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Why Your Mock Recall Will Never Actually Happen

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If a real crisis strikes, what's the chance that the mock recall exercise will have prepared you?

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You assemble your recall team and conduct your mock recall every year, maybe more frequently. But if a real crisis strikes, what's the chance that the mock recall exercise will have prepared you? Unfortunately for most companies, it's slim to none.

Most mock recalls are really mock traceability exercises. But since they are not reflective of the outbreak investigation process, they are better described as exercises that show which lot numbers contained a certain ingredient, or the distribution path of a finished product.

In an actual recall event, the traceback and trace forward are often the least of a firm's worries.

Following are the key challenges that we have observed from working with scores of companies involved in recalls or other food safety crises:

1. **Unclear decision-making authority.** Recall plans often identify the food safety/quality assurance staff as the "recall coordinator." But when customers or the government asks if you will issue a recall, who makes the ultimate decision? And what if that person is on a week-long vacation with no cell service? (Yes, that actually happened once.) Who participates in the discussion? What if there isn't consensus within the company? Are outside experts consulted?
2. **Difficulty in deciding how much to recall.** Once the decision is made to recall, the next challenge is deciding how much to recall. If the recall stems from a product that tested positive, do you recall just that lot? How can you be sure the issue didn't stem from raw material that could be present in multiple finished product lots (especially if the finished product lacks a kill step, like fresh produce)?

If the contaminant is *Listeria monocytogenes*, could it have been an environmental contaminant from your facility? Is it still there? Scoping the recall can be very challenging.

3. **Too little, too late communication.** The communications function often catches recalling companies flatfooted because they start thinking about it too late in the process. From the moment a potential issue is identified, begin preparing for both reactive and proactive communications. Identify the various internal and external audiences who may contact you and those with whom you may need to communicate. Remember, communication is two way, so prepare for not only issuing statements and messages, but also receiving questions and comments from employees, consumers, customers, boards of directors, regulators, and others. Monitor social media and online news sources, especially local ones. Have a holding statement that is used on an as-needed basis and which changes as you learn more.

For every communication task, identify the person or persons who will carry it out, how it will be carried out, and when. For example, most food companies have multiple customer contacts (food safety, buyers or purchasing agents, category managers, management, etc.). Which one(s) will you contact about a recall? Who will contact each one, when, and how? What will they say – exactly? What documentation do you need to demonstrate that you notified customers?

4. **Having a plan isn't enough.** Finally, the greatest challenge to effectively and efficiently carrying out a recall is lack of planning, or increasingly, the lack of familiarity with the plan. Driven by investors, regulations, or awareness, more companies seem to have recall plans, but in most cases, plans sit on shelves and are never updated, tested, or used – even when there is a recall. No company wants to issue a recall often enough to get good at it; but being good at it could save the company. So, practice. Conduct an annual recall simulation and make it as real as possible: go beyond the trace exercise, include communications, test the plan, and involve every major business function in the company.

We could go on and on with examples of recalls gone wrong. While there will always be unanticipated twists and turns associated with an issue, you can absolutely prepare and practice the general process. Achieving regulatory compliance and passing an audit become secondary; when in crisis mode, true preparedness is what could make or break your company.

[Recalls \(/keyword/Recalls/\)](#)

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