

# Recall Program

## Peer Foods Group

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## Privileged and Confidential Commercial Information

### A. Purpose

The purpose of this product recall policy is as follows:

1. To promote customer and consumer safety
2. To remove unacceptable or questionable products from the market at minimum cost and inconvenience to the customer
3. To comply with policies, procedures, and industry responsibility for recalls under the jurisdiction of the Federal Safety and Inspection Service of the US Department of Agriculture as spelled out in FSIS Directive 8080.1
4. To protect the assets of Peer Foods Group and our customers.

### B. Objectives

The objectives of the product recall and market withdrawal program is to promptly and effectively:

1. Locate the product
2. Remove the product from the market
3. Provide accurate information to our customers and regulators about the issue.

### C. Definitions

1. Product Recall: A product recall is a voluntary action by the plant which made the product or an action requested by a regulatory agency. An actual product recall is removing product from marketing and distribution channels due to the product being adulterated or misbranded to the extent such products are subject to seizure. A product recall is an effective means of removing sizable quantities from the market place. The alternative to the product recall is the seizure or other legal action by regulatory agencies.
2. Class I Recall: This is an emergency situation where there is a reasonable probability that use of or exposure to a product will cause serious adverse health consequences or death. In a class I recall, top priority must be given to the complete and immediate removal from all levels in the distribution chain all the way down to the consumer level.
3. Class II Recall: This is a priority situation in which a product deficiency may cause temporary or medically reversible adverse health consequences and where the probability of serious health issues are remote. In a class II recall, product must be removed from all levels in the distribution chain and that may include down to the consumer level.

4. Class III Recall: This is a routine situation in which adverse health consequences due to the product deficiency are highly improbable or non-existent. Product in a class III recall are recalled generally because of adulteration or misbranding not involving a health hazard.
5. Market Withdrawal: Used when there is a minor violation that is not subject to legal action or when the company wishes for other reasons to retrieve the product from distribution.
6. Stock Recovery: Employed in recovering product that has been placed in retail distribution channels but is still under direct control of the company. This would include product still located at our facilities or warehouses.
7. Correction: Covers the step to be taken to repair, modify, relabel, or otherwise adjust a product so that it may remain in distribution. This also includes the destruction of a product with regulatory concurrence.
8. Recall Number: The number assigned to the recall by the USDA, regardless of package size, lot number, and private labels. If a manufacturer requests a wholesaler, distributor, or retailer to perform the recall to a lower level.
9. Depth of Recall: What level into the distribution chain will the recall go.
  - i. Wholesale level
  - ii. Retail level
  - iii. Customer or end user level
10. Effectiveness Checks: Effectiveness checks are required to verify that all consignees have been notified about the recall or withdrawal and have taken appropriate action. An alphabetic letter represents the extent to which these verifications are made.
  - i. Level A effectiveness check: 100% of known recipients of the product to be contacted. Level A effectiveness checks will be warranted in class I recalls
  - ii. Level B effectiveness check: Some percentage of the total number of recipients of the product to be contacted which percentage is determined on a case by case basis. Level B may be used in Class I or Class II recalls
  - iii. Level C effectiveness check: 10% of the total number of recipients of the product to be contacted. Level C checks will be in Class II or III recalls or market withdrawals.
  - iv. Level D effectiveness check: 2% of the total number of recipients of the product to be contacted, Level D will be done in Class III recalls or market withdrawals.

