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Can-Trace Pork Pilot
Project Report
This publication produced in collaboration with:

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[FLANAGAN]
[PGCTI Information Technologies Advisors]

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Pilot Project Summary Report

Submitted to: Can–Trace Steering Committee

Submission date: September 30, 2004
Introduction

The focus of the current phase of the Can-Trace initiative has been the development of whole-chain data standards for traceability. Following the announcement by Can-Trace in May 2004 of a draft standard, pilot projects in beef, pork and produce were undertaken to verify the minimum mandatory data requirements, and to provide recommendations on any modifications that should be considered prior to their adoption as a national standard. A secondary objective of the pilots was to collect information to support the development of the business case “Decision Support Tool” by identifying categories of costs and benefits of Traceability to selected firms.

Pilot teams were then formed in the May/June timeframe. Each team hired a project manager/consultant to oversee the project and co-ordinate the research. Teams met regularly via conference call to discuss the findings and ensure the work was on track. Pilot project results were reported to the Can-Trace Standards Working Group in late September.

The decision to pilot beef, pork and produce came as a result of consultations across the country with industry and government in mid 2003. Funding was not available for a similar pilot in seafood.

The pilot teams were recruited with a focus on ensuring participation and involvement of all components of the supply chain. Particular attention and effort was directed toward including, where possible, involvement from SME’s.

Methodology

After the project managers were retained by the pilot teams, initial conference call meetings were held to agree on how the project would be conducted and on how the deliverables and timelines would be met. Considerable up front time was also spent identifying additional participants in order to ensure that all components of the supply chain were represented.

Appendix 1 contains a list of participating companies and the roles they played in the pilot.

The project managers then set up a series of interviews with participating pilot company members to begin the research. They were given a three-fold task:

- To gather information on current track and trace practices
- To map the Can-Trace attributes to existing participating company practices
- To undertake a series of recall scenarios designed to test whether the Can-Trace standards were sufficient to conduct a recall.

On average, pilot teams required about 6-8 weeks to do the work, with another 2-3 weeks of reports, revisions and approvals.

General Observations about Participants in the Pilot Studies

- Most firms have track and trace capability of varying degree and some kind of system for doing recalls. This variation among companies is evidence of the absence of national standards.
- Recall scope and frequency vary widely by role in the supply chain and by firm type [e.g. small, medium or large].
Participating companies were very co-operative at providing information; however, they were reluctant to share [or unable to extract] the kind of detailed financial information required by the Business Case report. While the Decision Support Tool developed by the Business Case study tested successfully, additional financial data would have allowed for a more robust verification.

The use of three different consulting firms to act as project manager for each pilot [RCM Technologies – Produce; Trimark Engineering – Beef; eBiz Professionals – Pork] added considerably to the administrative challenge. However, it likely provided a broader range of experience, approaches and analysis.

Conclusions/Recommendations From the Pilot Studies

All Pilot groups concluded that the draft Can-Trace standards provided stakeholders with sufficient information to enable the traceability of products in the supply chain.

Pilot participants are already using most of the Can-Trace data attributes.

Additions to the data attributes were proposed by all three pilots.

Traceability systems that are integrated with existing company business practices are more likely to be maintained and more likely to be accurate than stand-alone traceability systems.

Beef Pilot Recommendations:

- Add Purchase Order number to mandatory list of attributes
- Remove Buyer Identifier and Vendor/Supplier Identifier from Mandatory attributes
- Co-ordinate with CCIA to ensure whole-chain Traceability
- Promote awareness of technology solutions

Produce Pilot Recommendations:

- Adopt a consistent product lot number that aligns with the GTIN
- Shipment identifiers should be used in addition to retailer/distributor purchase order number
- Add shipped quantity and unit of measure to the proposed minimum data standard
- Add pack date to the minimum standard and remove harvest date from the minimum standard
- Develop requirements for Master data
- Develop data retention guidelines

Pork Pilot Recommendations:

- Promote Lot Number as a key mandatory data attribute
- Add quantity shipped and unit of measure as a mandatory attribute
- Consider the use of a Best Before Date as a possible data component for identifying a product Lot Number
- Establish Carton Serial numbers and Pallet Number as an optional attribute
Produce Technology Report

In addition to the pilot study of the Can-Trace standards, the Produce Pilot team specifically asked for a discussion paper looking at current technology options to support implementation of whole-chain food traceability in Canada. The report suggests four pillars of Track & Trace, and examines both bar coding and RFID data collection methods. While the recommendations and conclusions focused on options for the Produce sector, the report is interesting reading for anyone looking to better understand the linkages between technology issues and Traceability.

Summary

The Standards Working Group found the Pilot studies to be invaluable in terms of:

a) confirming the general ability of the Can-Trace data standard to enable product traceability; and

b) generating helpful suggestions on further standardization of the use of several data elements across the supply chain [e.g. with respect to Lot number].

Appendix 1: Supply Chain Company List

<table>
<thead>
<tr>
<th>Sector</th>
<th>Primary Producers</th>
<th>First Processor</th>
<th>Secondary Processor or Distributor</th>
<th>Retailer/Food Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Beef</td>
<td>CCIA</td>
<td>Better Beef</td>
<td>Caravelle</td>
<td>Metro-Richelieu</td>
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<tr>
<td></td>
<td></td>
<td>Abattoir Colbex*</td>
<td>Martin-Brower*</td>
<td>McDonald's Restaurants</td>
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<td></td>
<td></td>
<td>Levinoff Meats</td>
<td>Levinoff Butcher Shop*</td>
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<td></td>
<td></td>
<td></td>
<td>Metro-Richelieu</td>
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</tr>
<tr>
<td>Produce</td>
<td>All Season Mushroom*</td>
<td>Oppenheimer</td>
<td>Oppenheimer</td>
<td>Sobeys</td>
</tr>
<tr>
<td></td>
<td>Oppenheimer</td>
<td>Pro-Organics</td>
<td>Pro-Organics</td>
<td>Thrifty’s Food Services*</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Neptune Food Service</td>
<td>Neptune Food Service</td>
<td>Fairmont Hotels</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sobeys</td>
<td>Neptune Food Service</td>
</tr>
<tr>
<td>Pork</td>
<td>Samis Farms*</td>
<td>Quality Meat Packers</td>
<td>Valbella Meats</td>
<td>Sunterra West Market*</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Olymel</td>
<td>Loblaws/Provigo –</td>
<td>Flanagan Food Service</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Trochu (Sunterra) Meats*</td>
<td>Distribution Centre</td>
<td>Loblaws/Provigo</td>
</tr>
</tbody>
</table>

* Small or Medium Enterprise
Can-Trace Pork Pilot Project

Submitted to: Can-Trace Steering Committee

Submission date: November 15, 2004
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1. Highlights

eBiz Professionals Inc, of Guelph, Ontario and PGCTI, of Trois-Rivieres, Quebec, were commissioned to examine the current tracking and tracing capabilities of the Canadian pork sector through a pilot study with a group of voluntary industry participants. As we completed our study we found that:

• The Can-Trace traceability standards would be sufficient and appropriate to achieving tracking and tracing in the Pork sector.
• Participants are willing to comply with Can-Trace traceability standards.
• Most companies are waiting for Can-Trace (or some official organization) to establish guidelines before investing in system development and implementation.
• The size of an organization was indicative of the resources and/or automation they have currently invested in food traceability.
• Product recall processes that are in place are largely driven by HACCP requirements.
• Participants did not have any significant traceability gaps in comparison to the current set of Can-Trace data attribute standards. The analysis did unveil some attributes that have not been listed by Can-Trace as either mandatory or optional.
2. Executive Summary

This analysis was completed by eBiz and PGCTI to support the development of standards for the sector under the Can-Trace Traceability and Standards initiative. The project was managed by Frank Monteleone, a business and IT consultant at eBiz. His team included Jack Book, an eBiz associate consultant, and Guy Monfette, an IT consultant and partner in PGCTI.

The pilot study had three main objectives related to traceability standards:

- developing an understanding of key handling, packaging and production processes at the participating supply chain companies;

- collecting samples of automated systems, paper-based documents and product labels to determine adherence to Can-Trace's proposed minimum data standard for traceability and;

- executing several mock product recall scenarios and studying processes used and results achieved.

The data for the pilot study was collected through site visits to the participant companies. These were complemented by phone conferences to collect the traceability data and to perform mock product recalls.

The pilot study yielded a number of results which would need to be addressed in establishing valid traceability standards, two of which are noted in the following paragraphs.

The topic of unique animal source became a topic of discussion during the study as we examined “on-farm” traceability processes. As a result of visiting the Samis Farm, in Alma, Ontario, we were led into discussions with Ontario Pork, the Canada Pork Council (“CPC”) and the Canadian Food Inspection Agency (“CFIA”). We were informed that the CPC is actively working on a pilot study that will result in the development of the Canadian Swine Traceability system (e.g. the movement of live swine) by April 2005. Possible implementation dates are unknown at this time. We feel that the results of this study will have a significant impact on what traceability looks like for the balance of the industry.

Currently, the identity of hogs is limited to the farm and day they were shipped to a primary processing plant. The lack of a unique animal identifier results in a product recall of a large batch of hogs, rather than the single hog recall which would occur if a unique animal identity system were in place. The decision on the type of animal tracking that will be implemented will take costs and international standards into consideration.

Also at the grower level, we found that “one up” traceability information includes feed and medication. Processes for feed and medication come under the responsibility of the Canadian Quality Assurance program that the CFIA recognizes for on-farm food safety. There was also a call for monitoring through the supply chain (which is currently voluntary) to become mandatory, to ensure that a trail exists for what animals are fed.

At the distributor level it was brought to our attention that the industry includes organizations (known as Brokers) that are responsible for completing transactions that result in the movement of product from many processing and further processing plants to local retail outlets and small retail chains. These broker and retailers operate in the small-medium enterprise market space; commonly known as “SMEs” in Can-Trace parlance. Brokers, and also third party carriers, come into contact with pork products and in certain situations retain possession of these products for an unspecified period of time - a day, days or weeks. While they were not considered in the traceability scenarios in this study, they should be considered when traceability standards are completed by the Can-Trace Standards Working Group.
During the study we reviewed and collected a variety of carton bar code labels. The content of a EAN.UCC 128 bar code label is left to the discretion of individual companies in the supply chain. While standards exist for the type of data and how it is presented, the multiple varieties of bar code labels make it difficult for distributors and retailers to accurately and consistently collect traceability data when they receive pallets and cartons into their facilities. It is also important to note that a bar code is not currently mandatory. We therefore recommend that Can-Trace consider developing and implementing a standard EAN.UCC 128 bar code label as part of its continuing initiatives. If this recommendation is followed, consideration must also be given to the particular requirements of SMEs and their broker suppliers.

The participants also see the benefits of implementing food traceability. They are embracing these standards as a means of building market share, especially in the Asian market. It is currently a pre-requisite for Canadian pork-producing companies to have systems in place to compete in the Asian market place.

The mock product recalls were executed successfully, with product sources and destinations accurately identified. This report includes details of how each recall was executed (see appendix A). The recall did not include the actual collection and isolation of physical product, and therefore the time required to contact end customers and external organizations was estimated based on the size of the recall.

Our analysis concludes that use of the Can-Trace traceability data standards would establish tracking and tracing up and down the supply chain. As an example the standards for a Primary Producer (e.g. a hog) includes a Product Identifier or the tattoo number that the Producer applies to a batch of hogs on the day they are shipped to a Primary Processor. Currently, the size of the batch can be as minimal as five or six or as large as thirty or more. Regardless of batch size, the tattoo number represents the link that Can-Trace will have with existing “on-farm” support traceability systems, e.g. provincially with Ontario Pork. In the future it will also be the link with the Canadian Swine Traceability system currently being developed federally by the CPC. However, when implemented we anticipate this link will now contain a product identifier that represents a unique hog.
3. Background

Food traceability, the ability to track food products from point of production to point of consumption, and to trace food products back through from point of consumption to point of production, is a top priority for the Canadian Agri-food Industry. Can-Trace, formed in July 2003, is a voluntary, collaborative, multi-tier project to design, test and implement common standards to facilitate whole-chain food product traceability for Canada.

Can-Trace has created and utilizes a set of foundational ideas that guides the initiative and helps determine the objectives of the entire project. Its concepts are:

- Standards created for food traceability in Canada must be internationally compatible, whole-chain in scope, capable of accommodating multiple commodities and based on the EAN.UCC standards.
- Standards must allow for cost effective tracking and tracing for the food products and should take advantage of existing infrastructure, data management and capture solutions.
- The standards development process should identify any Canada-specific requirements.
- Standards effectiveness should be evaluated through pilot testing with Agri-food stakeholder companies at various levels of the food supply chain.
- The Can-Trace initiative must be conducted in an open and transparent manner.

In addition, business cases will be developed, where the specific aspects examined are:

- Incremental costs and accrued benefits, with results stratified by company size and supply chain segment.
- Industry recommendations surrounding how costs for the implementation of traceability will be divided.
- Other issues pertaining to the cost implications for domestic product vs. imported product.

Within the Can-Trace Pork Pilot Project, there were two supply chain scenarios to be analyzed, at a minimum, for “one up / one down” tracking and tracing. These chains are considered to be representative of typical Canadian pork supply chains:

- **Scenario 1:** Farm » Abattoir/Primary Processor » Distributor – Retail and Foodservice
- **Scenario 2:** Farm » Abattoir/Primary Processor » Further Processor » Distributor – Retail and Foodservice

3.1 Objectives

The pork pilot study was designed to support the overall Can-Trace objective of facilitating whole-chain food product traceability through the following project objectives:

- Validate the Can-Trace tracking and tracing standard for pork developed by the Standards Working Group.
- Test the tracing and recall capabilities, forward and backward (one up/one down), within the food supply chain, using sample products. The focus was on both the data and business process requirements and examined the impact of these standards within an electronic/technology environment.
- Provide implementation experience and data to form the basis for industry implementation guidelines.
3.2 Activities
The goal of the project was to perform an assessment of the ability of systems to meet minimum data requirements. The tasks to be performed were:

- Gather representative sets of documents used to support traceability (bills of lading, purchase orders, invoices, etc.)
- Gather representative sets of pallet and case labels to review human-readable and bar code data.
- Perform a gap analysis comparing the existing system to mandatory and optional Can-Trace data requirements.
- Gather existing HACCP and other internal procedures/guidelines and associated paper-based documents used for product recall events.
- Conduct mock product recalls.
4. Participants

Eight companies participated in this project. The level of interest and cooperation was very positive. Many of the participants view traceability as a necessity and a means of continuing to grow their respective businesses. In particular, a high percentage of pork products processed in Canada are exported to markets that have established traceability standards as a prerequisite to establishing a trading partner relationship.

<table>
<thead>
<tr>
<th>Company / Location</th>
<th>Supply Chain Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Samis Farm – Alma, Ontario</td>
<td>Producer</td>
</tr>
<tr>
<td>Quality Meat Packers – Toronto, Ontario</td>
<td>Primary Processor</td>
</tr>
<tr>
<td>Olymel – Vallée-Jonction, Quebec</td>
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</tr>
<tr>
<td>Trochu (Sunterra) Meats – Trochu, Alberta</td>
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</tr>
<tr>
<td>Valbella Meats – Canmore, Alberta</td>
<td>Further Processor</td>
</tr>
<tr>
<td>Provigo – St. Laurent, Quebec</td>
<td>Distributor, Retail</td>
</tr>
<tr>
<td>Flanagan Foodservice – Kitchener, Ontario</td>
<td>Distributor, Foodservice</td>
</tr>
<tr>
<td>Sunterra West Market – Calgary, Alberta</td>
<td>Retailer</td>
</tr>
</tbody>
</table>

**Samis Farms**

Maintain approximately 3,000 hogs as a supply for primary processing plants located in Ontario.

Hogs are identified by placing a tattoo on the carcass of each hog 24 hours before they are shipped to a processing plant. The tattoo number is unique by barn.

Medication given to each hog is logged and the feed loaded in bins is recorded by supplier and date received.

Precautions are taken to address the threat of external equipment and clothing contamination – e.g. 3rd party carrier is not allowed on farm property. Hogs are loaded onto a bus and moved to the end of the property where they are transferred to the carrier’s truck.

The number of hogs shipped from the farm to the primary processor is recorded on a form provided by Ontario Pork. The shipment information on the form includes farm number, name, date shipped, number of hogs by tattoo number, and carrier. The form accompanies the shipment to the primary processing facility where the information is validated (e.g. number of hogs received), and signed by the receiver.

The shipment and receipt information is sent electronically to Ontario Pork, where it is ultimately retained in information systems developed and supported by Ontario Pork. This model is the same in British Columbia, Quebec and Maritime provinces. In Alberta, Saskatchewan and Manitoba, responsibility is left to the individual organizations.

The future of on-farm traceability is being developed by the CPC, the Canadian Food Inspection Agency. This will possibly include individual hog-id tags.
Quality Meat Packers
This processor kills, cuts and packs approximately 28,000 hogs per week (2.5 million kilos). Processed products are shipped and sold to further processing plants, to retail locations, and to retail distribution centres, or are exported to Japan.

The company has both automated and manual systems in place to ensure that product traceability is maintained from the arrival of the hog at the receiving barn to the output of cut product that is packed in cartons or combo boxes. The plant is HACCP-certified and their product recall procedure is part of this process.

For selected products the hog/tattoo number captured on the kill line is associated with the packaged product. This is accomplished in a three minute time span from the time the hog drops on the process table to the time the bar code is printed and applied to the carton or combo box. In their opinion, this process gives them a very high degree of accuracy in knowing the origin of hogs that were a source for products shipped from their facility.

Pork cut from carcasses for other products is sent down conveyer belts and packaged on other lines. The time intervals for packaging these products is both longer and variable, and therefore it is more difficult to accurately associate tattoo numbers with these products.

Olymel
This processor kills and packs approximately 35,000 hogs per week (3 million kilos). Processed products are shipped and sold to further processing plants or to retail locations and/or distribution centres.

This company has automated and manual systems in place to ensure that product traceability is maintained from the arrival of the hog at the receiving barn to the output of cut product that is packed in cartons or combo boxes. The plant is HACCP-certified and their product recall procedure is part of this process.

Trochu (Sunterra) Meats
This processor is representative of small-medium enterprise companies in this sector. They kill and pack approximately 3,000 hogs per week (300,000 kilos). Processed products are shipped and sold to further processing plants or to retail locations and/or distribution centres, or exported to Asian markets (Japan and Korea). The company has one additional kill plant that processes other commodity products, namely sheep.

This company relies heavily on the use of manual, paper-based systems to capture and record traceability data attributes. Information on what is received (e.g. hog tattoo numbers) and products produced are entered into a PC database on a daily basis by the inventory control coordinator.

The company has a Quality Control supervisor who is currently very active in getting their plants HACCP certified. Their product recall procedure is also part of this process.

Valbella Meats and Deli
Located in Canmore, Alberta, this further processor is representative of small-medium enterprise companies in the sector. Finished products (sausages, bacon, hams etc.) are primarily produced for Sunterra Markets located in Calgary, Edmonton and Lethbridge. Pork used as a raw material for their products is supplied by Sunterra’s Trochu and Innsville plants.

Valbella has an objective of obtaining HACCP certification, and are currently taking the necessary steps to do so. Current volumes of input and output products are small in comparison to others in the industry. To date, Valbella has chosen to maintain product traceability information on respective receiving and shipment logs.
**Provigo**
The review took place at this participant’s head office located in St. Laurent, Quebec. Provigo owns or franchises more than 300 supermarkets and discount stores in Quebec under the Provigo, Loblaws, Maxi, and Maxi & Cie banners. It offers private-label and branded products. Provigo's wholesale group supplies cash-and-carry warehouses for restaurants and convenience stores, and independent food store clients. Provigo became a subsidiary of Loblaw Company Limited in 1998.

To supply its stores with pork products, Provigo operates distribution centres throughout Quebec. The centres are responsible for product quality and timely delivery, and focus closely on health, safety and cleanliness in their own working environment.

Warehouse management systems rely heavily on the use of radio frequency and “voice” technology to capture and manage traceability information as product is received, warehoused and shipped.

Traceability information for inbound product is obtained from supplier pallet and carton bar code labels. Captured information includes a “National Grocer” (internal) product number and pallet numbers, received date and time.

Traceability information for outbound packages/cartons is derived on the basis of a first-in first-out inventory movement process within the warehouse. Outbound pallet and/or carton labels are not scanned for picking and shipment confirmation steps.

**Flanagan Foodservice**
The review took place at this participant’s distribution warehouse in Kitchener, Ontario. Flanagan operates additional food distribution facilities in Owen Sound and Sudbury.

Pork products are received from further processing companies (e.g. Vienna/Quality, Maple Leaf Foods, Schneider), and are warehoused and shipped to clients in multiple industries; e.g. restaurant, hospitality, retail.

Flanagan applies HACCP processes for product handling and recall purposes. They are currently in the process of obtaining their HACCP certification.

Input is derived from supplier bar code labels and packaging information. Due to the lack of industry standards, it is not always possible to obtain mandatory information, e.g. lot numbers, production dates, best-before dates.

Finished packages/cartons are broken and repacked to satisfy customer order requirements, e.g. a single ham is retrieved from a carton and re-packed. This practice limits the availability of information sent to the recipient in the supply chain.

**Sunterra West Market**
Sunterra Foods (the Parent Company) has 8 Retail Outlets (or “Markets” as they call them) in Calgary and Edmonton. Most of their meat products are their own brand and they also sell other typical retail foods and consumables.

At store level they bar code received pork packages for inventory control and point-of-sale scanning purposes.
5. Existing Procedures for Product Recall

Participants in this study are either HACCP-certified or in the process of achieving certification. As part of the HACCP certification they are required to have product recall procedures and processes in place to identify the receipt and shipment of products at their facility. Participants have provided hard-copy documents of their product recall procedures and, where authorized, we have provided copies of these documents in Appendix 'A'.
6. Mock Product Recalls

The purpose of this section is to outline the mock product recall scenarios and results of the recalls executed. Appendix ‘B’ includes a process flow diagram for each scenario described below.

6.1 Mock Product Recall Scenarios

6.1.1 Grower to Primary Processor.

Samis Farm called Quality Meat Packers to report a potential problem with a specific lot of hogs identified by a tattoo number shipped on a particular day.

Under the supervision of their HACCP coordinator, Quality executed their product recall procedure and produced reports and documentation to demonstrate that they had received the hogs and to account for the number shipped.

Ontario Pork was contacted to verify the results as all transactions between growers and primary processors in Ontario are recorded in their database.

6.1.2 Primary Processor to Distributor and Retailers.

Quality Meat Packers identified that they had a quality issue with a specific product and lot of pork loins. As a result they put their internal product recall process into motion to determine the retail and distribution locations that had received this product.

This recall could have been a continuation of the recall described in point 6.1.1 above had some or all of the hogs been used to package this product.

6.1.3 Primary Processor to Distributor and Retailers

Olymel identified that they had a quality issue with a specific product and lot number. As a result they put their internal product recall into motion to determine the retail and distribution locations that had received this product. Provigo was notified, as they had received 110 cases on a specific customer order number, and was requested to retrieve and quarantine the cases in question.

Provigo used their recall procedure to determine the location of the cases in question. This included both the internal warehouse locations, if the cases had not been shipped, and retail locations of cases that had been shipped. In this scenario all of the cases had been shipped and a report was produced to uniquely identify each store location.

6.1.4 Distributor to Primary Processor

Provigo identified that they had a quality issue with a specific product and lot number of product they had received, which had been produced by Olymel. They notified Olymel and gave them the product information from the existing carton label.

Using the product and best-before dates from the label, Olymel executed their product recall procedure to identify other locations that had received this product.

6.1.5 Further Processor to Distributor

In an isolated scenario Flanagan Foodservice selected a pork product that they distribute to restaurants. Using a Pork Sausage supplied by Vienna Quality Meats and a specific best-before date they executed their product recall procedure to determine the internal locations of the cases that remained in inventory and the locations of cases that had been shipped.
6.1.6 Primary Processor to Further Processor to Retail

In Western Canada the supply chain of Trochu Meats (primary processor), Valbella Meats (further processor) and Sunterra Western Market (retail) was used to complete a product recall scenario. Details of this scenario included:

- Trochu selected a pork belly product processed on a specific date and notified Valbella as they are their sole customer of this product.
- Valbella was requested to identify the products and locations of the products that were produced using the pork bellies in question.
- Valbella executed their product recall procedure and identified the Sunterra locations that had received this product.

6.2 Mock Product Recall Results

6.2.1 Grower To Primary Processor

Samis used their internal records to provide Quality Meat Packers with the tattoo numbers and delivery date in question. Using this information it took Quality twenty minutes to accurately account for the number of hogs received and to produce the corresponding shipment manifest document.

In a real-life scenario, this recall would have been extended further into the process, requiring Quality to account for the total volume of kilos processed from this shipment of hogs. To do this they would have produced a report to locate the resulting cartons and combo bins. Examining Quality’s recall procedure we are confident that they would have been successful in executing the latter part of this recall.

In addition the Ontario Pork office validated Samis’ reported-as-shipped and Quality’s reported-as-received.

6.2.2 Primary Processor to Distributor and Retailers.

Quality Meat Packers would use the same internal system if the recall were a continuation of a problem reported from an external source, e.g. a producer, or internally from their Quality Control department, as was depicted in this scenario.

From the time they reported that they had a quality issue with 116 cases of a finished packaged product on August 13, 2004 it took them 15 minutes to produce a report of customers that had received the cases of questionable product.

6.2.3 Primary Processor to Distributor and Retailers

On August 16, 2004 Olymel initiated a recall by informing Provigo that they must recall 110 cases of a particular product that they had received on a given customer order number.

Provigo used the receipt date of this product and the internally-assign pallet number(s) to determine which of their retail stores had received the cases in question.

As a result of this recall Provigo would have recalled 123 cases or 13 more than had been shipped to them by Olymel. This is standard practice, as their warehouse management system reports cases for the pallet numbers assigned to the warehouse receipt in question, and for the next sequentially-assigned pallet number.

The execution of this recall resulted in the preparation of an internal shipment report that took one hour and twenty minutes to complete.
6.2.4 Distributor to Primary Processor

Provigo identified that they had a quality issue with an Olymel pork product, notified the supplier and gave them the product information from an existing carton label. This information included product number and lot number.

Olymel used this information to determine the exact date, shift and production date of this product and lot. With this information, Olymel was able to produce an internal report that gave them the names/locations and number of cases shipped for the same lot.

The recall took one hour and twenty seven minutes to complete and they were able to account for the number of cases manufactured in comparison to the number of cases shipped.

6.2.5 Further Processor to Distributor

Flanagan Foodservice initiated a product recall using a pork sausage product that had a production date of July 21, 2004. They used their internal information technology system to determine the number of cases of this product that remained in one or more of their distribution warehouses and the customers that had received the product.

Their procedures include the preparation of an internal system Velocity report, contacting warehouse personnel, contacting customers, and transferring the cases to a quarantine area for disposal.

This recall took thirty five minutes to complete.

6.2.6 Primary Processor to Further Processor to Retail

For quality issues, Trochu determined that they had to recall 104 kilos of pork bellies that they had shipped to Valbella Meats on August 9, 2004.

Using their production and shipping records, Valbella identified that they had produced six cases of packaged bacon that was subsequently shipped to the Sunterra West Market store in Calgary.

This recall took two hours and fifteen minutes to execute. While this overall time is not significantly different from other tests we conducted, the recall could have been completed much faster if electronic systems and databases had been available.

6.3 Usage of Can-Trace Minimum Data Standards during Mock Product Recalls

A certain amount of communication concerning mock product recalls takes place unofficially through phone calls and e-mails. Where more official written communication samples were gathered, it can be noted that data elements provided for the purpose of recalled product identification did include some, but not all, of the Can-Trace proposed minimum standards. Samples of some of these supporting documents have been provided in Appendix "C".

For recall purposes it is not known if the use of all or just some of these attributes would have made the recalls any more accurate or reduced the completion time.

However, it can be pointed out that two product attributes, Best Before Date and Case Serial Number, used in the mock product recalls are not currently on the list of mandatory data attributes for the pork sector.

The tables in the following section identify data elements used and not used for the recall communications.
7. Gap Analysis

A gap analysis was performed, comparing the attributes currently in use by the participants versus the Can-Trace minimum data requirements for each level in the pork supply chain. Existing electronic database and paper-based systems were examined in this process.

Can-Trace has developed a set of mandatory and optional requirements for information that was collected, shared and kept at each level of the supply chain. The results of the analysis is summarized below:

**Primary Producer**

<table>
<thead>
<tr>
<th>Data Attribute</th>
<th>Collected (One Up)</th>
<th>Shared (One Down)</th>
<th>Kept</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buyer Identifier</td>
<td>Yes</td>
<td>N/A</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Description</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Identifier</td>
<td></td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vendor / Supplier Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>License Number</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Shipment Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Notes:

- Name of carrier and driver name is recorded and kept when hogs are shipped to Primary Processing plant.
- Product Identifier refers to the tattoo number that is applied to a batch of hogs on the day they are shipped to a Primary Processing plant.

**Primary Processor**

<table>
<thead>
<tr>
<th>Data Attribute</th>
<th>Collected (One Up)</th>
<th>Shared (One Down)</th>
<th>Kept</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buyer Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Batch or Production Lot</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Description</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vehicle Identifier (optional)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vendor / Supplier Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>License Number</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shipment Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Notes:

- Best Before and Case Serial Number are (one-down) data attributes that are used at this level. They appear on bar code labels and are kept in electronic databases.
**Distributor Retail**

<table>
<thead>
<tr>
<th>Data Attribute</th>
<th>Collected (One Up)</th>
<th>Shared (One Down)</th>
<th>Kept</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buyer Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Batch or Production Lot</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Description</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vehicle Identifier (optional)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vendor / Supplier Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>License Number</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shipment Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Notes:

- Pallet number is a data attribute that is used at this level. It is primarily used for internal control within a warehouse to manage the location of a product by lot, best-before date, or production date. Pallet numbers are useful in product recall scenarios as it can quickly help to locate and quarantine product.

**Distributor Foodservice**

<table>
<thead>
<tr>
<th>Data Attribute</th>
<th>Collected (One Up)</th>
<th>Shared (One Down)</th>
<th>Kept</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buyer Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Batch or Production Lot</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Description</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Product Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vehicle Identifier (optional)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Vendor / Supplier Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>License Number</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Shipment Identifier</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Notes:

- It becomes extra work for a Distributor at this or any level to find and assign a unique batch or lot number for in-bound product. At this time the industry is lacking standards for the content of case and/or bar code labels.
8. Recommendations

eBiz Professionals Inc. make the following recommendations:

- Develop and implement industry standards for the content of pallet and carton bar code labels. This would be helpful for distributors to accurately and consistently collect and share this information.

- Promote lot number as a key mandatory data attribute.

- Consider the use of Best Before Date as a possible data component for identifying a product’s lot number.

- Establish Carton Serial Numbers and Pallet Number as an optional Can-Trace data attribute for primary processors, further processors and distributors. Both of these attributes are considered important for business purposes; but optional from a traceability point of view.

- Determine applicability of Can-Trace standards to Brokers and Common Carriers.

- Establish minimum standards for the supply chain in how and where food traceability is collected and retained. As an example, Can-Trace could design and implement an affordable electronic database solution for each level of the supply chain. This would be particularly useful for SMEs in the industry and would ensure that events like product recalls are responded to accurately, consistently and on a timely basis.

The Can-Trace Pork Pilot project team welcomes any comments or discussion related to the content of this report.
Appendix A: Product Recall Procedures

Quality Meat Packers

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**Purpose:**
To quickly and thoroughly locate and retrieve all affected product from the distribution channel.

**Standard**
It is the policy of Flanagan Foodservice to have procedures for executing a recall or retrieval of product to the consumer level. The plan includes:
- Identifying, storing, and controlling the food, product, and material.
- Implementing the recall program.
- Testing the effectiveness of the recall program.
- Notifying the government agency of actions taken as directed by the Recall Coordinator.

*Flanagan Foodservice may decide to remove products from the market for various reasons, which do not involve a government regulatory agency. Removals of this sort are identified as company "retrievals".*

**Classes of Recall**

**Class I - Life threatening**
A situation in which there is a reasonable probability that the use of, or exposure to, a product will cause serious adverse health consequences or death. Consequences are immediate to long term, life threatening and involve a direct cause effect relationship, e.g. Botulism toxin in Foods. Class I recalls require: (1) A recall to the consumer level, (2) Extensive effectiveness checks on the removal of product and adequacy, (3) Insurance of Public Warnings, and (4) Notification of the appropriate regulatory agencies.

**Class II - Not Life threatening**
A situation in which the use of, or exposure to, a product may cause temporary adverse health consequences or where the probability of serious adverse health consequences is remote. (illness). e.g. pathogenic bacteria population inadequate to cause Food poisoning.
Class II recalls require: (1) A recall to the retail level, (2) A check retrieval effectiveness, (3) When in the public interest – a press release, and (4) Notification of the appropriate regulatory agencies.

**Class III**
A situation in which the use of, or exposure to, a product is not likely to cause any adverse health consequences. (quality related issues) e.g. labelling violations, filth in food relating only to aesthetic qualities.

**Class IV - Product Retrieval**
Involves the removal from the market product, which have no violations (or only minor violations) of the Federal regulations. The reason for withdrawal does not subject the company to legal action- e.g. the product does not meet company quality standards.

**When to Recall**
The need for a recall may be established in a number of ways. Some of the most common ways are:
- Report from customers
- Report of illness
- Supplier or Manufacturer recall
- CFIA – Health Hazard Alert
- Internal information

It is critical that anyone receiving this information communicates potential problems to the Recall Coordinator as soon as possible.

**TIMING**
The recall process starts as soon as there is good reason to suspect that a recall is needed. The initial information gathering (determining amount products and where it is located) should be completed within four hours.
<table>
<thead>
<tr>
<th>INFORMATION SOURCES</th>
</tr>
</thead>
<tbody>
<tr>
<td>□ Product Recall Summary</td>
</tr>
<tr>
<td>□ Warehouse Recall Information Sheet</td>
</tr>
<tr>
<td>□ Customer Recall Information Sheet</td>
</tr>
<tr>
<td>□ Customer Concern Form</td>
</tr>
<tr>
<td>□ Mock Recall Form</td>
</tr>
</tbody>
</table>

**Section:** Recall and Mock Audit  
**Title:** Recall Procedure  
**Code:** 1-1000-1-PURCH-RECALL  
**Completed By:** Rick Flanagan  
**Approved By:** The HACCP Committee  
**Page:** 2 of 10  
**Revision:** #3  
**Date:** 06/12/04  
**Date:** 06/12/04
Recall Steps

- Information about a potential problem received by Recall Coordinator
  - No recall needed
  - Recall possible
    - Possible Recall?
      - No recall needed
      - Recall possible
        - Assemble Recall Team
          - Is recall necessary
            - Yes
              - Inform Owner/Manager
              - Notify CFIA
              - Quality Problem
                - Begin completing the Recall Tracking Form
                  - Put product on hold in appropriate storage
                    - Inform customers and bring product back
                      - Determine disposition
                        - Dispose of product
                          - Evaluate effectiveness of recall and make changes to improve systems.
                            - Determine the cause of the recall and make corrections to prevent reoccurrences
    - Initial assessment and information gather:
      - What Class of recall?
      - How much was received?
      - How much was shipped and where?
      - How much is in each storage area?
### Recall Team Members

The functions listed are the primary responsibility of the person named, but other people can assist in these functions as needed.

<table>
<thead>
<tr>
<th>Name/ Phone Number(s)</th>
<th>Function on Team</th>
<th>Alternate</th>
</tr>
</thead>
</table>
| **Recall Coordinator** | 1. Investigation need for recall and initiate if necessary  
2. Fill out Product Recall Summary  
3. Follow through all steps of the recall | Jim Grieb Ext 3500  
Cell: 519-580-1535  
Rick Flanagan Ext 3900  
Cell: 519-897-0024 |
| **Determine receiving date and method of identifying lots**  
**Determine if product in transit to our warehouse and refuse at the door**  
**Send “Merchup” to notify all Sales staff** | Teresa Collier Safety & Compliance Coordinator  
Phone: 748-2190 ext 3206  
Home: 519-578-4428  
Cell: _ _ _ _ | Jacque Ballagh Ext 3510  
Rick Flanagan Ext 3900 |
| **Determination of numbers and location of recalled product**  
**Fill out Warehouse Recall Information Sheet** | Bob Jamieson Inventory Control Supervisor  
Phone: 748-2190 x 3905  
Home: 519-291-4636  
Cell: _ _ _ _ | John McNulty Ext 3910  
Cell: 519-501-8297  
Murray Flanagan Ext 3130  
Cell: 519-501-9639 |
| **Determine customers likely to have received affected product**  
**Contact customers likely to have received affected product**  
**Arrange pick up of affected product**  
**Fill out Customer Recall Information Sheet** | Kim Thacker Store Manager  
Phone: 748-2190 x 3720  
Home: 519-895-1313  
Cell: _ _ _ _ | Brian Hopkins Ext 3700  
Cell: 519-240-4553  
Rick Flanagan Ext 3900 |
| **Coordination and control of returned goods and segregating inventory**  
**Coordinating disposition of product** | Bryon Lillie Warehouse Manager  
Phone: 748-2190 x 3940  
Home: 519-885-3695  
Cell: _ _ _ _ | John McNulty Ext 3910  
Murray Flanagan Ext 3130 |
| **Can-Trace Pork Pilot Project Report** | | |
**In the event of a product recall, whether initiated by a supplier, customer or Flanagan Foodservice itself, it is the responsibility of Flanagan Foodservice to remove all affected product from the distribution chain immediately. Our responsibility includes: product on hand at customer locations, product on the truck, staged but not loaded, and product in the warehouse.**

**The recall will be coordinated by the Recall Coordinator, who will ensure all steps in this procedure take place. In the absence of the Recall Coordinator, the Purchasing Manager, or Executive Vice President will coordinate the recall.**

**Immediately upon being notified of a product recall, a Product Recall Information Sheet will be filled out. Information required is: Flanagan Product Number, Supplier Product Number, Pack/size, Description, the code that identifies the affected lot (Best Before Date/Production Date/Batch Number), the date on which the supplier shipped the affected product to Flanagan’s and the reason for the recall. A call must be made to the manufacturer if any of this information is missing or unclear. If product is on order and in transit from the manufacturer, it must be verified that this shipment contains no affected product. If it does, then those products will be refused at the receiving door.**

**The buyers in the other branches will be advised of the recall so that the same efforts can be made there to isolate all affected product.**

**Inventory Control will be advised to check the warehouse for any affected product in the warehouse. If found, it will be pulled from stock IMMEDIATELY, isolated and clearly marked “DO NOT USE”. If product is found staged but not yet loaded onto a truck, it is to be removed from the pallet, isolated and clearly marked “DO NOT USE”. It may be replaced with unaffected product from a different lot if available. A Warehouse Recall Information Sheet will be filled out with the details of what has been removed.**

**A “MERCHUP” e-mail will be sent to all sales staff advising them of the recall so that they may be able to answer any question that is asked by customers.**

**Through the use of the Warehouse Management System and Receiving History Reports it will be determined which days the affected product was shipped. Through the use of Velocity Reports, it will be determined to which customers the affected product was shipped. If it is determined that some product is on the trucks being delivered that same day, all drivers will be contacted and advised not to deliver those items but to clearly mark them “DO NOT USE” and return them to the warehouse for isolation.**

**All customers suspected of receiving affected product will be contacted that same day and advised to check their inventory for the specific lot and isolate it for return if found. If a case has been opened and it cannot be determined whether or not it is affected product, the customer will be asked to cease using that product and to isolate it for return. Request for Credits will be sent out with the next delivery so that affected product can be picked up and returned to the distribution center to be isolated while awaiting return to the manufacturer. Request for Credits are to be marked “BAD PRODUCT – DO NOT RESTOCK” and the date or code that identifies the lot is to be recorded in the code line.**

**A Customer Recall Information Sheet will be completed with all the details of the contact with each customer. If the customer needs replacement product prior to their next delivery, the necessary arrangements should be made.**

**Once they have verified that all product has been returned from the customers, affected product from the other branches is to be returned directly to the manufacturer whenever possible. If not possible to return it to the manufacturer, it should be sent to Kitchener. Product is to be sent on a separate pallet and clearly marked “DO NOT USE”. In Kitchener, this product is to be isolated with the rest of the affected product and returned to the manufacturer or destroyed once all product is accounted for.**

**In the event of a recall initiated by the Supplier or Customer, “out-of-pocket expenses” should be recorded by account, and**
Section: Recall and Mock Audit

Title: Recall Procedure

Code 1-1000-1-PURCH-RECALL

Revision: #3

Completed By: Rick Flanagan
Date: 06/12/04

Approved By: The HACCP Committee
Date: 06/12/04

- A product recall must be initiated by Flanagan Foodservice in the event of an error on our part that puts product safety in jeopardy. This can be caused by, but is not limited to, product rotated improperly, short code product, tempered product, bad product, or damaged product due to incorrect handling.

- All paperwork must be returned to the HACCP Coordinator to review the effectiveness of the recall and for later reference.

Responsibilities

Recall Coordinator (Purchasing Manager)

1) Coordinates recall assessment;
2) Fills out Product Recall Summary
   - Product and container codes
   - Depth of retrieval (warehouse, customer)
   - Disposition of retrieval products
3) Explanation and justification of recall
4) Maintains all contacts with government agencies, if involved
5) Reconciles shipped and unshipped food, products, and materials
6) Reports percentage of retrieval effectiveness

Inventory Control Department

1) Determination of numbers and location of recalled product
2) Determin shipping dates of recalled product and advise Customer Service
3) Fill out Warehouse Recall Information Sheet

Customer Service Department

1) Identifies customers who have received recall products
2) Prepare inventory and distribution status of questionable product, showing where, when and to whom product was shipped
3) Contact all customers and have shipment stopped
4) Issues instruction to customers and responds to inquiries
5) Issue credit memos
6) Arrange to pick up involved products through shipping department.
7) Pick up products and issue credit memo to customers

Warehouse Department

1) Locates, segregated and secures all unshipped products in inventory
2) Stop all shipment of product
3) Coordination and control of returned goods and segregating inventory
4) Coordinating disposition of product
Customer Concern Form

This form is to be completed whenever there are customer concerns about the condition a product was received in or what you would have used the CALL REQUEST FORM for. Examples of valid concerns would be:

- Frozen protein product allowed to thaw during delivery;
- Flour bags that have been punctured/or taped
- Chemicals that have leaked on to product
- Signs of pest infestation
- Mouldy Product
- Wood or metal in product or any type of physical contamination
- Premature Product Expiration

Anything that would constitute a valid food safety complaint. Do not use this form for standard returns where the customer simply does not want the product.

Date: ____________________________

Supplier: __________________________ Rep: __________________________ Fax #: __________________________

Customer Number: __________________________ Customer Name: __________________________

Contact Name: __________________________ Telephone Number: __________________________

Address: __________________________ City: __________________________

Date of Invoice: __________________________ Invoice #: __________________________

Product # and Description: __________________________

Lot Identification (Best Before/Production Date): __________________________

Manufacturer’s Code: __________________________

Occurrence: __________________________

Action: __________________________

Customer Follow Up: __________________________

Page 7 of 10
## Product Recall Summary

<table>
<thead>
<tr>
<th>Date:</th>
<th>Recall Start Time: a.m./p.m.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recall Coordinator/Alternative:</td>
<td>Manufacturer Name:</td>
</tr>
<tr>
<td>Product Number:</td>
<td>Manufacturer Contact:</td>
</tr>
<tr>
<td>Product Description:</td>
<td>Phone Number:</td>
</tr>
<tr>
<td>Pack/Size:</td>
<td>Lot Identification: (Best Before/Production Date)</td>
</tr>
<tr>
<td>Reason for Recall:</td>
<td></td>
</tr>
</tbody>
</table>

## Corrective Action

<table>
<thead>
<tr>
<th>Kitchener</th>
<th>Owen Sound</th>
<th>Sudbury</th>
</tr>
</thead>
<tbody>
<tr>
<td>Amount of product received:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Remaining product in stock:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product at customer locations:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Product unaccounted for (i.e. consumed):</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Person Responsible:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corrective Action:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

## Action Plan:

<table>
<thead>
<tr>
<th>Date:</th>
<th>Recall Finish Time: a.m./p.m.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorized By: (Recall Coordinator/Alternative)</td>
<td></td>
</tr>
</tbody>
</table>
Purpose:
- To determine how quickly and thoroughly all records can be obtained and to evaluate the ability to accurately locate the product. In this mock recall management it is essential to identify the location of all product.

Responsibility:
- Recall Coordinator

Frequency:
- Annually

Procedure:
- Choose a product, code date and size. Follow the Recall Procedure to determine location of all product in distribution, transit and shipped to customers. Record this information on the Mock Recall Form.
- Indicate the start and finish time on the form.
- Record trace (tracking of recalled product) results. Calculate the percent completeness of trace. If the result is <100% (not all recalled product accounted for) must be determined by the Recall Team. Indicate specific corrective actions as who is responsible and the timing.
- When corrective actions are complete, the Recall Coordinator can sign off at the bottom of the form.
- The target time is four hours maximum from the time mock audit is initiated.

Verification:
- Once corrective actions have been implemented another Mock Recall will be conducted at a later date on the same ensure corrective actions are effective.

Records:
- Mock Recall Form
## Recall and Mock Audit

### Title: Recall Procedure
- **Page 10 of 10**
- **Revision:** # 3
- **Completed By:** Rick Flanagan  
  **Date:** 06/12/04
- **Approved By:** The HACCP Committee  
  **Date:** 06/12/04

### Mock Recall Form

<table>
<thead>
<tr>
<th>Date:</th>
<th>Mock Recall Start Time: a.m./p.m.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recall Coordinator/Alternative:</td>
<td></td>
</tr>
<tr>
<td><strong>Product Number:</strong></td>
<td><strong>Product Brand:</strong></td>
</tr>
<tr>
<td><strong>Production Description:</strong></td>
<td><strong>Product Size:</strong></td>
</tr>
<tr>
<td><strong>Pack/Size:</strong></td>
<td><strong>Code Number:</strong></td>
</tr>
<tr>
<td><strong>Lot Identification:</strong> (Best Before/Production Date)</td>
<td></td>
</tr>
<tr>
<td><strong>Production/Purchase Volume</strong></td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td><strong>Remaining Stock Volume</strong></td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td><strong>Distributed Volume</strong></td>
<td>Units (i.e. cases/kg)</td>
</tr>
</tbody>
</table>

**Completion Time:** a.m./p.m.

***Note: Mock Recall must be completed within four hours of start time.***

### Corrective Action

- **A** Amount originally produced or supplied  
  Units (i.e. cases/kg)
- **B** Amount in transit  
  Units (i.e. cases/kg)
- **C** Amount held by distributors  
  Units (i.e. cases/kg)
- **D** Amount held by restaurants/units  
  Units (i.e. cases/kg)
- **E** Total unaccounted for or consumed  
  Units (i.e. cases/kg)

\[
\text{% Mock Recall Effectiveness} = \frac{B+C+D+E}{A} \times 100 = \% \text{ Effectiveness}
\]

1. Mock Recall is less than 100%, outline cause and indicate corrective action required:

### Person Responsible:

**Timeline:**

**Authorized By:**
Recall Program for Sunterra Meats Innisfail
EST 136

A) Information Required for Tracking

a) Product Identification, Package Size, and Quantity

All products are packed into boxes and combo bins with labels to identify what is in the box, when it was packaged, and how much the product in the box weighs.

b) Address Shipped to at Initial Level of Distribution

The salesmen have all information regarding the addresses; phone numbers, fax numbers, and a contact person for all customers.

c) Records

The amount of product produced, distributed and the amount in inventory at the plant can be determined with the records below

<table>
<thead>
<tr>
<th>Daily Production Records</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Person Responsible</td>
<td>Bruce Reid-Production Manager</td>
</tr>
<tr>
<td>Records</td>
<td>Break sheet/ Pick ticket sheets</td>
</tr>
<tr>
<td>Storage Place</td>
<td>P.S. office/ Front Office Filing Cabinet/ Storage in basement</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Distribution Records</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Person Responsible</td>
<td>Berri Shirley Shipping Supervisor</td>
</tr>
<tr>
<td></td>
<td>Salesmen- Sam McElhinney, Shaun Thompson and Glenn Gartner</td>
</tr>
<tr>
<td>Records</td>
<td>1. a) Distributec- Sales records</td>
</tr>
<tr>
<td></td>
<td>b) Shipping Supervisor Load verification sheet</td>
</tr>
<tr>
<td>Storage Place</td>
<td>1. a) Sales office- computer distributec</td>
</tr>
<tr>
<td></td>
<td>b) Loading Verification sheet- Shipping Supervisor Filing cabinet</td>
</tr>
<tr>
<td></td>
<td>2. Front Office filing cabinet/ storage in basement</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Plant Recovery Records</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Person Responsible</td>
<td>Shipping Department</td>
</tr>
<tr>
<td>Records</td>
<td>Shipping Supervisor/ HACCP Department</td>
</tr>
<tr>
<td>Storage Place</td>
<td>Shipping Supervisor’s Office/ Storage in basement</td>
</tr>
</tbody>
</table>

All records are maintained for 1 year prior to the current date or the shelf life of the product.

d) Recall Policy

If a food safety problem is found for a particular day’s production all distributed product for that day’s production will be recalled.
**B) Persons Responsible**
The recall team consists of the following individuals:

<table>
<thead>
<tr>
<th>Person Responsible</th>
<th>Phone Number</th>
<th>Responsibilities</th>
</tr>
</thead>
</table>
| Pat Hussey         | Home phone: (xxx) xxx-xxxx  
|                    | Work: (403) 227-3386  
|                    | Cell: (xxx) xxx-xxxx  
|                    | Fax: (403) 227-1661 and 442-2771  | Perform and oversee all aspects of the recall. Will notify (or designate the person) to inform the Canadian Food Inspection Agency of the recall and work to keep them informed throughout the recall process. |
| Bruce Reid          | Home phone: (xxx) xxx-xxxx  
|                    | Work: (403) 442-4202  
|                    | Cell: (xxx) xxx-xxxx  
|                    | Fax: (403) 442-2771  | Recall Coordinator. Responsible to investigate the expected cause or causes of the recall, as well as determine the extent to which other Sunterra Meats- Innisfail products may be affected by cross contamination. Will coordinate the in-plant inventory tracking. |
| Ray Price           | Home phone: (xxx) xxx-xxxx  
|                    | Work: (403) 546-3818  
|                    | Fax: (403) 546-4179  | Will act as a spokesperson on behalf of the company and be the only person who is allowed to converse with the media. |
| Berri Shirley       | Work: (403) 442-4202  
|                    | Fax: (403) 442-2771  |  |
| Sam McElhinney      | Work: (403) 227-3386  
|                    | Cell: (xxx) xxx-xxxx  
|                    | Fax: (403) 227-1661  | Sales Person |
In addition, the individuals involved in the processing of the recalled product may also be involved in the recall procedure as well as the individuals who are responsible for keeping the records as discussed in part A.

C) Criteria for a Recall
The Recall Classification is as follows:

Class I (Life Threatening)
A situation in which there is a reasonable probability that the use of, or exposure to, a volatile product will cause serious adverse health consequences or death. Examples would include toxic substances in food.

Class II (Not Life Threatening)
A situation in which the use of, or exposure to, a volatile product may cause temporary adverse health consequences, OR where the probability of serious adverse health consequences is remote.

Class III (Routine)
A situation in which the use of, or exposure to, a volatile product is not likely to cause adverse health consequences. Examples include the deterioration of product quality or labeling violations.

Once the product is removed from circulation the recalled product may then be subject to tests, corrective action to ensure compliance or destruction depending on the nature of the problem.

If there is uncertainty as to whether a recall is required then the CFIA will be notified and advice requested.

Required Notification Information for the CFIA:
1. The reason for the recall - the real or potential problem that exists and the event that triggered the recall;
2. Product identification - product name, establishment number and identification codes, date of production, date of importation or exportation, etc.;
3. Amount of product involved, broken down as follows:
   Amount originally involved;
   Amount remaining in operator's possession;
   Amount distributed;
Distribution date - areas, provinces, or cities, countries, names of wholesalers, retailers etc.;
4. Details of recall strategy - extent of recall, communication measures, notification of recall, etc.

Note: If any other product might be suspected of being defective the above information should also be included for it.

**D) Recall Effectiveness**
For each given class of recall the following levels of effectiveness must be accomplished.

<table>
<thead>
<tr>
<th>Class 1</th>
<th>Distributed Product</th>
<th>100% of the total product distributed will be recalled -(consumer or user level, including any intermediate wholesale or retail level).</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Product in Inventory at plant</td>
<td>100% of the product in inventory in the plant will be destroyed.</td>
</tr>
<tr>
<td></td>
<td>Effectiveness Checks</td>
<td>100% of the total number of consignees to be contacted (level A). The method for contact will be a fax followed by a telephone call to be coordinated by Tim Chapman. The contact will be requested to confirm receipt of the fax and the amount of product in inventory by fax.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Class 2</th>
<th>Distributed Product</th>
<th>100% of retail level, including any intermediate wholesale level.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Product in Inventory at plant</td>
<td>100% of the product in inventory in the plant will be destroyed.</td>
</tr>
<tr>
<td></td>
<td>Effectiveness Checks</td>
<td>100 percent of the total number of consignees to be contacted (level A). The method for contact will be a fax followed by a telephone call to be coordinated by Tim Chapman. The contact will be requested to confirm receipt of the fax and the amount of product in inventory by fax.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Class 3</th>
<th>Distributed Product</th>
<th>100% of wholesale level</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Product in Inventory at plant</td>
<td>In some circumstances product may be reformulated rather then destroyed. This decision will be made in consultation with the CFIA.</td>
</tr>
<tr>
<td></td>
<td>Effectiveness Checks</td>
<td>100 percent of the total number of consignees to be contacted (level B). The method for contact will be a fax, followed by a telephone call to be coordinated by Tim Chapman. The contact will be requested to confirm receipt of the fax and the amount of product in inventory by fax.</td>
</tr>
</tbody>
</table>
E) Recall Testing
The recall program must be tested to determine its effectiveness. Testing of the recall program is done by a mock recall that is performed once a year. The mock recall is the responsibility of the Recall Coordinator or designated alternate. All forms for actual recall are used to test the recall program and records of mock recall can be found in the binder marked Health & Safety Complaint Records. Items that need to be tested or verified are:

1. Does each of the persons mentioned in section B - "Persons Responsible" understand and are capable of the actions they are responsible for? If people do not understand any part of their responsibilities this is an opportunity to address their misunderstandings.

2. Is a list readily available with all customers’ names, addresses, phone numbers, and fax numbers?

3. Is information regarding what was shipped, whom it was shipped to and how much they got readily available?

4. Can it be determined what is in inventory at the plant level and what has been distributed?

A mock recall follows the same procedure as an actual recall except for the following:

- Production and distribution will not be halted
- Government agencies will not be contacted (CFIA)
- Product will not be returned, removed from stores or disposed
- Customers may or may not be contacted

F) Complaints related to Product Safety
Information on complaints is to be documented using the Customer Complaint Record.

All complaints are to be kept on file.

Copies of these records when completed are to be filed at the plant by the HACCP Coordinator for a period of 1 year or shelf-life of the product.

G) Recall Procedure
When a concern is brought forward by letter, phone call or any other means, the person receiving the complaint will fill out the Customer Complaint Record. The Recall Coordinator, or designated alternate, reviews all customer complaints as they are received, and will verify the Customer Complaint Record. The Recall Coordinator, or designated alternate, will determine if the complaint represents a food safety concern. The finding and the reasons for the conclusion reached are attached to the Customer Complaint Record. If the complaint does not represent a food safety concern, a person designated by the General Manager will deal with the complaint. Otherwise, members of the recall team will evaluate the complaint.

An individual is assigned to contact the complaint (individual or organization) by the Recall Coordinator or designated alternate.

The Recall team evaluates the written complaint to determine if a recall is required. Note: If a recall is not required a note is to be attached to the written complaint indicating any action that was taken and any follow-up that was required.
If a recall is required it is designated as a Class 1 or Class 2 or Class 3. If in doubt the Class 1 designation should be utilized. (Recall Classification Flow Diagram, Form 1: Recall Strategy, Form 2: Critical Recall Information) All product that may be affected is identified and located (Form 4: Product Inventory, Form 5: Distribution Status) The recall is initiated with product recalled and persons contacted to the level required by the Recall Class by the person designated by the General Manager or designate, using Form 6: Customer Communications Log, Form 7: Urgent Product Recall. Notification of the CFIA is performed by the General Manager or designate, using the Form 9: CFIA Recall Notification Form.

9: CFIA Recall Notification Form.
   a) The name of the effected product and all appropriate identification data
   b) That all distribution of the product should cease immediately.
   c) When applicable the direct account should inform others that received the product about the recall.
   d) Specify what is to be done with the product.
   e) Provide a means for the recipient of the communication to acknowledge receipt of the notice, to provide data of the amount of product on hand and any clients contacted etc.

If possible objective evidence is to be gathered by the Recall team, including samples of effected product etc.

Recall effectiveness to the required level for the recall class is to be proven using Form 10: Effectiveness Check Questionnaire.

An investigation as to whether any cross contamination may have occurred with other products is to be conducted by the HACCP Coordinator or designated alternate. If further recalls are required they are initiated. Potential causes of the original recall are reviewed in writing.

If no further recalls are required the recall is reviewed in writing by the Recall Coordinator (Form 11: Recall Review) and a report submitted to all the members of the recall team and the Inspector in Charge. The report is to include a description of all actions taken and follow-up.

Recall Training Form for Recall Team Members

I have read the recall procedures and understand my responsibilities as a recall team member.

____________________
Signature

____________________
Name (Print)

____________________
Date
Appendix B: Mock Product Recall Process Diagrams

MOCK PRODUCT RECALL DIAGRAM

Grower to primary processor

SAMIS FARMS

Ontario Park

Quality Meat Packers

Barn Ownership and Location Document
Lot number 750
Producer number 597120000
Ontario pork produced the report within 30 minutes

August 9th, 2004
Samis calls Quality to report a potential problem with 34 hogs.
Tattoo number: 69912

It took Quality 20 minutes to print the report called “Manifest” and validate the receipt of the hogs
Quality indentified an internal quality issue and exercised recall on number: 102 Pork loins, Town Club
Quantity: 116 cases

Results:
It took 15 minutes for Quality to generate their “Recalled product report” identifying customer, location, invoice number, number of cases, weight and customer contact telephone number.

Products were shipped to 8 different locations

August 13th, 2004

Quality Meat Packers

Retailers

Primary processor to distributors and retailers
August 16th, 2004
Olymel identified quality issue and exercised recall on cases. This information was provided to Provigo:

Shipped date: 2004/08/05
Shipped to: Provigo Dist Inc.
          2700 Francis Hugues
          Laval
Order number 319303-67
#command 901147
UPC 62124
110 cases Epaule porc picnic Olymel

Results:
It took 1 hour and 40 minutes to receive the "Mock Recall report"
It was completed and included 123 cases distributed to:
Loblaws Gatineau: 50 cases
Loblaws Drummondville: 34 cases
Loblaws Trois-Rivières: 30 cases
Loblaws Chicoutimi: 9 cases
Provigo identified an internal quality issue and exercised recall on product. We took the information from a label Provigo and sent it to Olymel:

**Product:** 1241F  
**Quantity:** 116 cases  
**432-A1**  

Net Kg 20.97  
Net lbs 46.23  
27381 J-000005  
Ref. 87-4222-0005  

**August 16th, 2004**

It took 1 hour and 27 minutes to get back to us with results.

1241F is longes coupe courte, variable weight, COV 432-A1, as been manufactured on August 9th 2004 J-00005, is the 5th case of the day shift.  
363cs have been manufactured in this lot, day shift.

8 invoices have been issued to 6 clients as follow:

<table>
<thead>
<tr>
<th>Client #</th>
<th>Region</th>
<th>Qty</th>
<th>Delivered</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provigo</td>
<td>Laval</td>
<td>40/40</td>
<td>August 9th</td>
</tr>
<tr>
<td>081610</td>
<td>Edmunston</td>
<td>1/1</td>
<td>August 9th</td>
</tr>
<tr>
<td>039768</td>
<td>Chambly</td>
<td>278/300</td>
<td>August 9th</td>
</tr>
<tr>
<td>085630</td>
<td>Toronto</td>
<td>6/6</td>
<td>August 9th</td>
</tr>
<tr>
<td>039768</td>
<td>Chambly</td>
<td>1/200</td>
<td>August 10th</td>
</tr>
<tr>
<td>Provigo</td>
<td>Laval</td>
<td>30</td>
<td>August 10th</td>
</tr>
<tr>
<td>090206</td>
<td>PQ</td>
<td>2</td>
<td>August 10th</td>
</tr>
<tr>
<td>000030</td>
<td>PQ</td>
<td>20</td>
<td>August 10th</td>
</tr>
</tbody>
</table>

378cs
Further processor

Flanagan Foodservice

August 18th, 2004
We invited a recall of Quality Selection Pork Sausage

Production date: July 21st, 2004
Product number: 86519

Results:
It took 35 minutes to isolate what they still had in their warehouses and produce the velocity report (ship to information, quantity, contact information).

A total of 36 cases were identified as being shipped to 19 locations.
Trochu Meats Abattoir

Trochu confirmed shipment of bellies to Valbella on August 9th and Valbella confirmed receipt on August 10th.

Valbella Further Processor

Valbella was able to identify that these bellies were transformed into cases of bacon that were sent to Sunterra West Market on August 17th.

Trochu sells pork bellies to Valbella

August 26th, 2004
Valbella initiated a recall to Sunterra West Market
Best before date: September 23rd 2004
Number of cases: 6
Weight 93.36 Kg

Results:
It took 2 hours and 15 minutes to receive their “Retrieve Product” report, Form 8. That report was generated from Trochu’s HACCP recall procedure assisting Valbella with their recall.

All 6 cases were retrieved weighing 93.36 Kg.
Appendix C: Mock Product Recall Supporting Documents
Samis Farm to Quality Meat Packers

[Image of a form with handwritten notes: "Traced Back From Quality Meat"]
Samis Farm  Tattoo # 69912  Total #34

Arrived: Hogs - Monday Aug 9 at 11:03 a.m.
Vel Transport  Har. Yard 750

No dead
No Carryover
No condemn.

KF Entry  Aug 9, 04  →  1:04 p.m. - 3:59 p.m.
CR Exid  Aug 10, 04  →  10:42 a.m. - 3:35 p.m.

34

8:55 a.m. finish.
<table>
<thead>
<tr>
<th>Status</th>
<th>Date</th>
<th>Location</th>
<th>Code</th>
<th>Code Description</th>
<th>Start Date</th>
<th>End Date</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active</td>
<td>08/02/2004</td>
<td>TX</td>
<td>123</td>
<td>CA</td>
<td>12/03/2004</td>
<td>03/01/2005</td>
<td>Good condition</td>
</tr>
<tr>
<td>Active</td>
<td>08/02/2004</td>
<td>CA</td>
<td>456</td>
<td>NY</td>
<td>01/03/2005</td>
<td>04/01/2005</td>
<td>Minor wear</td>
</tr>
<tr>
<td>Active</td>
<td>08/02/2004</td>
<td>IL</td>
<td>789</td>
<td>MA</td>
<td>02/03/2005</td>
<td>05/01/2005</td>
<td>No issues</td>
</tr>
<tr>
<td>Active</td>
<td>08/02/2004</td>
<td>WI</td>
<td>101</td>
<td>CT</td>
<td>03/03/2005</td>
<td>06/01/2005</td>
<td>Slight damage</td>
</tr>
<tr>
<td>Active</td>
<td>08/02/2004</td>
<td>MN</td>
<td>122</td>
<td>MA</td>
<td>04/03/2005</td>
<td>07/01/2005</td>
<td>No problems</td>
</tr>
</tbody>
</table>

**Can-Trace Pork Pilot Project Report**
FORM 9  CFIA RECALL NOTIFICATION FORM

Name of CFIA Chief: Mark Morlock
Phone Number: 403-292-4162
Fax Number: 403-292-5292
Date of Recall: Aug 26, 2004
Time Faxed to CFIA:
Date Faxed to CFIA:

Recall Product Information:
Product Name(s):
- Pork belly
- Outside, Pork Loin
- Leg

Size(s):
477.76 kg

Code Number(s)/Lot Number(s) recalled:
214, 88, 181, 226

Reason for recall:
Temperature failure upon transport

Amount of Product Produced (kg):
977.76

Amount of Product in Inventory (kg):
0

Amount of Product in Distribution (kg):
977.76

Area of Distribution:
Local [X] National [ ] International [ ]

Customer Distribution Log will be faxed and will include all relevant shipping information
Is the Distribution Log attached? Yes [X] No [ ]

Corrective Actions:

Completed By: O. Halliday
Verified By:

J. Hendry Revised as per log book on 22/03/02

AUG-27-2004 11:33AM TEL:1 403 442 2771 ID:EBIZ PAGE:003 R=57%
**FORM 8: RETRIEVED PRODUCT**

Completed by: Pat Hussey  
Time completed: 1040 am/PM

Date: Aug 26 10 4  
Time received: 125 am/PM

<table>
<thead>
<tr>
<th>Customer Location</th>
<th>Retrieved Product Count</th>
<th>Picked up by (Name)</th>
<th>Number of Units</th>
<th>Disposal Location</th>
<th>Witness of Disposal (Signature)</th>
</tr>
</thead>
<tbody>
<tr>
<td><em>Central West</em></td>
<td>93.26</td>
<td>John</td>
<td>6 box</td>
<td>TMP</td>
<td>Pat Hussey</td>
</tr>
</tbody>
</table>

Completed by: Pat Hussey  
Time completed: 145 am/PM

Verified By: ________________________________

---

J. Hendry  
Revised on 22/10/12 as per logbook.
Flanagan Foodservice Product Recall Documents

Section: Recall and Mock Audit
Title: Recall Procedure
Page 9 of 10
Code 1-1000-1-PURCH-RECALL
Revision: # 2
Completed By: Rick Flanagan
Date: 06/12/04
Approved By: The HACCP Committee
Date: 06/12/04

MOCK RECALL PROCEDURE
Purpose:
- To determine how quickly and thoroughly all records can be obtained and to evaluate the ability to accurately locate the product. In this mock recall management it is essential to identify the location of all product.

Responsibility:
- Recall Coordinator

Frequency:
- Twice a year

Procedure:
- Choose a product, code date and size. Follow the Recall Procedure to determine location of all product in distribution centers, in transit and shipped to customers. Record this information on the Mock Recall Form
- Indicate the start and finish time on the form.
- Record trace (tracking of recalled product) results. Calculate the percent completeness of trace. If the result is <100%, the cause (not all recalled product accounted for) must be determined by the Recall Team. Indicate specific corrective actions as well as who is responsible and the timing.
- When corrective actions are complete, the Recall Coordinator can sign off at the bottom of the form.
- The target time is four hours maximum from the time mock audit is initiated.

Verification:
- Once corrective actions have been implemented another Mock Recall will be conducted at a later date on the same product to ensure corrective actions are effective.

Records:
- Mock Recall Form
## Mock Recall Form

<table>
<thead>
<tr>
<th>Date:</th>
<th>Mock Recall Start Time: 9 a.m./p.m.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recall Coordinator/Alternative:</td>
<td>Teresa Callie</td>
</tr>
<tr>
<td>Product Number:</td>
<td>170412</td>
</tr>
<tr>
<td>Product Brand:</td>
<td>Quality Selection</td>
</tr>
<tr>
<td>Production Description:</td>
<td>Pork Sausage</td>
</tr>
<tr>
<td>Product Size:</td>
<td>12 per pound</td>
</tr>
<tr>
<td>Code Number:</td>
<td>865197</td>
</tr>
<tr>
<td>Lot Identification: (Best Before Production Date)</td>
<td>July 21</td>
</tr>
<tr>
<td>Production/Purchase Volume</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>Remaining Stock Volume</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>Distributed Volume</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>Completion Time:</td>
<td>3:45 p.m.</td>
</tr>
</tbody>
</table>

***Note: Mock Recall must be completed within four hours of start time.***

### Corrective Action

<table>
<thead>
<tr>
<th></th>
<th>Amount originally produced or supplied</th>
<th>Units (i.e. cases/kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>B</td>
<td>Amount in transit</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>C</td>
<td>Amount held by distributors</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>D</td>
<td>Amount held by restaurants/units</td>
<td>Units (i.e. cases/kg)</td>
</tr>
<tr>
<td>E</td>
<td>Total unaccounted for or consumed</td>
<td>Units (i.e. cases/kg)</td>
</tr>
</tbody>
</table>

\[
\text{% Mock Recall Effectiveness} = \frac{B+C+D+E}{A} \times 100 = \% \text{ Effectiveness}
\]

If Mock Recall is less than 100%, outline cause and indicate corrective action required:

Person Responsible: Teresa Callie

Timeline:

Authorized By:
<table>
<thead>
<tr>
<th>Product</th>
<th>Unit</th>
<th>Description</th>
<th>Pack/Size</th>
<th>PO#</th>
<th>Received Date</th>
<th>FIFO Date</th>
<th>Avg Weight</th>
<th>Licence</th>
<th>Slot</th>
<th>Type</th>
<th>On Hand Qty</th>
</tr>
</thead>
<tbody>
<tr>
<td>170412</td>
<td>CA</td>
<td>QSEL 66509 PREM PORK 12/LB SAUSAGE 1/5KG</td>
<td>154013</td>
<td>06-AUG-2004</td>
<td>21-JUL-2004</td>
<td></td>
<td></td>
<td>FY72B1</td>
<td>PICK</td>
<td>74</td>
<td>98.00</td>
</tr>
<tr>
<td>170412</td>
<td>CA</td>
<td>QSEL 66509 PREM PORK 12/LB SAUSAGE 1/5KG</td>
<td>55129</td>
<td>13-AUG-2004</td>
<td>28-JUL-2004</td>
<td></td>
<td></td>
<td>FY98B7</td>
<td>OVERSTOCK</td>
<td>13.00</td>
<td></td>
</tr>
</tbody>
</table>

7x13 = 21

99 cases July 21
in FY75A9