Recall Hazard/Risk Analysis Form

Using this Form:

The decision to recall can be somewhat subjective at times. There are some situations where the hazard is known to be potentially life threatening, and the decision to recall is clear. In other situations it may be necessary to separate public perception of risk from scientific analysis of risk, and the decision to recall can be more difficult. This form is designed to clarify the thought process when making a decision to recall, and to provide a record of recall decisions for future reference.

DATE NOTIFIED	
BRAND/PRODUCT NAME	
COMPANY CONTACT DETAILS Address, email and phone details	
CONTACT PERSON Name, position, email and phone details	
PRODUCT INFORMATION	
What batch or batches is suspected?	
Are batches before and after suspected / affected?	Please tick one below: ☐ Yes ☐ No If YES what batches?
Quantity of product per batch including quantity of individual consumer packs per batch	
Product weight/volume	
Batch identification details i.e. date mark/batch code or ID as is stated on product label	
DETAILS OF HAZARD/NON COMPLIANCE (PLEASE TICK ONE BELOW) ☐ Microbiological Contamination ☐ Chemical contamination ☐ Foreign Matter ☐ Undeclared Allergen ☐ Labelling Incorrect ☐ Other	**DESCRIBE HAZARD/NON COMPLIANCE**
Has any testing been done?	Please tick one below: ☐ Yes ☐ No If YES please attach a copy of the test results
Does the product contravene a regulatory limit or standard?	Please tick one below: ☐ Yes ☐ No If YES which regulatory limit or standard?

Does the hazard/non-compliance have the potential to cause risk to health? Please tick one below:

☐ Yes - recall possible, proceed with risk analysis

☐ No - recall not required, unless other factors indicate otherwise (see ANY OTHER RELEVANT FACTORS). Company's own commercial risk to recall or not.Corrective action to prevent reoccurrence to be undertaken and documented.

DISTRIBUTION DATA (see Note 2)	
Where is the affected product (batch/batches)?	
Is ALL product still in company/distribution control (not yet with consumers)? Please tick one below: ☐ Yes - Product Hold or Withdrawal (see Note 1) ☐ No - Recall possible, proceed with risk analysis	
Where is product sold? (Please list all customers/retailers and include their location)	
Approximately how much product has been sold?	
Has product been exported? This includes all product sold outside of NZ including exports to Australia & the Pacific Islands	Please tick one below: ☐ Yes ☐ No If YES which countries?
CONSUMPTION INFORMATION How is this product commonly used (e.g. eaten immediately, stored for a few days, stored for a long period of time in freezer/pantry)? How much of this product is usually eaten in one sitting and how often? Is it Ready-To-Eat?	
CONSUMER/MEDICAL REPORTING (Note 3)	
Have there been consumer complaints about this product?	Please tick one below: ☐ Yes ☐ No If YES give details
Any reports of illness or injury?	Please tick one below: ☐ Yes ☐ No If YES give details
EXPERT OPINION (Note 4) Note experts consulted, and results of consultation.	
ANY OTHER RELEVANT FACTORS This section should be used to record anything else that influences the recall decision.	
Hazard/Risk Assessment indicates Recall Required? Please tick one below: ☐ Yes ☐ No ☐ Maybe - insufficient information to make accurate scientific assessment. Precautionary principle to be used.	
Precautionary Principle: Where assessment of available information indicates the possibility of harmful effects on health but scientific uncertainty exists, assume the product presents a risk to human health and take appropriate control action.	

Final recall decision *(including the extent of the finalised scope of the recall (batches, distribution etc))* **and key reasons:**
Please attach photo(s) of product including an image of batch identification details and its location on the label when returning this form

Notes:

1. Risk analysis may be required to determine whether product is suitable for reconditioning and release for sale or must be disposed of (destroyed). Disposal actions must be discussed with MPI.
2. Distribution contributes to the risk analysis, as it assists in identifying the potential exposure of consumers to the hazard. Third party distributors and their customers must be considered also.
3. Consumer/Medical reporting: Where two or more consumer complaints or reports of illness or injury implicate the same product or manufacturer the likelihood of a hazard being associated with the product is high and therefore likelihood of recall is high, particularly if the reports have originated from different households or otherwise unrelated sources. Recall is not automatic on suggestion of illness, unless there is additional evidence that confirms a causal link with a particular food product, however reports of illness must be taken seriously. Product may need to be put on hold, or withdrawn pending further investigation.
4. Expert Opinion becomes very important when differentiating between 'real' risk based on scientific evidence versus perceived risk. Expert opinion may also be a source of recent, unpublished, advances in scientific understanding of risks associated with particular hazards that may impact on the decision to recall.