

Company Name: Hudson Foods Venture LLC
USDA Establishment: M4611/P4611
Prepared by: AgriForaging Compliance Services

Hudson Foods Venture LLC Recall Plan

Hudson Foods Venture LLC's Recall Plan will be reviewed annually and revised by Management as necessary, when personnel, procedures, processes, or other factors change.

Recall Team:

Claudia Salazar | HACCP Coordinator, Team Co-Lead
Pierre Razzo | CFO, Co-Lead
Alain Foster | Business Development/Admin
Frederic Fischer | Chef/General Manager
Nicole Day | AgriForaging Compliance Services | Compliance Advisor

Determining Whether a Recall is Necessary

Hudson Foods Venture LLC will collect and analyze all information and data it has regarding products that may be recalled. It will take into account the following factors:

- Has an adulterated or misbranded product been produced?
- Has an adulterated or misbranded product been shipped?
- Where has the product been shipped?
- Is the product in commerce?
- Is the product available to consumers?

Scope of Recall

Hudson Foods Venture LLC will assess the amount and type of product that is implicated in a recall. When the problem involves contamination with microbial pathogens, the recall should include all products produced under a single Hazard Analysis and Critical Control Point (HACCP) plan between performance of complete cleaning and sanitizing procedures. However, the act of sanitation does not necessarily define the scope of all product removal actions. For instance, with E. coli O157:H7, the company will also consider the use of source materials. Some examples of how to define the scope of product removal actions include:

- Contamination of product with a foreign material;
- Use of an incorrect label; or
- Use of the same source of raw materials, in other products, on other days of production

In addition, Hudson Foods Venture LLC will consider such factors as:

- Coding of product;
- Pathogen of concern;
- Processing and packaging;
- Equipment;
- Our HACCP plan monitoring and verification activities (including microbiological testing);
- Our Sanitation Standard Operating Procedure (SSOP) records; and

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Recall Communication Implementation

Hudson Foods Venture LLC will attempt to contact all consignees or customers via the following methods (in this particular order) until a point of contact receives and acknowledges our communication:

- Telephone;
- E-mail; and
- Fax.

In addition, all consignees or customers shall be contacted via special delivery letters conspicuously marked (on the letter or envelope) "URGENT – FOOD RECALL." Follow-up communications shall be sent to consignees or customers who fail to respond to initial recall communications within 24 hours.

Recall Communication Content

All recall communications will be written in accordance with the following guidelines:

- Be brief and to the point;
- Clearly identify the product and any other pertinent, descriptive information including but not limited to:
 - Product/brand name;
 - Product code;
 - Package/case size;
 - Package/case date code; and
 - Lot number/expiration date.
- Describe the risk involved in consuming the product;
- Concisely explain the reason for the recall and the hazard involved;
- Provide specific instructions on what should be done with the recalled product;
- Request an official, written statement from consignees;
- Provide a means for consignees (and other communication recipients) to report whether or not they have any of the product under their control; and
- Include our company's contact information and a point of contact.

Responsibility of Recipient

Consignees or customers who receive a recall communication should immediately carry out all instructions provided and, where necessary, extend the recall to their consignees or customers.

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Public Notification

The class of a recall and the extent to which the product was distributed in commerce will determine the distribution of public notification by FSIS. Hudson Foods Venture LLC will decide if the company will issue its own press release in addition to the Recall Release or Recall Notification Report issued by FSIS and how it will be issued.

Effectiveness Checks

In an effort to assess the progress and effectiveness of a recall, FSIS will conduct effectiveness checks to verify that all consignees (at the determined recall depth) have received notification about the recall and have taken appropriate action.

Regardless of the recall scenario, all consignees will be contacted via the following methods (in this particular order) until we receive written acknowledgment from them:

- Telephone call;
- E-mail or Fax;
- Special delivery letters; and
- Personal visit.

Hudson Foods Venture LLC will consider the following information with regards to the recall effectiveness check process:

- How much product is implicated in the recall?
- How is the product identified to our customers/retailers (e.g., lot markings)?
- How many locations did we ship the product to and where are they?
- How did we communicate the product removal action to those who received it?
 - Did we document this contact?
 - Did we ask for and receive written acknowledgement from them?
- What actions were taken with the product and by whom?
- If a product was destroyed, then was destruction witnessed and documented?
 - Were FSIS inspection program personnel present?
- Is there a written record of: When the issue was identified?
 - When customers were notified?
 - When we received notification that the product was either placed on hold or was no longer in a customer's control?
- Can we account for most (or all) of the product?

Returned Product Control and Disposition

Hudson Foods Venture LLC will specify how the recalled product will be disposed of and how it will be controlled pending disposition. FSIS should be notified prior to disposition actions, which may include

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destruction or relabeling of product that is returned. If the product is destroyed, it will be rendered inedible for humans and animals. All labeling will be made unusable for trade.

Recall Simulations

Hudson Foods Venture LLC will conduct annual simulation exercises to evaluate our recall plan. The simulated recall will involve the selection, without prior notice to personnel involved in the exercise, of at least one product lot that has been distributed in commerce.

A hypothetical reason for recalling the product will be specified and will involve the activation of the recall plan. The simulation will proceed at least to the point at which communication is made beyond the firm's organizational limits (full details of who will be contacted and how this will be established will be specified prior to the start of the exercise).

In addition, the recall simulation exercises will include scenarios in which the recalled product has been shipped beyond the firm's initial customer to one or more of the consignee's customers.

A recall simulation file is maintained by Hudson Foods Venture LLC to record the details and results of all simulated recall exercises. It includes the following information

- Name, address and telephone number of clients (of the test lot);
- Production records
- Inventory; and
- Distribution of the test lot.

If problems are identified during a recall simulation exercise, our recall plan (and procedures) will be revised as necessary.