

Corrective Action

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Scope and limits

Corrective action is the post-certification process: it applies to a product that already carries, or is represented as carrying, the mark. It is a commercial and operational process, not legal advice, and it does not determine a brand's reporting, recall, disclosure, or contractual obligations. Confidentiality here is not attorney-client privilege and is not a promise that relevant evidence can never be reached through lawful process. Nothing in this process delays a recall, overrides a reporting duty, withholds evidence from a regulator who asks, or permits use of the mark on a nonconforming product. Where a result may present a legal or public-health issue, it is escalated to the brand's own quality, food-safety, regulatory, and legal decision-makers, and any required withdrawal or recall action remains fully applicable.

What decides the effect on the certificate

The effect of a nonconformity on the certificate and the mark is not one blanket rule. It turns on two facts: whether the nonconforming lot was released into commerce, and whether the affected product is currently represented to the market as certified.

Was the nonconforming lot released?	Is the affected product currently represented as certified?	Effect
No, the lot was held or quarantined	The lot never carried the mark into commerce	The lot does not enter the certified stream; the cause is investigated and fresh production is verified before release. Conforming production continues under the published status rules.
No, but a trend is developing toward the limit	Yes, current production is certified	Preventive corrective action begins before the trend becomes an exceedance; the certificate continues while the item stays on schedule under the published status rules.
Yes, a released lot is confirmed above its applicable published limit	Yes, the affected product is represented as certified	The mark may not represent that product as conforming; the affected certificate and mark are handled under the published status rules, and any required legal, regulatory, retailer, withdrawal, or recall action remains fully applicable.
Yes, a released lot is confirmed above its applicable published limit	No, the product is no longer represented as certified	The withdrawal has already occurred for representation purposes; the corrective-action record documents the cause and the verified correction, and any required withdrawal or recall action still applies.

The applicable published limit, and how any claim-analyte exceedance is handled in Remediation, are defined by the certification statuses and the status rules under [how limits are derived](#). Corrective action follows those rules; it does not create an exception to them, and it does not hold the mark on a product

represented as conforming while it is confirmed above the limit that applies to it. Every claim analyte is equal at the gate.

What qualifies

The process is for findings a brand brings forward, and for trends that have not yet become exceedances. It is not a route for a failure the program discovered first, and it is not a way to keep the mark on product that is out of limit.

Situation	Eligible	Why
Brand identifies a trend before any exceedance	Yes	The intended case, caught by the brand's own surveillance before a limit was crossed
Brand identifies a finding at or approaching a published limit and reports it	Yes	Handled under the published status rules while the corrective action runs
Brand identifies an exceedance of any claim analyte and reports it	Yes	The process governs the record and the correction; the mark is still handled under the status rules: any exceedance enters Remediation unmarked, and no metal has an allowed overage
Supplier or process change with a known contamination risk	Yes	Reportable before a result exists; opening early is cheaper than opening after a failed lot
Program surveillance finds the exceedance first	No	The process rewards disclosure; a finding the program made is handled through the standard status process
A known exceedance is not reported	No	Grounds for revocation; this is the behavior the process exists to make irrational

How an item runs

Step	When	What happens
Report	Day 0	The brand opens an item naming what was found, the affected products and lots, and a proposed direction. A completed root-cause analysis is not required to open.
Scope	Days 1 to 10	The program and brand agree what is affected: which SKUs and lots, whether product on shelf is implicated, and whether reflex or speciated testing is needed.
Corrective action	Agreed window	The brand executes the correction the root cause requires, with a dated deadline recorded against the item.
Re-test	After the action	Fresh lots run the full analyte panel at an accredited laboratory. A trend item requires enough lots to show the trend has actually turned, not one favorable result.
Close	On evidence	The item closes against the re-test evidence, under the status rules that apply to it.

An item that misses its corrective-action deadline converts to the standard status process, and the status change is visible in the register like any other.

Limits of confidentiality

Confidentiality here is a commercial protection, not a shield against a safety obligation. Stating its boundaries plainly is what keeps the rest of it credible.

Confidentiality does not	
Delay a recall or a withdrawal	never
Override a reporting or disclosure duty	never
Withhold evidence from a regulator who asks	no
Survive a missed corrective-action deadline	no
Survive concealment of a known exceedance	no
Cover unsafe product left on shelf	no

A product that should not be on shelf comes off shelf, and the record is produced to a regulator on request. Concealment of a known exceedance is grounds for revocation, the most severe outcome the program has.

Opening an item

Items are opened from the brand portal by any seat with Quality or Administrator access. A brand without portal access yet can open one by contacting the program directly; the confidentiality applies from first contact, not from when an account exists.