

# Simulated Recall Guidance for Food Businesses



**New Zealand Food Safety**  
Ministry for Primary Industries  
Manatū Ahu Matua

This guidance is for food business operators undertaking a simulated food recall<sup>1</sup>.

## What is a simulated recall?

A simulated recall (or mock recall) tests the effectiveness of your traceability and recall procedures. It involves developing a scenario, carrying out your scenario in a similar way to a genuine food recall, then reviewing how effective it was to identify any areas for improvement.

A simulated recall is a bit like an emergency evacuation drill, it can help:

- to improve capability (to make a real recall quicker and more effective);
- support everyone involved so they are clear on roles and responsibilities, and know what to expect in a real recall;
- identify any gaps or areas for improvement in your procedures; and
- demonstrate the importance of good traceability record-keeping to staff.

A successful simulated recall scenario should result in either:

- a consumer-level simulated recall which involves simulating the process for removing affected product from the supply chain and communicating to consumers; or
- a trade-level simulated recall which involves simulating the process for removing affected product from the food supply chain.

### Key



**Forms/records**



**Requirements**

## Who should be involved in a simulated recall?

You should aim to involve everyone in your simulated recall who would be involved in a real recall. This means senior staff responsible for making decisions, as well as staff involved with operations, marketing and communication, and sales and distribution.

## How often should I carry out a simulated recall?



From 1 July 2023 businesses with a plan or programme under the Food Act, Wine Act, or Animal Products Act, as well as importers and exporters, will need to carry out a simulated recall. Regulations require this at least every 12 months after a simulated recall, or a genuine recall if that recall demonstrated the traceability and recall procedures to be effective<sup>2</sup>.

<sup>1</sup> This includes wine and animal products producers, manufacturers, importers, exporters, and distributor.

<sup>2</sup> (refer Food Reg [27A](#), [72A](#), [126A](#), [137D](#), Animal Products Reg [108](#) and Wine Reg [85](#))

You can contact New Zealand Food Safety anytime for help on:

**0800 00 83 33** or [Food.Recalls@mpi.govt.nz](mailto:Food.Recalls@mpi.govt.nz).

# Recommended simulated recall steps

Here is an overview of the steps in a food recall. You can find more detail on each step later in the document:

## STEP 1

### Develop a scenario

- Pick a problem
- Develop a back-story
- Prepare supporting information

## STEP 2

### Work through your scenario

#### Investigate

**Gather information**, understand the scenario, identify affected products, trial on hold processes



#### Inform

Record how you would tell your verifier (or New Zealand Food Safety) in a real recall.



#### Assess

**Assess the risk**, decide if a recall is needed and what level (trade or consumer)



#### Check

Record how you would tell New Zealand Food Safety and check your assessment and decision with New Zealand Food Safety in a real recall



#### Communicate

Prepare draft communications materials with impacted businesses, and consumers (for a consumer-level simulated recall)  
Record how you would communicate in a real recall



#### Audit

Collect reconciliation records  
**Optional:** Fill out Audit form  
Review and Identify Corrective Actions



Keep Records



\* Some businesses choose to combine informing, assessing, and checking into a single step using an online tool e.g. GS1's ProductRecallNZ application.

# STEP 1

# Develop a scenario

## Best practice tips

It is best practice:

- to base your scenario on something that could really happen in your business;
- to design a new scenario for each simulated recall;
- to design your scenario to reflect a worst-case for your business, and to design it as a consumer-level recall; and
- for a different person (or Team) to develop the simulated recall scenario to the person (or Team) carrying out the simulated recall.

## Pick a problem

Example problems could include an undeclared allergen (e.g. peanut, gluten), foreign matter (e.g. glass, metal), a microbiological hazard (e.g. *Listeria monocytogenes*), a chemical hazard (e.g. histamine in fish) found in your product, or something else.

## Develop a back-story about the problem

Identify how the simulated problem was identified or reported, by who, and when. Examples could include:

- a complaint from a consumer;
- a complaint from a trade customer;
- a detection of a hazard following testing;
- notification from a supplier.
- a detection of illness in the community reported via New Zealand Food Safety; or
- notification from an importer or foreign regulator.

Identify what caused the problem, and when: e.g. packaging, labelling, ingredients, raw materials, equipment, staff, environment, water.

## Prepare supporting information

Prepare information to release to the person (or Team) carrying out the simulated recall. For example:

- a simulated communication (e.g. an email) informing them about a problem at the start of the simulated recall;
- a simulated communication from a lab (e.g. an email) with test results to provide them during their investigation into the simulated problem; and
- a simulated communication from a supplier, to provide them during their investigation into the simulated problem.

## Examples of simulated recall scenarios and supporting information

You might like to use one of the following simulated recall scenarios if they are suitable for your business. If they aren't suitable for your business, you could adapt them to your specific situation.

Problem	Back-story	Ideas for Supporting Information
<b>Undeclared Allergen</b>	<ul style="list-style-type: none"> <li>A consumer experienced an allergic reaction following consumption of your product.</li> <li>NZFS informed you about the problem</li> <li>The allergen was peanut</li> </ul>	<ul style="list-style-type: none"> <li>Simulated correspondence with NZFS (e.g. email reporting the problem, the product, and batch number(s)).</li> <li>Simulated correspondence with supplier (e.g. email)</li> <li>Simulated correspondence with lab (e.g. email with test results from products (e.g. 200mg/kg allergenic protein) and/or ingredients revealing that the source of the allergen was one batch of a contaminated ingredient</li> <li>Simulated (or real) sales and distribution records</li> </ul>
<b>Foreign Matter</b>	<ul style="list-style-type: none"> <li>A consumer found foreign matter in your product.</li> <li>A consumer complained directly to your business about your product</li> <li>The foreign matter was metal wire</li> </ul>	<ul style="list-style-type: none"> <li>Simulated correspondence with consumer (e.g. an email with pictures of the foreign matter, the product, batch number(s), foreign matter measurements (e.g. 10mm) and description (e.g. hard and sharp)).</li> <li>Simulated (or real) inspection and/or maintenance records revealing that the source of foreign matter was a breakage in your factory</li> <li>Simulated (or real) sales and distribution records</li> </ul>
<b>Microbiological Hazard</b>	<ul style="list-style-type: none"> <li>Three people reported becoming sick after consuming your product:</li> <li>NZFS informed you about the problem</li> <li>The bacteria was <i>Listeria monocytogenes</i></li> <li>Note, this scenario works best for ready-to-eat products.</li> </ul>	<ul style="list-style-type: none"> <li>Simulated correspondence with NZFS (e.g. an email reporting the problem, the product, batch number(s)).</li> <li>Simulated (or real) cleaning records</li> <li>Simulated correspondence with lab (e.g. an email) with test results (e.g. presumptive positive/not detected), from different areas in your facility and/or from product revealing that the source of the bacteria was likely to be a contaminated cutting table</li> <li>Simulated (or real) sales and distribution records</li> </ul>
<b>Chemical Hazard</b>	<ul style="list-style-type: none"> <li>Multiple reports of illness, your product is suspected:</li> <li>A retailer informed you about the problem</li> <li>The chemical hazard was elevated histamine</li> </ul>	<ul style="list-style-type: none"> <li>Simulated correspondence with retailer (e.g. an email from retailer about the problem, the product, batch numbers, batch number(s)).</li> <li>Simulated correspondence with lab (e.g. email) with product test results (e.g. 220mg/kg histamine)</li> <li>Simulated (or real) sales and distribution records</li> <li>Simulated temperature records revealing inadequate temperature control due to malfunctioning chilling equipment.</li> </ul>

## STEP 2

# Work through your scenario

You or your staff will need to work through the recall steps, with a few modifications explained below. Have your recall procedure ready to test. Here's an example:

### Investigate

- Let other staff in your business that are involved in production or sales (if any) know about the simulated recall and invite them to take part.
- Simulate gathering information about the problem. Do this by identifying actions to take or what to investigate, and in what order. Supporting information should be made available accordingly.
- Simulate using records (e.g. production, inventory, sales and distribution) to identify affected products.
- Simulate using records (e.g. production, inventory, sales and distribution) to determine where simulated affected products are.
- Test your on-hold processes (it isn't necessary to put a real-life hold on all simulated affected products in a simulated recall). Identify an area for secure storage of on-hold products (e.g. locked or taped-off).



### Inform

- There is no need to inform your verifier (or NZFS) immediately of your simulated recall. However, you should prepare draft communications (e.g. email) to your verifier and/or NZFS to show your verifier at your next verification.
- Support everyone involved so they are clear on roles and responsibilities, and know what to expect in a real recall.

**Optional:** You may like to prepare draft communications (e.g. email) to logistics providers, customers, suppliers, and brand owners.



### Assess

- Let other staff in your business that are responsible for technical assessment and decision-making (if any) know about the simulated recall and invite them to take part.
- Carry out a risk-assessment, New Zealand Food Safety recommends using the Risk Assessment form. Add the words SIMULATED RECALL or similar to the top of the form.
- Make a decision to recall (or no further action), the type of recall (e.g. consumer-level or trade-level), which products and batches are included, and record your justification. If the decision results in no further action, carry out another simulated recall.



## Check

- There is no need to check your simulated recall decision, or your product management/disposal plan with New Zealand Food Safety. Instead create a draft communication (e.g. an email with risk assessment form attached) checking your simulated recall decision and product management/disposal, to show your verifier at your next verification.



## Communicate

If your simulated recall is a consumer-level simulated recall:

- Let other staff in your business responsible for communications and marketing (if any) know about the simulated recall and invite them to take part.
- Prepare a draft point-of-sale notice. However, there is no need to provide it to retailers.

If your recall is a consumer or trade-level recall:

- Prepare draft recall communications (e.g. emails) to impacted businesses<sup>1</sup>. There is no need to send the communications.

If your simulated recall is a consumer-level simulated recall:

- Prepare draft advertising. However, there is no need to put it into practice.



## Audit

Collect reconciliation records:

- Amount of affected product produced/imported;
- Other (e.g. staff sale, quality control samples, internet sales, export) (units);
- Amount with trade customers/consumers;
- Amount unaccounted for.

Review what went well and not so well. Identify any areas for improvement and/or staff training needs, what needs to be done, and timelines for action.

**Optional:** Complete the recall audit form. There is no need to send it to NZFS/your verifier.



<sup>1</sup> If you have access to one, you can use a digital tool to prepare your mock communications to impacted businesses (e.g. GS1's ProductRecallNZ application)

## Records



The following kinds of records may be helpful to show your verifier:

- Your simulated recall scenario including supporting information
- Reconciliation information showing:
  - Identification of affected products and batches
  - Distribution of affected products and batches
  - Customer contact information
- Draft correspondence with supplier (e.g. email)
- Draft correspondence with your verifier and NZFS (e.g. emails/name, day, time of phone call).
- Your risk assessment
- Meeting notes (e.g. notes including day, time, attendance, key points)
- Draft communications e.g.:
  - draft point-of-sale notice (for a consumer-level simulated recall)
  - draft communications to customers e.g. emails
  - draft media release (for a consumer-level simulated recall)
  - draft social media notifications (for a consumer-level simulated recall)
- A timeline of your simulated recall

## Resources

- [Simulated Recall Scenario and Supporting Information Example](#)
- [Simulated Recall Checklist Example](#)

### Guidance

- [Step By Step Food Recall Guidance For Food Businesses](#)

### Procedures and checklists

- [Recall Procedure Example](#)
- [Recall Checklist Example](#)

### Communications

- [Point-of-sale notice template](#)
- [Allergen point-of-sale notice template](#)
- [Email to Businesses example](#)
- [Media Release Example](#)
- [Social Media Release Example](#)

### Spreadsheets

- [Affected Products Spreadsheet Example](#)
- [Distribution Spreadsheet Example](#)
- [Reconciliation Spreadsheet Example](#)

### Forms

- [Risk Assessment Form](#)
- [Recall Audit Form](#)