



2.6 Product Traceability and Crisis Management

Rev 02/01/2024
Reviewed 03/13/2025

2.6.1 Product Identification (Mandatory)

2.6.1.1 The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure:

- i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and
- ii. Finished product is labeled to the customer specification and/or regulatory requirements.

2.6.1.2 Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

Parts Identification Process

Materials Received	
Step	Process
1	Parts received are compared to COAs and PO
2	Large Part Identification Label printed using program "Materials: Label Printer Gen2" which prompts for lot number and part.
3	Labels are applied to materials
	Items that come individually or just a few on a pallet get 1 label per item
	Materials that come as a pallet receive 4 labels per pallet, placed 1 per side on the product package (not the plastic wrap) on the bottom or 2nd to bottom layer of the pallet.
4	Materials are recorded on the "PO Receiver" printed from Bizowie

Material Handling - Batch Material Gathering / Kitting (Mixing)

Step	Process
1	Scheduler Prints out Mixing Batch Paperwork and delivers to the warehouse desk
2	Material Handler uses Batch Paperwork provided by Bizowie to gather materials Every material gathered must match idem and lot number provided on batch sheet.
3	After all parts are gathered, the material handler counts the number of bags and compares them to the number listed on the batch sheet. Then signs the initial box and records the number of bags.
4	Batch Paperwork is filled in the mixing room, the pallet is left in staging area for mixing

Mixing

Step	Process
1	Pallet is retrieved, a person doing pre-weigh / minors (partial unit materials) gathers and weighs materials listed in the pre-weigh column. When complete they sign the "pre-weigh" by box.



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2	All materials gathered are verified by item and count and verifier signs "Parts verified By" and records the number of full unit / kitted materials and pre-weigh materials.
3	Pallet is weighed on the pallet scale to ensure materials (deducting for bags and pallet) to ensure the materials are within range
4	Pallet is lifted up to the Mixing Drop Station (which contains the sifting screen) Bin is moved under the Drop station Batch paperwork is put into the pocket on the Bin, WIP tag added to bin QMR 011 (h)
5	Bin is tumble mixed
6	Any 2nd Cycle materials are added (primarily ING3000s that react with Sodium Bicarbonate, but also some ingredients needing less tumbling)
7	Batch paperwork and sample are taken to Quality Control for testing QC completes section regarding bake and gluten testing

Material Handling - Batch Material Gathering (Packing)

Step	Process
1	Production Supervisor Prints out Packing Batch Paperwork and delivers to Kitting Supervisor
2	Kitting retrieves Packing Batch Paperwork and begins any labeling jobs required Labeled materials are delivered to Packing Room along with Batch Paperwork
3	Material Handler uses Batch Paperwork to gather materials Every material gathered must have a Large or Part Identification Label.
4	As materials are gathered, the initial box is signed off
5	Batch Paperwork is given to the production supervisor, the pallet is left in staging for packing

Packing

Step	Process
1	Packing retrieves pallet and Packing paperwork Compare materials gathered to Packing paperwork Check WIP paperworks shows WIP has passed QC testing
2	Lift and Load Bin into upper mixing platform drop hopper
3	Make sure all machine settings match Product Spec side of Packing paperwork
4	Package materials per instructions. Team members sign box corresponding to task(s) done
5	Final inspection to ensure the product meets criteria. Sign "Final Verifier" box.
6	Once Final inspection has been done, product is handed off to Materials department

Material Handling - Material Gathering (Milling/Pressing)

Step	Process
1	Scheduler Prints out Traveler Paperwork and delivers to the production line
2	Production personnel use production lot Traveler paperwork to gather materials as production progresses. Each tote of material gathered must be recorded.
3	As materials are gathered, the operator completes the traveler paperwork and the line supervisor signs off.



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Milling	
Step	Process
1	Materials and lot numbers that are to be pulled for production are listed on the traveler paperwork
2	For every pallet prepared for production, the source lot, PFF lot, and pallet # are recorded on the Metal Detection Reject Log.
3	Traveler/Process Log Paperwork is reviewed at the end of each day with lot numbers and bag quantities recorded
4	When the job is completed, Milling Final Inspection is filled out recording source lots and PFF lots.
5	Batch paperwork and retains/samples are taken to Quality Control for testing. QC reviews paperwork and signs. Retains are given to QC for every source pallet run, with source lot and PFF lot recorded, as well as the pallet number.

Pressing	
Step	Process
1	Materials and lot numbers that are to be pulled for production are listed on the traveler paperwork.
2	For every pallet prepared for production, the source lot, PFF lot, and pallet # are recorded on the Metal Detection Test/Reject Record.
3	Traveler Paperwork is reviewed at the end of each day with lot numbers and bag quantities recorded
4	When the job is completed, Pressing Final Inspection is filled out recording source lots and PFF lots.
5	Batch paperwork and retains/samples are taken to Quality Control for testing. QC reviews paperwork and signs. Retains are given to QC for every source pallet run, with source lot and PFF lot recorded, as well as the pallet number.

Warehousing / Shipping	
Step	Process
1	Using Sales Order (SO) provided by scheduling, gather materials required for order
2	Record Materials for order on Shipping Record printed from Bizowie Ensuring part numbers, lot numbers, and quantities are included
3	Either Materials or Compliance Department record the Shipping Record Sales Order information into Bizowie.

Records

The Compliance Department collects all records required for product identification including QMR 012's, mixing batch paperwork and packaging paperwork and ensures they have been added to electronic registers. Paper copies are located in the Compliance office.



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Appendix 1: Part Identification Number Meaning All Parts are identified by a 3 Letter Prefix followed by a 4 digit number		
Prefix	Range	Usage
FIN	Finished Goods	
	First 2 Digits specify the Customer, 3rd and 4th are sequential for the item FINs are the output of the Packing Room	
ING	Ingredients	
	First digit identifies category, other digits are sequential within that category Most ING are received from vendors, but may also be made in facility	
	0000s	Flours, Powders, Starches
	1000s	Salts & Sweeteners
	2000s	Oils, Fats, Shortenings
	3000s	Leavenings, Gums, Emulsifiers
	4000s	Customer Owned
	5000s	Grains & Granulates
	6000s	Fruits, Flakes, Pieces
	7000s	Flavors, Herbs, Spices
	8000s	Nuts & Seeds
9000s	Miscellaneous, Colors, Chocolates	
PKG	Packaging Materials	
	First digit identifies category, other digits are sequential within that category FCP = Food Contact Packaging PKG are received from vendors, 7000s are also printed on in facility	
	0000s	Bulk Bags (FCP)
	1000s	Corrugated boxes / inserts
	2000s	Retail Bags (FCP)
	3000s	Retail Boxes
	4000s	Seals (FCP)
	5000s	Film, Mylar, Form Fill (FCP)
	6000s	String (FCP) Glues, Tapes, Adhesives
	7000s	Blank / Raw Material for Labels, Stickers, Tickets printed in facility
	8000s	Retail Labels - printed out of facility
9000s	Miscellaneous Packaging (some FCP)	
WIP	Work in Progress	
	Numbers are sequential in order of formula creation Most WIP are produced by the Mixing Room	



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Appendix 2: Part Identification Labels

Size (Width x Height)	Contains	Where Used
Small (2" x 0.75")	Part Number Lot Number QR Code Codes for Allergens, Certifications Date & Time Printed Workstation Printed at	Batch Paperwork (materials used) Product retrieved by Material Handling QMR 012(h) R&D Material Usage Log Product Package (when a R&D portion is taken out)
Large (6" x 4")	Part Number Lot Number QR Code Description (including certification) Date Label Printed (usually date of receipt) Allergens / Gluten Test	Receiving Item Produced Label on Batch Paperwork (WIP or FIN)

Appendix 1 b: Part Identification Number Meaning Milling Line System

All Parts are identified by a 3 Letter Prefix followed by a 5 digit number

Part	Range	Usage
Finished Goods Descriptive See >	Infinite Prefix + 00000-99999 EXAMPLE SKW10100 Sunflower Kernel Whole ###(Part based) ## (Mesh based) Prefix is generally based on raw input part description ### is generally tied to prefix as a corresponding numeric value ## is generally tied to mesh size but cannot allow for finer than 99 mesh. (Note: 20,25,30 aren't necessarily mesh size but merely representative of mesh difference)	To identify finished goods



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2.6.2 Product Trace (Mandatory)

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure:

- i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier;
- ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.);
- iii. Traceability is maintained where product is reworked (refer to 2.4.6); and
- iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2).

Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

Responsibility & Methods

Product Trace at PFF is accomplished by recording the lot numbers at every step from receiving from Vendor (1 back) through mixing and packaging to shipping to Customers (1 forward). (A more in-depth process flow can be found in 2.6.1).

All departments are responsible for Product Trace, but the Materials Department has the majority of responsibility for recording the movement of materials, and the Compliance Department has responsibility for ensuring the system is functioning properly.

Primary Records for Trace	
Every transaction must be recorded either by paper log or electronically Each entry records date, employee, part number, lot number, and quantity.	
Forms	Use
PO Receiver and Shipping Record (Transport Logs)	Records information connected to shipping and receiving including truck inspection, and materials received, shipped, or breached on arrival
Bizowie Inventory Adjustment Records	Records Materials during Cycle Counts
Electronic Breach Register Materials: SRW ACCESS	Records materials breached Breached on Arrival are lost and unusable Materials Breached Inhouse may be salvageable
Electronic R&D Material Usage Register	Records materials used by R&D
Mixing Batch Sheet (WIP)	Records materials used by Mixing
Packing Batch Sheet (FIN)	Records materials used by Packing
Electronic Label Printing and Verification Worksheet	Records source lot and corresponding PFF lot
Electronic Ro-Tap Record	Records source lot and corresponding PFF lot for every pallet/sack produced
Pressing Batch Paperwork	Records materials used by Pressing from the Pre-Op Checklist, Traveler, Process Log, to the Final Inspection



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Milling Batch Paperwork	Records materials used by Milling from the Pre-Op Checklist, Traveler, Process Log, to the Final Inspection
QMR 030 Rework	Traces materials used during rework Rework also receives a custom Batch Sheet

Product Lots		
Part	Lot Format	Linked
FIN	Depends on Customer requirements Most common: date, line, sequence (which batch of the day)	Back by Packing Batch Sheet to WIP, PKG, & other materials used Forward by Bizowie
ING	Variable by vendor, must be supplier or lot is rejected	Back by Bizowie Forward by Mixing Batch Sheet
PKG	Variable by vendor, match what is provided by vendor If not provided by vendor use: (1) PO# (2) manufacture (3) receive date	Back by Bizowie Forward by Packing Batch Sheet
WIP	MMDDYYBS MM = 2 - digit Month, DD = 2 digit day YY = 2 digit year B = Bin number, S = Sequence (which batch of day)	Back by Mixing Batch Sheet Forward by Packing Batch Sheet
8 Character Parts (WIP and FIN)	Starts with 3 digits that are the Julian Date, then 2 digits that represent the year. For example, if production started on 12/15/2020 the lot would be (35020).	Bizowie

Product Trace Exercise

At least annually, a Product Trace exercise / test is done to ensure the system is working properly, this is typically coupled with a mock recall exercise.

Records & Retention Period

Record keeping is the responsibility of the Compliance Department, paper records are stored in the Compliance office, and electronic records are managed by the Compliance Department. Records must be retained in accordance with Records Policy.



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2.6.3 Product Withdrawal and Recall (Mandatory)

2.6.3.1 The responsibility and methods used to withdraw or recall products shall be documented and implemented. The procedure shall:

- i. Identify those responsible for initiating, managing and investigating a product withdrawal or recall;
- ii. Describe the management procedures to be implemented including sources of legal, regulatory and expert advice and essential traceability information;
- iii. Outline a communication plan to inform site personnel, customers, consumers, authorities and other essential bodies in a timely manner appropriate to the nature of the incident; and
- iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature, or product recall for any reason.

2.6.3.2 The product withdrawal and recall system shall be reviewed, tested and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts, and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

2.6.3.3 Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

A product withdrawal/recall is a method of removing or correcting consumer products that require a remedy. Food recalls usually result from a perceived violation of laws administered by the Food and Drug Administration (FDA). A withdrawal/recall may be undertaken voluntarily, and at any time, by manufacturers and distributors. A request by the FDA for a recall is reserved for urgent situations and is to be directed to the firm that has primary responsibility for the manufactured product.

Responsibility and Methods

Pure Functional Foods (PFF) Senior Management is responsible for following this policy and must support the fulfillment of the details and actions taken if a defective product reaches a customer and must be recalled or withdrawn from the public.

Initial investigation and Response Procedures

Step	Description
1	<p>Receipt of External Information</p> <p>Since information may come from many sources, including individual consumers, an enforcement agency, or retailer, the first response action is to ensure investigation takes place. All customer complaints must follow PFF customer complaint handling procedure.</p>
2	<p>Management & Compliance Manager preliminary risk assessment</p> <p>Complaint information must be communicated immediately to the management and Compliance Manager who assess the situation status as Critical or Non-Critical. An attempt to define the problem must be made, including verification of the product defect and the extent of product affected.</p>
3	<p>Critical / Non Critical assessed</p> <p>a. If a recall or withdrawal is unlikely; the issue is handled through the standard complaint resolution process.</p>



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	<p>b. If a recall or withdrawal is a potential; the issue must be immediately communicated to the Company CEO/PRESIDENT.</p>
4	<p style="text-align: center;">Company CEO/President Notified</p> <p>No responses are to be taken by anyone until the Company CEO/PRESIDENT (or in their absence, the nominated deputy) has been informed.</p>
5	<p style="text-align: center;">Full Investigation</p> <p>An investigation that includes a formal risk assessment of the situation must take place as soon as possible. Investigation normally includes full identification and traceability exercise for the suspect product by the following checks:</p> <ol style="list-style-type: none"> a. Compliance with standard production processes. b. Compliance with Raw Material and Packaging Specifications. c. Department records of the product in question during its associated production cycle steps with references to final product standards. d. Checks of Cleaning procedures and condition of equipment. e. Condition & characteristics of product must be reviewed in various areas: PFF retains, warehouses, distribution centers, on store shelves, in transit. <p>Note: It may be necessary to gather samples of the affected product to determine the cause & extent of defect. Analysis must be done by independent laboratories, if the issue requires.</p>
6	<p style="text-align: center;">Justification status of Withdrawal/Recall</p> <ol style="list-style-type: none"> a. The Company CEO/PRESIDENT dictates that a withdrawal/recall is not justified and the issue is handled through the standard complaint resolution process. b. The Company CEO/PRESIDENT dictates that a withdrawal/recall is justified and the issue is escalated to the Product Recall Team. <p>Note: A product withdrawal/recall can only be approved by the Company CEO/PRESIDENT, or in their absence, the nominated deputy.</p>
7	<p style="text-align: center;">Product Recall Team assembled</p> <p>The Company CEO/PRESIDENT is responsible to assemble the Product Recall Team in a timely fashion so that the withdrawal/recall is initiated in a timely manner.</p> <p>The individuals who are in the Product Recall Team are the same individuals who are currently listed as members of the HACCP team in the current company HACCP plan.</p>
8	<p style="text-align: center;">Identify Products for Withdrawal/Recall</p> <p>The Product Recall Team must formulate a Proposed Plan for locating and containing all products involved in the withdrawal/recall.</p>
9	<p style="text-align: center;">Contact Private Label Customer(s) <i>(Private Label)</i></p> <p>Prior to public announcement or notification, the private label customer must be contacted by Senior Management. Product information including lot(s) and production dates impacted, along with incident details must be provided.</p> <p>This contact will also help to determine disposition and collection of the product, and may modify the Product Recall Plan.</p>
10	<p style="text-align: center;">Notify applicable external contacts (authorities-customers-public)</p> <p>The FDA, SQF, and Eagle require communication within 24 hours.</p> <p>Other certification bodies, State and Local regulatory authorities may also require notification of the situation.</p>
11	<p style="text-align: center;">Finalized Product Recall Plan</p> <p>Based on FDA recommendations, PFF Recall Team Proposed Plan, and Private Label</p>



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	Customer desires, a finalized Product Recall Plan is developed. This plan will outline public communication (including press releases and additional customer calls) as well as the procedure for disposition and collection of the impacted materials.
11 b	<p style="text-align: center;">Product Recall Team determination of disposition Based on Product Recall Team and Private Label Customer</p> <p>a. If a disposition can be reached without physical examples of the product involved in the withdrawal/recall, it may be necessary that the product be discarded upon discovery to contain the situation.</p> <p>b. If a disposition can be reached without physical examples of the product involved in the withdrawal/recall, it may still be necessary to arrange for pickup and return to PFF if the situation allows for such.</p> <p>c. If no physical examples of the product involved in the withdrawal/recall are readily available and disposition is not possible without them, it is necessary to arrange for pickup and return to PFF.</p>
12	<p style="text-align: center;">Receipt, Segregation and Hold</p> <p>Upon arrival at the site, all products involved must be counted, segregated, tagged and put on the hold register until disposition is reached. Note: Private Label Customers may designate another facility for their quarantine location.</p>
13	<p style="text-align: center;">Finalization of disposition</p> <p>The final steps that address the known defects or threats must be corrected or neutralized and the issue resolved by proper disposition according to the Product Recall Plan.</p>
14	<p style="text-align: center;">Resolve cause and make necessary changes</p> <p>The withdrawal/recall may only be terminated upon the completion of the following items:</p> <ul style="list-style-type: none"> · All suspect products have been accounted for and disposed of properly, including obtaining verification of product disposal or destruction. · The immediate risk to the public has been eradicated. · The root cause has been determined and all associated corrective actions are complete. · An official recall termination letter has been sent to the customer from the company CEO/PRESIDENT or Compliance Manager. · Management and Compliance Manager notify all department supervisors, via a company memo the issue has been resolved and normal production may resume.

Product Recall Plan and Investigation

All investigation results must be reported to and circulation restricted to the Product Recall Team. The receptionist or sales representative must direct calls in and out pertaining to the withdrawal/recall to the company CEO/President. Any resulting information must be kept with the Customer Complaint Investigation Form (QMR 003) or the associated Non Conformance, or relayed directly to the Product Recall Team.

Emergency Contacts

Emergency contact information is listed in Crisis Management Policy if needed to execute this policy.



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Private Label Brand Withdrawal/Recall

For Withdrawal/Recalls of private label products this sequence of events must take place.

Private Label Withdrawal/Recall:

Some responsibility and tasks must be handled by the customer involved in the private label withdrawal/recall, such as relaying associated complaint information and tracking of product.

Removal of product from distribution is the responsibility of the private label customer. PFF will work together with the customer, in conjunction with legal and insurance regulations to determine specific recall notification steps.

Product Recovery and Disposition for any withdrawal/recall:

All defective products must be physically recovered and returned to PFF as allowed by customer cooperation. The Logistics Manager oversees the operation of recovery. Depending on the nature and severity of the defect, recovered product may be segregated to an off-site facility until a disposition plan can be formulated. This limits the spread of contamination to the production facility. In the most severe cases, where continued exposure to the public poses a greater health risk, suspect products, where possible, must be destroyed at the source of discovery.

The Compliance Manager must work with the management to ensure accurate counts of suspect products take place according to the Product Recall Team action plan.

Deliberate or Malicious Contamination

The product at risk may have been caused by deliberate contamination. This information may come from the initial communication. A special course of action may be necessary as the problem will become a legal and/or criminal matter. Deliberate or Malicious contamination will be handled as required in accordance within the jurisdiction of the F.B.I.

In order to verify its effectiveness the Product Recall procedure is subjected to a timed test at least annually and the results of the exercise recorded and reviewed by the senior management team to identify and implement areas for improvement.

Records of withdrawals/recalls shall be maintained. PFF observes CEO/President or Compliance Manager Recall Termination letter and Non Conformance/Correct Action tracking as acceptable retention.

Withdrawal/recall involving product in market place

If a product involved in a product withdrawal/recall is in the marketplace, then an attempt must be made to gather it. PFF must state the situation to customers who distributed the product and request that customers attempt to gather the affected product out of circulation and be made ready for handling and disposition. If customers have acknowledged their awareness of the situation and yet make no effort to gather product, PFF is not responsible for customer inaction, as cooperation is the customer's prerogative and customer assumes liability for such items.



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Proceeding & following investigation

Withdrawal/Recall investigation must take into account the batch or lot that is proceeding and following the one in question due to the potentials of carry-over. Example: If sequentially numbered batch 2 is found to have an issue, then batches 1 and 3 must be investigated as well due to the possibility of carry-over.



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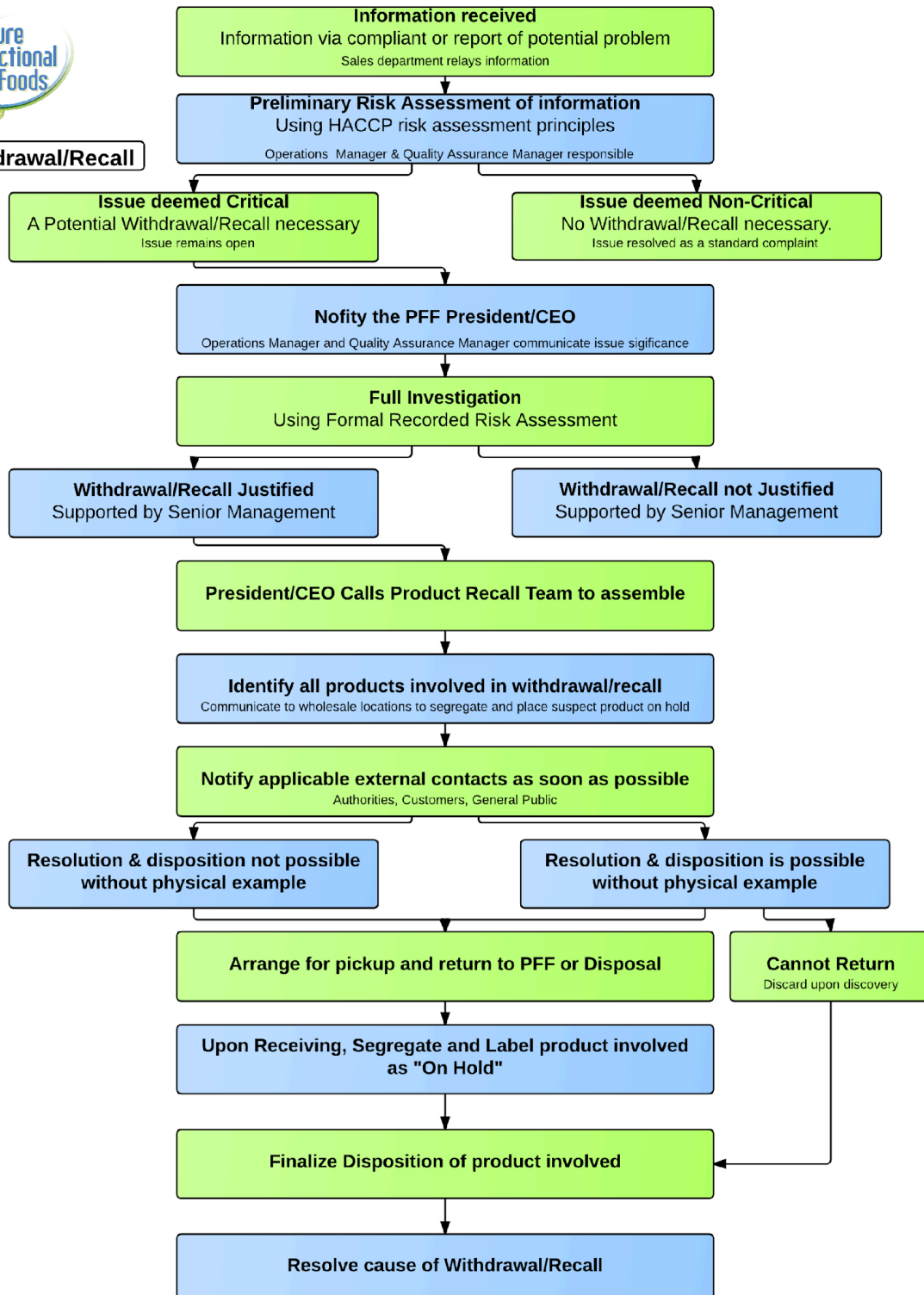
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Pure Functional Foods Brand Withdrawal/Recall

For Withdrawal/Recalls of PFF brand products this sequence of events must take place.



Withdrawal/Recall





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2.6.4 Crisis Management Planning

2.6.4.1 A crisis management plan based on the understanding of known potential dangers (e.g. flood, drought, fire, tsunami, or other severe weather event, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food, shall be documented by senior management outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include as a minimum:

- i. A senior manager responsible for decision making, oversight and initiating actions arising from a crisis management incident;
- ii. The nomination and training of a crisis management team;
- iii. The controls implemented to ensure any responses do not compromise product safety;
- iv. The measures to isolate and identify product affected by a response to a crisis;
- v. The measures taken to verify the acceptability of food prior to release;
- vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers;
- vii. Sources of legal and expert advice; and
- viii. The responsibility for internal communications and communicating with authorities, external organizations and media.

PFF Senior Management has prepared this policy / plan in order to deal with a business crisis or emergency situation that may impact the ability to produce safe food.

Risks (Known Potential Dangers)			
Natural Disasters		Local / Structural	
Earthquake - Low	Snow/Blizzard - High	Fire - Moderate	Phone / Internet Loss - High (not essential to production work, can be accessed off-site)
Wildfire - Moderate	Flood - Low	Catastrophic building failure - Low	Drain Backup - Moderate
Tornado - Low	Pandemic - Low	Power / Water Loss - Moderate	

Senior Management

The PFF President has made known their responsibilities concerning safe food, therefore, Senior Management shall consult the Crisis Management Team in the event of a crisis.



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Crisis Management Team

Nominated employees retain those positions until otherwise stated by Senior Management.

Name	Position	Responsibility	Contact #
Dean Weed	President Service Dept Manager	Head of Crisis Management Team Communicate with Customers & Media Nominate Employees to team Contact Insurance Providers Review all written communications concerning the crisis prior to release	315-406-7996
Dana Weed	Vice President (PCQI Trained)	Assist Crisis Management Team head Assist Compliance Manager Contact FDA & Public Authorities	315-283-8684
Viorela Buzica	SQF Practitioner (PCQI Trained)	Ensure team members are properly trained & know policy Maintain records of the annual review & verification in the Compliance office	315-294-0733
All Members	<ul style="list-style-type: none"> - Act as the “first point of contact” for crisis situations - Quickly contact and assemble team when made aware of a crisis - Quickly and collectively evaluate the situation, formulate an action plan, and communicate with company President (if not already present) - Continual communication with each other throughout the crisis - Be involved in the annual crisis management exercise and policy review 		

Concerning Crisis Control and Crisis Response Measures

If no solution to the crisis incident can be made in a timely manner to address a believed food safety risk, then PFF will utilize the services of Raymond Hadley (a Gluten Free SQF certified facility). The contingency plan for utilizing the services of our secondary source may be utilized immediately until full control, assessment and correction can be obtained at PFF.

Risk Assessment prior to release of food product

Pending a risk assessment, all products within the facility at the time of a crisis that have been deemed suspect are subject to the policy and controls as dictated by Control of Nonconforming Material, Control of Product Rework, and Product ID Trace / Recall. All products tagged “Hold” during a crisis can only be released from Hold /Quarantine for use (production, distribution, or other) by completion of this policy and approval of the Company President.

All communications to and from the company regarding the crisis must be directed to the Company President.



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If a product recall or withdrawal is required, then it must follow the procedure outlined in the Product Recall Policy.

2.6.4.2 The crisis management plan shall be reviewed, tested and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

Yearly Test

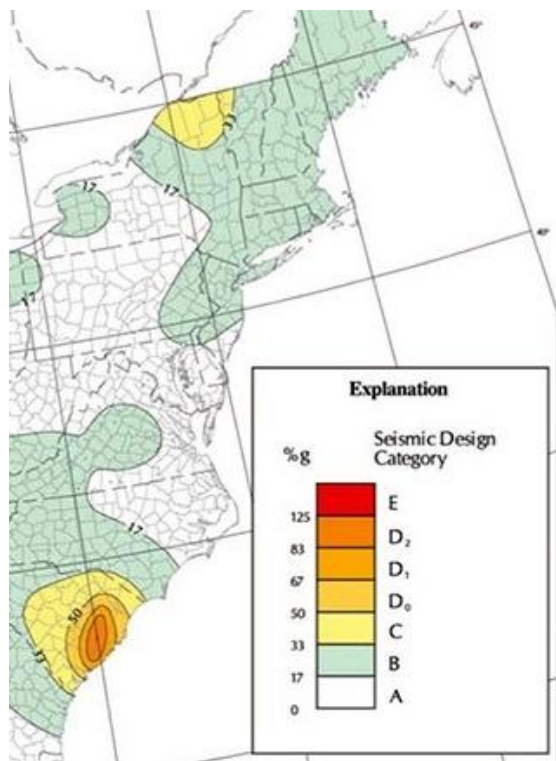
PFF will review the Crisis Management plan and conduct a test of the plan on at least a yearly basis. The yearly test is performed by selecting one of the known potential dangers as identified above on a rotating basis, and going through a mock scenario of what methods and options we have at our disposal to mitigate risk and get back to normal business function without compromising food safety. This event must be recorded and filed alongside previous tests.

Emergency Contacts			
Name	Description	Phone	Email
FDA	Federal Food Safety	866.300.4374 301.796.8240 Recall Coordinators 718.662.5577	orahqrenyk@fda.hhs.gov
NY Agriculture & Markets	State Food Safety	315.487.0852	www.agriculture.ny.gov
SQF	SQF	202.220.0635	foodsafetycrisis@sqfi.com
GFCO	Gluten Free Certification Organization	253.833.6655	gfco.alerts@gluten.org
Eagle	Food Safety Certifying Body	800.795.3641	foodsafety@eaglecertificationgroup.com
Raymond Hadley	Emergency BackUp Manufacturer	800-252-5220	acct@raymondhadley.com
Delmonico	Insurance Company	(315) 472-4242	Jed@DelmonicoInsurance.com
Riccardo Galbato	Attorney	315.252.1234	www.galbatolaw.com

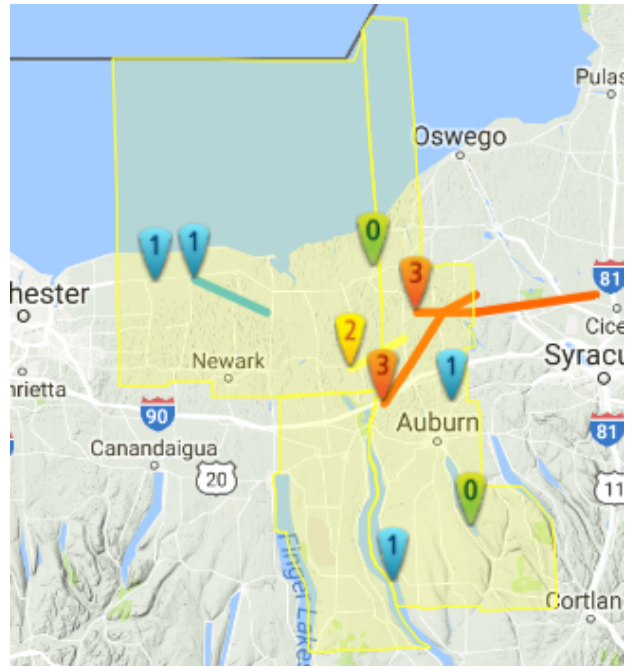


2.6 Product Traceability and Crisis Management

Rev 02/01/2024
Reviewed 03/13/2025



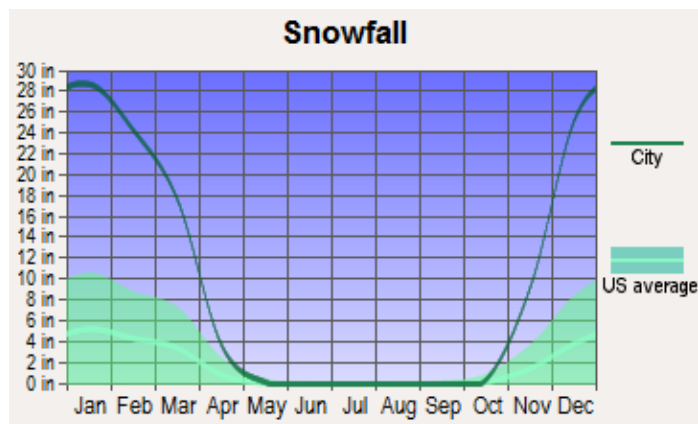
FEMA - Earthquake Risk - White (Low)



Tornado Risk - 10 Tornadoes in Wayne, Cayuga or Seneca Counties since 1969

E	Map/Forum	SPC #	Date	Time	State(s)	Fujita	Fatalities	Injuries	Width	Length
		231	1969-06-02	14:30:00.3	New York	3	0	0	10	17.5
		520	1980-06-09	11:20:00.3	New York	1	0	0	200	9.9
		241	1983-05-02	19:15:00.3	New York	3	1	0	200	20
		400	1991-04-30	14:20:00.3	New York	1	0	0	23	0.1
		525	1993-09-15	12:05:00.3	New York	0	0	0	100	0.5
		127	2002-05-31	15:00:00.3	Pennsylvania, New York (overall summary)	1	0	1	300	1.5
		127	2002-05-31	14:55:00.3	Pennsylvania	1	0	0	300	0.5
		127	2002-05-31	15:00:00.3	New York	1	0	1	300	1
		272	2003-05-11	13:30:00.3	New York	1	0	0	50	2.3
		68	2004-04-18	11:43:00.3	New York	0	0	0	75	1
		761	2007-06-21	13:46:00.3	New York	1	0	0	100	1.5
		343871	2011-08-21	13:15:00.3	New York	2	0	0	200	7.88

Summary						
Date(s) (yyyy-mm-dd)	Tornadoes	Fatalities	Highest Fatalities	Injuries	Highest Injuries	Longest Path
1909-06-02 - 2011-08-21	10	1 person	1 person	1 person	1 person	20 miles



Snow Risk - High

Wildfire Risk - Moderate risk (0.9 - 1.3 per Square Mile from 2001 - 2015)

