

## TRACEABILITY AND PRODUCT RECALL



**Traceability and product recall are important for enhancing customer protection. Retailers need to ensure that products are safe to consume for customers. What was considered best practice before has now become a regulated requirement. Customers put their trust into the supply chain and the many stakeholders that touch the food and products they consume and use. Customers are more aware of labelling requirements and are demanding more information.**

Traceability means the ability to trace any finished product, that will be used for consumption, its raw materials, its ingredients and its packaging, through all stages of production, processing, distribution and storage. An effective traceability system should mean that movements can be traced one step backwards and one step forwards at any point in the supply chain.

It is vital when an organisation identifies a risk, they can trace it back to its source to swiftly isolate the suspect product and prevent the suspect product from reaching consumers. In addition, traceability allows targeted withdrawals and the provision of accurate information to the public, thereby minimising disruption to the trade.

(R. 638, regulation 10.18, page 23)

18) despite the provisions of sub regulation 10(17); a traceability system is maintained according to the best available method and a recall procedure is in place and any incident requiring recall activation is reported to the local inspector and the National Directorate: Food Control.

**Why is traceability important?**

Traceability enables corrective action (such as a product recall) to be implemented quickly and effectively when something goes wrong. When a food safety problem is identified, an effective traceability system can help isolate and prevent contaminated products from reaching customers.

Traceability allows food businesses to target the product(s) affected by a food safety problem, minimising public health risk/s and disruption to trade. It is important for all food businesses to be able to track products.

The traceability system a SPAR owner has in place must include information and procedures for identifying producers, suppliers, customers, products and records kept including:

- Name and address of suppliers and a description of products supplied
- Date of delivery
- Batch identification
- Volume and quantity of product supplied or received
- If product is made in store – the production date, sell by date and country of origin
- Person responsible for the making of the product and the manager's approval
- Packaging batch code related to the food product

Use **traceability templates provided in the template section** to ensure that the above details are being documented.



The ability to remove products from the market rapidly and effectively is vital to every producer and distributor. A recall procedure is a written plan that is carefully constructed, tested and evaluated to ensure efficiency. It is a safety net that can prevent consumers from buying or consuming potentially unsafe products. When there is transparency by the organisation with regards to a recall, customers develop trust in the brand and the organisation gains in customer loyalty.

### Food Safety Alerts/Recalls

Food businesses (manufacturers, distributors, wholesalers, suppliers and retailers) may voluntarily issue a food safety alert, requesting customers to return the implicated food product to retailers and/or the business concerned or to dispose of it as it is not fit for human consumption. In this case customers are usually refunded for the products they return.

In other instances where industry fails to issue a food safety alert, the National Health Authority may issue an official food safety alert, whereby provincial and municipal health authorities are usually informed in writing by the Department of Health, Directorate: Food Control, while a media release, by the Communications Unit of the Department of Health, is used to inform the public. In most cases an official food safety alert is followed by an official food product recall.

Whether the product recall is voluntary or instituted by the National Health Authority all industry partners share the responsibility of ensuring that the public of South Africa is protected from products that present a risk to health or gross deception. We all have a moral obligation to recall any food products that have been released into the market that we know may pose a health risk to the customer.

Universally, it is recognised that there are three types of food product recalls:

**Class I** recall (high risk), involving a health hazard situation where there is a reasonable probability that eating the food will cause health problems or death;

**Class II** recall (moderate risk), involving a potential health hazard situation where there is a remote probability of adverse health consequences from eating the food;

**Class III** recall (low risk), involving a situation where eating the food will not cause adverse health consequences. This may include products that do not comply with regulatory guidelines in terms of labelling or where quality defects are present in a food that will not render the food unsafe for consumption.

Food product recalls can also be classified as either a trade/industry recall or a consumer recall.

**A trade/industry recall** involves recovery of the food product from distribution centres and wholesalers, as well as production premises, hospitals, restaurants, major catering establishments as well as outlets that sell food manufactured for immediate consumption.

**A customer recall** involves the recovery of the product from all points in the production and distribution network, including customers. This is a more extensive recall.

To be able to process a recall the following details are required:

- Name of the product as well as the full description
- Packaging size and type
- Lot/batch code identification
- 'Use by date' or 'Sell by date'
- Whether the product was manufactured in SA or, if not, the country of origin
- Where and how the product must be disposed of
- Contact details and roles of all the relevant role players i.e. recall committee members, SPAR regional support team, direct supplier details.

### **A recall committee**

The SPAR retailer must set up an instore recall committee. The committee must include personnel with access across the store/s where possible. Typically, the committee would be a mix of knowledge across the following areas: store owner/manager, purchasing manager or buyer (for the store or group), customer service representative, food safety ambassador, legal advisor, marketing or social media manager, logistics team member and fresh food manager/s or representation from the fresh food department/s. It would be important to appoint a committee chair person who will take charge in the case of a store product recall.

The recall committee is responsible for the management of all recall activities and to adhere to the customer retail recall procedure.

### **Public Notice/Communication strategy**

Communication must be clear, timely, transparent and accurate.

The SPAR retailer sending out communication must appreciate that the South African customer is not used to product recalls. Whilst some South African customers may have been exposed to the odd recall, there have not been many recalls.

Due to this, the SPAR retailer must be well prepared for customer queries or complaints, as well as some anticipated level of confusion as to which actual product is involved in the recall. It is essential that all communication carries a photograph of the product.

It is recommended that the SPAR retailer appoints a customer service staff member/s to respond to queries from the media, and others to assist with queries from customers. It is recommended that the retailer notifies their employees as soon as possible to prevent misunderstanding and to emphasize the communications service staff member/s who shall be handling customer queries.

It is important to clearly instruct employees to direct queries to the appointed customer service staff member/s.

It is also important that the customer service staff member/s reserve any personal opinion/s on the matter rather than making misleading comments. It is equally important that such a staff member obtains the answer/s to the query and responds to the enquirer as soon as possible to reduce customer frustration and confusion.

It is recommended that queries from the media are requested via fax or email and responded to in writing so as to avoid any misunderstandings.

Communication to the customer needs to be by the most effective method, depending on the target market of the recalled product – this may include the use of one or more of the following:

1. Official media releases
2. Advertising – newspaper, on radio or television
3. The internet or social media – Twitter, Facebook, Company Website, SMS, Whatsapp.
4. Instore communication – by means of a notice on the notice board in the store, placing notices up in the surrounding areas to the store i.e. bill boards, taxi ranks, public areas. Notifying customers over the loud speaker in the store. Flyers or handouts at the entrance to the store.

The SPAR retailer must inform the Customer Care department at SPAR Central Office and the Group Food Safety Manager immediately and throughout the process.



### **Scope of recall**

The scope of the recall is a very important part of the process; it ultimately ensures the effective identification of all affected products (e.g. specific batches), ingredient/s and location/s.

Should it be found necessary to send a product for testing, contact The Group Food Safety Manager who can assist by recommending a laboratory that would be suitable.

### **Physical retrieval of product**

The SPAR retailer needs to:

- Specify as to whether the customer should dispose of the recalled product and merely retain some proof that it was purchased e.g. a barcode from the packaging, the date marking of the packaging, the empty packaging or whether they wish to collect all the recalled products to ensure it is fully removed from the marketplace.
- Have a plan in place as to how they will collect recalled products from all their customers, including spaza shops and pavement traders. The retailer needs to advise if the retailer will do the collection themselves (identifying central collection points, how many collections, allocate a staff member to be in charge) or will the retailer request the customers to return the products/proof of products to the store.
- Notify customers that they intend receiving product returns and specify the manner in which they intend to do so.
- Arrange for returns to the direct supplier, reimbursement of the relevant product.
- The following needs to be clear to the customer:
  - a) What proof of the relevant/suspicious product stock is required before the customer is reimbursed?
  - b) Whether cash, vouchers or product will be offered as a refund?
  - c) Whether the customer will be reimbursed for any expenses incurred when returning the product?

### **Disposal of suspect product/s**

It is critical that recalled product not suitable for reworking is not reintroduced into the supply chain. It is therefore critical that whatever disposal route is chosen, it is overseen by a responsible store manager, photographs are taken, and the method of disposal ensures the customers and brand's protection.

Given the South African situation of dump pickers at municipal waste sites and street pickers on the streets going through consumer's waste, disposal of recalled products via these municipal routes is strongly discouraged.

Depending on the nature of the recall, National and Provincial Authorities may need to be consulted on the safe disposal of the recall product.

A destruction certificate (uplift and safe disposal) must be issued by the local authority or waste management company and should indicate:

- The name of the product being destroyed
- The quantity of products that have been destroyed (number or in weight)
- The method of destruction
- Where the destruction took place
- The date of destruction
- Preferably co-signed by the company witness present at the destruction
- Preferably accompanied by photographs of the destruction.

The destruction certificate is the assurance to the owner of the goods that the product has been destroyed appropriately. Copies of the proof of disposition/destruction certificates from the local authority or relevant company must be kept on file by the store management and sent to the National Consumer Commission in the event of a Class 1 recall.

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**Post recall reporting /documentation**

Post recall reporting is important in any recall including an official food product recall that was/is conducted in the interest of public health. This information is used to develop a database of Class I and Class II recalls that were initiated from within South Africa at any given time.

Post recall reporting also helps to assess the effectiveness of the recall. The effectiveness of the recall is assessed on the basis of the amount of product received back in proportion to the amount of product that originally left the food business.

The post recall reporting also includes investigating the reason for the recall so that action can be taken to prevent a recurrence of the problem.

A post recall report can also be used by industry, following voluntary recall, as a means to notify the Directorate: Food Control of the recall.

Use **Retail Recall Policy** found in **Policy Section** of this file.