Authorized By: _____

PO Box 65029
716 Whitfield Street
Fayetteville, NC 28306-1029

Telephone (910) 484-8999
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Fresh and Frozen Food Innovators

SQF 2.6.3-B Product Recall Policy

Recall Classification
Vanguard Culinary Group, Ltd. may initiate action to regain control over product already in distribution. Actions available are:

Company Initiated Recall
A product correction or recall undertaken by Vanguard Culinary Group, Ltd. on its own initiative.

Market Withdrawal
Used when there is a minor violation that is not subject to legal action by FDA or FSIS or to remove product from distribution for other reasons such as noncompliance with internal quality specifications.

Stock Recovery
Used to recover product that has not reached retail distribution channels but is still under Vanguard Culinary Groups' direct control; either on its premises or in its warehouses (owned or contracted).

Corrective Action
Steps to repair, modify, re-label, inspect, or correct a product so it can remain in distribution. Destruction of product as needed, with regulatory concurrence.

Vanguard Culinary Group, Ltd. initiated actions require no agency notification (except when regulations dictate).

Recall Classifications

Class I Recall
Used in situations where there is a reasonable probability that use of or exposure to a product will cause serious injury.

Class II Recall
For cases in which use of or exposure to a product may cause temporary or medically reversible adverse consequences.

Class III Recall
Employed when use of or exposure to product is not likely to cause adverse health consequences.

Government Initiated Recall
Undertaken by a manufacturer at the request of a government agency; USDA or FDA. In a government initiated recall the government agency classifies the recall not the company. The company recall strategy must be approved by the government agency undertaking the recall. The agency determines when the recall is officially ended.

THE RECALL ACTION PLAN:

1. Identify the product by listing the brand name, product name, size or weight, product code, and lot number of the product involved.

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2. Develop a list of all brokers, distributors, retailers, etc., to whom the product has been shipped. Record names of businesses and the number of boxes shipped to each. Determine total of boxes/packages shipped.
3. Develop a list of the "Recall Contacts" at each business that received the suspected product, include telephone numbers. List the type of business: Broker, Distributor Wholesale, or Retail.
4. Determine the Recall Depth:
   - **Consumer Level** - This includes household consumers as well as all other levels of distribution.
   - **Retail Level** - The level that includes all retail sales of the recalled product.
   - **User Level** - This level includes hotels, restaurants, and other food service institutional consignees.
   - **Wholesale Level** - The distribution level between the manufacturer and the retailer. This level may not be encountered in every recall situation, i.e., the recalling firm may sell directly to the retail or consumer level.
5. Determine the method for disposition of the recalled product: Return to the manufacturer or destroy on premises (Only under the supervision of a company representative and with the permission of FSIS/FDA).
6. Prepare and mail Recall Notices to all accounts who received the product. Include **"URGENT"** on all notices.
   - As Seriousness Dictates, a more urgent response could be needed (i.e. Phone calls, Personal visits).
7. It may be necessary to ask wholesalers to forward the "Recall Notice" to sub-accounts, or send a list of accounts, so the company may send the notices directly.
8. Immediately notify USDA/FDA once a determination that recall action will be undertaken.

Department	Contact	Contact Information
USDA	Todd Furey	(919) 208-2945
FDA	Consumer Complaint Coordinator NC	(404) 253-1169
SQFI	N/A	foodsafetycrisis@sqfi.com
SGS	Kevin Brabant	Kevin.Brabant@sgs.com
SGS		US.food@sgs.com
SGS		au.sqf@sgs.com

9. Consider the need for and means of public notification upon initiating a recall. For example:
   - General public notification by press release through general news media, either national or local as appropriate, or
   - Public notification through specialized media, e.g., professional, trade or ethnic press, store placards or to specific customers (if known), etc.

   NOTE: Regardless of the public notification action taken by the company, FSIS/FDA will issue a press release for all recalls.

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10. Make arrangements for returning products to the plant, if applicable. Notify USDA/FDA that recalled product will be transported back to the plant and, the expected date and time of arrival.
11. Make arrangements to ship replacement product. Record number of boxes returned from each account.
12. Continue investigation to determine source/cause of problem.

RECALL MONITORING PROCEDURE AND EFFECTIVENESS CHECKS:

1. Contact all or a representative number of accounts involved in the recall by way of personal visits, letters, or telephone calls.
    - **For Wholesale Level** - Contact all, or most accounts.
    - **For Retail Level** - Contact a representative number of accounts.
    - **For Consumer Level** - Contact as many direct and sub-accounts as possible. It is impossible to contact every consumer, so make every effort to ensure that proper public notification is being disseminated to customers.

RECALL ASSESSMENT:

Vanguard Culinary Group, Ltd. is expected to regularly, and in a timely manner report the results of the effectiveness checks performed to UDSA/FDA in order to keep the Agency apprised of the status of the recall progress. The reporting frequency will be agreed upon by the company and USDA/FDA. Unless otherwise specified, the recall status report should contain the following information:

1. The number of consignees notified of the recall, the date and method of notification.
2. The number of consignees responding to the recall communication.
3. The quantity of product each consignee had on hand at the time communication was received.
4. The number and identity of consignees that did not respond.
5. The quantity of product returned or held by each consignee.
6. An estimated time for completion of the recall.

TERMINATION OF RECALL:

1. A recall will be terminated when USDA/FDA and Vanguard Culinary Group, Ltd. are in agreement that the product subject to the recall has been removed and proper disposition or correction has been made.
2. When the official recall has been terminated, the Emergency Response Division (ERD) will notify the company in writing and will modify the Recall Notification Report (RNR) to reflect the closure.

RECALL SIMULATIONS:

Vanguard Culinary is committed to being able to respond quickly and effectively to remove product from commerce when there is reason to believe that it has been adulterated or is misbranded. Therefore, the following guidelines will be used to ensure readiness:

1. A simulated (mock) recall will be conducted 4 times annually.
2. The simulated recall will be initiated by the recall coordinator.
3. The simulated recall will include a customer complaint that falls under food safety concern followed by an in-house root cause investigation report.

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4. The simulated recall root cause investigation will involve a selection of at least one lot of products that has been distributed into commerce or an ingredient that has been used to produce product(s).
5. Date and Time of the simulated recall will be known only to the recall coordinator and/or the President of Vanguard Culinary.
6. A recall simulation file will be maintained containing at least the following info:
    - ❖ Production records including all direct food contact processing records such as CCP records, metal detection records, packaging records, palletizing, and tray forms.
    - ❖ Identification and quantity of original inventory
    - ❖ Distribution records showing where product was delivered
    - ❖ Summary of simulation success and/or needed improvements

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RECALL TEAM ORGANIZATION AND FUNCTIONS

RECALL COORDINATOR
V.P. of FSQA – Jeffrey J. Gruber
Alternate – Charles Manis

1. Coordinate all activities associated with the recall action.
2. Preliminarily determines the potential hazard.
3. Notification of recall team and USDA/FDA
4. Begin Event log showing date, time, events, and actions initiated.

DISTRIBUTION
Logistics – Tommy Cook
Alternate – David Smith

1. Stop all in-transit shipment of product in question. Arrange for return of product.
2. Prepare inventory and distribution status of product showing where, when, to whom, and quantity shipped.

PRODUCTION
VP of Operations – Kenny Reidy
Alternate – Peter Manis (President)

1. Lot identification.
2. Halt production pending investigation
3. Investigate for cause, check all records.

QUALITY ASSURANCE
V.P. of FSQA – Jeffrey J. Gruber
Alternate / Mock Recall Coordinator– Daniela Garcia

1. Obtain lot ID and samples involved
2. Determine location of product(s) and place on “Hold”
3. Consult with outside Contracted Laboratory
4. Consult with regulatory agencies if applicable
5. Coordinate disposition instructions
6. Do not destroy product without FDA/UDSA observation if applicable
7. Maintain recall log

LEGAL COUNSEL
Coordinated by Charles Manis – Chairman (CEO)/Owner with appropriate legal

SPOKESPERSON
Charles Manis – President (CEO)/Owner

1. Coordinate all activities through recall coordinator
2. Handle all press releases, media
3. Prepare response to consumers
4. Answer all consumer questions

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MARKETING/SALES

R&D Manager – Lily Johnson

Sales – Per Didrikson

1. Notify Sales Brokers and Customers
2. Arrange for pick-ups at retail level
3. Arrange for credit as appropriate for customers
4. Arrange for confirmation letters to customers

BROKERS

1. Aid in contacting customers
2. Utilize sales force in actual pick ups

ACCOUNTING

Dennis Cedzo

1. Set up collection system to determine cost of recall.