

# Customer information:

## How to act in case of a Recall or Withdrawal

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### 1. Introduction

Recalls and withdrawals are incidents that may affect the status of the certificate, therefore our customers are obliged to report to us within 3 working days whenever they have such a situation (ISACert Certification Protocol and Regulations). A specific paragraph has been added to this protocol to word this more clearly (paragraph 10.3).

Standard Owners require reporting to and follow-up from Certification Bodies.

This procedure describes the ISACert process, including responsibilities and decision criteria.

The role of ISACert is to ascertain that your company is still “certificate worthy”. Our approach here is to help you demonstrate this.

In case a recall or withdrawal was not reported to us, we have to issue a non-conformity in your next audit. If we receive information via other channels, we will contact you to start this procedure which may also lead to a non-conformity in the next audit.

### 2. Process for Handling Recalls and Withdrawals

#### *Step 1. First reporting of the Recall/Withdrawal*

You are required to inform us of any recall or withdrawal within 3 working days.

Reporting can be done by telephone or mail to the local ISACert contact person. Purpose of this first information:

- a) Make ISACert aware of the incident
- b) Agree how further communication shall take place

Recalls and withdrawals that shall be reported comprise all products produced or handled on your site. Recalls on products out of scope (exclusions) shall also be reported as the cause may have a relation with products in scope.

Recalls on traded products do not need to be reported (unless the certification is based on a Broker standard). We appreciate a notification in this case, but will not start further investigations.

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### *Step 2. Providing detailed information*

ISACert requests you to supply the necessary information to be able to judge whether the status of the certificate can be maintained. In order to get consistent information, the “*Notification Form Recall/Withdrawal*” has to be used.

The final version of this report has to be completed and returned to ISACert, standard timings we use are:

- Within 2 weeks if Food Safety is concerned
- Within 4 weeks for reasons other than Food Safety

Should ISACert feel that more urgency is required, these time-lines can be shortened. Also interim updates may be requested. Reasons for this could be involvement from government, press, standard-owner etc.

Should you need more time to finish the report, this shall always be communicated to and approved by ISACert. We may request interim reporting in such cases.

### *Step 3. Information review and evaluation*

ISACert will appoint one person (ISACert incident owner) who is owner of the process of managing the communication with you and judging the interim and final technical information.

It is important that we get a complete view of the recall/withdrawal, i.e. reason, type of product, amount of product, who else was notified.

The ISACert incident owner shall review your information using the following criteria:

- a) completeness of information.
- b) was communication in the food chain well managed
- c) content of the information:
  - was the recall/withdrawal handled efficiently (i.e. did the companies recall procedure work)
  - is the root cause analysis sufficient
  - are corrective actions and time frame appropriate

If required, a re-audit or visit can be organized to assess the information.

### *Step 4. Recommendation and final decision*

After receiving and judging the documentation provided by the customer (plus extra information of visit if applicable) there are 3 options:

- a) Certificate maintained, incident was handled satisfactorily and case can be closed
- b) Suspension of certificate awaiting further information
- c) Withdrawal of certificate

Option a) can be recommended if all was handled as expected.

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Option b) may be used when there is confidence that the company has acted correctly, but needs too much time to provide the evidence. A certificate can only be suspended for a time period of 4 weeks. After that it needs to be re-installed or withdrawn.

Option c) is used when the company has not handled the recall well, i.e. recall procedure not working, poor decision making, failing to identify or install corrective actions, failure to communicate etc).

#### **3. Follow-up in next audit**

At the next audit the auditor shall perform a review of the recall and implementation and effectiveness of corrective actions. Depending on nature and size of the recall, extra audit time may be added.

If during the audit, the auditor finds out that there was a non-reported recall or withdrawal, a non-conformity will be issued.

#### **4. Confidentiality**

All information will be treated strictly confidential but may be shown to standard-owners or accreditation bodies at their request. Incidents having a major impact on public safety and/or generating a lot of media interest have to be reported pro-actively to standard owners at the discretion of ISACert.

ISACert is the owner of the certificate and decides on the status. Standard owners (e.g. BRC, IFS, FSSC) have to respect our judgement but may challenge our decision. Openness and completeness of information from your side are crucial in such situations.

BRC requires CBs to give quarterly overviews of all recalls/withdrawals reported. This information is not public.

#### **5. Questions or unclarities**

In case of any questions, unclarities, do not hesitate to contact ISACert. Together we will manage a smooth settlement of your obligations to maintain your certificated status.