Stock Feed Manufacturers' Council of Australia

Stock Feed Manufacturers' Council of Australia Inc.
ABN 84 816 063 155
PO Box 151 Curtin ACT 2605
www.sfmca.com.au

10.3.7. & 10.3.8. Review of Recall Incident & Mill Procedures

Standard

10.3.7 Is each recall incident documented and reviewed to ensure procedures were adequate?

10.3.8 Are mill practices and procedures reviewed to prevent recurrence?
This should link to corrective actions clause 10.2.

Purpose

A recall incident shall be reviewed for effectiveness and to identify areas of improvement and review any procedures or practices in the mill that have failed to prevent an unsafe or ineffective product leave the mill. Practices should be adequate to prevent reoccurrence.

Reason

Mill practices and procedures form part of the operators Good Manufacturing Practice and HACCP System. They are intended to ensure product is manufactured in compliance with procedure, safe and of consistent quality to animals. Following a recall incident or where a deviation or inadequacy is detected, a corrective actions procedure should be initiated (See Fact Sheet 10.2.1).

Reasons why mill practice, or procedures could fail, may be attributed to internal factors such as:

1. Lack of clarity and understanding of procedure. Is the procedure too complex or not detailed enough?
2. Lack of implementation and follow up with mill operators. Have operators been inducted?
3. Lack of training and support. Evidence of practical training?

What is Acceptable?

The review of a recall incident shall be conducted at the conclusion of each incident. If, however, no recalls have been initiated in a year, a review of the mock recall (refer to Fact Sheet 10.3.9).

<u>Review of incident</u>
A recall incident will comprise of more than one document, communication, or form. When reviewing a recall incident, all documents should be considered. A review will involve:

1. Was identification and traceability conducted in a timely manner (less than 4 hours)?
2. Does the recall form capture all information required to complete a recall?
3. Is there a communication/events Log?
4. Was the time to notify customers, stakeholders and market appropriate?
5. Based on information provided from recall notification, was the response time of customers and third parties appropriate?
6. Has each recall committee member fulfilled their responsibility?
7. What hurdles made the process harder? What can we do to change that?

Where management concludes a gap or improvement can be made from recall incident, this may form part of your continuous improvement practices documented in the corrective action procedure (refer to Fact Sheet 10.2.1). If improvements required are urgent, they should be acted on immediately and all changed recorded.

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Review of mill practices

As part of reviewing the recall incident, the operator shall assess the effectiveness of current practices within the mill. Which procedures failed to prevent an unsafe or ineffective product leave the mill? Procedures to consider include, but not limited to:

1. Raw Material Acceptance and Specifications.
2. Blending / Formula Batch Sheets.
3. Release.
4. Testing.
5. Packaging.
6. Training.
7. Critical Control Points (CCPs).

Where management warrants a review of procedure, the appropriate methods shall be followed (See Fact Sheet 10.2.1). All reviews shall be recorded, implemented, and followed up with training to all relevant operators.