Product Recalls & Withdrawals Process Guide (Excluding Medicinal Products)

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Table of Contents

1. Versions and Amendments 2
2. Abbreviations & Definitions 3
3. Purpose 4
4. Scope 4
4.1. In Scope 4
4.2. Out of Scope 4
5. Background 4
6. Audience & Responsibilities 4
7. Process Step by step 5
7.1. Stage 1: Initiate 5
0330 606 9490 option 3 and then option 5 5
7.2. Stage 2: Communicate 7
7.3. Stage 3: Take Action to Stock 12
7.4. Stage 4: Financial Resolution 14
8. 'Severe Recalls'/Christmas Day/Easter Sunday/New Year's Day 15
9. Root Cause Analysis (Coop Brand) 15
10. Compliance & Monitoring (Co-op Brand) 15

1. Versions and Amendments

Version	Outline of what has been updated	Author	Date Updated
1	Original Version	Sarah Roden	01/09/2016
2	Updated watch-out for allergen recalls (8.1) Addition to Food Policy tasks (8.2.3)	Sarah Roden	19/12/2016
3	Updated with 'Severe Recalls' process (9) Amended ownership from Neil Hyslop to Matthew Speight	Sarah Roden	28/02/2017
4	Updated with Food Distribution Project Manager responsibility for notifying partnered charities	Sarah Roden	30/10/2017
5	Updated with changes for Anaphylactic Society charges	Sarah Roden	06/06/2018
6	Minor changes throughout, including addition of Nisa and removal of Supplier Relationship Team	Sarah Roden	03/09/2018
7	Amended the definition of a product recall and withdrawal Amended ownership from Breige Donaghy & Matthew Speight to just Breige Donaghy Significant changes throughout the document including the addition of franchise and new channels. Amendments to contact details and end-to-end process flow.	Michael Garside	16/10/2019
8	Minor changes throughout, including additional guidance on when to prohibit from sale and amendment of 'Supplier' to 'Vendor' in line with new terminology.	Michael Garside	24/03/2020
9	Minor change to 'Stage 2: Communication' to ensure RSC use consistent distribution list if further communication is required following an incident.	Michael Garside	01/07/2020
10	Minor change. Reference to T&C's updated from 'Version G040210' to 'Version 01012019'	Michael Garside	26/11/2020
11	Update to Out of Hours telephone number	Michael [illegible]	30/03/2021
12	• Changed all links to documentation from the Knowledge Portal to the Supplier Hub. • Added Vending Machine Suppliers to the other retail channel list (page 5). • Updated Technical Manager responsibilities in the Co-op Brand sub-section (page 6). • Added NISA contact email for comms for completed PAN forms (page 6). • Updated the NISA section with information on products supplied to the Republic of Ireland (page 6). • Changed all sections referring to 'Food Policy' to the 'Co-op Food Safety Team.'	Joseph Lang	02/09/2021
13	Updated the out of hours telephone number	Joseph Lang	13/01/2022
14	Added new owner details/removed reference to DFT and Food Policy/addition of E-Commerce process/OOH process amended /FSA RCA form link added/Added Caboodle, the new Foodshare partner/use of RIMT for Christmas Day, Easter Sunday and New Year's Day/amended contact for publishing of public recall notice on Co-op website/ Anaphylaxis campaign notification process added/the inclusion of the Non-Food product recall process/ add step for Technical Regulation and Compliance Team to inform the Public Relations Team.	Lucia Renshaw	01/08/2022
15	Added new in-hours number/removal of 'All the relevant GDL lists and example messages are available on the Supplier Hub in the 'Field Distribution Lists & Example Messages' document' from RSC Distribution section as no longer relevant/added Export Team as an initiator of recalls for export issues/replaced RAPEX alert with new UK PRISM alert for Non-Food Recalls/amended Food Technical (Regulation and Compliance) to Food Technical (Technical Services – Regulation) Team	Lucia Renshaw	07/11/2022
16	Added 2nd hourly check into compliance checks sections Added Starship and Deliveroo images to show whereabout of Co-op Product Recalls link	Lucia Renshaw	30/01/2023
17	Replaced RAPEX with Safety Gate Portal Replaced with new in hours number Suggested wording for 'Reason for Withdrawal or Recall' Added Planning and Value Chain (promotions) process Technical Mock Recall check added	Lucia Renshaw	14/09/23 and 09/10/2023
18	Owner change	Lucia Renshaw	30/7/24

18	Add Social Media notification for Non-food Product Recalls Update non-food notification to appropriate authorities FSA incident page access via chrome New FSA Root cause analysis link Change to Anaphylaxis notification as we now pay an annual membership fee (no additional costs apply for notifications) Own Brand Team notification changes Changes to Co-op Product Recall page notifications Further clarification of the Customs/Export Recall process	Lucia Renshaw	11/12/2023 23/01/2024 19/02/2024
Proposed amendments for 19 - to be added	Under review – Customs/Export Team - Once agreed by HMRC, will be what happen to the goods withdrawn from sale - i.e. destroy, handed to colleagues, sent back to HMRC etc. Product Recall Notification contact for Co-op Live Arena concessions added Communications contacts added Opening hours for anaplayxsis phone contact added Changes RSC abbreviation to RSC for Retail Support Centre title Removed reference to superdrug and RoI as not relevant – notification goes to all	Lucia Renshaw	23/5/24 5/11/24 14/11/24

2. Abbreviations & Definitions

Cedar	Invoice matching system used for Stores
Co-op Branded	Products sold by Co-op in stores or through other channels such as wholesale, which are labeled as a Co-op product
RSC	Retail Support Centre
CTS	Corporate Trading System (product database)
Didos	Invoice matching system used for Depots
DMT	Data Management (team in Commercial Support)
FRTS	Federal Retail Trading Services (Co-op Independent Societies, previously known as CRTG)
FSA	Food Standards Agency (Government body)
FSS	Food Standards Scotland
FSSC	Financial Shared Services (team in Finance)
GDL	General Distribution List
HHT	Hand Held Terminal (scanning device used in stores to record stock)
Medicinal Device	Medical devices and in vitro diagnostic (IVR) medical devices
Nisa	Nisa Wholesale & Nisa Partners
PAN	Product Action Notification (document that triggers initiation and closure of an incident, and captures the end-to-end process)
POS	Point of Sale (a notice displayed in place of a recalled product in stores and online to notify customers of any actions needed).
PR	Public Relations (team in Marketing)
Primary Authority	Manchester City Council
RoI	Republic of Ireland
SLA	Service Level Agreement (agreed timeframe for completing a task)
Stores	All Co-op stores
SWN	Send Word Now (mass communication system used by RSC)
TCG	The Co-op Group (collective term used for the Co-op and excluding Independent Societies and wholesale)
Vendor	Previously referred to as 'Supplier'
Vendor Branded	Products sold by Co-op in stores or through other channels such as wholesale, which are labeled as the vendors product

3. Purpose

This guide offers a detailed overview of the full end-to-end process for product recalls and withdrawals – excluding medicinal products.

The difference in responsibilities between a vendor branded and a Co-op Brand recall or withdrawal initiation will be outlined as part of this guide. As well as slight variations required in the process depending on if an incident is a recall or a withdrawal.

4. Scope

4.1. In Scope

- All Co-op Brand and vendor branded product recalls and withdrawals for TCG, Franchise, FRTS, E-Commerce, Nisa & New Channels.

4.2. Out of Scope

- Non-Food lines stocked in other Co-op businesses (Funeralcare, Co-op Health)
- Licensed Medicinal Products – Full information on medicinal recalls will be available on the Supplier Hub from 2020.
- Goods not for resale

5. Background

The Co-op Food needs a robust and auditable process to deal with product recalls and withdrawals. The lack of such a process could leave the business open to risk of customer illness or injury, the effects of which would include negative publicity, increased insurance premiums, fines and criticism from the Food Standards Agency, and other industry bodies.

The difference between a recall and a withdrawal is defined as follows:

- RECALL (RED ALERT) - Action to remove a product from distribution and stores and customers for legal and quality reasons where the product presents a risk to health and/or safety of customer.
- WITHDRAWAL (BLUE ALERT) – Action to remove a product from distribution and stores for legal or quality reasons but where the product does not present a risk to health and/or safety of customers.

6. Audience & Responsibilities

All teams highlighted below have a level of responsibility as part of the end-to-end process. The full detail of the accountabilities, responsibilities, consults and informs is available in the Product Recalls & Withdrawals RACI on the Supplier Hub.

- Co-op Finance
- Co-op Group & Franchise Stores
- Co-op Food Technical
- Co-op Trading
- Co-op Supply Chain (Customs/Export Team)
- Data Operations
- Vendor
- Caboodle (Foodshare)
- FRTS
- Logistics
- NISA
- Retail Support Centre
- Planning and Value Chain
- Food Technical (Technical Services Regulation Team)
- Other Retail Channels: (E-Commerce, Festival Stores, Starship, Superdrug, and Vending Machine Suppliers.)
- Co-op Live Arena

7. Process Step by step

This section details the actions that take place during each of the 4 key stages that take place during a recall or withdrawal incident.

7.1. Stage 1: Initiate

To be in line with the RSC team's working hours, the terms 'In Hours' and 'Out of Hours' throughout this section relate to the following times:

	Monday to Friday*	Weekends*	Contact Number
In Hours	07:30 / 19:00	08:00 / 16:00	0330 606 9490 option 3 and then option 5
Out of Hours	19:00 / 07:30	16:00 / 08:00	0843 290 6662

*For Christmas Day, New Year's Day, Easter Sunday use RIMT

Co-op Brand (Own Label)

- The Technical Manager is accountable for initiating a Co-op Brand recall or withdrawal.
- The Technical Manager should immediately call the RSC team on contact number provided (above) to notify them that an incident has been raised.
- The Technical Manager should then download the 'Product Action Notification' (PAN Form) template from the Supplier Hub and complete Section 1. This includes product information and actions required.
  The PAN form should be downloaded from the Supplier Hub for each incident to ensure the correct version is being used.
- Suggested wording for the reason for the Withdrawal or Recall on the Pan Form/Product Recall Notice should be in line with FSA guidance as follows:

Reason for Alert	Suggested Wording – Recall (Safety)	Suggested Wording – Withdrawal (Quality)
Confirmed contamination of product with salmonella/listeria monocytogenes/E.coli etc.	"X product" is being recalled because salmonella/listeria monocytogenes/E.coli etc. has been found	"X product" is being withdrawn due to an ongoing investigation into possible salmonella/listeria monocytogenes/E.coli etc.
Inadequate procedures to control Clostridium botulinum	"X product" is being recalled because of concerns over procedures to control Clostridium botulinum	"X product" is being withdrawn due to an ongoing investigation over procedures to control Clostridium botulinum
Confirmed contamination of product with foreign objects	"X product" is being recalled due to the presence of "foreign object"	"X product" is being withdrawn due to an ongoing investigation into the presence of "foreign object"
Allergens not mentioned on the product label * "coeliac disease" should only be referenced in relation to cereals containing gluten	"X product" is being recalled because it contains "allergen ingredient" which is not mentioned on the label. This means the product is a possible health risk for anyone with "coeliac disease*/an allergy to/an intolerance to/a sensitivity to" "allergen"	"X product" is being withdrawn due to an ongoing investigation into a possible allergen issue.
Possible contamination of product with salmonella/listeria monocytogenes/ E.coli etc.	"X product" is being recalled as the product may contain salmonella/listeria monocytogenes/E.coli etc.	"X product" is being withdrawn due to an ongoing investigation into possible salmonella/listeria monocytogenes/E.coli etc.
Possible contamination of product with foreign objects	"X product" is being recalled which may contain "foreign object"	"X product" is being withdrawn due to an ongoing investigation into the potential presence of "foreign object"

A Process Fault	'X Product' is being recalled because a problem during the production process may have resulted in unsafe food being distributed.	'X Product' is being withdrawn due to a problem found during the production process.
Exceeding Maximum Levels (I.e. ingredient or pesticide)	'X product' is being recalled because of high/low levels of X. This makes the product unsafe to eat.	'X product' is being withdrawn due to an ongoing investigation of high/low levels of 'X'.
Short Weight Products	'X product' is being recalled due to some products that have be found to be underweight.	'X product' is being withdrawn due to an investigation into possible short weight products.
Incorrect Labelling (but not allergy related)	'X product' is being recalled because of an incorrect label applied to the product which may mislead the consumer as to its ingredients.	'X product' is being withdrawn because of an incorrect labelling issue.
Incorrect Packaging (But not allergy related)	'X product' is being recalled because of a packaging issue found that could affect the safety of the product.	'X product' is being withdrawn because of a packaging issue.
Unauthorised/unintended ingredient (but not allergy related)	'X product' is being recalled because an incorrect ingredient X has been unintentionally added.	'X product' is being withdrawn because an incorrect ingredient issue.
Avoid using the wording 'not to specification' as this is not clear enough for customers and government bodies		

For further information and guidance please see link below:
Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry

- If the product if being **recalled** (as opposed to withdrawn), the 9x3 POS template (also located on the Supplier Hub) **and** A4 POS Template should also be completed. Guidance on completing POS is available on the Supplier Hub.
- The Technical Manager should send their completed PAN form (and POS Notices if it's a Recall) to the RSC team, the NISA Team and inform the relevant Co-op Buyer.
- The completed PAN form (and POS Notices for Recalls) should be sent to RSC no longer than 4 hours after the initiation call.
- The Technical Regulatory Team Leader will carry out a mock recall once a quarter and the outcome will be recorded on a mock recall tracker

Vendor Branded Product(s)

- The Vendor is accountable for initiating a Branded recall or withdrawal.
- The Vendor should immediately call the RSC team on the contact number provided above to notify them that an incident has been raised following confirmation from the FSA/FSS.
- The Vendor should download the 'Product Action Notification (PAN Form)' form template from the Supplier Hub and complete Section 1. This includes product information and actions required.
  The PAN form should be downloaded from the Supplier Hub for each incident to ensure the correct version is being used.
- If the product if being **recalled** (as opposed to withdrawn), the FSA approved POS should also be sent through.
- The Vendor should send their completed PAN form (and POS Notice for Recalls) to the RSC team (GDL_ProductRecallNotifications@coop.co.uk) and NISA at recall@nisaretail.com and mark the communication as 'URGENT'.
- Once received, RSC check the PAN form and Notices (for Recalls), ensure all fields have been completed by the Vendor, and that product codes match to our internal records on CTS.
- The completed PAN form (and POS Notice for Recalls) should be sent to RSC no longer than 4 hours after the

initiation call.

Exported Product(s)

- In the event of an export issue in regard to a product(s) the Customs/Export Team (Supply Chain) can initiate a withdrawal or recall of the items.
- The Customs/Export Team will inform the Commercial Delivery Team who will initiate the recall/withdrawal making it clear that it affects NI stores only on the PAN Form.

Out of Hours

If an incident occurs whilst Out of Hours, the Technical Manager (Co-op Brand) or Vendor (Branded) should call 0843 290 6662.

Selling Distribution

To ensure the communication of action is clear to stores only one request will be sent and therefore all the products and batches must be identified. **The need for additional products/batches to be included after the action request has been sent can severely reduce the effectiveness of actions in stores.**

FSA guidance on product recalls and withdrawals can be accessed from the link below:
https://www.food.gov.uk/business-guidance/food-incidents-product-withdrawals-and-recalls

Only affected stock delivered to store directly by a vendor and NOT through our depot/distribution network can be requested to be held and collected at store by the same vendor.

For duty products and those with special handling requirements, such as electrical items (which cannot be conducted at store) these may need to be returned to depot for specialist handling, all other products will be immediately removed from sale and disposed of at store.

POS Guidance

- Branded: POS should be supplied which has been approved by the FSA.
- Co-op Brand: POS templates should be used. The product description and batch codes should make exactly the description and format on the product.

The POS should also have a Display Notice until Date. This should be the use by/before date of the product plus one day OR 15 days (two weeks and one day) from the date of the recall whichever is the shortest date, i.e.

Date of Action:	1st August	1st August
Date of Action + 15 days	16th August	16th August
Use by of product	13th August	21st August
What date is used for the Display Notice Until Date	Product Use-by date	Date of action + 15 days

7.2. Stage 2: Communicate

RSC Distribution

Once the PAN form has been received, the RSC team are responsible for communicating the product details and actions required via the SWN system, MyWork or email to the field distribution lists and all relevant external and internal teams via email.

When a withdrawal is to be undertaken by a limited number of stores (Direct delivery only), this must be included within the title of the message to clearly show it is an isolated incident and not for all stores. This action should only be taken where we can be certain stock has gone to specific stores and there is no possibility of a cross-pick.

The message must clearly inform stores that have Deliveroo, Amazon, Starship or on-line/home delivery orders to check and ensure no affected product has been packed ready for customers, and to remove any affected products from the list of available products via online platforms and collection bags.

All distribution lists except Caboodle (Foodshare) Active Charities contacts must be kept up to date by RSC on a monthly basis and should include the following teams (taking preference to shared inboxes wherever possible). If further communication on an incident is made as new information becomes available, the RSC team will ensure the same distribution list is notified.

The RSC – Salesforce Administrator for Caboodle (FoodShare) is responsible for maintaining the contact address emails of all ACTIVE charities with Salesforce. When the addresses are required, the RSC Duty Manager should run the report to export these active contacts into MyWork for distribution.

Nisa

Nisa will receive notification of all recalls and withdrawals from RSC and should respond back to RSC for all notifications to confirm receipt.

Nisa should identify affected Partners and notify them of all Recalls. For Withdrawals Nisa's Recall Co-ordinator will review on a case-by-case basis notifying Partners where appropriate.

Nisa uses the same charging model as Co-op for Recalls and Withdrawals meaning both Vendors on harmonized terms and Nisa only Vendors will be charged the same. The Vendor will receive an invoice from Co-op and a separate invoice from Nisa.

Food Technical (Food and Non-Food Co-op Brand Recalls)

Food Technical (Technical Services Regulation) Team is responsible for informing the FSA (Food Recalls Incident Form via Chrome), Primary Authority (Manchester City Council), Co-op Public Relations Team and forwarding the POS Notice to Proposition and Communications Team to host on Co-op Product Recalls page.

Communications Team (Nov 2024)

- Sam Mather
- Bex Harper (rebecca.harper@coop.co.uk)
- Beth Murphy
- Hannah Jones

For Food Allergen Recalls see additional step below.

For Non-Food product recalls: Food Technical (Regulatory) Team shall complete an Enforcement Authority Notification Form. The completed form shall be sent to the Primary Authority (Trading Standards) along with the POS Notice and copies of any relevant documentation such as test reports, safety data sheets, and product label(s).

Primary Authority will discuss the Product Recall with the Food Technical (Regulatory) Team. If it affects product supplied into NI then the PA will complete a Safety Gate Rapid Alert on the EU Safety Gate Rapid Alert System Notification which they send to BEIS who issue an international Safety Gate Rapid Alert.

If it affects the UK then the PA will alert the market surveillance authorities (MSAs), including OPSS and local trading standards authorities. Where MSAs identify that a product is unsafe through investigations, or where they have been notified by a business that a product, they have placed on the market is unsafe, this must be notified on the Product Safety Database.

Products which present a serious or high risk and those which have been recalled are published on the above list. MSAs may also submit other products for publication by notifying this to the UK Product Safety Contact Point within the OPSS Incident Management team ukproductsafetycp@beis.gov.uk.

Food Allergen Recalls – Food Technical

For Recalls involving Allergens, Food Technical (Technical Services Regulation) Team is responsible for requesting an allergy alert to relevant Anaphylaxis Campaign members.

Email the Anaphylaxis Campaign and request an allergen alert is sent to their affected members ASAP. **There is no cost for this service as the annual membership covers notifications.**

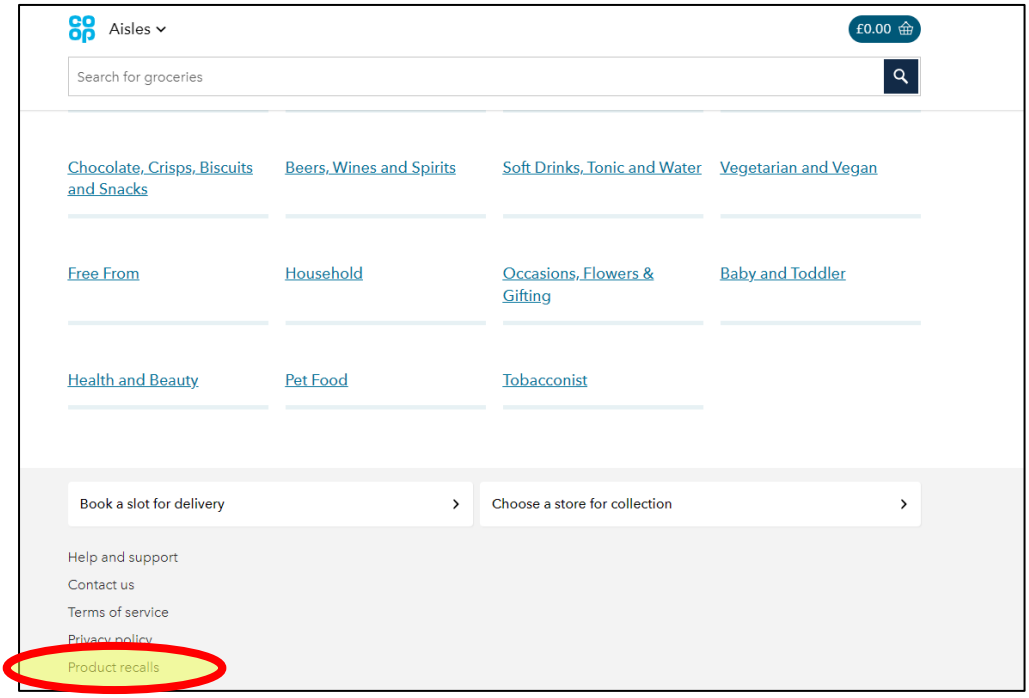
At no point should the supplier be requested to pay this charge.
Anaphylaxis Campaign Contact Details
info@anaphylaxis.org.uk or call on 01252 542029 (9 – 1pm)

The associated cost will be paid for by Food Technical and MUST NOT be invoiced to the vendor at this present time.

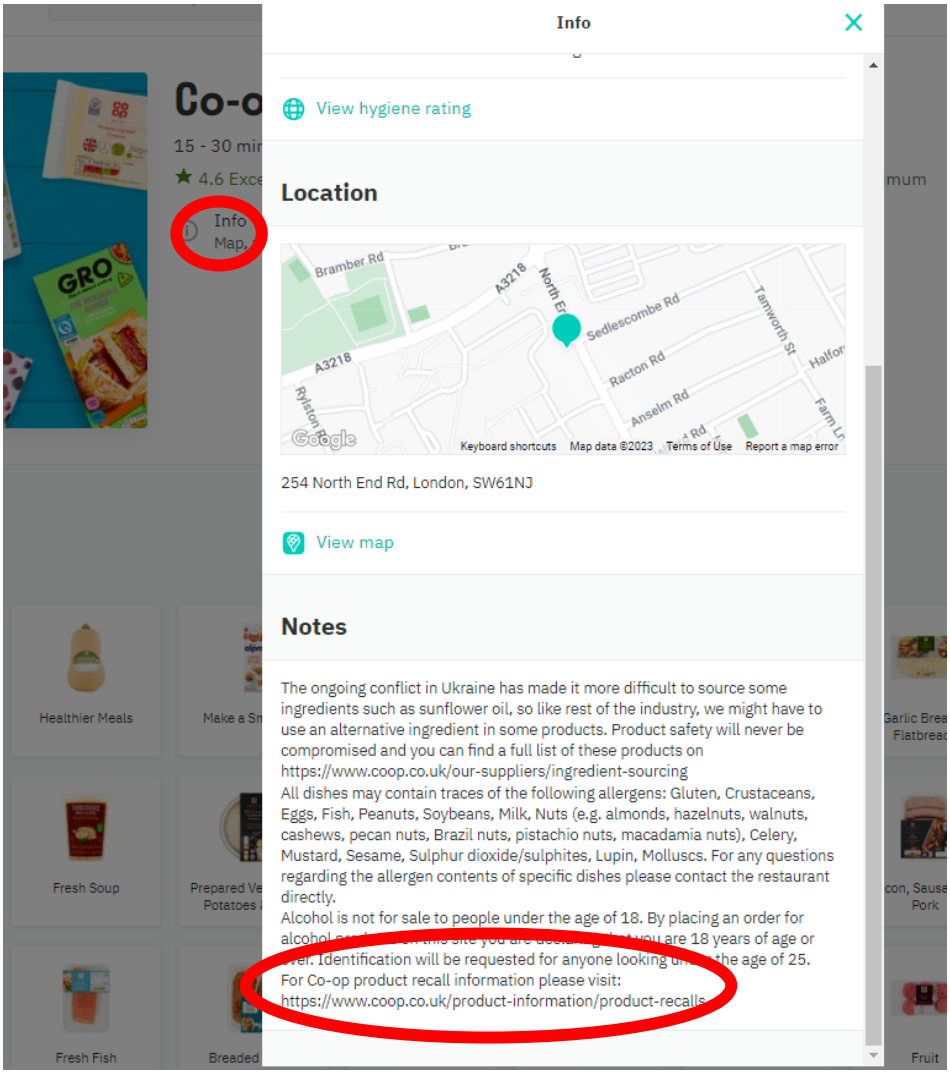
E-Commerce

Digital/E-Commerce team will ensure product cannot be selected from the website. Stores should not be able to pick stock from store and customers informed. They must confirm receipt of email.

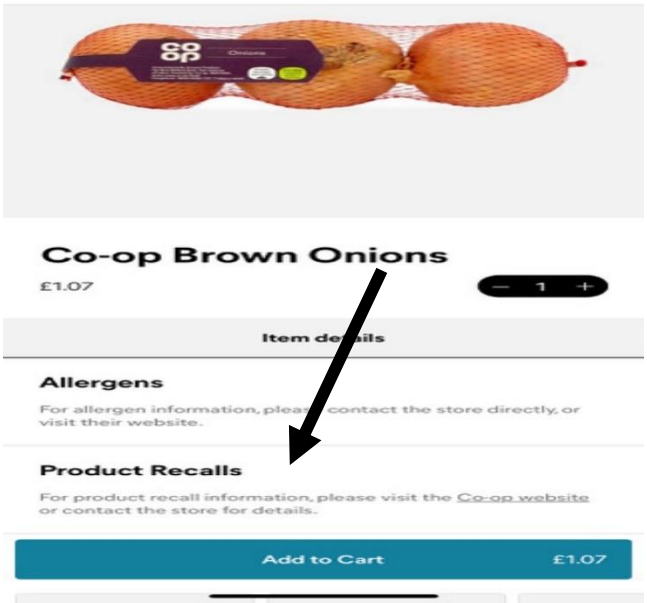
The customer view recalls through the link to the Co-op Product Recalls Webpage at the bottom of every page.



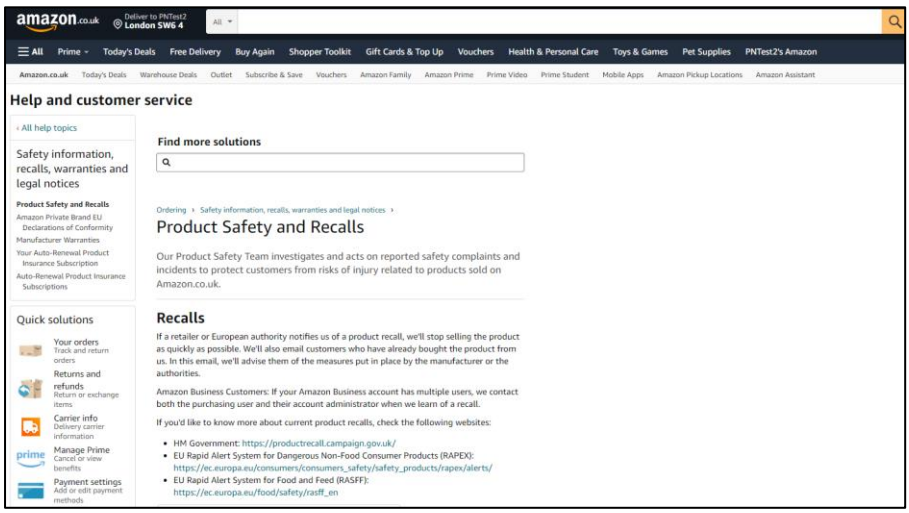
Deliveroo Platform: The link to Co-op's Recall page is displayed in the Information section, see below:



Starship service: This statement is now visible against every product description linking back to the Co-op Recalls page as example below:



Amazon platform: The link to the product recalls page is on the Amazon's help section. If you go to customer service (in the footer) or search for recall and it will take you to the recall page where Amazon has a link to the FSA Product Recalls Webpage. Any Co-op product recall will be displayed on the FSA Product Recalls webpage.



Own Brand Team

Own Brand team often co-ordinate sampling of Co-Op products (finished, as sold in store). These can include initiatives where recipients can be tracked (e.g. providing product for subscription boxes) but also not tracked (e.g. handing out samples at events).

Any product being sampled would have its batch coding recorded.
Sam Griffiths from the Own Brand Team will be notified of every withdrawal and recall via the business gdl notification. They will then notify any recipients of these products if affected

Prohibit from Sale Flag

The decision to prohibit a product from sale will be made jointly between the Vendor and Co-op Technical Manager. The action to prohibit a line from sale should only be made when absolutely necessary as the action cannot be restricted to specific batches or codes. Once applied the flag will prevent all sales on the restricted retail line until it is removed.

If required, DMT will receive a communication to prohibit the stock from sale, DMT should mark the product with the 'Prohibit from Sale' flag on CTS.

DMT should then receive an email from either the Technical Manager (CO-OP BRAND) or the Supply Chain Analyst (VENDOR BRANDED) confirming that it is now ok to remove the flag on CTS (this should usually be after 3 days of the incident alert, allowing sufficient time for Stores to have recorded their waste stock and to have successfully removed all of the product from within our supply chain).

DMT should not remove the flag unless confirmation has been received that it is ok to do so.

Compliance Monitoring

Once the alert has been sent out to all of the above, the RSC team will need to monitor the real-time compliance report via SWN to identify which Stores, Depots and Independent Societies have not responded to the alert.

After 1 hour a further alert should be sent to the escalation points for all non-respondents to the relevant area or regional manager. This will be repeated after 2 hours. Further actions will be taken if no response received following the 2nd repeated alert.

RSC should complete Section 2 of the PAN form, recording important elements of the communication and response rates

via SWN to Stores, Depots and Independent Societies.
This should then be saved the Product Recalls SharePoint site and Accounts Receivable should be notified.

Customer Alerts, Brand Comms & PR

Customer and Member Services, Digital Communications, and Public Relations teams are responsible for dealing with public queries.

The Brand Communications team should publish the recall notice received from Food Technical (Technical Services - Regulation) Team to the 'Product Recalls' page on the Co-op website.

For Non-Food recalls – the Product Recall Notice shall also be sent to the Social Media Team at social@coop.co.uk. Note this inbox is only monitored 8am – 4pm Mon-Fri. The social team will then coordinate to place Facebook and X/Twitter.

RSC is responsible for notifying our partnered charities of any recalls.

Co-op Live Arena – all notifications will be sent to this generic inbox Coopliveprodrecall@rhubarb.co.uk and managed by the Co-op Live Partnerships Team

Business to Business

Businesses once notified should take the appropriate action to remove stock from sale and notify customers. They must confirm receipt of email.

Supply Chain Analysts

The Supply Chain Analysts are responsible for planning and implementing replacement stock once an incident communication has been received. Once the Supply Chain Analysts are confident stock has been returned to vendor or correctly quarantined, they responsible for notifying DMT once a 'prohibit from sale' flag can be removed on CTS following a recall that required this action.

7.3. Stage 3: Take Action to Stock

If an incident has occurred, all Stores, Depots and Independent Societies will receive a standard initial alert phone call via SWN, notifying colleagues that there is an urgent task that must be actioned via MyWork. Once the Independent Societies (FRTS) have received the SWN notification, they are accountable for responding via the 'Get Word Back' feature to authorise that they have received the alert and will take action to stock immediately. The message will sound similar to the following:

> *"This is the RSC team calling from Manchester Support Centre. Please be aware there is an urgent product recall that needs to be actioned immediately. Further details on the product affected and actions required on MyWork. To confirm you have understood this message and will take immediate action, please press 1. Alternatively, press 2 if you are unable to respond right now, but please note that this will be actioned as a non-response and your Area Manager will be notified."*

After 1 hour of calling, if there are recipients who have not responded, a further automated phone call will be issued to those contacts escalation points (e.g. Area Managers for Stores). This is applicable to all Stores, Depots, and Independents.



Figure 1: MyWork Notification

Above (Figure 1) is an example of how the MyWork alert will look for all Stores, Depots, and Independents. This will be a red alert if a recall, and a blue alert if a withdrawal. The email will notify colleagues of key information regarding the incident, including product details (including date codes affected), the reason the incident was raised, actions required, and POS attachments for recalls. The notification will also remind stores to make any products affected unavailable through digital channels.

For STORES ONLY, there will also be a response prompt to understand whether the product(s) affected is ranged (Figure 2):

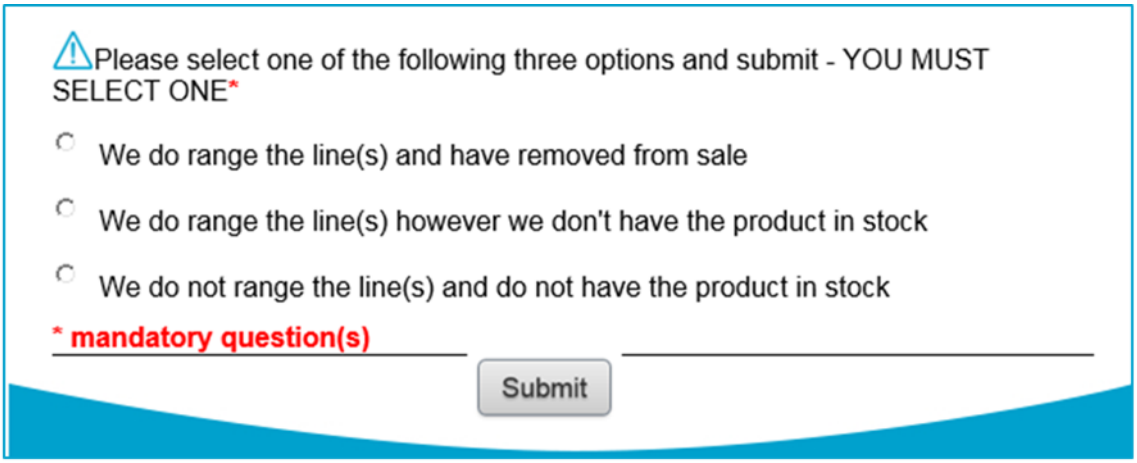


Figure 2: Store Response Prompt

Stores will also be provided with full support on how to take action and appropriately waste the product(s) affected, including performing a product recall using the HHT

Comms Report on PAN Form

	SLA
Stores	Stores will be given 3 days for reporting on stock count. This allows sufficient time to include all stock that may be in transit.
Depots	Depots will be given 2 hours to report back on their stock count, as this should be almost immediate after an incident has been communicated.
Independent Societies	Independents are not required to report on their stock count. Our FSSC team will claim 33% on behalf of all Independents when invoicing the Vendor for stock wasted, and this will be paid back via the annual general fund (which is split across Societies based on sales).

Nisa	Nisa is not required to report on their stock count. Nisa will invoicing the Vendor for stock wasted.
Business to Business	Other businesses are not required to report on their stock count.

7.4. Stage 4: Financial Resolution

After any recall or withdrawal incident there is a need to ensure that appropriate financial resolution is reached with the Vendor and the distributed throughout Co-op businesses.

As the recalled or withdrawn stock will be at different points in its journey through the supply chain and to customers there is a different cost associated with the incident, and different teams that will process any invoices or credits.

Depot Stock

The Goods for Resale team (FSSC) are responsible for dealing with claims for Depots. The team will receive the minus receipt alert via Didos and completed Claim-for-Credit forms through from Depots and should then invoice the vendor directly with these costs.

Store Stock

The Accounts Receivable (FSSC) team run a MicroStrategy report detailing the stock recorded on the HHT at all TCG and Franchise stores. They then need to complete Section 3 of the PAN form, including the product recalls charges matrix to work out total costs to the vendor. The total cost is made up of elements for:

Administration	Stores	Depots
Head Office Admin	Per store recall charge	Depot Handing charge
Quality Assurance – Co-op Brand only	Pre store withdrawal charge	Route to Market charge

This should be done within 5 working days. Once completed, this should be sent to the Buyer who will have 10 working days to raise any objection to the invoice being sent to the vendor.

If the Buyer has not raised an objection after the 10 days an invoice is raised by Accounts Receivable (FSSC) on Cedar. This will give the Vendor at least 30 days' notice in which to raise a dispute. The Buyer is then accountable for dealing with any vendor disputes if required and should refer to the PAN form on the SharePoint site for a record of all evidence and breakdown of costs as evidence.

All recalls and withdrawals must be processed on Cedar with the following cost center and nominal code. This ensures the Vendor is given at least 30 days' notice before we take a payment.

Cost Centre – 140498 **Nominal Code –** 2903

Once payment is received from the Vendor the Franchise Finance team will distribute the relevant funds to Franchises and Accounts Receivable will pass the remaining funds to Branch Charging to be distributed to FRTS and TCG stores.

VAT

For the purposes of recall and withdrawal charges the following information has been taken from the VAT Matrix and applies to charges made against the Vendor.

Type of income

Product Recall or Withdrawal

Summary

Where a vendor makes a specific payment which relates to a specific product which has become wasted for a specific reason under a product recall. This means that the product cannot be sold and therefore leads to a loss of income and costs (including admin costs) incurred in dealing with the recall, which the vendor makes good by making payment to the Co-op

Tax View

Compensation for poor goods/service – outside the scope of VAT

Rationale

Where a specific loss is incurred as a result of the vendor's actions (e.g. product recall), which is then met by the vendor, this is effectively a compensation payment from the vendor and will be outside the scope of VAT. The standard terms and conditions (version 01012019) provide that the vendor shall reimburse Co-op for all costs incurred relating to the product recall, as well as the price of the goods and a sum to reflect lost profit. The wording in the contract supports the view that this type of payment is compensatory.

Typically a consolidated invoice covering all costs and losses would be raised to the vendor for compensation payments. If separate invoices are raised specifically for fees incurred in connection with the product recall (e.g. admin/transport fees etc.), this represents compensation for costs in administering the recall. This is also outside the scope of VAT, but any such invoice should be worded to reflect that it is a compensatory fee in respect of the product recall (e.g. "Compensation for admin/travel etc. costs"), as provided for under the standard terms and conditions.

8. 'Severe Recalls'/Christmas Day/Easter Sunday/New Year's Day

Refers to an incident which is deemed a higher-level of potential risk to a regular recall or withdrawal incident. This will be determined by the Head of Technical who is accountable for initiating RIMT Crisis Incident.

RIMT should be instigated for severe recalls. The Head of Technical is responsible for initiating a Severe Recall or Recall that occurs when stores are closed on Christmas Day/Easter Sunday and New Year's Day.

In the case of a severe recall, a RIMT Crisis Incident should be initiated following the RIMT process. The role of Food Safety RIMT is to discuss, plan and implement the relevant actions for a severe recall incident via a series of conference calls.

9. Root Cause Analysis (Coop Brand)

Following a Co-op Brand product recall the Technical Manager for the product area must undertake a Root Cause Analysis investigation immediately following the incident. The Technical Manager must complete the RCA form detailing the full cause of the issue/incident and what action has been agreed/taken to prevent a reoccurrence.

The completed RCA form must be sent to Food Technical (Technical Services - Regulation) Team at foodsafety@coop.co.uk for review and forwarding on to Co-op Primary Authority. The RCA form can be found on the FSA Product Recalls Website - RCA Form link https://www.food.gov.uk/sites/default/files/media/document/rca-report-form_0.docx

10. Compliance & Monitoring (Co-op Brand)

After each Product Recall, a review meeting must be undertaken by Food Technical with all teams involved after the Root Cause Analysis investigation has been completed to review actions undertaken by the vendor and identify any issues with the product recall process to determine actions for completion.

This is only a requirement for Co-op Brand recalls, however, can be conducted after any incident if necessary.