IMA

Product Recall **Response Plan**

As regulatory pressures intensify, it is crucial for processors to assess how prepared they are to withstand a product incident or crisis:

Formalized-Written Product-Recall Plan

A formal written recall plan should address and describe the following procedures:

- [ ] Determining if a recall is needed and the processes for reporting a recall to regulatory agencies.
- [ ] Identify the person(s) or key roles executing the recall. Specific duties should be assigned to specific individuals to ensure the effective execution of the recall plan.
- [ ] Identified system for locating and isolating shipments of all affected products.
- [ ] Plan for the execution of notifying customers and consignees of the product as well as the public when necessary.
- [ ] Procedures for product replenishment and appropriate disposal or refurbishment of recalled products.
- [ ] Conduct effectiveness checks to verify the recall has been appropriately executed and review plan of accuracy. The plan should include monitoring of the recall.

Testing the Formal Written Recall Plan by Conducting Mock Recalls

A mock recall is a simulated process to test and evaluate the effectiveness of a formal recall plan. Mock recalls can help identify vulnerabilities in traceability or faults in a recall strategy. Mock recalls are a mechanism to improve procedures and increase readiness to ensure swift action in the event of a genuine recall.

Internal Communication Strategy

+ **What to say:** In addition to a formal written recall plan, processors should develop an internal communication strategy that addresses how to advise employees and sales representatives of the recall and how they should respond to inquiries.
+ **What *not* to say:** It is essential to guide employees and sales representatives on what to say during a recall and what not to say. Disparaging remarks and acknowledgments of product performance made by employees and sales reps in the recall process to consumers may be discoverable if a lawsuit or claim is filed concerning injuries related to a recalled product.

Engaging with Carriers and External Experts

+ Some carriers provide pre-incident product recall training and response resources. Your current broker should be discussing these resources with you to better understand available support and determine how those resources can strengthen recall readiness.
+ Legal counsel should be engaged early to help guide recall communications, regulatory obligations and liability considerations throughout the response process.