



## STOP, LOOK AND LISTEN

Just like our own view of heart attacks, most companies don't ever think that a product recall will ever affect them, to dispel that truth, it's worth taking a look at RAPEX the EU Rapid alert system for all dangerous consumer products with the exception of food, pharmaceutical and medical devices. The National Consumer Agency has the responsibility for product recall in Ireland and the Trading Standards department is responsible in NI & UK.

The Food Safety Authority of Ireland has the responsibility of product recalls for food.

So stop, look at your systems for dealing with a product recall (your own product or one that you buy in) and listen to the advice that's readily available. Stop, look and listen was the advice that got you safely to the other side of the road as a youngster, taking this same advice in business now will ensure that you're ready to get over any hurdle thrown at you through a product recall situation. Remember the pork scare ... could your current business systems cope if something similar was to happen in your industry?

### Anytime, anywhere

A product liability situation can arise at any time and almost always without warning. It can happen to the most quality conscious company as well as the most careless. So what can your company do to protect itself? Here are four possibilities:

- Ignore the risk and hope it doesn't happen. If you are lucky this is the least expensive approach. If you are unlucky, it could destroy the company.
- Insure against the risk by passing it to others, but in many cases insurance isn't available and even if it is available initially, as soon as an event has taken place, future premiums will be prohibitive.
- Reduce the risk through your quality management systems and processes. This will reduce the risk and the right approach will also cut costs significantly.
- Establish a product recall procedure to minimise potential impact.

A product recall will always be the result of the discovery of a real or potential hazard which will require the fastest possible location of every item responsible for the risk and its removal from the market. Experience indicates that with the best will in the world this is close to impossible if an effective procedure is not in place.

Clearly, failure to act quickly, or acting without a plan, could result in chaos. The resulting costs will also be much higher than if a proper plan is ready and in place. To be effective, a product recall plan must be capable of instant implementation and you should also have tested the recall procedure.

***Do you know that in Ireland there are still up to 3,000 dangerous gas cookers that could cause carbon monoxide poisoning, leading to death, still being used despite a recall notice being issued last October?***

In a worst case scenario, you will need to make decisions on each of the following:

- Recall of product from overseas

- Tracing individual consumers
- Advertising on television, in newspapers and online
- Withdrawal or freezing of stock in warehouses and retail units
- Replenishing stocks
- Issuing instructions for the safe use of the product or its disposal
- Subsequent monitoring of the health of those who may have inhaled or consumed doubtful chemicals, food stuffs, gases or radiation
- Internal costs of product modification and replacement
- Administration of the plan

### **The recall process**

It can be difficult to judge when a recall is necessary, but a recall should always be initiated when it has been ascertained that there is a definite or potential danger to life or health and when the continued use or circulation of the product is likely to result in legal action.

A recall may also be initiated when it is found that a fault in the product, or lack of performance, is likely to affect the reputation of the company and when the lack of performance fails to justify the claims made in advertisements. This would also include drugs, where the dosage advised was found to be at variance with requirements.

### **Recall data**

The first stage in a recall programme will be some form of notification of a hazard. This could come from a number of sources and in many forms, depending upon the product. The most likely sources include:

- The user
- An independent test house report
- Government sources
- The company's own reliability test programme or research
- Research institutes and laboratories
- Overseas sources

### **Hazard evaluation report**

Immediately a hazard has been identified by any source, it will be necessary to evaluate the level of danger, and the category of recall, if required.

Levels may be set as:

- **User level recall.** The most widespread and therefore expensive type of recall, most likely in the case of consumer products. It would be essential in all urgent cases and probably in most serious cases and entails recall from users, retail outlets and warehouses. It would be necessary to reimburse the owners for losses sustained as a result of the withdrawal. The order for such a recall would always be made at board level
- **Retail level recall.** This would apply particularly in cases where an existing product has been in widespread use for some considerable time and information has now revealed a minor hazard
- **Wholesale level recall.** This would entail product recovery from the first stage in the distribution chain and may be applied in the case of non-safety critical situations
- **Limited recall.** This would mean the recall of individual batches and consignments. It would probably occur most often when manufacturing faults have been discovered or suspected in an established product.

**This is a current notice on the FSAI website - How damaging could this be to your business?**

## Message:

**The Food Safety Authority of Ireland** would like to bring to the attention of relevant food businesses, information released by the Food Standards Agency (UK) regarding cases of Salmonella Enteritidis PT14b which may be linked to an egg production premises in Spain.

We are aware of six cases of illness in Ireland associated with a similar strain of Salmonella Enteritidis PT14b, **one of whom has unfortunately died**. To date, no specific food has been identified as the cause of any of these illnesses in Ireland. The cause of these illnesses is subject to an on-going investigation by the HSE.

As a precaution, the Food Safety Authority of Ireland would like to remind food businesses of the need to source good quality eggs and to follow good hygienic practices.