A. Background:
To ensure that potentially unsafe or non-regulatory compliant product is identified and action taken to prevent or minimize harm to the consumer.

B. Purpose:
Outline procedures for responding to a recall of potentially unsafe or out of compliance product; to prevent or minimize possible harm to the consumer from use of the recalled product. Product recalls may be initiated by the firm or by order of a relevant regulatory agency.

C. Scope:
This procedure applies to all inspected and finished product items packaged at 32-37 Tompkins Point Rd, Newark, NJ 07114. And shipped from Golden Platter Warehouse 280 Wilson Ave, Newark, NJ 07105

D. Responsibilities:

1. The President (P), QC Director (QCD), Operations Director (OD), the HACCP Team lead, and Golden Platter Foods, Inc. attorney, will comprise the Recall Team (RT). The RT, or a designated member, is responsible for:
    a. Initiating and overseeing all action required below that involve a product recall or market withdrawal,
    b. Contacting the SQF Institute and the certification body within 24 hours of recall activation,
    c. Contacting the Regional Director, USDA/FSIS
    d. Contacting GFCO if a Gluten Free Product test positive for gluten.
    e. Contacting QCS if the product recalled is organic.
    f. Ensuring the implementation of the recall is effective,
    g. Non-compliant product is accounted for as required by the class of recall,
    h. Establishing a root cause for the recall, and
    i. Ensuring that any required corrective action as a result of the recall, is implemented and appropriately documented.
2. The current contact list for the RT and other key individuals involved in recall communication or information transfer, is as follows:

Name	Recall Job Assignment	24/7 Contact phone	Contact E-mail
Scott Bennent	Recall Team Leader HACCP Team Lead	917-882-8640	sbennett@goldenplatter.com
Stephen Mahabir	Director of Operations	917-304-8636	stephen@goldenplatter.com
Monica Quinonez	QC Director	862-588-9586	monica@goldenplatter.com
Theresa Flagg	Production Manager AM	973-202-1359	tflagg@goldenplatter.com
Donald Barnett	Production Manager PM	973-614-4466	donald@goldenplatter.com
Jack Bashwiner, Esq. – Bashwiner	Company Attorney	973-699-8386	jbashwiner@gmail.com

and Deer, LLC			
Bill Louttit	EVP Sales & Marketing	201-906-6611	blouttit@goldenplatter.com
Carlos Rodriguez	Purchasing Manager	201-951-9662	crodriguez@goldenplatter.com
Dr. Yonas Mehari	USDA/FSIS Regional Contact	267-693-8536	Yonas.Mehari@fsis.usda.gov
NSF International	SQF Certification Body	734-769-8010	recalls@nsf.org
SQF Institute	SQF Institute	202-429-4519	foodsafetycrisis@sqfi.com.
GFCO	Gluten Free Certification Body	253-455-0676	GFCO.alerts@gluten.org
QCS	Organic Certification Body		usda@qcsinfo.org
Halal Watch World	Halal Certification Body	877-425-2599	support@halalwatchworld.org

3. In event the RT is not fully available due to travel or other circumstances, the following individuals, may initiate a recall:1) P, 2) QCD, 3) OD, 4) HACCP lead
4. The P will act as the Recall Director and is responsible for determining the scope and class of recall and for coordinating information transfer to state, federal, and local authorities or members of the news media. The company attorney may act as a backup to the P in communications to the state and federal regulatory authorities.
5. The QCD or designate, will contact the SQF Institute and the certification body by phone and back-up e-mail, within 24 hours of the decision to initiate a product recall.
6. The QCD in the role of Recall Coordinator and is responsible for collecting all required samples, accounting for returned goods, establishing a proper hold procedure for products and returned goods originating once the recall begins, and securing all documentation prepared during the period of a product recall or withdrawal.
7. The QCD, or designate, is responsible to conduct an analysis of the cause of the recall and develop documentation to be retained in the files for evaluation during the annual system audit.
8. The Purchasing Manager is responsible for establishing and maintaining a 24/7 contact list of approved suppliers and their recall contact, customers, regulatory contacts at the FDA, USDA, and State of NJ.
9. The VP of Sales, or designate, is responsible for documenting reimbursable costs connected with any product recall or market withdrawal,
10. The HACCP Team Lead or SQF Practitioner, is responsible to ensure that all employees are trained in their responsibilities with regard to a recall, including the significance and meaning of the customer contact list, and for updating the training register.
11. The SQF Practitioner is responsible to perform at least one test per year of the recall procedure and to prepare a documented report of the exercise.

12. All manufacturing supervisors are responsible for identification of non-conformities (Sec 2.4.6) which can result in product recalls or market withdrawals and for cooperating with the HACCP team leader or QCD in the recall effort.

E. Definitions:

1. Finished Inventory - a lot or batch of produce that has been received, approved for placement into inventory, and has undergoing value-added inspections and grading to meet customers requirements

2. Nonconforming Product – produce that is part of a packaging lot that has been inspected according to procedures in place at the Golden Platter Foods, Inc. (GPF) facility and which has been rendered either (1) unsafe by contact with dirty surfaces, equipment, or employees that do not meet personally hygiene and health policies or (2) failure to meet U.S.D.A standards for safety and wholesomeness of finished products.

3. Potentially Unsafe Product or Material – An ingredient, packaging, or equipment condition that does not meet expected food safety specifications or guidelines (failure in CCPs, GMPs, or PRP) and meet the definition of nonconforming product, packaging or ingredients. Raw produce can be brought into a conforming condition as a normal part of the same operation and is not considered part of the regular product flow.

4. Hold – Time period used for investigation after a food has been identified as potentially unsafe or subject to market withdrawal.

5. Recall – the coordinated act of removing food from the distribution system due to potential of possible foodborne illness or injury or because of a regulatory non-compliance such as an unapproved label, quality issues, or wrong net weight.

6. Segregate – to isolate and identify recalled or non-conforming product spatially so that cannot be used or mixed with other products without proper evaluation or disposal.

7. Recall Class – the indication of significance or risk of death or injury reflected by the potential threat associated with contaminated food and establishes the level of return and accountability of contaminated product to be required. The class of recall is established by the Food and Drug Administration after being informed about a potential problem from the food supplier. There are 4 recognized classes: Class 1 is attached to potential hazards that cause death or injury. Class 2 is attached to potential hazards that require serious medial treatment.

F. Procedure:

1.0 Recall Initiation

1.1 The RT will initiate a product recall or market adjustment, when a nonconformity with potential food safety consequences or quality or regulatory non-compliance.

1.2 A Guidance Document which outlines the process of determining whether a voluntary recall is necessary, is included in Attachment 1. In some instances, the recall will be mandatory or declared by the USDA/FSIS in instances when product is thought to be misbranded or adulterated (21 CFR 601).

1.2 Decisions to initiate a recall could begin after

1. Review of complaints (SOP 2.1.3),
2. A supplier contacts GPF with realization that a shipped raw material had a recognized hazard or,
3. A regulatory notification from either the USDA/FSIS or the U.S. FDA.
4. Halal labeled product is suspected or known to be contaminated with non-halal substances.
5. Gluten free labeled product is suspected or known to be contaminated with gluten-containing substances.
6. Non-GMO labeled product is suspected or known to be contaminated with GMO substances.
7. Organic labeled product is suspected or known to be contaminated with non-organic substances.

1.3 The Recall Director, or individuals recognized in part D2 above, will complete and sign the Product Recall Request Log (2.6.3R1). A copy of the complaint record on this product will be attached to the Recall Request Log (if available).

1.4 The QCD will transmit the required information about the recall and potential hazard to the Reportable Food Registry, the SQF Institute and the SQF certification body.

1.5 The Recall Director, or designate, will establish the class of recall:

- Class 1 suspected health hazard with reasonable likelihood that consumption of the product will cause death or serious injury
- Class 2 suspected likelihood of health problem caused by consumption of the product
- Class 3 product consumption will cause unpleasant reaction but not cause health problem.

2.0 Recall Communication

2.1 The Recall Request Log will be made available to the following departments or supervisors and updates on the progress of the recall action will be available at all time to:

- Maintenance
- Operations
- Office Manager and Administrative staff
- Shipping and receiving supervisors

2.2 The President or company attorney will notify the FDA District Recall Coordinator (see recall contact list) providing all information available on the Product Recall Request Log.

2.3 The President, together with the company attorney, will draft and review a communication to the U.S. FDA and USDA/FSIS (see Attachment 2 for content).

2.4 The President, together with the SQF Practitioner, will communicate to NSF International and SQF Institute about the recall, ether the recalled product is SQF scope excluded or not.

If the product in question is specially certified (i.e. GFCO, Halal, Non-GMO) then Golden Platter shall contact the designated recall contact (see table above) to inform them of the issue and plan.

2.5 Additional information with more detail on the product in questions should also be provided to the U.S. FDA and USDA/FSIS as the recall continues to unfold.

2.6 Press releases and other communications appropriate to the class of the recall will be prepared. A model letter can be found in Attachment 4 is attached. In the case of a suspected Class 1 recall, this press release will be completed within 48 hours.

2.7 The VP of Sales will identify all customers potentially impacted by the recall and notify them in a timely manner using all available and reasonable contract methods (TV, radio, company website, e-mail and phone calls). Recommended information for retail customers is provided in Attachment #4, but any routine communications throughout the course of the recall should include at a minimum:

- Product identification – type, batch, lot number, Julian date, size, weight, etc.
- Shipping information – ship date, BOL, sales confirmation number
- How to isolate and hold product for later pick-up and disposition
- How to establish a product item count

3.0 Implementing Recall Activities

3.1 The OD will distribute and monitor the progress of the implementation of tasks as out lined in Attachment 3 of this document.

3.2 The RT shall meet at least daily to review the progress in completion of required tasks by the GPF staff engaged in the recall activity.

3.3 Deviations from this action plan in Attachment 3 will be brought to the attention of the members of the RT, who will discuss and then decide appropriate action.

3.4 Changes to activity in Attachment 3 will be documented by the OD using either a bound notebook, or electronically.

4.0 Handling Recalled Product

3.1 The QCD shall ensure that recalled product can be located, supervise any inventory count, and account for all recalled product received at the facility or returned by customers.

3.2 The QCD and OD shall work together to secure any inventory or returned good implicated in this recall action. This will include appropriated product identification as required under Sec. 2.4.6 or the product hold procedure.

3.3 Recalled product will be returned or condemned product in compliance with SOP 2.4.5 (Non-conforming product) and will be disposed of in compliance with denaturation procedures required by the USDA.

3.4 The QCD will sample, and immediately label, store and freeze a retain portion for each customer, and also authorize testing of recalled product as required. All test results will be retained for determination of the proper disposition and to help determine cause of the recall and threat to public health.

3.5 On an on-going basis during the recall, the P or designate, will establish and update the effectiveness with which suspect product is identified and retained. In Class 1 recalls, the P is expected to update regulatory authorities concerning effectiveness on a regular basis.

3.6 Files established to support the recall action shall be maintained for a minimum of three (3) years from the date of the start of the recall.

3.7 The VP of Sales shall ensure that reimbursable costs are properly documented and are reimbursed on a schedule that meets company policy

3.8 The QCD or designate shall establish a file to contain information of meetings, communications, test records, and other essential information that was accumulated during the actual recall. This information file will constitute one of the requirements for meeting the review of the recall process.

4.0 Review of Product Recall Process

4.1 The QCD or designate shall update the Corrective Action Log shall audit (annually, at a minimum) logs and other records related to product recalls within 4 months of a recall, to determine if recall procedures were properly implemented. This shall include a summary report that identifies the:

- The effectiveness and timeliness of the recall or market withdrawal,
- Effectiveness of the communication program,
- Outcome of disposition decisions for non-conforming product impacted by the recall,
- Establishes the likely cause and corrective action required as a result (Sec. 2.5.3).

4.2 GPF shall periodically test recall procedures (minimum annually) to determine capability of the procedure and to verify the value of information in them. The target for effectiveness of recall recovery is 95-105% of manufactured product.

4.3 Records from any third party audits of the recall procedure should be retained and reviewed by the HACCP team at the time the recall test procedures are evaluated.

5.0 Conducting the Recall Test

At least twice per year the recall procedure is to be tested to ensure adequate functionality and the ability of Golden Platter Foods, Inc. to conduct an effective recall process, including samples of communication with exterior stakeholders.

5.1 The recall exercise will be conducted by the SQF Practitioner or designated individual.
5.2 The exercise will seek to confirm the ability of Golden Platter Foods, Inc. to communicate effectively with customers, suppliers and regulatory agencies.
5.3 The exercise will explore the supplier's ability to trace raw materials and packaging. Testing of raw material and packaging can occur on alternate years. (One step back) and finished product (one up).
5.4 A summary report will be prepared by the SQF Practitioner that establishes the effectiveness of the recall exercise by including 1) record of start and stop time, 2) product lot numbers assumed to represent a problem, 3) evidence of traceability of shipments containing affected lots (i.e., invoices, BOL, other), and 4) a record of effectiveness (recovery) of the test product or packaging. A test result of 100% effectiveness in identifying or accounting for a test lot of raw material product, or packaging, will be considered an indication that the procedure is validated.

G. Records:

1. Nonconformance Activity Log or NR Log
2. Return Goods Authorization Form
3. Product Recall Summary
5. Copies of all recall records (communication, product return handling, and disposition)
6. Copies of annual recall tests.

H. References:

1. ISO 22000 Standard Procedures for Food Safety Management Systems.

I. Approvals:

Approved by:	**Signature:**	**Date:**
Monica Quinonez		11/23/2021

J. Document Change History:

Date	**Version**	**Change**	**Approval**
2/5/15	Original		
03-29-16	V1	Recall Team Members Updated	
11-17-17	V2	Notify to NSF and S.Q.F for any Products Recall to NSF and SQF	
12/21/2017	V3	Reassessment to comply with SQF V8	
03/05/2018	V4	Added Shirley De La Guardia	
02/05/2019	V5	Increment to 3 Mock Recalls per year to comply with Albertson's policy	
09/05/2019	V6	Stephen Mahabir added as Plant Mgr, Reviewed against SQF V8.1	
02/17/2020	V7	Yearly Reassessment- No Changes Needed	
02/12/2021	V8	Yearly Reassessment- No Changes Needed	
11/23/2021	V9	Update to SQF V9, add line 3	

ATTACHMENT 1
GOLDENT PLATTER FOODS RECALL TEAM GUIDANCE:
DOCUMENTING NEED FOR A PRODUCT RECALL OR WITHDRAWAL

Company strategy for handling and investigating complaints including possible health/quality defects

The following actions shall be taken upon the receipt of a complaint potentially necessitating a recall. All complaints shall be investigated and assessed to establish their validity and to determine the cause of the health hazard or quality defect.

As all complaints received by a company may not represent actual health/quality defect issues caused by consumption of our products, health/quality complaints which we can't immediately verify with certainty that they were caused by consumption of our product must be investigated thoroughly and the root cause determined to ensure that it necessitates a recall.

When a health/quality defect investigation is initiated, the following shall be addressed:

1. The description of the reported health/quality defect.
2. Determine the extent of the quality defect. The checking or testing of reference and/or product in house should be considered as part of this (check production and inventory records).
3. Request a sample of the defective product from the complainant and, where a sample is provided, the need for an appropriate evaluation to be carried out. Apply the same logic as establishing hazard significance in the development of the HACCP plan, the team should give consideration to the severity of the potential hazard, and the potential its presence in the product. The potential for presence will establish how wide-spread the potential hazard is in the product.
4. The decision making process that is to be used concerning the potential need for risk-reducing actions to be taken in the distribution network, such as batch or product recalls, or other actions.
5. The assessment of the impact that any recall action may have on customers that might not be affected by the scope of the complaint/recall.
6. The internal and external communications that should be made in relation to a health/quality defect and its investigation.
7. The identification of the potential root cause(s) of the health/quality defect,
8. The need for appropriate Corrective and Preventative Actions (CAPAs) to be identified and implemented for the issue, and for the assessment of the effectiveness of those CAPAs.

Investigation and Decision Making

The information reported in relation to possible health/quality defects should be recorded, including all the original details. The validity and extent of all reported quality defects should be documented and assessed in accordance with quality risk management principles in order to support decisions regarding the degree of investigation and action taken.

If a health/quality defect is discovered or suspected in a batch, consideration should be given to checking other batches and in some cases other products, in order to determine whether they are also affected. In particular, other batches which may contain portions of the defective batch or defective components should be investigated.

Health/quality defect investigations should include a review of previous quality defect reports or any other relevant information for any indication of specific or recurring problems requiring attention and possibly further regulatory action.

The decisions that are made during and following quality defect investigations should reflect the level of risk that is presented by the health/quality defect as well as the seriousness of any noncompliance with respect to the requirements of the marketing authorization/ product specification file or GMP. Such decisions should ensure that customer safety is maintained in a timely manner, in a way that is commensurate with the level of risk that is presented by those issues.

As comprehensive information on the nature and extent of the quality defect may not always be available at the early stages of an investigation, the decision-making processes should still ensure that appropriate risk-reducing actions are taken at an appropriate time-point during such investigations. All the decisions and measures taken as a result of a quality defect should be documented.

Root Cause Analysis and Corrective and Preventative Actions

An appropriate level of root cause analysis work should be applied during the investigation of quality defects. In cases where the true root cause(s) of the health/quality defect cannot be determined, consideration should be given to identifying the most likely root cause(s) and to addressing those.

Special attention should be given to establishing whether a quality defect relates to falsification.

Where causes other than those directly related to our product is suspected or identified as the cause of the health/quality defect, care must be taken when communicating with the claimant to work with them to discover the root cause of the health/quality issue. Research the facts themselves and take care not to assign any blame or make assumptions.

Appropriate corrective and/or preventative actions (CAPAs) should be identified and taken in response to a health/quality defect immediately. Further actions steps should be identified to ensure such actions will eliminate the health/quality defect. The effectiveness of such actions should be monitored and assessed.

Quality defect records should be reviewed and trend analyses should be performed regularly for any indication of specific or recurring problems requiring attention.

ATTACHMENT 2
REGULATORY NOTIFICATION

If the Company decides to recall or withdraw a product from distribution because it believes the product is in violation of applicable laws or regulations, the Company should immediately notify the FSIS regional office, NSF and SQFI within 24 hours. The usual method of notification is a telephone call followed by written confirmation of details associated with the action. The company should provide the following information.

External Notification of FDA or USD A

1. The product's identity including lot numbers and/or other identification codes to aid in recognition of the affected product.
2. The reason for removal or correction and details about when and how any deficiency was discovered.
3. An evaluation of the risk associated with the consumption of the product, and how the evaluation was made (although the agency will make its own determination of risk).
4. The quantity of questionable product produced and the time span of that production.
5. An estimate of how much of the product is in distribution channels and how long it has been there.
6. Information about which distributors or customers received the product. If product has been diverted from one or more geographic areas to others, the recall can be considerably broader and more complicated.
7. A copy of any company correspondence with distributors, brokers or customers relating to recall strategy or actions, and a copy of any proposed news release.
8. Names, titles, and telephone numbers of company officials who will have a role in the recall action.

ATTACHMENT 3
FOOD RECALL CHECKLIST

A. Administrative Tasks

Task	Person Responsible	Completion Date
Have copy of company's recall procedure		
Write the food recall notice; review with all managers • determine the problem • determine action required • Review communication plan • Communicate the recall to USDA, FDA, NSF, SQF, GFCO, HWW within 24 hours		
Communicate and document the food recall notice to all company sites • Document receipt of the notice to each site • Complete the documentation of the recall registry		
Collect health-related information needed for public communication for FDA/ USDA Class 1 or 2 recalls. The following must be collected and documented: • Determine when the product was shipped, when, to whom • Gather reports of potential health problem to the recall ed product; include physical symptoms and action needed.		
Provide the following to group handling communication: • Copy of the recall notice • Information related to the recall • In formation on who received the material and dates • Reports of potential adverse health risk related to the product • Identify product received by customers • Located recalled product by site • Verify the food item bears product ID codes; production dates in the recall notice		
Obtain accurate inventory counts of the recalled product from each customer, including amounts in inventory, samples, and amount shipped		
Account for all recalled food by verifying inventory counts against records of food received by customer		
Confirm that customer sites have segregated and secured the recalled food.		
Carry out the following as appropriate: • Determine if the food is to be returned (to whom) or destroyed (by whom) • Notify all personnel and departments affected about procedures required for collection or destruction of food product • If the product is to be returned, follow procedures. The product being returned should be consolidated in no less than 30 days. • If product is due to destruction, follow state and local requirements; document the destruction • Consolidate documentation from all departments for inventory counts • Document any reimbursable costs		
Complete and maintain all required documents related to the recall such as • Communications to regulatory and public information agencies		

• Records of how returned product was accounted for and destroyed • Reimbursable costs • Records of adverse health impact		
Maintain copies of all communications received or action taken in relation to the food recall for 3 years plus the current year		

B. Responsibilities of the Operations (Manufacturing) Facility

Task	Person Responsible	Completion Date
When recall notice is received, identify the recalled product immediately using the product codes, lot numbers and dates of production		
Hold the product with the following steps: • Physically segregate the product, including any open containers, leftover, and WIP. • Clearly label the product "on hold", "do not use" • Inform the entire staff the product is not to be touched without authorization from the Department Manager • Document the quantity of suspect product in inventory		
Determine if the product has been used or shipped by reviewing invoices, production records, inventory records, etc.		
Make certain suspect product has been removed from potential inventory; • Account for all product received by customers		
Add the amount of product in inventory to the amount already shipped – the amount should equal the amount manufactured		
If recalled product has been shipped, document date and to whom product was shipped		
Submit to the food safety team leader or Recall Director: • Inventory counts of the recalled product and counts of amount of the product shipped before the recall notice • How the recalled product is being segregated and secured from further use • Reports of health problems and action taken (if any)		
Follow directions of the Recall Director regarding collection, return, and disposition of recalled product		
Complete necessary documentation for collection, return or destruction and reimbursement		
Submit required documentation to the Recall Director		

Maintain copies of documentation on file for 3 years
• Copies of communication received regarding the recall
• Documentation that proves required procedures were followed
  ○ How product was secured to prevent its use
  ○ Returns of suspect product
  ○ Destruction records
  ○ Reports of symptoms of physical illness
  ○ Records on who received product and the date received		

ATTACHMENT 4
PROTOTYPE LETTER WITH DETAILS FOR COMMUNICATING WITH REGULATORY AGENCIES

GOLDEN PLATTER FOODS, INC.

Company representative, , for Golden Platter Foods at 37 Tompkins Point Road, Newark, NJ has identified certain containers of certain of its products for which there may be a potential health hazard. Details are provided below:

Label names:
Product codes:
Lot numbers:
Container sizes:
Area of distribution:
Retail outlets shipped to:
Nature of the potential problem:
Potential risk to consumers:
Period of manufacture:
Period of distribution:
Number of containers involved:
Status of withdrawal action:
What consumer should do if product is in their possession:

The company is cooperating with regulatory officials in its action, and it has corrected the cause of the problem.

ATTACHMENT 5
PROTOTYPE LETTER FOR COMMUNICATION WITH PUBLIC MEDIA
GOLDEN PLATTER FOODS, INC.

Golden Platter Foods at 32-37 Tompkins Point Road, Newark, NJ has identified certain containers of certain of its products for which there may be potential health hazard. Details are provided below:

Label names:
Product codes:
Lot numbers:
Container sizes:
Nature of the potential problem:
Potential risk to consumers:
Period of manufacture:
Ship dates:
Number of containers involved:
Status of withdrawal action:
What consumers should do if product is in their possession:

You will be contacted regarding specific requirements and/or whether these products need to be returned.

The company is cooperating with regulatory officials in its action, and it has corrected the cause of the problem.

If you have any questions, please contact:

Scott Bennett, President
Golden Platter Foods