:** Instead, use the mock recall to confirm you have up-to-date contact details for all major retailers and distributors.
- **Communication Simulation:** Practice communication protocols with internal teams and designated external contacts (e.g., regulatory bodies).
- **Document Everything:** Document all actions taken during the mock recall for future reference and improvement. This can also provide an excellent example of due diligence.
- **Focus on Efficiency - 2-Hour Target:** Aim to identify and locate all potentially affected products within 2 hours. This timeframe reflects the urgency of a real recall situation.
- **Physical Stock Verification:** Conduct a physical inventory check to ensure documented stock levels match actual stock on hand.
- **Mass Balance Confirmation:** Perform a mass balance calculation to verify if your stocktaking and production records accurately reflect the flow of ingredients and finished products. This helps identify potential gaps or inconsistencies in your tracking system.
- **Debrief and Improve:** After the mock recall, gather your team for a debriefing session. Discuss what worked well, identify areas for improvement, and update procedures as needed.

CONDUCTING A FOOD RECALL

The FSANZ website maintains an up to date and easy to follow [guide to recalling food](#).

This webpage also details the key contact details for the FSANZ Food Recall Coordinator including outside business hours contact details.

FSANZ also maintain the [Food Industry Food Recall Protocol](#) which has important information on conducting the recall process, the responsibilities of all involved parties and helpful examples.

Flow of a Food Recall

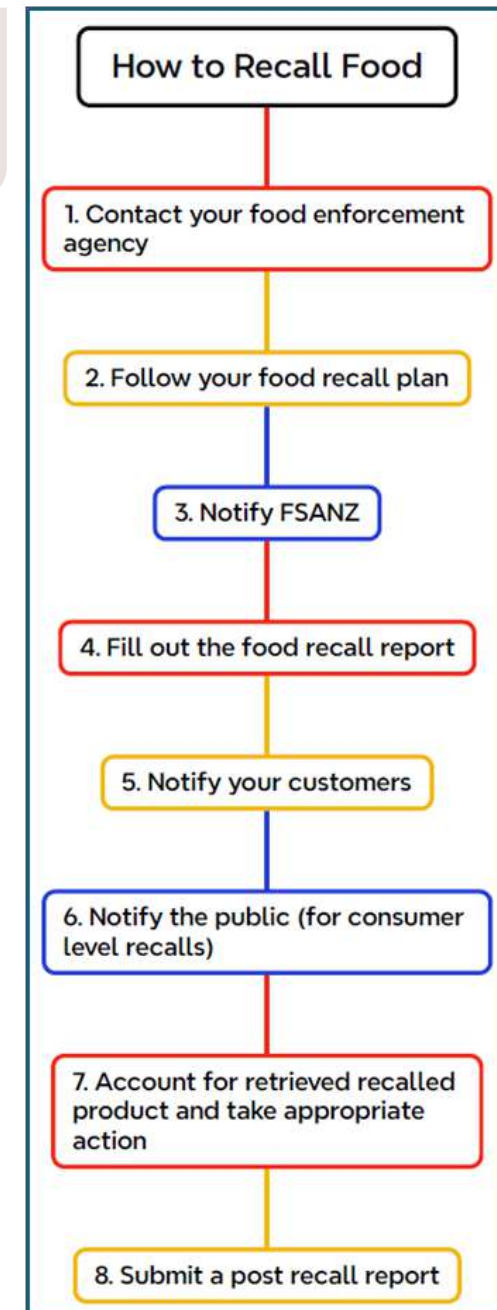
As per the FSANZ [guide to recalling food](#) the expected flow of a food recall is as per the flow diagram outlined.

From stage 3 onwards the FSANZ Food Recall Coordinator will step you through the process until the recall has concluded.

The following [recall templates](#) are available on the FSANZ website:

- [Food Recall Report](#)
- [Food recall notification to distributors](#)
- [Distribution list template](#)
- [Request for a Post Recall Report Template](#)
- [Food Recall Press Advertisement Template](#)
- [RECALL Media Release Template for Business](#)

A detailed webpage of FAQs for food businesses is also found [HERE](#).



CONDUCTING A FOOD RECALL

Contacting the Local Food Enforcement Agency

Before contacting the local food enforcement agency about a potential food safety issue, where possible breweries should have the following information readily available (**However this should in no way delay you starting the recall process**):

1. Specific Details of the Incident:

- **Nature of the Hazard:** Clearly identify the potential contaminant or issue affecting the product.
- **Affected Products:** Pinpoint the specific batches at risk.
- **Timeline:** Establish a clear timeline of events, including the date the issue was discovered, the suspected source (if known), and any actions already taken.

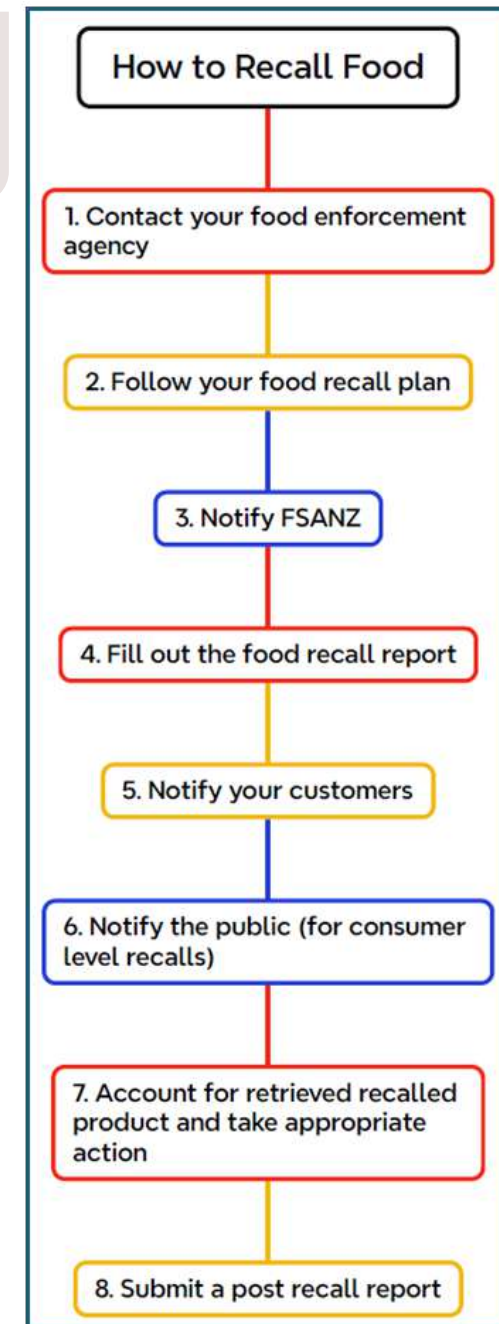
2. Risk Assessment

3. Recall Plan

4. Supporting Documentation:

- **Traceability Records:** Provide detailed records to demonstrate the movement of potentially affected products throughout the supply chain.
- **Test Results** (if available): Include any test results confirming the presence of a contaminant or other safety concern.
- **Corrective Action Plan:** Outline the steps your brewery will take to prevent similar incidents in the future.

Having this information prepared beforehand demonstrates a proactive approach to food safety and streamlines the communication process with regulatory authorities.



MANAGING THE DESTRUCTION OF RECALLED PRODUCTS



The following points should be taken into consideration when organising the destruction of recalled products.

Due Diligence and Evidence

- **Documented Procedures:** Establish a clear procedure outlining the process for destroying recalled products. This should include details on how the products will be identified, transported, and destroyed.
- **Traceability Records:** Maintain accurate records throughout the destruction process, linking the destroyed products back to the original recall. This demonstrates a clear chain of custody and strengthens your due diligence efforts.
- **Destruction Certificate:** Obtain a certificate of destruction from the facility handling the disposal. This document should verify the quantity and type of products destroyed, serving as evidence for regulatory bodies and insurance companies.

Presence During Destruction

- **Risk Assessment:** Consider the value of having a member of the recall team witness the destruction. For high-risk recalls or large quantities of product, having a witness can strengthen your position and deter any potential misconduct.

Important Note: *When considering the presence of a witness during destruction, be especially mindful for recalls involving alcoholic products. Due to their inherent value, alcoholic beverages can be more attractive to theft or diversion within the disposal chain*

MANAGING THE DESTRUCTION OF RECALLED PRODUCTS



Presence During Destruction

- **Cost-Benefit Analysis:** Weigh the cost of having a staff member present against the level of risk associated with the recall. In some cases, relying on a reputable destruction facility and a detailed certificate may be sufficient.

Additional Points

- **Security Measures:** Ensure secure transportation of recalled products to the destruction facility to prevent any accidental release or re-entry into the market.
- **Record Retention:** Maintain all records related to the destruction process for the timeframe stipulated in your state regulations.

THE COST OF CONDUCTING A RECALL



Accounting

Enacting a food recall will cost money. As part of a food recall plan, the business should consider establishing an account to allocate and track the costs associated with the food recall.

Below are some of the benefits of tracking recall costs with a dedicated account:

- **Clear Cost Allocation:** Tracks all expenses associated with the recall, simplifying financial reporting and identifying areas for potential cost reduction in the event of future recalls.
- **Streamlined Insurance Claims:** By tracking all recall expenses in a dedicated account, you can easily generate clear and comprehensive records for insurance claims. This simplifies the process, reduces the risk of errors or omissions, and helps ensure you receive the full reimbursement you're entitled to under your policy.
- **Informed Decision-Making:** Provides a clear picture of financial impact, allowing for better-informed decisions regarding the return on investment for future risk mitigation and cost avoidance strategies.
- **Improved Efficiency:** Reduces time spent gathering and sorting financial records related to the recall.
- **Supplier Accountability:** Facilitates recovery of costs from suppliers in situations where their negligence or faulty products contributed to the recall. By documenting all expenses and maintaining a clear audit trail, you can strengthen your case for cost recovery.

REVIEW AND REFLECTION - DEBRIEFING



Once the recall is complete, it is important for the Crisis Management Committee to debrief and review the process and outcomes.

Here are areas to focus on:

- **Communication Effectiveness:** Evaluate how well communication reached all stakeholders. Identify areas to improve communication channels and messaging in the event of future incidents.
- **Recall Efficiency:** Analyse the recall process for efficiency. Look for ways to streamline procedures to minimise disruption in the future.
- **Root Cause Analysis:** Determine the root cause of the product issue. Implement preventive measures to minimise the risk of similar incidents.
- **Consumer Response:** Analyse consumer reaction to the recall. Use their feedback to drive activities around customer retention and building trust.

REVIEW AND REFLECTION - DEBRIEFING



Moving Forward

By taking the time to review these critical aspects, the business can build upon their strengths and identify areas for improvement. This will ultimately lead to a more robust system for handling future product concerns.

Continuous Improvement

Using the product recall experience as a learning opportunity to further strengthen quality control measures and refine the business crisis management plan will ensure you are well-prepared for any future challenges.

Final Thoughts

- Consider an external food safety audit to identify further areas of risk.
- Consider conducting a post-recall survey to gauge consumer perception of your handling of the situation.
- Remember to recognise the team's efforts with a team lunch or a small token of appreciation.