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Cannabis and Hemp Product Recalls - What To Expect?

Everyone has heard of a recall before – from defective childrens' toys to contaminated meat or produce – but what about in the cannabis and hemp industry? There have been numerous notices circulated of batches found to contain harmful contaminants, heavy metals, pesticide levels, and other issues that could potentially harm the public; but how should your company prepare for – and handle – a possible recall?

Having a strong set of recall protocols in place well in advance of an event is the key to not only making it through such an ordeal, but being able to learn and adapt in the wake of it. Recalls may not always be inherently your company's fault, if stemming from mishandling by other parts of the supply chain, but your organization *does* have to handle the fallout. Thorough testing and inspection of ingredients and components used in the manufacture of your company's products is a must – simply trusting certificates of analysis at face value for new suppliers can be extremely risky. Investing in third-party testing to verify the CoAs on new suppliers' inputs may be well worth the cost if it helps avoid the expense and reputational damage of a recall!

Insisting on third-party certification of your suppliers – to a reputable standard such as cGMP (current good manufacturing practices) – is highly recommended. Your brand might depend on what they offer to bring products to your customers, but it's your brand that may pay the price for a lack of consistency or compliance. Seeing an up-to-date certificate from a reputable third-party certification body can help offer more peace of mind: always ask for proof!

If preventive measures have failed and a recall must be conducted – either voluntary or not – the first step is quickly and accurately identifying the products tied to the complaints. Whether it's a particular ingredient in common, a certain date of manufacture, equipment used, or even which workers were on shift during production, it's crucial to have adequate traceability measures in place to identify what products are included. If traceability is inadequate to specify *with confidence* which items pose a hazard to the public, it may be necessary to expand the recall to include “any and all” products – never a good thing.

After identifying affected product, distributors, wholesalers, and consumers who received the product in question must be notified. Product returns, reimbursements, and disposals should be expected – and an investigation conducted. What was the root cause of the hazard that prompted the recall? Reaching the ultimate source of the problem will allow corrective action to be undertaken, using a corrective action preventive action (CAPA) plan to correct the problem in the product and prevent a recurrence.

Just as important as finding the root cause (and correcting it) is identifying similar possible weaknesses in your systems and processes to likewise prevent failures in other areas. For instance, if insufficient supplier verification allowed one contaminated ingredient to enter your product, then it would be inadequate to simply be more rigorous about the supplier of that single ingredient moving forward; verification for *all* suppliers should be similarly improved.

While a recall is never a good or enjoyable occurrence, it can be viewed as a valuable opportunity to learn and improve if handled correctly. Maintaining cGMP throughout your facility and programs and having thorough policies surrounding testing and verification lie at the core of being prepared for a recall as well as what follows.