

Kraft Chemical Company Recall Plan

In the event that a food safety issue arises with our products Kraft Chemical Company will protect public health by facilitating the efficient, rapid identification and removal of unsafe food from the distribution chain and, by informing consumers (where necessary) of the presence in the market of a potentially hazardous food.

There is a documented recall procedure in place and this will be periodically tested to ensure that it is comprehensive and fit for purpose in its ability to remove an unsafe product from consumers and/or the distribution chain.

Recall Procedure

Introduction

This procedure states the action/s Kraft Chemical Company will take to effectively manage the recall of a food which has been determined to be unsafe or unsuitable.

There are two levels of product recall, these are as follows:

Recall (also known as a consumer level recall): This is a removal of unsafe food from the distribution chain and extends to food sold to consumers and therefore involves communication with consumers.

Withdrawal (also known as a trade level recall): This is the removal of an unsafe food from the distribution chain but does not extend to food sold to the consumer.

An effective product recall will ensure that the unsafe or unsuitable food/s is contained and either destroyed or made safe.

Roles and Responsibilities

It is Kraft Chemical Company responsibility to effectively organize and manage the recall of food that has been demonstrated to be unsafe or unsuitable. The recall coordinator for the site is the Quality Manager, who has been given authority from management to make recall decisions on behalf of Kraft Chemical Company.

The FDA wishes to work with us in our recall action and thus be satisfied that we are taking all reasonable steps to protect consumers. When a recall is initiated, our actions in recalling the affected food/s need to be coordinated with the FDA.



We shall notify FDA as soon as a recall is likely.

It is our responsibility to manage the recall by clarifying the food safety issue and the exposure (who and where risk exists), and to provide details on distribution and the method of recall.

Kraft Chemical is available to provide support and technical advice via the Officer coordinating the recall.

The Recall Committee

The recall coordinator will initiate the formation of a committee and will co-ordinate actions with FDA and our marketing and distribution agents.

Committee members will include personnel from across Kraft Chemical Company. Typically, the committee would have a mix of knowledge across the following areas:

- production
- quality
- purchasing
- marketing
- sales
- legal services
- distribution & supply
- consumer affairs/public relations

The recall committee is responsible for the management of all recall activities and to adhere to this procedure. Duties of the recall committee are to:

- assess the overall problem;
- notify the relevant regulatory authority;
- evaluate the hazard in the food and the extent of contamination;
- determine a strategy to be followed;
- make decisions about product still in manufacture or in storage;
- decide who makes any press statements;
- notify insurers (must be done immediately because recalls are covered by our insurance);
- notify legal counsel (insurance requires involvement of lawyers due to potential claims).



Recall Actions & Documentation

Decision to Recall

The decision on whether to recall or withdraw a product/s or not will be based on the identification of a hazard that makes a foodstuff unsafe and its likelihood of affecting public health. This will be determined by careful, considered risk assessment. The recall team will conduct a risk assessment using the *Recall Summary Record* and we will include the appropriate regulatory authority in the process.

Scope of Recall

The scope of a recall is a very important part of the process; it ultimately ensures the effective identification of all affected product/s, ingredient/s and location/s.

Notification of a product recall

If the decision is taken to initiate a Withdrawal we will notify:

- Senior management of Kraft Chemical Company, supply chain personnel
- FDA
- Anyone that has received our product, including distributors, wholesalers, manufacturers, and retailers.
- SQFI and the certification body shall be notified in writing within twenty-four (24) hours in the event of a regulatory warning. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com

If we are engaged in a Withdrawal but find that for whatever reason that it is not possible to contact all relevant consumers then we will consider expanding the Withdrawal to a Recall.

If the decision is taken to initiate a Recall we will notify:

- All people mentioned under initiation of a withdrawal, outlined above and;
- Consumers, via the media contacts included on our contact list.

The contact list must contain the contact details for the following:

- The product recall committee and senior management and key company personnel.
- Suppliers of all ingredients.
- Distribution company and business customers.
- Sources of technical advice and support including laboratory facilities.
- Regulatory authorities.

Communication



Notification in respect to the recall needs to be done promptly and should cover the following areas:

1. Regulatory Authority

We will notify the appropriate regulator at the earliest opportunity, after an incident is identified that may lead to a recall. We will supply as much information as possible, using the *Recall Summary Record*. The regulatory authority will be updated throughout the process.

2. Distribution Chain

We will notify contacts by telephone and fax or email.

3. Consumer

Communication to the consumer will be by the most effective method. It is anticipated that we will communicate with the consumer either by a media release or paid advertisement in newspapers, on radio or television. The form of media used will depend on the circumstances involved and advice received from the Regulatory Authority. We may also place notices at locations where the product has been sold.

Regaining control of affected stock

If affected stock is directed to be returned to us, then the recovered product/s will be stored in an area that is separated from any other food products. Accurate records will be kept of the amounts recovered and the codes of the product/s. If the recovered product/s is unfit for human consumption, it may be destroyed or denatured under the supervision of the company management and/or the regulatory authority where legally required.

Effectiveness of the Recall

To be effective, the product recall notification must reach as far as the product has been distributed. The effectiveness of the product recall is assessed on the basis of the amount of product returned as a proportion of the amount of product that left Kraft Chemical Company, while taking into account time in the distribution chain and the retail turnover of the product.

Progress of the product recall must be reviewed so that its success can be monitored. If it is decided that there is now little risk to the public, the product recall can be judged to have been a success and brought to an end, however if there have been few returns and little response to a high risk problem the product recall procedure must be reassessed. The product recall may have to be repeated using different methods to reach the consumer.

Testing & Reviewing the Product Recall Plan

The recall committee will review this procedure every twelve months, and the contact list will be amended as required. Mock recalls will be conducted on a bi-annual basis. The expected minimum accountability level is 99.5%. The recall planning includes a maximum time frame for performing each traceability



exercise. Failure to meet these requirements necessitates a repeat traceability exercise until the criteria is met. The maximum allotted time to complete is 4 hours. Records of these mock recalls will be documented.

Once the mock recall is completed, a review must be carried out with the relevant recall committee members to correct and improve the process where necessary.

Recall Report

We will submit a recall report to the regulatory authorities within an agreed timeframe of the closure of the recall.

