

Three key lessons for an effective food recall process from Scott Svihula



Scott Svihula, food and beverage manufacturing expert and founder of Hula Consulting, shares his key lessons for an effective food recall process so you can stay on the right side of food compliance.

A food recall is a voluntary or mandatory action to remove a food product from the market. While food recalls aim to protect consumers and restore consumer confidence, they can be damaging.

“Not only can it damage your reputation,” explains Scott Svihula of Hula Consulting, who has over 27 years of experience in the food and beverage industry. “But there are also financial implications: lost sales because of loss of brand trustworthiness and the cost of actually doing a recall.”

You may assume you’re immune to a recall, because you’re everything to stay food safe, but Scott urges food and beverage manufacturers to remember, “You could do everything right but still may be part of the recall because of your suppliers,” explains Scott.

We aren’t trying to scare you but want to highlight the importance of being prepared for those unfortunate situations. To help you prepare, we decided to speak to industry expert Scott Svihula to get his insights on the topic. Here are his three key lessons for an effective food recall process.

An effective food recall plan starts with a strong team

For Scott, having a strong food safety team is the first key step to an effective recall plan. Scott explains that the team “is more than just the regulatory compliance officer. It is a multi-disciplinary team across different departments. You have people from different parts of the business, whether it be a line worker, ops manager, owner, or someone on the C-suite or mid-tier management.”

The benefit of having this team is that “you’re getting the viewpoint from all angles, not just from a trained regulatory compliance person who maybe didn’t work the line or understand the nuances of a certain type of production process.”

Of course, you still need a certified regulatory compliance officer as the new Food Safety Modernization Act mandates it. This person is known as a preventive controls, qualified individual, or PCQI.

“A PCQI is responsible for writing and managing the programs, but they don’t have to do the day-to-day,” explains Scott. “They’re the ones who are doing the higher level, broader strokes. That person can be an on-staff trained person or a consultant, and that’s where I typically come in, because many companies don’t have the time, money, or resources, especially in the middle to smaller company size, to go through all that training.”

Communication is crucial: Consult the FDA and inform customers

Transparent, responsive, and consistent communication during a food recall helps protect your reputation. But who do you communicate with? What information do they require?

“If you’re in an actual recall, there’s a lot of things you need to do,” explains Scott. “One, you must contact the local FDA operator in charge of your state. You’re just notifying them that, ‘Hey, I was informed my mint has Salmonella, or ‘Hey, I forgot to put an allergen claim on this.’ They will then dictate the parameters around the recall and guide you on the next steps and information they need.”

Usually, they’ll want a complete list of customers, including how many units were sold to retail, wholesale, and grocery clients. Scott emphasizes the importance of providing this information promptly—usually within a couple of hours or a day—but mentions it will depend on the class of recall and how bad it is.

It’s then time to notify the public. “They’re [FDA] going to ask you to write a press release that they will put on the PR Newswire so that everybody in the US will get it,” explains Scott. “The FDA will

then ask you for constant updates every few days. ‘How many people have you contacted? How many people responded? How many people are left?’”

This recall process ends once the FDA feels you’ve notified the public, reached out as best you can, and done your due diligence.

Take note: If you have a global footprint, expect to deal with the equivalent of the FDA in other countries. They will have their own documents to complete and processes to follow to ensure you meet food safety compliance standards.

Mock recalls are your best friend—do them when it’s inconvenient

Mock recalls are test recalls to assess a company’s readiness for actual recalls. They are great tools to help minimize the financial impact of an actual recall. As Scott points out, four hours is typically the benchmark for completing the notification and communication process.

While most companies typically do mock recalls when convenient, Scott recommends the opposite “because a recall is never going to be convenient if it happens.”

“I typically try to do one recall during office hours,” explains Scott. “And I also try to—and I plan this with the owners—do a mock recall after hours, just to see what kind of response time I’m going to get from my staff [recall team] who are responsible for this.”

Scott mentions that every member of your recall team should have a defined role for the mock recalls, with someone to handle physical counts, run reports in Fishbowl, contact suppliers, reach out to customers, deal with the FDA, write a press release, and be the front-facing person if they have to go on the news.

He also alluded to the importance of having their contact information, as well as that of suppliers, and your 24-hour contact people on hand should they be needed. Also, don’t ignore insurance and lawyers.

While insurance and lawyers are usually not required in a mock recall, you should still consider the following:

- General liability insurance to provide coverage in the case of actual recalls
- Lawyers can still provide guidance and advice on preparing for and evaluating a mock recall—and may prove crucial during actual recalls

The bottom line on food recalls

Food recalls can occur even if you have the best food safety practices. That's why it pays to be prepared for these situations by using the key lessons from Scott:

- Create a strong recall team
- Communicate immediately with the FDA
- Conduct regular mock recalls when they're not convenient

Preparing a Recall Plan



Executing a Recall Plan

