



HACAP Food Reservoir Standard Operating Procedure

TRACEABILITY & RECALL/WITHDRAWAL PROGRAM

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2023 AIB Standard(s): 5.17, 5.18

STATEMENT: Traceability and recall procedures must ensure effective, efficient and orderly return or other appropriate disposition of volatile product to the extent necessary to protect the consuming public from products that present real or potential health risk or gross consumer deception.

PROCEDURE:

- A. The HACAP Food Reservoir does not receive/distribute bulk/raw materials or ingredients. We do not repackage materials or ingredients or utilize materials and ingredients to create any finished product.
- B. Traceability information such as product type/pack size, brand names and expiration dates for all product that enters the Food Reservoir will be entered into our inventory management system.
- C. All food product will be coded and recorded in our inventory management system by the Product Reference Number. Every pallet of food product will be labeled with the associated Product Reference Number.
- D. The Warehouse Operations Managers, Volunteer Coordinator, the Partner/Programs team, the Food Reservoir Director will serve as the recall team. The Ops Managers are the head of the recall team. The Ops Managers will receive notification of all recalls via email and be responsible for notifying and removing product from distribution.
- E. All FA recall notifications we receive include; manufacturer/company contact info, supplier, distribution range, brand name, product type, product description, announcement date, FDA publication date, type/reason for recall, lot number, links to initial press release, USDA and FDA recall publications.
- F. Recalled product notifications; nationwide, in Iowa or from our seven county distribution area will be reviewed. We will determine whether it involves a food safety issue or a food defense issue.
- G. We will search for recalled product in Food Reservoir's inventory management system by: Brand name, Product type and pack size, Product, Reference Number, Expiration date.

- H. When a recall notification meets the criteria of line F, we will send the notification by email to all our partner agencies and the recall team. We will send the communication out within an hour of when the recall team has reviewed the notification.
- I. Recall notifications will be reviewed/and or conducted during regular HACAP business hours, M-F, 8am-5pm. Weekend/after hour recall emergencies shall be handled at the discretion of recipients per; local news authority, press release or otherwise.
- J. During investigation of inventory, in the event we discover we have or have had a specific recalled product:
- We generate a report through our inventory system to determine who has received or is set to receive said product.
 - We will have total number of cases accounted for: received, physically on-hand and previously shipped.
 - We will put product on hold:
 - Deactivate product from orderable inventory.
 - Physically remove product from pre pulled future orders.
 - Notify all past or upcoming recipients of the specific possible threat.
 - Advise recipients to discard product from their inventory and alert any of their clients, if possible to do the same.
 - Physically dispose of product through a legitimate regulatory and environmental method.
 - Adjust inventory in our inventory management system.
 - Refund or credit all partners who had to dispose of product they may have purchased from us.
 - After we review recall notifications and we determine there is a possibility a product could be in our warehouse by means of local donation or food drives:
 - As part of initial email warning, The Volunteer Coordinator is included, they shall warn volunteers to be on the lookout for possible product in question.
 - The recalled product will be posted in the volunteer rework room.
 - If any recalled product is found, we will discard immediately.
- K. The Chief Executive Officer, Food Reservoir Director or their designee will function as the external spokesperson for the recall. All media communication will be directed to the CEO, Food Reservoir Director or designee.
- L. The recall team is responsible for documenting, collecting, and recording all information generated by the recall. Periodic reviews will be conducted throughout the recall in order to ensure that the recall actions are effective and that the appropriate efforts are being made to locate and return or destroy the product being recalled.

- M. The recall team will work with the regulatory agency on the time, location and means of disposing of the recall product. The recall team will supervise and document the disposal of recalled product.
- N. The appropriate regulatory agency will terminate a recall when the recall is completed by correction or disposing of the volatile product.
- O. Recalled product that was found to be in our inventory will be included in the Food Safety Committee monthly meeting. Results, findings and corrective action will be shared.
- P. The Traceability and Recall Program will be tested by the Food Reservoir twice annually and will document:
- Actual test results
 - Success rate
 - Test timings
 - Corrective actions and process improvements where gaps in the program have been identified
- Q. The Traceability and Recall/Withdrawal Program will be reviewed twice annually.

The Recall Team:

- Taylor Glanz- Operations Manager tglanz@hacap.org- Review recall, send communication, review inventory, remove and dispose of product, adjust inventory and cost credit, review program and conduct mock recalls.
- Tyler Mills- Assistant Ops Manager tmills@hacap.org- Review recall, send communication, review inventory, remove and dispose of product, adjust inventory and cost credit, review program and conduct mock recalls.
- Craig Stiefel-Strategic Insights Analyst cstiefel@hacap.org-
- Hailey Carr- Partner and Program Supervisor hcarr@hacap.org- Liaison for partner inquiries, monitor inventory at site visits.
- Jim Mabry- RPC jmabry@hacap.org- Liaison for partner inquiries, monitor inventory at site visits.
- Mallory Stewart-RPC mstewart@hacap.org- Liaison for partner inquiries, monitor inventory at site visits.
- Angie Albright- Assistant Director aalbright@hacap.org- Liaison for partner inquiries, monitor inventory at site visits. Acting head of recall team in absence of Ops managers.
- Aron Brecht- FR Director abrecht@hacap.org External spokesperson.