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| **Farm Name:**  **TRACEBACK AND RECALL PLAN**  **Signature/date of Person filling out form: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**  **Signature/date of Supervisor review: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_** | Effective Date: \_\_\_\_\_\_\_  Document #: \_\_\_\_\_\_\_  Revision #: \_\_\_\_\_\_\_  Revision Date: \_\_\_\_\_\_\_ |

**G-6.1 Description of Lot Tracking System:**

Our farm utilizes a traceability system that allows us to trace product one step back and one step forward. Records are maintained that link product with the source of the produce or production inputs.

Information includes:

* What is in the package and how much
* Who packed the produce (crew #, group, or individual)
* The date it was harvested
* The field it came from that links to production records of inputs
* The date it was packed
* The date of shipment

The information is used to create an ID# - lot number on the package. When selling to wholesale buyers, each case of produce packed has a label that identifies or links to our records.

*Describe your lot tracking, coding and accounting systems to identify and describe recalled product. Include use of lot numbers and case labels and show ability to trace one step forward and one step back.*

* *Describe the coding system of each item included in your lot number.*
* *Include maps of growing areas and facilities as needed.*
* *Describe what is labeled, when, and with what type of label (include all product that is labeled on farm and distributed).*
* *Describe where lot numbers are recorded (on invoices, sales logs, etc.).*
* *Describe where trace-related records are kept.*

**G-7.1 Mock Recall**

**Policy:** To test our traceability plan, we conduct an annual mock recall. In the recall, a buyer is contacted and asked to identify a load received from our company. We ask how much of the product has been sold and how much they still have in inventory. This information is recorded in our mock recall form (Form 1) and kept on file. **(G-7.1)**

**Purpose:** To test and verify our traceability system

**Responsible Parties:**

|  |  |
| --- | --- |
| **Sample Mock Recall SOP** | |
|  | **Action** |
| 1 | Confirm contact info for all recall team members. |
| 2 | Determine the product and lot number that will be used for the mock recall. |
| 3 | Determine the quantities involved in the lot and the amount of product in the marketplace, using our traceability and inventory systems, and identify the customers who have received the product.  Invoices are the best place to access this information. The lot numbers and customer contact info are recorded on our invoices beside the product description as part of our traceability program. |
| 4 | Contact a customer that received this product by phone and explain to them that you are in the process of testing your product traceability systems. Tell them that you will be sending a follow-up email that you need them to respond to. If multiple customers received the same lot number, it is not necessary during the mock recall to contact them all. |
| 5 | Fill out the information in italics in the below message and send in an email to the customer(s) chosen for the mock recall.  Dear Buyer,  As part of our food safety program, we conduct a traceability exercise on an annual basis. We have chosen to analyze lot number *(lot number here)(Weight and product here),* of which you received *(amount they received here)* cases. Please respond to this email letting me know how many cases you currently have in stock and how many have been sold. It is important that you respond to this email as soon as possible. Our food safety program requires that we are able to trace all products within 4 hours.  **This is only a traceability analysis: you do not need to dispose of the product.** Please distribute or consume the product as usual. Thank you for assisting us with this exercise.  (*Signature here)* |
| 6 | Print confirmation email upon receipt from buyer. Complete the Mock Recall Record in your food safety manual. Attach the email to your Mock Recall Record and maintain with our recordkeeping. |

**G-7.1 Timeline And Process For Alerting Buyers In The Event of a Recall**

*Describe your procedure for alerting buyers with step-by-step detail. If you have an issue it needs to be clear for anyone who deals with it what he or she must do. Example procedures is below. Edit as needed to reflect your timeline and process.*

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|  | **Policies and Procedures** |
| Notify all management and employees |  |
| Halt production of the product pending an analysis of the cause. |  |
| Record the reason for the recall, and the health risk (Form 2 – Recall Information). |  |
| Halt distribution of the product and isolate the quantities still within the operation. |  |
| Identify the product and determine the quantities involved, and who received it (Form 3 – Product Information). |  |
| Identify who needs to be contacted (Form 4 – Contact Information). |  |
| Communicate with the parties concerned (Form 5 – Recall Notification). |  |
| Retrieve the product (Form 6 – Product Retrieval Record). |  |
| Non-conforming produce on hold for food safety is clearly identified and segregated from other products and packaging materials. |  |
| Properly dispose of all contaminated product. (Form 7 - Disposal Record) |  |
| G-8.1 Determine and document corrective and preventative plans (Form 8 – Follow-Up Plan). |  |

**5. Plan for Disposing of Affected Product***Describe your disposal plan. Include specific business and contact information that you involve.*

**6. Contact Information Procedure***A written procedure that states you will maintain a list with updated primary and secondary 24-hour contact information for each grower, pack house, processing facility, cold storage, broker, handling and transportation entity involved in both the inbound and outbound supply chain for each product.*

**7. Record Keeping Procedure***A written procedure that states you will secure necessary records for a minimum of two years beyond the expected shelf life of the Product, or to the extent required by applicable by law whichever is greater.*

**FDA Guidance For Recalls:** <https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts/industry-guidance-recalls>

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