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# Guidance for Developing Good Operating Practice Procedures: Complaints, Non-conforming Product, Corrective Action and Recalls

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Amendment 1

## Background

Food business operators have a legal duty to ensure the food they sell is safe and suitable. A system for managing problems with products will ensure the operator is able to:

- control the product that is released from their control;
- quickly and effectively recall or withdraw product from the market;
- inform customers if they suspect or become aware product is unsafe so they do not use it and become ill.

Problems with products may be identified by:

- the supplier of goods such as ingredients or packaging (e.g. the supplier discovers a non-compliance with their product after selling it to the food business);
- the food business itself;
- a customer or through consumer complaints; or
- a regulator or verifier.

Proper investigation and the regular review of customer complaints can help you to better understand the performance of your food safety system and to identify potential hazards that you may have been unaware of.

Key words used in this document:

A **food complaint** is a customer or consumer complaint relating to the safety or suitability of a food (e.g. food adulteration, contamination, composition and labelling). Complaint feedback is invaluable information that allows you to accurately assess the potential risk of a food incident issue and take appropriate action to safeguard consumer health.

**Non-conforming product** is any food or input known, or suspected, of failing to meet the regulatory requirements (including sections 1 & 2 of the Australia New Zealand Food Standard Code).

**Recall:** This is a removal of unsafe food from the distribution chain and extends to food sold to consumers and therefore involves communication with consumers.

**Withdrawal (also known as Trade Recall):** This is the removal of an unsafe foodstuff from the distribution chain but does not extend to food sold to the consumer.

## 1 Purpose / Scope

Write up your purpose and scope for Complaints, Non-conforming Product and Recalls.

*Example:* To ensure non-conforming food is rapidly and accurately assessed (including consideration of the potential exposure and the severity of the risk to consumers) and to ensure that appropriate corrective action is taken including, where necessary withdrawal or recall of product and communication of risks to safeguard consumer safety.

## 2 Authorities and Responsibilities

Write up who has specific authorities and responsibilities for Complaints, Non-conforming Product and Recalls. Think about managers, supervisors and other people as may be necessary, including others in the distribution chain.

*Examples:* The business operator has overall responsibility for ensuring the safety and suitability of food, including the handling of non-conforming product, customer complaints and product recalls as may be necessary. The Store Supervisor is responsible for segregating, labelling and holding non-conforming food to prevent accidental release.

## 3 Control Measures

Write up how you ensure any Complaints, Non-Conforming Product and Recalls are effectively and efficiently managed.

### 3.1 Complaints

Consider at least the following points:

- how you ensure customer/consumer complaints are managed, e.g.:

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- ensuring you have an effective complaints procedure in place identifying who is responsible for handling complaints, and how complaints are to be investigated, resolved, recorded and reported;
  - ensuring the responsible personnel are trained in dealing with complaints, including what information is to be gathered and, where appropriate, what information is to be given to the complainant; and
  - ensuring that all complaints are documented so they can be properly assessed and reviewed. The regular review of complaints can help you to identify potential problems that you were previously unaware of.

### **3.2 Non-conforming Product**

Consider at least the following points:

- how you detect food non-conformances, e.g. through:
  - investigating and reviewing complaints (see section 3.1);
  - following up on relevant feedback / notifications from suppliers, verifiers and regulators;
  - investigating failures in good operating practices;
  - process control checks and monitoring, and
  - any sampling and testing of product.
- how you identify which specific food is non-conforming and what is the extent of the problem, e.g.:
  - ensuring you identify what caused the problem, why it happened, and how much product is affected (e.g. using inventory records, product descriptions, batch codes, lot numbers, dates and times etc.).
- how you ensure non-conforming food is secured against use or dispatch, e.g.:
  - putting non-conforming food on hold, pending further investigation;
  - ensuring product on hold is clearly identifiable/labelled and held in segregated storage or in a designated area away from other food;
  - ensuring staff are trained to recognise the product status and the significance if the product was to be dispatched or used; and

- ensuring product can only be released on the authority of an appropriate person (e.g. restricting access the area where product is on hold).
- how you manage non-conforming product. Consider the following corrective actions, as appropriate:
  - release as is, with customer's agreement (only if they can manage the problem);
  - re-grading affected food and making it suitable for another propose (e.g. disposal to pet food or transfer to animal feed if appropriate. Clearly label the food "Not for Human Consumption");
  - re-working or re-labelling affected food where the fault can be removed;
  - rejecting the food and making sure it is denatured before disposal (e.g. defacing the packaging or puncturing tins before removal to landfill), and where necessary
  - recalling the food (see section 3.3).

### **3.3 Recalls (including Trade Recalls or Withdrawals)**

Consider at least the following points:

- how you ensure you are able to quickly isolate and remove unsafe food from the distribution chain and food already sold to consumers, e.g.:
  - have a recall plan for each part of distribution chain (where food goes, how to contact them, who is the contact person and what to tell them etc.) to enable the complete, rapid recall of any implicated lot of the finished food;
  - preventing the release of any further unsafe food into the market; and
  - .have a communication plan for notifying consumers of the recall.
- how you manage any affected food.

Refer to separate guidance on [Recalls and Warnings](#) published on the MAF website.

## **4 Monitoring**

Write up how you check the above procedures in section 3 are effective.

Consider the following checks:



- periodic checks of complaints investigation and review process;
- periodic checks of whether non-conforming food is managed appropriately as per the procedures;
- periodic checks of whether appropriate corrective actions have been taken after non-conforming food has been identified;
- de-brief and analysis after any recall; and
- periodic mock food recalls to see whether the system would work.

## 5 Corrective Action

Write up how you correct any problems that monitoring identifies, or that you otherwise become aware of (e.g. through product non-conformances).

Include how you cover the following:

1. Defining the extent of the problem (i.e. what has happened, why and when it happened, and how much and which (if any) product has been affected);
2. Restoring control (i.e. the action needed immediately to stop more product becoming affected and to fix problem);
3. Handling affected foods (i.e. re-grade, rework, reject or release as appropriate. Liaise with MAF if affected product is already out of your direct control and a recall is likely); and
4. Preventing re-occurrence (e.g. review procedures including contact lists and/or method of communicating product recall notice; identify any gaps in your staff-training; repair or replace any faulty equipment / amend ingredient specifications as may be necessary; evaluate any other products which are produced under similar conditions, etc.).

## 6 Documentation and Record Keeping

Determine what records you need to keep for this procedure. These will help you to introduce and maintain consistent good practices, and to demonstrate to your verifier (auditor) that you are sufficiently controlling those factors that can impact on the safety and suitability of the food.



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Assess any records you already have, and introduce any additional records you need for the monitoring and corrective action activities you specify in your procedure. When monitoring, you may have an option to either:

- record every check; or
- indicate that checks have regularly been carried out (e.g. throughout a week) and only record the results of a specific check where something went wrong. In these instances, always make a record of what you did to put things right (the corrective action).

Keep blank record forms handy for staff to use and let people know where they are. Keep completed record forms together where they can be found easily for your regular internal verification checks.

For your [general programme requirements](#) refer to the guidance document on the appropriate risk-based programme or plan which can be found on the Food Safety website.