GS1 Australia

The Global Language of Business

Title	**GS1 Recall User Guide** **Chapter 1 – Background and Introduction**
Version	**10.2**
Date	**26 March 2022**
Doc type	**User Guide**

© GS1 Australia

Disclaimer

THIS DOCUMENT IS PROVIDED "AS IS" WITH NO WARRANTIES WHATSOEVER, INCLUDING ANY WARRANTY OF MERCHANTABILITY, NONINFRINGMENT, FITNESS FOR PARTICULAR PURPOSE, OR ANY WARRANTY OTHER WISE ARISING OUT OF THIS SPECIFICATION. GS1 Australia disclaims all liability for any damages arising from use or misuse of this document or its contents, whether special, indirect, consequential, or compensatory damages, and including liability for infringement of any intellectual property rights, relating to use of information in or reliance upon this document. GS1 Australia retains the right to make changes to this document or its contents at any time, without notice. GS1 Australia makes no warranty for the use of this document and assumes no responsibility for any errors which may appear in the document, nor does it make a commitment to update the information contained herein.

Table of contents

1.0 Preface 1
2.0 About GS1 Recall 2
3.0 Using GS1 Recall 3
3.1 High Level Recall / Withdrawal Process 3
3.2 Back-up Process 4
3.3 Key Concepts – Recall, Withdrawal & Other Actions 4
3.4 Key Concepts – Consumer vs. Trade Recalls 5
4.0 Foodbank and GS1 Recall 6
5.0 Need more information? 7
5.1 About FSANZ 7
5.2 About the ACCC 8

1.0 Preface

The Productivity Commission (PC) conducted a review of the Australian consumer product safety system and released its report on 16 January 2006. In July 2008, the Council of Australian Governments approved the recommendations made by the PC in its report. One of those recommendations was for a review of the existing consumer product recall guidelines to ensure that recalls are undertaken in the most effective manner. The Australian Competition and Consumer Commission (ACCC) conducted its review of recall effectiveness pursuant to that PC recommendation.

The ACCC review examined the existing consumer product recalls system, the regulators involved in its oversight and the ways in which the risks associated with unsafe goods can be addressed by suppliers and regulators and has enabled the ACCC to consider a number of product recall processes and practices which may improve the effectiveness of the system.

The review identified four broad aspects of the recalls system that are influenced by differing levels of involvement of regulators through provision of advice, through oversight or through intervention in the recall process.

The first aspect identified in report was **the notification of the product recall by recall sponsors to both industry and regulators** (other aspects included the communication of the product recall to consumers, retrieval of the recalled product and closure of the recall.)

When a supplier decides to recall an unsafe product from within the supply chain or from consumers, the supplier has a legal obligation under statute to notify the relevant government Minister or Commissioner in most states and territories where the product is supplied. The review found that the multiplicity of notification requirements may be a burden on suppliers that could delay recall initiation. Alignment and clarification of the notification requirements across jurisdictions may create efficiencies and assist with recall effectiveness.

Notification of other entities in the supply chain is also crucial when it comes to successfully recalling unsafe products. Currently, the statutory notification provisions require suppliers to advise international recipients of products being recalled but do not require notification of others in the domestic supply chain, which results in inconsistent protection of Australian consumers.

The ACCC review into the Australian Product Recall system sets the backdrop on the GS1 Recall project. GS1 Recall was developed in collaboration with industry and regulators with the aim at improving the communication of recalls and withdrawals to supply chain partners and regulators.

2.0 About GS1 Recall

GS1 Recall is a standardised, industry-driven communication tool enabling organisations of any size, including manufacturers, wholesalers, retailers and importers, to share real-time product recall and withdrawal notifications with their trading partners and regulators in a secure and efficient manner.

GS1 Recall is based on a global and scalable GS1 Product Recall platform that is operating in many countries around the world and will provide the basis for global interoperability for recall notifications. Today, this platform is being rolled out in the US, Canada, Australia, New Zealand, South Africa and Germany.

The GS1 Recall service has been developed based on an industry wide project which started in July 2009 and ended with the launch of GS1 Recall in August 2011. This project was completed with the support of the Australian Food and Grocery Council, Food Standards Australia and New Zealand, Coles, Woolworths, Metcash and a group of leading Australian suppliers.

Through the project period, the project team developed comprehensive business requirements gathered during numerous workshops with industry and government representatives to address the various recall and withdrawals scenarios.

Two full industry wide pilots were also completed as part of this project. During the pilots recall and withdrawal scenarios were simulated with the project team using GS1 Recall ensuring the system delivered the functionality needed by industry to effectively and efficiently execute recall and withdrawals.

Based on global GS1 standards and best practices, GS1 Recall standardises the recall and withdrawal communication process. This online platform makes it easier for organisations to communicate efficiently with their trading partners and key government agencies and significantly decrease business risks.

The functionality of GS1 Recall was extended to the General Merchandise and Apparel sectors in October 2014.

GS1 Recall is a service offered by GS1 Australia, a not-for-profit organisation, on a cost-recovery basis. The aim is to ensure it is accessible by all businesses, big and small.

3.0 Using GS1 Recall

GS1 Recall is a service only available to registered users. Businesses must complete an online registration process with GS1 Australia before access to the service is granted. The registration and administration processes for GS1 Recall are covered in detail in Chapter 2 of the User Guide.

NOTE: Administrative tasks and setup activities are required to be completed prior to being able to use GS1 Recall. Register now to avoid delays - don't wait until you have a need to issue a recall.

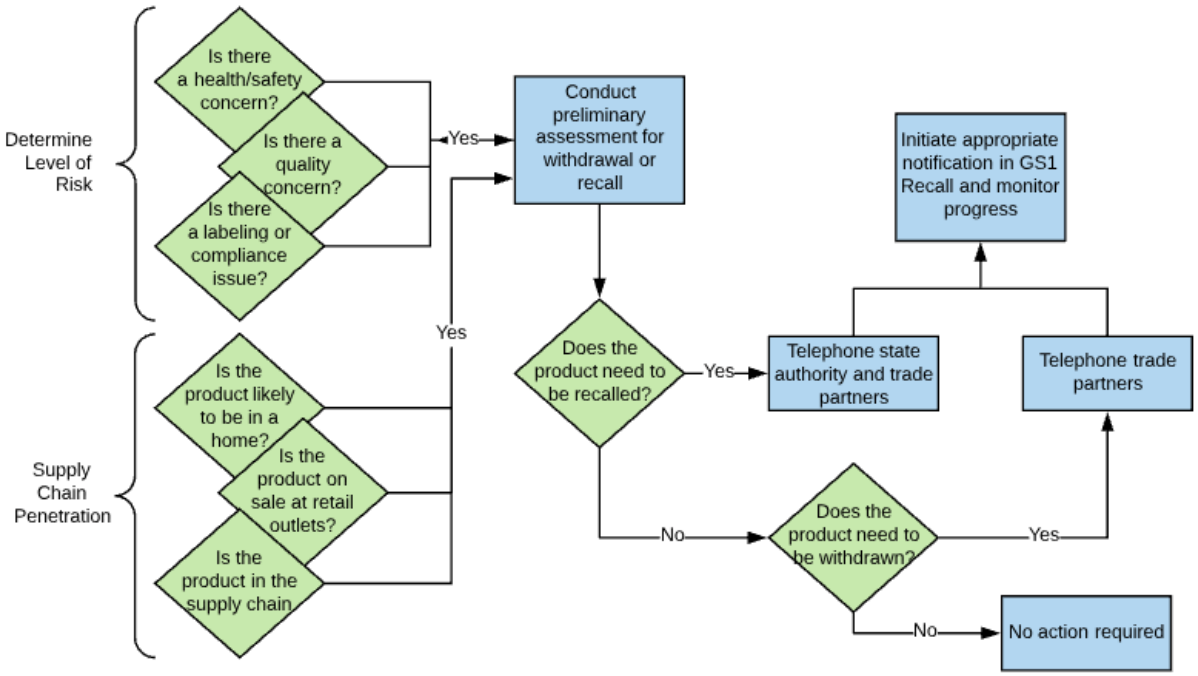
Once an organisation is registered to use GS1 Recall, and access is granted, authorised personnel would access GS1 Recall for the creation and issuing of recall and withdrawal notifications to other registered users, to FSANZ and to the ACCC.

GS1 Recall guides the user through a standard process for creating, approving and issuing a recall or withdrawal notification. This process is explained in detail in Chapter 3 of the User Guide.

NOTE: Companies issuing a recall or withdrawal notification via GS1 Recall are expected to contact FSANZ, ACCC, their state and territory Health Department Recall Coordinator and their trading partners via the telephone to advise them of all urgent recalls.

3.1 High Level Recall / Withdrawal Process

The flow diagram highlights the overall process in the creation and issuing of a recall or withdrawal notification.



3.2 Back-up Process

GS1 Recall, like all types of systems, may experience technical difficulties which could cause the system to be temporarily out of service.

If GS1 Recall is out of service at the time when your organisation must issue a recall or withdrawal notification, the ECRA Recall/Withdrawal Notification Form and process should be used instead.

This form is available on the following websites:

- GS1 Recall: https://www.gs1au.org/our-services/recall/
- ACCC Recall Web Form: https://www.productsafety.gov.au/contact-us/for-retailers-suppliers/submit-a-recall#contact-details
- FSANZ Recall Form: http://www.foodstandards.gov.au/industry/foodrecalls/recalltemplates/Pages/default.aspx
- Trading Partners Forum: http://www.tradingpartnerforum.com.au/publications/2016/4/5/recalls-and-withdrawals.html

3.3 Key Concepts – Recall, Withdrawal & Other Actions

A recall is an action taken to remove from distribution, sale and consumption, food that may pose a health and safety risk to consumers.

Recall action may be required if there is a reasonable possibility that use, or consumption of the food would cause adverse health consequences or even death. Reasons for recall could include contamination by pathogenic bacteria or the presence of chemicals or foreign matter (e.g. pieces of glass, metal or plastic) that could cause physical harm to a person consuming the food. Action may also be required for other issues that pose a potential health risk such as incorrect labelling (e.g. allergens such as peanuts, milk or milk products not being declared on the label, or incorrect/insufficient cooking instructions).

When a recall occurs, government, including the Minister responsible for consumer affairs, require a notification of the event.

A withdrawal is action taken to remove food from the supply chain where there is no public health and safety issue. A food product may be withdrawn from sale for two reasons:

- The food product has a quality defect (e.g. colour or texture) or is underweight or has labelling irregularities that do not pose a potential risk to public health and safety
- As a precaution, pending further investigation of a potential public health and safety risk - if a risk to public health and safety is established, the food product must be recalled

Withdrawals do not require notification to the government or consumers. If a withdrawal is converted into a recall then notification to government and consumers is required.

Both recall and withdrawal notifications can be issued via GS1 Recall.

Other Actions may be used to create or distribute notices that do not require regulatory approval, such as a grocery chain distributing a notice to its network of stores, where the original notice has already been approved by the regulator, via the sponsor company. These notices bypass the FSANZ workflow steps in the Recall platform and do not get sent to the ACCC.

Recall Raised Offline – Where a **recall** type action has been received outside the Recall platform (email/fax) and a subscribed company wishes to re-create the notice in the Recall platform for distribution within their network

Withdrawal Raised Offline – Where a **withdrawal** type action has been received outside the Recall platform (email/fax) and a subscribed company wishes to re-create the notice in the Recall platform for distribution within their network

3.4 Key Concepts – Consumer vs. Trade Recalls

A **trade recall** involves recovery of the food product from premises that are not controlled by the business having primary responsibility for the supply of the food product in Australia, for example, distribution centres and wholesalers. It may also involve recovery of food product from hospitals, restaurants and other major catering establishments and outlets that sell food manufactured for immediate consumption. A trade-level recall involves food product that has not been available for direct purchase by the general public.

Once a food product has left the premises of the food business, or premises owned and controlled by the food business, it is effectively in a distribution centre or wholesaler.
If a food product represents a public health and safety risk and is in a distribution centre or wholesaler as described above, recovery of the food product is classified as a trade recall.

A **consumer recall** is more extensive than a trade recall. It involves recovery of the food product from all points in the production and distribution networks/chains including any affected food product in the possession of consumers. Distribution networks/chains include, but are not limited to, trade outlets, retail outlets, supermarkets, grocery stores, health food stores and gyms that sell food. In addition to government, the public must be informed of a consumer recall. This normally involves the use of media such as newspaper advertisements.

4.0 Foodbank and GS1 Recall

Foodbank is Australia's largest food relief organisation, operating on a scale that makes it crucial to the work of the front-line charities who are feeding vulnerable Australians. Foodbank provides more than 70% of the food rescued for food relief organisations nation-wide.

Foodbank work makes a positive difference in the lives of Australians, with recipients of food and grocery relief reporting they feel less hungry, are able to focus and concentrate, are less stressed and more hopeful.

Foodbank not only plays a lead role in fighting hunger, but also a vitally important role in tackling Australia's $20 billion food waste problem and helping the environment. Our food and grocery rescue operations last year saved 81 million kilograms of CO2 emissions.

Despite their very best efforts, the food they supply is still not enough. That's why they rely on the food and grocery sector as well as individuals, corporations, community groups and all levels of government to join us in the fight against hunger.

Foodbank and GS1 Recall have worked together to provide an accessible and easy to use method for Initiators of recall or withdrawal to contact Foodbank, in the instances where food could possibly be donated. Recall automatically forwards the notification to Foodbank if the Good Samaritan check box has been checked. Users will also find Foodbank contact details within the notification details and the platform allows for specific instructions for recipients to follow, if a donation can occur.

5.0 Need more information?

If you require more information about your obligations during a Food, Grocery or Liquor recall or the process that you must follow you should contact Food Standards Australia and New Zealand (FSANZ).

FSANZ is the agency responsible for coordinating food recalls and for keeping state and territory authorities informed of potential food-related public health and safety issues in their jurisdictions. FSANZ provides guidance on conducting a recall, disseminates important recall information to relevant parties, assists with notification to the ACCC and provides the ACCC with the sponsor's post-recall report which includes details on the effectiveness of the recall and proposed corrective action.

FSANZ Website: http://www.foodstandards.gov.au

You can obtain more information on the governance of Food, Grocery and Liquor product recalls and guidelines at the following:
http://www.foodstandards.gov.au/publications/Documents/FSANZFoodRecallProtocol2014.pdf

If you require more information about your obligations during a General Merchandise or Apparel recall or the process that you must follow you should contact the Australian Competition and Consumer Commission (ACCC).

The ACCC provides guidance to suppliers on how to conduct a product safety recall. These guidelines have been developed by the ACCC in consultation with state and territory product safety regulators. The ACCC recalls website www.productsafety.gov.au provides information on the process and guidelines to follow during a recall. It must be noted that the authority of the ACCC extends across all recalls across all industry sectors. However, for recalls specific to the General Merchandise and Apparel sector the Consumer Product Safety Recall Guidelines published by the ACCC should be followed. These guidelines can be found at
https://www.productsafety.gov.au/system/files/Consumer%20product%20safety%20recall%20guidelines.pdf

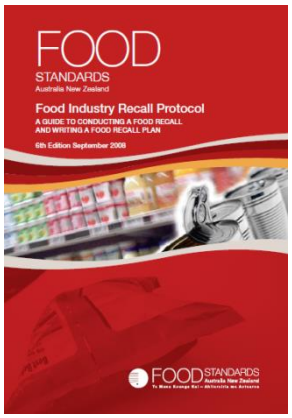
If you require further details on GS1 Recall, how to subscribe or the benefits to your business you should contact the GS1 Australia Recall team on 1300 2 RECALL (1300 273 225).

5.1 About FSANZ

Food Safety Australian and New Zealand is a bi-national Government agency. Their main responsibility is to develop and administer the Australia New Zealand Food Standards Code (the Code), which lists requirements for foods such as additives, food safety, labelling and GM foods. Enforcement and interpretation of the code is the responsibility of state and territory departments and food agencies within Australia and New Zealand.

In consultation with state and territory food authorities and the food industry, FSANZ developed Food Industry Recall Protocol (Protocol) to provide guidance to food businesses on how to develop a written recall plan and how to conduct a food recall.

Although the Protocol is provided for guidance only and is not legally binding, it has been developed to help food businesses plan for and respond to an incident where the recall of potentially unsafe food is required. It contains the legal requirements for food businesses in relation to food recall, specified in Standard 3.2.2 Food Safety Practices and General Requirements in the Australia New Zealand Food Standards Code (the Code).



The Food Standards Australia New Zealand Act 1991 (FSANZ Act) specifies that FSANZ, at the request of the states and territories, is responsible for coordinating recall action. This means that when FSANZ is notified of a recall, it liaises with the food business and state and territory authorities to gather and collate all necessary information. This information is then disseminated to state and territory governments, other government agencies and the food industry. FSANZ also monitors the effectiveness of food recalls on behalf of the Australian Competition and Consumer Commission (ACCC).

In GS1 Recall, FSANZ is automatically notified when food recalls are created by Initiators based on the data provided by the Initiator. FSANZ will also have access to all Base Notification data within the platform and will be the only user in GS1 Recall that can access information provided by Initiators under the FSANZ Forms.

5.2 About the ACCC

The Australian Competition and Consumer Commission (ACCC) is an independent Commonwealth statutory authority whose role is to enforce the Competition and Consumer Act 2010 and a range of additional legislation, promoting competition, fair trading and regulating national infrastructure for the benefit of all Australia.

If a product or service presents a safety risk or is non-compliant with a mandatory standard or ban and requires a recall, the ACCC's Consumer Product Safety Recall Guidelines provide guidance and should be read before any recall action is commenced.

When a product is recalled, suppliers are required by law to notify the Minister responsible for competition and consumer policy within two days. This can be done using the online recall notification form supplied by the ACCC at https://www.productsafety.gov.au/contact-us/for-retailers-suppliers/submit-a-recall?source=recalls

The ACCC administers and maintains the https://www.productsafety.gov.au website that contains information of all product recalls in Australia.

In GS1 Recall, the ACCC is automatically notified when General Merchandise & Apparel recalls are created by Initiators based on the data provided by the Initiator. The initiators of Food Recalls also have the option of notifying the ACCC in GS1 Recall if required.