

PLAN. PREPARE. BE RECALL READY

PROGRAM COMBINES PROFESSIONAL SERVICES, EDUCATIONAL WORKSHOPS



ERIN GREETHER

United Fresh
Produce
Association

IN AN IDEAL WORLD, your company will never have to issue a product recall; nor will it ever be negatively affected by someone else's recall. However, anyone involved in the fresh produce industry supply chain knows that contamination events warranting a recall do and will unfortunately continue to occur throughout the produce supply chain. Detection methods are better and surveillance is prevalent, so even given the tremendous improvements in food safety, there will be recalls.

When these industry recalls happen, it is important companies be prepared and ready to take action from the beginning. However, long before the recall event occurs, senior-level management and executives should be fostering an organization-wide approach for food safety and recall-ready preparedness, ensuring that all employees understand the direct impact recalls can have on the business and industry as a whole.

As senior vice president of food safety and technology for United Fresh, David Gombas said, "You don't want an actual recall to be a training exercise, and unfortunately, we know that recall events will continue to have an impact on the entire fresh produce supply chain. As an industry, we must all be committed to implementing effective strategies to protect public health, comply with government requirements and, moreover, minimize the impacts on businesses."

There are many aspects to consider when putting together a company recall plan. First and foremost, having the appropriate recall team in place is crucial for planning. The team should include communications, marketing and sales, operations and senior management, along with food safety or quality assurance personnel. Often, there is a misconception that only food safety and technical staff should be trained to handle a recall.

Identifying your recall team also sets clear roles and responsibilities for everyone involved in the process. Make sure to assess risks, and always test and evaluate your plan. Practicing mock recall simulations should include a mock contamination event, all the way through assembling the entire team, making decisions, knowing who to contact and ensuring all communications are as prepared as they can be. This will help find any holes in your plan and make you better prepared in the long run.

Furthermore, just being hypothetically "prepared" these days may not be legal anymore. The newly published Food Safety Modernization Act final rule on Current Good Manufacturing Practice and Hazard Analysis and Risk-Based Preventive Controls for Human Food states that companies subject to the rule must have a written recall plan.

Poor recall planning can have devastating business implications and public health consequences. Consider loss of sales; the potential impact on your company's brand and the

commodity or category itself being associated with negative press; and don't forget to factor in the potential financial and legal effects. For example, the 2008 salmonella outbreak, which was incorrectly attributed to tomatoes, cost the tomato industry millions of dollars in related losses. Eventually, the contamination was traced to jalapeno and serrano peppers from Mexico. Or take the deadliest foodborne outbreak from listeria contamination in cantaloupes. The result was 33 deaths and hundreds of illnesses, according to the CDC report; conviction and legal fees; and thus, cantaloupe industry sales heavily declined in the following weeks and months.

So at United Fresh, our motto is simple. "Plan. Prepare. Be Recall Ready." United Fresh has designed a Recall Ready program made up of an exclusive group of professional services such as personalized education and training, and industry workshops and seminars. All Recall Ready services come standard with the expertise of the food industry's leading professionals in food safety, legal and regulatory counsel and crisis communication. Working together with OFW Law, known for its expertise in food and drug regulatory law, and Watson Green, among the food industry's leading crisis counseling firms, United Fresh leverages the expertise of food safety, legal and crisis communication professionals who know what it takes to execute a recall to protect public health, comply with government requirements and minimize detrimental impacts on your business.

The United Fresh Recall Ready Program offers recall plan review, onsite recall training and simulations, written custom recall plans, executive management workshops at your facility and annual maintenance programs. All of these program services can be customized to your commodity, company and operations!

If you prefer group settings, The Recall Ready Training Workshops are hands-on, two-day workshops that will help companies understand the fundamentals of a product recall, including their rights and responsibilities, the role of FDA and how to limit liability, manage customer expectations, and develop a recall plan. The workshop combines recall protocols and communication management principles to ensure that technical food safety, management and communication and marketing staff work together effectively and efficiently during the entire recall event. If you are interested in attending a Recall Ready Workshop, the next training is Dec. 8-9 at Hamburger University in Oak Brook, Illinois.

All of the programs are designed for companies throughout the produce supply chain, including growers, shippers, packers, processors, wholesalers and distributors, retailers, restaurant operators and other industry organizations. For more information on all of the United Fresh Recall Ready services, call Erin Grether, United Fresh grassroots manager, at 202-303-3402, or email egrether@unitedfresh.org. To learn more about Recall Ready Programs, visit www.unitedfresh.org/recall-ready-program. P