
Product Withdrawal & Recall Procedure

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Introduction

..... Limited has a documented recall procedure in place and this will be periodically tested to ensure that it is Comprehensive and fit for purpose in its ability to remove an unsafe product from consumers and/or the distribution / Supply chain.

Recall Procedure

This procedure states the actions of Limited will take to effectively manage the recall of a product which has been determined to be unsafe or unsuitable.

There are two levels of product recall, these are as follows;

- 1. Recall (also known as a consumer level recall):** This is a removal of unsafe product from the distribution chain/buyer and extends to product sold to consumers and therefore involves Communication with consumers.
- 2. Withdrawal (also known as a trade level recall):** This is the removal of an unsafe product from the distribution chain but does not extend to product sold to the consumer.

In the event of product withdrawal following steps are taken:

1. Goods are counted and registered.
2. Label is removed.
3. Goods are quarantined.
4. Customer is notified of action taken.
5. Packing list is made accordingly.
6. Authorization is requested from the customer if goods can be.
 - Sold as stock lot after quarantine time has passed.
 - Goods are destroyed (brand dependent).

If goods have been agreed to be destroyed, photo evidence is submitted to the customer.

Roles and Responsibilities

It is -----Limited responsibility to effectively organize and manage the recall of our product that has been demonstrated to be unsafe or unsuitable. When a recall is initiated, our actions in recalling the affected products need to be co-ordinate with the Buyers. We shall notify Buyers as soon as a recall is likely. It is our responsibility to manage the recall by clarifying the product safety issue and the exposure (who and where risk exists), and to provide details on distribution and the method of recall.

The Recall Committee

The recall co-coordinator Head of Operation will initiate the formation of a committee and will coordinate actions with Buyer.

Committee members will include personnel from across -----Limited. Typically the committee would have a mix of knowledge across the following areas;

- ❖ Head of Operation
- ❖ Head of Quality
- ❖ Head of Merchandising
- ❖ Production Head
- ❖ Commercial Department

The recall committee is responsible for the management of all recall activities and to adhere to this procedure. Duties of the recall committee are to:

- ❖ Assess the overall problem;
- ❖ Notify the relevant regulatory authority;
- ❖ Evaluate the hazard in the product and the extent of contamination;
- ❖ Determine a strategy to be followed;
- ❖ Make decisions about product still in manufacture or in storage;
- ❖ Decide who makes any press statements;

Recall Actions & Documentation

The recall committee shall reference and follow the actions outlined in the Recall Guidance Material when we become aware a product may be unsafe or unsuitable. We will ensure that records of all actions and decisions and who was responsible are recorded and retained.

Decision to Recall

The decision on whether to recall or withdraw a product/s or not will be based on the identification of a hazard that makes a product unsafe and its likelihood of affecting public health. This will be determined by careful, considered risk assessment. The recall committee will conduct a risk assessment using the Hazard/Risk Assessment and we will include the appropriate regulatory authority in the process. We will refer to the Recall Guidance Material on the roles of regulatory authorities in regards to a recall.

Scope of Recall

The scope of a recall is a very important part of the process; it ultimately ensures the effective identification of all affected product/s, ingredient/s and location/s. We will follow the requirements set out in the Recall Guidance Material to ensure our plan incorporates the details mentioned.

Notification of a product recall

If the decision is taken to initiate a Withdrawal we will notify:

- ❖ Senior management

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- ❖ Buyer/Customer
 - ❖ Anyone that has received our product, including distributors, wholesalers, retailers. If we are engaged in a Withdrawal but find that for whatever reason that it is not possible to contact all relevant customer then we will consider expanding the Withdrawal to a Recall. If the decision is taken to initiate a Recall we will notify:
 - ❖ All people mentioned under initiation of a withdrawal, outlined above and The contact list must contain the contact details for the following:
 - ❖ The product recalls committee and senior management and key company personnel.
 - ❖ Suppliers of all ingredients.
 - ❖ Distribution company and business customers.
 - ❖ Sources of technical advice and support including laboratory facilities.
 - ❖ Regulatory authorities.

Communication

Notification in respect to the recall needs to be done promptly and should cover the following areas;

Regulatory Authority

We will notify the appropriate regulator at the earliest opportunity, after an incident is identified that may lead to a recall. We will supply as much information as possible, using the Hazard/Risk Assessment and the Recall Guidance Material. The regulatory authority will be updated throughout the process.

Regaining control of affected stock

If affected stock is directed to be returned to us then the recovered product/s will be stored in an area that is separated from any other products. Accurate records will be kept of the amounts recovered and the codes of the product/s. If the recovered product/s is unfit for human use, it may be destroyed or denatured under the supervision of the company management and/or the regulatory authority where legally required.

Effectiveness of the Recall

To be effective, the product recall notification must reach as far as the product has been distributed. The effectiveness of the product recall is assessed on the basis of the amount of product returned as a proportion of the amount of product that left DIPTA/DIRD GARMENTS LIMITED & DIRD Washing Plant Ltd while taking into account time in the distribution chain and the retail turnover of the product. Progress of the product recall must be reviewed so that its success can be monitored. If it is decided that there is now little risk to the public, the product recall can be judged to have been a success and brought to an end, however if there have been few returns and little response to a high risk problem the product recall procedure must be reassessed. The product recall may have to be repeated using different methods to reach the customer.

Testing & Reviewing the Product Recall Plan

The recall committee will review this procedure every twelve months, and the contact list will be amended as required. The procedure will also be reviewed after any recall, the review will consider the elements suggested by the Recall Guidance Material.

We will conduct a mock recall exercise within three months of the initial development of this procedure and additional mock recalls will be conducted on an annual basis. Records of these

mock recalls will be documented and filed in the -----Limited. Once the mock recall is completed, a review must be carried out with the relevant recall committee members to correct and improve the process where necessary.

Recall Report

We will submit a recall report to the regulatory authorities within an agreed timeframe of the closure of the recall. The final report will include the elements outlined in the Recall Guidance Material.

Prepared By	Approved By	Approval Signature	Seal
Compliance & Quality Department	Executive Director		