PURPOSE: To communicate Gordon Food Service requirements to suppliers and chain customers regarding the initiation and management of product recalls and withdrawals for products distributed by Gordon Food Service.

SCOPE: This document applies to all suppliers, co-packers and raw material suppliers of products distributed by Gordon Food Service in the continental United States.

REFERENCES:
1) Code of Federal Regulations CFR Title 21 Food & Drugs, Part 6
2) Establishment and Maintenance of Records Under the Public Health Security and Maintenance of Records Under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002
3) FDA Reportable Food Registry

RESPONSIBILITIES:
Suppliers (including co-packers and raw material suppliers) must have comprehensive and tested traceability capability and recall and withdrawal plans to ensure their ability to respond appropriately to protect GFS customers, the consuming public and our shared business interests. It is essential that Suppliers are prepared for timely implementation of any product recall or withdrawal.

Should the need arise, suppliers (and/or authorized chain customer representative) are expected to promptly provide Gordon Food Service Quality Assurance with appropriate complete written information and instructions as detailed on the GFS Notification Form (page 3) required for us to initiate a timely and well-executed recall. An Excel version of the GFS Notification Form on page 3 can be obtained from a member of the GFS Quality Assurance upon request. Suppliers shall perform periodic mock recall exercises with their systems and procedures to ensure their recall system and actions comply with all regulatory expectations and confirm the effectiveness and readiness for a real exercise.

GFS Quality Assurance: Upon receipt of the information specified below, the designated GFS Recall Coordinator will initiate all Gordon Food Service aspects of the recall, including where appropriate, GFS Distribution Center and potentially affected customer notifications using approved communications.

PROCESS STEPS:

I. (RECALLS AND WITHDRAWALS) GFS CONTACTS: These are the only GFS contacts that should be used in the event of a recall or withdrawal. Suppliers (and/or authorized chain customer representative) are responsible to notify GFS Quality Assurance IMMEDIATELY once the recall or withdrawal action has been determined. These individuals from our Grand Rapids Quality Assurance team will coordinate subsequent recall activities for ALL GFS U.S. distribution centers and notify potentially affected customers. (Calls directly to our buyers or our distribution centers will unnecessarily delay the recall or withdrawal process.) LIVE CONTACT WITH A MEMBER OF QA IS REQUIRED FOR ALL RECALLS.

<table>
<thead>
<tr>
<th>FOOD SAFETY RECALLS – LIVE PHONE CONTACT IS REQUIRED</th>
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<tbody>
<tr>
<td>Sara Aranda: QA Systems Supervisor Ph 616-717-4631 Cell 616-644-3413 Email: <a href="mailto:sara.aranda@gfs.com">sara.aranda@gfs.com</a></td>
</tr>
<tr>
<td>Laura Pontus: QA Systems Analyst Ph 616-717-4360 Cell 616-890-8583 Email: <a href="mailto:laura.pontus@gfs.com">laura.pontus@gfs.com</a></td>
</tr>
<tr>
<td>Erica Waara: QA Manager Ph 616-717-4578 Cell 616-502-5441 Email: <a href="mailto:erica.waara@gfs.com">erica.waara@gfs.com</a></td>
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<tr>
<th>QUALITY WITHDRAWALS and HOLDS – EMAIL COMMUNICATION IS SUFFICIENT</th>
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<tbody>
<tr>
<td>Quality Assurance Mailbox N/A Email: <a href="mailto:quality_assurance@gfs.com">quality_assurance@gfs.com</a></td>
</tr>
<tr>
<td>Michelle Dammen: QA Operations Analyst Ph 617-714-4417 Email: <a href="mailto:quality_assurance@gfs.com">quality_assurance@gfs.com</a></td>
</tr>
<tr>
<td>Laura Pontus: QA Systems Analyst Ph 616-717-4360 Email: <a href="mailto:quality_assurance@gfs.com">quality_assurance@gfs.com</a></td>
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II. (RECALLS AND WITHDRAWALS) TRACEABILITY INFORMATION:
Within 2 hours of determination of a recall or withdrawal, Suppliers (and/or authorized chain customer representative) are responsible to provide a completed GFS Notification Form (page 3) to a GFS QA contact regarding the affected product(s). For recalls, this information must include the Reportable Food Registry file number for the recall.
With this information, the designated GFS Recall Coordinator will immediately notify the affected GFS Distribution Centers (and GFS Marketplace Stores) to identify and quarantine all potentially affected inventory.

**Important:** Supplier traceability information related to GFS deliveries is considered confidential and is not to be shared with anyone besides GFS or as requested by a regulatory agency.

**III. (RECALLS ONLY) CUSTOMER-LEVEL WRITTEN NOTIFICATION DOCUMENT (and MEDIA RELEASE)**

If the activity is a customer-level recall, in addition to the notification that the supplier uses to communicate to GFS as a distribution customer, the supplier is also responsible to provide to GFS a written notification whose audience will be our potentially affected customers. E-mailed word documents are strongly preferred to facilitate editing/revision resulting from the review.

*This documentation is to be provided to the designated GFS Recall Coordinator within 6 hours of the initial notification.*

Required elements of this communication include:

- The document shall appear on the supplier’s letterhead
- The document must specify:
  - The supplier’s item number (or the GFS Reorder number if the product is a GFS Brand)
  - The product description including label/brand, pack size, and UPC code.
  - The lot number(s)
- The reason for and classification of the recall
- Customer disposition instructions:
  - It is important to note that Gordon Food Service will not accept instructions to have customers return recalled product back into GFS Distribution Centers. This requirement is in place to ensure that recalled product is not inadvertently released and redistributed. Acceptable customer-level disposition instructions are:
    - Disposal/Destruction at the customer’s location, or
    - Supplier prepaid shipment instructions to return directly to Supplier
- A contact at the supplier, including a toll-free phone number, for customers who have additional questions

Examples of customer-level recall notification letters are attached for your assistance (pages 4-6).

If the recall involves retail sales of the affect product(s), then a **media release** must also be prepared utilizing the customer-level information specified above.

**Important:** Media releases involving a Gordon Food Service Brand must be reviewed by the designated GFS Recall Coordinator prior to the supplier’s release to media outlets and regulatory agencies.

**IV: (RECALLS AND WITHDRAWALS) WRITTEN PRODUCT REPLACEMENT PLAN**

In the event of a recall or withdrawal, in order to reduce the risk of product shortages or outages for GFS customers, Gordon Food Service expects the supplier company to submit a written action plan for product replacement to GFS. This written plan should ensure safe, wholesome product which is not involved or at risk of involvement in the recall or withdrawal is made available from a GFS approved source to replenish products affected by the recall or withdrawal and include timelines for delivery to each affected Distribution Center.

**V: (RECALLS AND WITHDRAWALS) SUPPLIER PROCESS CONTINUOUS IMPROVEMENT**

Following a recall or withdrawal, as directed by GFS Quality Assurance, the supplier may be required to initiate a thorough investigation of their process’ and programs as necessary and complete the GFS Vendor Complaint Resolution Process (CRP) form which will be supplied by GFS Quality Assurance. At a minimum, the investigation should include clear definition of the problem, interim containment, root cause analysis, a corrective action plan, verification of the effectiveness of the plan, and steps to prevent other future and like products from similar occurrences.

**VI: (RECALLS AND WITHDRAWALS) COST RECOVERY**

The supplier will be responsible to reimburse GFS for all GFS costs associated with the recall or withdrawals including, but not limited to time, communication costs, materials, and customer credits.
### Supplier Product Recall and Withdrawal Policy and Procedures

**Document Name:** SUPPLIER PRODUCT RECALL AND WITHDRAWAL POLICY and PROCEDURES  
**Doc. Number:** SOP0202  
**Revision No:** 24  
**Page:** 3 of 6

**Owner:** Sara Aranda, Quality Assurance Systems Supervisor  
**Created:** 6/16/2006  
**Reviewed:** 3/25/2015  
**Revised:** 3/25/2015

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**Gordon Food Service**  
**Notification Form for Product Recalls, Withdrawals, or Holds**

Please provide the following information to the Gordon Food Service Quality Assurance Team which will allow us to respond as promptly and efficiently as possible to the situation.  
Please forward this completed form to: Email: quality_assurance@gfs.com or FAX: 1-800-968-6209

We also recommend that you make live phone contact with one of our QA Team members to ensure receipt of your form and immediate response. Live contact is REQUIRED FOR ALL RECALLS.

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<table>
<thead>
<tr>
<th><strong>FOOD SAFETY RECALLS</strong> – <strong>LIVE PHONE CONTACT IS REQUIRED</strong></th>
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<tbody>
<tr>
<td>Name: Sara Aranda: QA Systems Supervisor</td>
</tr>
<tr>
<td>Laura Pontus: QA Systems Analyst</td>
</tr>
<tr>
<td>Erica Waara: QA Manager</td>
</tr>
</tbody>
</table>

**QUALITY WITHDRAWALS and HOLDS – EMAIL COMMUNICATION IS SUFFICIENT**

- Quality Assurance Mailbox: N/A  
- Michelle Dammern: QA Operations | Ph 616-717-4417 | N/A | Email: quality_assurance@gfs.com |
- Laura Pontus: QA Systems Analyst | Ph 616-717-4360 | N/A | Email: quality_assurance@gfs.com |

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**** You are required to complete an individual form for EACH affected item **

1. GFS Reorder Number (GFS Item Code) -  
2. Supplier Item Code (optional):  
3. Product Description including Lot Number(s) affected:  
4. Reason for product notification:  
5. Location of lot code on packaging  
6. Classification of this situation (see options below):

**Recall** [a potential Food Safety issue that requires: 1) quarantine of affected inventory at GFS and 2) GFS customer notification]. REQUIRED: Provide the FDA Reportable Food Registry file number (not applicable to USDA-regulated products) below:

- RFR Number (for Recall only):

**Withdrawal** or **Hold** [a quality issue (not food safety) that you wish to have us stop shipment from our distribution centers]. Checking this box means that GFS will quarantine product even if it will result in shorting customer orders.

**Inventory check** [a potential quality issue (not food safety) that you may wish to have us stop shipment from our distribution centers depending on the potential impact on filling customer orders.] If GFS has only this lot or if quarantining this lot will impact filling customer orders, then no cases will be placed on Hold.

**Your company contact to be used by GFS QA for any questions or to provide status updates:**

- Name:  
- Phone:  
- Email:  

**GFS Distribution Center(s) cross-referenced to: GFS Purchase Order #(s), shipment quantities and lot code #(#s):**

<table>
<thead>
<tr>
<th>GFS Distribution Center</th>
<th>Number - 8 digits</th>
<th>Quantity</th>
<th>Lot Code</th>
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*please insert additional rows as needed*
CUSTOMER RECALL NOTIFICATION TEMPLATE: MICROBIOLOGICAL

ON SUPPLIER LETTERHEAD

<<DATE>>

ATTENTION: FOOD SERVICE DIRECTOR

URGENT - PRODUCT RECALL NOTICE

There is a product recall involving the following items packed by <<NAME OF SUPPLIER>>:

<table>
<thead>
<tr>
<th>Supplier item #</th>
<th>GFS Reorder #</th>
<th>Product Description, label/brand and pack size</th>
<th>UPC Code</th>
<th>Lot numbers</th>
</tr>
</thead>
</table>

The recall includes these items and lot numbers only. These products are not to be consumed or served.

<<Provide the reason for the recall and any relevant epidemiology/symptom information. >>>

For example: The recall is due to the potential for these products to be contaminated with Salmonella. Symptoms of foodborne Salmonella infection include nausea, vomiting, fever, diarrhea, and abdominal cramps. In persons with poor health or weakened immune systems, Salmonella can invade the bloodstream and cause life-threatening infections. Individuals who have recently eaten these products and experienced any of these symptoms should contact their health care professional.

Please isolate any product with the listed lot numbers and destroy it in a secure manner to prevent unauthorized consumption. If you have product stored out of the case and are unsure of the code date please destroy this product also. Your distributor will be able to issue you credit.

Please note that proper procedures must be followed and these cases may not be returned to your distributor.

If you have further distributed any of this product, then you are responsible to notify all consignees of this recall.

Customers who have additional questions may contact <<CONTACT NAME>> at <<SUPPLIER’S NAME>> at 1-800-XXX-XXXX.

Thank you for your prompt attention to this situation.
CUSTOMER RECALL NOTIFICATION TEMPLATE: FOREIGN MATERIAL CONTAMINATION

ON SUPPLIER LETTERHEAD

<<<<DATE>>>>

ATTENTION: FOOD SERVICE DIRECTOR

URGENT - PRODUCT RECALL NOTICE

There is a product recall involving the following items packed by <<NAME OF SUPPLIER>>:

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<tr>
<th>Supplier item #</th>
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<th>Product Description, label/brand and pack size</th>
<th>UPC Code</th>
<th>Lot numbers</th>
</tr>
</thead>
</table>

The recall includes these items and lot numbers only. These products are not to be consumed or served.

<<Provide the reason for the recall. >>>
For example: The recall is due to the potential presence of metal shavings in these products.

Please isolate any of these items with any of the listed lot numbers and destroy it. You should keep the product container that identifies the product’s manufacture code to verify that a credit is due. If you have product stored out of the case and are unsure of the code date please destroy this product also. Your distributor will be able to issue you credit.

Please note that proper procedures must be followed and these cases may not be returned to your distributor.

If you have further distributed any of this product, then you are responsible to notify all consignees of this recall.

Customers who have additional questions may contact <<CONTACT NAME>>> at <<SUPPLIER’S NAME>>> at 1-800-XXX-XXXX.

Thank you for your prompt attention to this situation.
CUSTOMER RECALL NOTIFICATION TEMPLATE: UNDECLARED ALLERGEN

ON SUPPLIER LETTERHEAD

<<<<<DATE>>>>

ATTENTION: FOOD SERVICE DIRECTOR

URGENT - PRODUCT RECALL NOTICE

There is a product recall involving the following items packed by <<<<NAME OF SUPPLIER>>>:

Supplier item #  GFS Reorder #  Product Description, label/brand and pack size  UPC Code  Lot numbers

The recall includes these items and lot numbers only. These products are not to be consumed or served.

<<<<Provide the reason for the recall. >>>>

For example: These products are being recalled because they may contain undeclared peanuts. People who have an allergy or severe sensitivity to peanuts run the risk of serious or life-threatening allergic reaction if they consume these products. For consumers who do not suffer from a peanut allergy or sensitivity, this product is safe to eat.

Customers who do not wish to use this product due to allergy or sensitivity concerns should destroy the product and contact their distributor representative for appropriate credit. You should keep the product container that identifies the product’s manufacture code to verify that a credit is due.

OR:

Please isolate any of these items with any of the listed lot numbers and destroy it. You should keep the product container that identifies the product’s manufacture code to verify that a credit is due. If you have product stored out of the case and are unsure of the code date please destroy this product also. Your distributor will be able to issue you credit.

Please note that proper procedures must be followed and these cases may not be returned to your distributor.

If you have further distributed any of this product, then you are responsible to notify all consignees of this recall.

Customers who have additional questions may contact <<<<CONTACT NAME>>> at <<<<SUPPLIER’S NAME>>> at 1-800-XXX-XXXX.

Thank you for your prompt attention to this situation.

Description of Revision  Revisor
Updated GFS QA team contact information  Sara Aranda