

RECALL & CRISIS MANAGEMENT PLANNING & RESPONSE



A well-developed, thought-out and tested recall and crisis management plan can save a company when its reputation is on the line. The Acheson Group (TAG) helps prepare companies to successfully handle a product recall in the best possible light. TAG provides expertise in building robust recall / incident management programs for food and beverage related crises, such as those driven by social media or new regulations, and help companies implement those plans and navigate to a rapid recovery.

TAG's unique public health, medical, and regulatory experience, as well as its ability to communicate complex issues, provides effective solutions developed to help companies minimize damage during a crisis from legal to financial, brand damage and loss of customer confidence. TAG guides companies in the right direction with our unique approach:

▼ DEVELOP

TAG experts will assess a company's facility and evaluate the procedures and systems in place relating to handling product recall and public relations/media response strategies involved with their recall/ incident management. TAG will take these learnings and observations, align them with industry practices and regulatory requirements and draft a best-in-class recall plan that is customized to its needs and best protects the company's brand reputation.

▼ ENHANCE

TAG will review and conduct a gap analysis of a company's recall and incident management plan in effort to enhance readiness to successfully manage a recall or other product-related crisis. This service includes guidance on how to perform a health hazard evaluation, determine scope and depth of a recall, how to develop a recall strategy and appropriate communication strategies.

▼ TRAIN

TAG will devise a realistic, tailored "real-life" recall simulation scenario to help test a company's recall plan, process and systems. This simulation exercise can expose potential gaps in a current process or system, and builds awareness and confidence with recall roles, responsibilities and procedures.

▼ RESPOND

Should a potential recall situation arise, TAG will help manage the situation to minimize brand damage, monetary losses and other recall-related consequences. TAG offers a variety of services during an actual or threatened recall situation such as, giving advice on potential courses of action, assessing epidemiological information and insight on the degree of public health risk, assistance with a Health Hazard Evaluation and providing support for any interaction between clients and Local, State or Federal Regulators as well as composing appropriate messages, talking points and FAQ's to customers, other stakeholders, the public and/or media.

RECALL SIMULATION: THE ULTIMATE TEST

In a threatened or actual crisis, a robust recall/crisis management plan is crucial. Proper training, testing, recall decision-making and communication strategies will help guarantee a successful outcome. However, in order to succeed, a company must plan **in advance** which is why a recall simulation is critical for ensuring success. The goal of a recall simulation is to find out if the recall/crisis plan in place actually works in practice!

Developing and executing a good recall/ crisis management plan is no small task. It takes detailed planning, an exhaustive use of resources and practice.

TAG can help a company test its plan with a variety of scenarios that will lead to the discovery and resolution of problems that may arise, and ensure that its plan will run smoothly if a simulation someday becomes a reality.



INDUSTRY BEST PRACTICES RECALL PROCEDURES

Recalls are now subject to FDA mandate for the first time in history! Congress, in contemplating the Food Safety Modernization Act (FSMA) requirements, recognized that FDA must have the tools to respond effectively when food safety problems emerge. Section 206 of FSMA provides FDA with authority to issue a mandatory recall when a company fails to voluntarily recall unsafe food after being asked to by FDA.

The recipe for a successful recall starts with ensuring that a company's food safety team understands the best practices of a product recall, especially with the ever-increasing global supply chain and food recalls reported each year. Below, are best-in-class procedures that most company's follow:

COMPLAINT MANAGEMENT

Those who receive consumer and customer complaints are the first line of defense! Identifying critical complaints and having robust escalation, investigation, and chain of custody procedures and systems that automatically trend and track complaint data, with an alert, to a potential recall are critical.

HEALTH HAZARD EVALUATION

Procedures should be established to perform this risk-based approach to determine what level of risk, if any, there is to consumer health and safety.

ROOT CAUSE ANALYSIS

Procedures for determining the missing or inadequately applied controls that caused the recall so that corrective actions can be developed and implemented in order to prevent a reoccurrence must be addressed in a robust recall plan.

CORRECTIVE ACTION PLAN

When root causes of recalls are known, procedures for developing and monitoring corrective action plans should be required and implemented.

RECALL SCOPE & TRACEABILITY

The recall plan should define how to determine the scope of a recalled product, highlighting the dependence on accurate production, traceability and sanitation records.

CLASSIFICATION OF RECALL

Recalls are designated into classifications based on public health risk. Firms should understand the classifications and operate under the classification system for purposes of recall notification depth and recall strategy.

DEPTH OF RECALL

Procedures for determining the depth of recall are also encouraged. Depth is the level in the distribution chain to which a recall notification must be given, e.g. to the consumer/end user level, the retail or wholesale level.

COMMUNICATIONS

Recalls typically require numerous notifications to be provided to a variety of stakeholders including regulatory agency, customers, distribution centers and consumers. Template communicates and procedures should be contained in the plan.

RECALL STRATEGY

A recall strategy should include the recall notification to the depth of recall, effectiveness check level and product disposition strategy.