



Procedure		Effective date: 01.09.2017	
INCIDENTS, PRODUCT WITHDRAWAL/RECALL PROCEDURE			
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INCIDENTS, PRODUCT WITHDRAWAL/RECALL PROCEDURE

1. Purpose:

The purpose of this procedure defines requirements and responsibilities regarding non-conforming product

2. Scope:

The procedure complies to all product issued through Sapex Exports and takes into account all mandatory requirements for withdrawal as set out by the Department of Forestry and Fisheries and GlobalGAP standards.

3. Responsibility:

Crises management and food defence team

DESCRIPTION	NAME	EMAIL	OFFICE TEL	EMERGENCY TEL
Marketing Manager (HR001) – Crisis Team Leader	Bertus Swart (1 st point of call in emergency)	bertus@sapex.co.za	+27218838280	+27828803367
COO (HR004)	Kobus Louw	kobus@sapex.co.za	+27218838280	+27836434140
Logistical Manager (HR006)	Tokkie Malan	tokkie@sapex.co.za	+27218838280	+27836354198
Technical Manager (Food safety team leader) (HR005) COO (in case team leader unavailability)	Andrea Esterhuisen	andrea@sapex.co.za	+27218838280	+27609606391
Legal Advise	Jordaan Attorneys (Gerrit Jordaan)	jordaang@law.co.za	+27218838040	+27829205797
NSF	Call office		+27218802024	+27218802024

4. Procedure Statement

Adhering to this procedure will ensure that non-conforming product, relating to quality standards, food safety standards, and MRL guidelines, will correctly be identified as incidents, able to recall or withdraw, or even destroyed (where serious non-conformances occur) to ensure safety for the end consumer of the product and 100% traceability of the product.

5. Procedure

- a. A recall can be issued in the event of the following:
 - a. Uncontrolled events such as Fire, Flooding, Natural disaster etc.
 - b. Chemical contamination such as MRL exceedance
 - c. Physical contamination such as foreign bodies
 - d. Microbiological of Allergen contamination
 - e. Packaging defects
 - f. Sabotage or tampering
 - g. Phytosanitary exceedance i.e. FCM detection
- b. Before a recall can be issued an evaluation of the risks need to be established. These include:
 - a. Consideration of contingency plan to maintain business continuity and unsure food safety, legality and quality
 - b. Severity of the hazard
 - c. Real risk involved to consumer health
 - d. Consumer uncertainty what the risk may cause to the image of the product
 - e. Damage to the image of the company and brand integrity
 - f. Legislative- and insurance issues.
- c. SAPEX will be alerted by receiving party via email or telephonic conversation (always followed up with email) of possible or definite recall/withdrawal of a product and reason(s) for such a measure.
- d. The crises team leader/marketing manager will always be available to receive such notifications. Should the team leader be sick or on holiday during a crisis the COO will be acting team leader.
- e. Reasons include protecting the market in cases of non-compliance to MRL requirements, phytosanitary requirements of the specific country, not meeting customer quality specifications and thus removing the risk to the consumer.
- f. The crises team manager will notify the team members and actions will be initiated to start the incident management process. Form009 – Corrective actions report form will be opened.
- g. The Technical manager will then inform the relevant supplier involved of the incident and request all relevant information.
- h. PROC013 – Non-conforming product management procedure followed.
- i. This will ensure that a non-compliance/incident report can be prepared and made available to all parties directly involved with the investigation. This report will be maintained as the investigation progresses.
- j. Incidence will be reported on Reg004-Non-conformance register
- k. This will ensure that non-compliance/incidence can be trended.
- l. Actions taken during this process includes identifying the source of the product (Logistical manager), determining what went wrong and the severity of the problem and what the most appropriate response should be (Marketing manager with Technical Manager).
- m. If all relevant information has been gathered Form009 – Corrective actions report form will be completed and no further action is required.
- n. Incidents report will be concluded with all evidence and reasons for the halt of activities in this regard.

- o. Once the findings and decisions have been accepted the Technical manager will communicate with all parties involved.
- p. If relevant information has been gathered and further action is required, the process will proceed with diligence until the problem is resolved;
- q. This procedure must commence in a time period no longer than 5 hours.
- r. This includes taking corrective actions, identifying if other products are at risk, establishing the current locations of products at risk (if any), notifying trading partners of the potential problem, withdrawing the products according to agreed procedure and showing evidence of withdrawal/recall.
- s. In the incidence where the product needs to be destroyed, destruction evidence must be sent by the customer via email and attached to the incidence report before the report can be closed. Evidence should include:
 - a. Date of destruction
 - b. Authorised company responsible for destruction
 - c. Details of product destroyed
 - d. Amount of product destroyed
 - e. Method of destruction
 - f. Name and signature of incident management team member present during destruction
 - g. Name and signature of representative from authorised destruction company.
- t. Certification body issuing current certificate for the site against IFS for Food Safety will be informed within 3 working days of the decision to issue a recall.
- u. This procedure will be tested annually by the entire Crises management team in conjunction with the Traceability procedure annual test and documentation kept for 1 year.