FOOD SAFETY MANAGEMENT SYSTEM CODE OF PRACTICE

PRODUCT RECALL AND WITHDRAWAL

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FOOD SAFETY

Commitment to food safety is our culture

I. Overview

Many controls are taken into account when preparing a food product. Despite the best efforts to produce safe products, unsafe food or food that do not meet legislative requirements, make their way to the marketplace or consumer ends.

A food establishment should be able to identify the food that they have in the premises in order to facilitate tracing products in the event of a recall or a food incident. A product recall is triggered when a product or its ingredients is identified with any food safety hazards that have the potential to cause harm to the consumer. This could be identified before the product reaches the customers or after the product has reached the customers. Accurate retrieval of products throughout the supply chain within a limited time prevents the risk of food borne illnesses, and liability of corporate negligence that can cause significant costs.

II. Purpose

To establish a protocol on preventing the consumption of contaminated food, that could pose a health and safety risk to the consumers. Recall is required if there is a reasonable possibility that consumption of food would cause health hazards.

III. Scope

This Code of Practice is applicable to all food items catered by Emirates Flight Catering (EKFC) for airlines, lounges and Outlets in airport and commercial operations, and EKFC Customer Retailers.

This Code of Practice covers all recall circumstances mentioned in 6.1.

IV. Responsibilities

The Management team is responsible for the approval of resources required to implement this Code of Practice.

The Recall Team Leader is responsible for communicating the recall or withdrawal activity to the Recall team leader and head of departments.

The Recall team leader is responsible for initiating and executing the product recall and withdrawal exercise whether actual or mock recall.

The Recall team member from each department is responsible for implementing the product recall and withdrawal procedures. *(Refer FS-ACH-019 Product Recall Team)*

The head of respective departments is responsible for obtaining required documents and information pertaining

to their department.

The Legal Department is responsible for ensuring that all legal formalities are completed including insurance claims and for advising the Recall team for any regulatory updates.

The respective customer service team of airline clients and commercial customers are responsible for communicating with their clients in case of any products supplied to them is affected.

V. Definition

5.1 **Recall** – an action taken to remove from distribution, sale and consumption, food which may pose a health risk to consumers.

5.2 **Product Recall –** the removal of a product by a supplier from the supply chain that has been deemed to be unsafe and has been sold to the end consumer and is available for sale (GFSI v7.2:2018)

5.3 **Product Withdrawal –** the removal of a product by a supplier from the supply chain that has been deemed to be unsafe and which has not been placed in the market for purchase by the end consumer (GFSI v7.2:2018)

5.4 **Traceability** – the ability to track any food, feed, food-producing animal or substance that will be used for consumption, through all stages of production, processing and distribution.

VI. Procedure

6.1 Product Recall Circumstances

6.1.1 Internal laboratory test results detecting pathogenic microorganisms

6.1.2 Customer complaint on critical foreign object in finished or packaged product

6.1.3 Internal findings on critical product contamination defects

6.1.4 Supplier notification on their product defect

6.1.5 Notification from regulatory or legislative authorities, customer or airline client` on food recall

6.1.6 Other critical complaints for which recall is deemed necessary

6.1.7 Detecting the critical foreign objects in a food product wherein the extent of contamination is possibly high and it could result in multiple incidents of product contamination causing serious health hazard to customers

6.2 Product Recall Team

6.2.1 All product recall team members and other relevant staff should undergo training on Product Recall Code of Practice.

6.2.2 Recall team leader and team members should be appointed (Refer FS-ACH-019 Product Recall Team).

6.2.3 Contact information of Product Recall Team should be updated as often as necessary. *The contact list which includes contact information for appropriate person(s) at each food supplier, customer and regulatory or legislative authority that applies to the facility should be managed and updated by the respective Product recall team members from time to time.*

6.2.4 The Recall team member representing Commercial &Services is responsible for notifying all respective impacted customers about the food recall incident.

6.2.5 Secondary recall team members should be nominated by the recall team members in case of their absence or unavailability during the recall.

6.2.6 Recall team members should be trained to perform their assigned responsibilities, without assistance from others and they should understand how to evaluate situations or determine if a recall or other action is warranted.

6.3 Recall Team Roles and Responsibilities

6.3.1 Recall Team Leader

- Initiate the formation of the recall team
- Make recall decisions on behalf of the company in liaison with the team members
- Manage and coordinate the implementation of the company's product recall
- Activate various components within the company for priority assistance
- Keep management informed at all stages of the recall
- Assure the documentation of all recall decisions and actions are in a master file
- Ensure that recall and withdrawal procedures are completed efficiently within the specified timeline.

6.3.2 Recall Team Members

- Composed of the various functions or department of the organization
- Individual recall activities assigned prior to a recall event to avoid confusion during a recall:
    i. Notification
    ii. Tracking
    iii. Tracing
    iv. Retrieval
    v. Isolation and Quantification
    vi. Evaluation
    vii. Disposition

6.4 Recall Classification

The Recall team categorizes the recall of products based on the severity or consequence of consumption or ingestion of violated or non-conforming products. The categorization is carried out by the Recall team.

6.4.1 Class I Recall (red alert) – a situation in which the ingestion of a violative product will cause serious adverse health consequences or death (e.g., detection of pathogenic bacteria, presence of critical

foreign object like glass, metal, sharp object, etc., presence of hazardous meal ingredient, chemical contaminants or allergens).

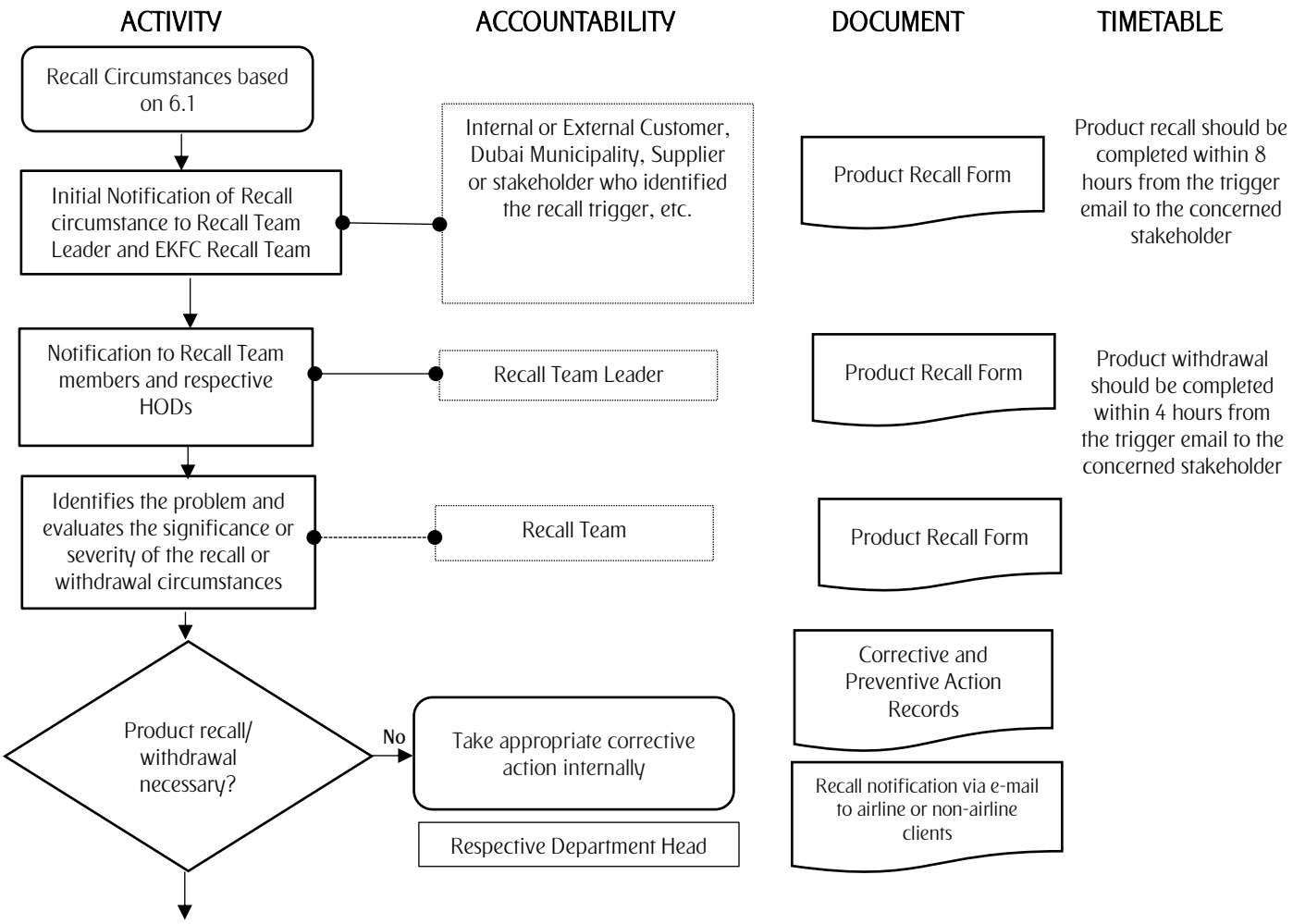
6.4.2 Class II Recall (orange alert) – a situation in which the ingestion of a violative product may cause temporary or medically reversible adverse health consequences (e.g., detection of indicator pathogens, presence of medium risk foreign objects like plastic, bone, rubber, etc., high risk items consumed after use by date, products with off odor)

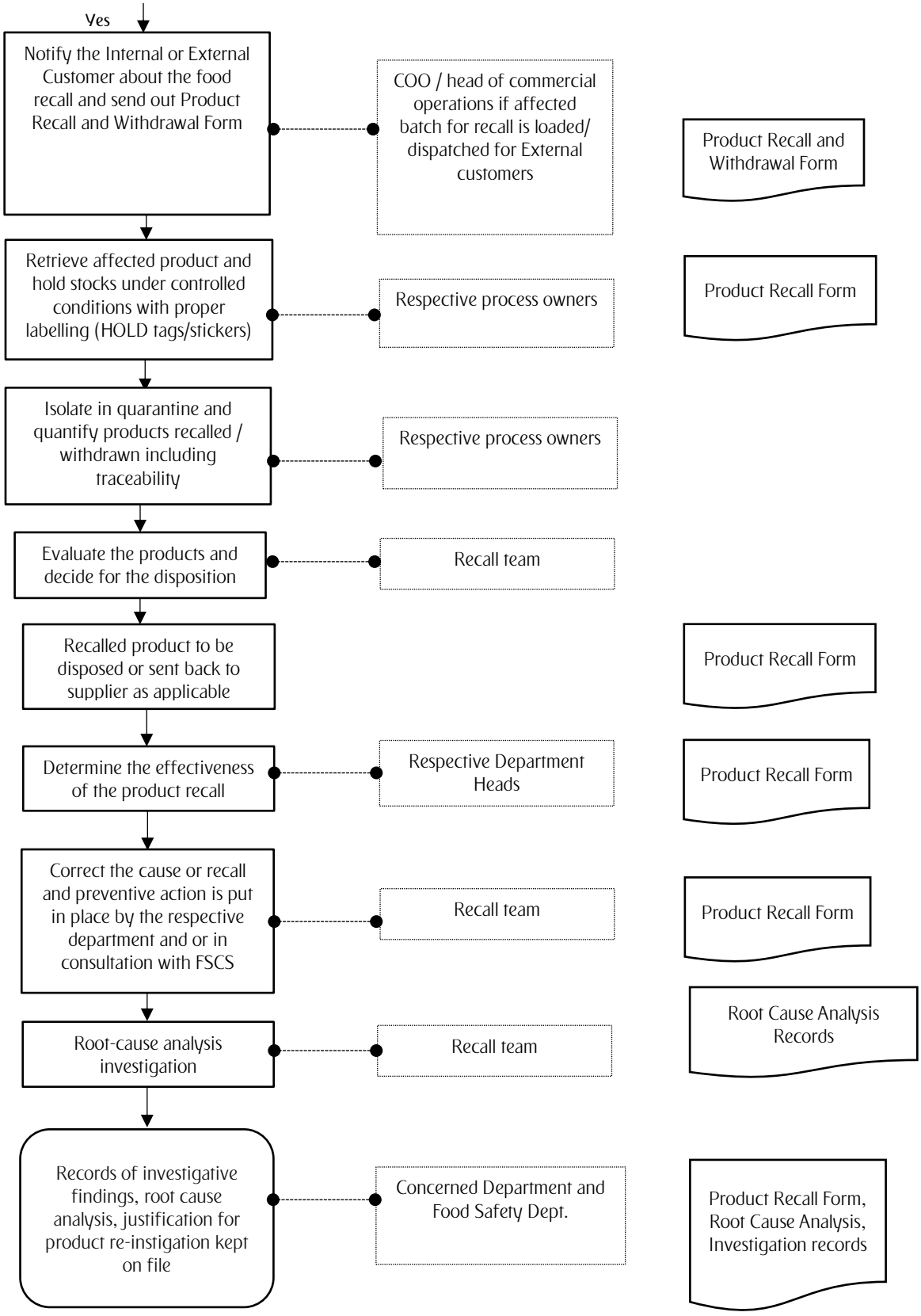
6.4.3 Class III Recall (yellow alert) - a situation in which the ingestion of a violative product is not likely to cause adverse health consequences (e.g., stored product insect in bakery products, products past expiry date or best before date, products without production details or labels).

Note: Decision as to when and if a regulatory agency will be notified should be based on the decision of the Recall team and Top Management.

Reporting any media or regulatory officials, contact customer (commercial customers such as ELR) whether the information related to media or regulatory officials are effected, this must be consulted with the customer representative.

6.5 **Product Recall Process Flow**





6.6 Timelines for Product Recall and Withdrawal

6.6.1 Products that have reached the customer's site or consumers should be recalled wherein the quantity of products dispatched and quantity available for retrieval from outlets and within EKFC should be accounted within 8 hours from the trigger email until the decision for disposition is taken.

6.6.2 Products that have not reached the customer's site or consumers or products that is still in the facility (EKFC) should be withdrawn within 4 hours from the trigger email until the decision for disposition is taken. The quantity available within EKFC should be accounted, withdrawn and isolated in quarantine area with label and properly segregated.

6.6.3 Recall system exercise should be carried out at a minimum frequency of once per year with a recommended elapsed time of 4 hours to ensure that the procedure works effectively and efficiently.

6.6.4 Results of the trials or actual recalls should be reviewed for continuous improvement.

6.6.5 For commercial clients, identified product by code date or use by date should be identified, tracked and located 100% within 4-hour period wherever its location is within the supply chain.

6.6.6 Brand or Business Unit QA or stakeholders should be notified by Email/ telephone within two hours of incident discovery (leaving a message on voicemail or sending fax without personal contact is not acceptable.

6.7 Mock Recall

6.7.1 In the event that there is no actual recall or withdrawal within the calendar year, then a mock recall should be carried out.

6.7.2 Mock recall for airline clients is restricted only within the catering facility. Therefore, only product withdrawal is affected.

6.7.3 Mock recall should be conducted at least once a year or whenever there are significant changes to the plan or personnel.

6.7.4 The mock recall or withdrawal should include the following elements:

- Select a product which has reached the dispatch chillers – for airline clients
- Select a product which has reached the consumer market – for outlets or commercial clients
- Track and trace the product from the finished product to the raw ingredient (e.g. source)
- Verify the communication systems (e.g., contact information, test emails, etc.) to outside contacts
- Modify the recall or withdrawal plan to correct any problems encountered during mock recall
- All stakeholders should be notified that the exercise is a mock recall or mock withdrawal.

6.7.5 Annual mock recovery for specific commercial clients should be available (either ingredient or food contact packaging) completed from forward distribution (first external customer) back to ingredients, including grower where applicable.

6.7.6 Elements of the commercial client mock recovery should include:

6.7.6.1 Identification of which raw ingredient or packaging material traced, including summary of calculations (<99.5% or >105% of product recovered is classified as failure).

6.7.6.2 Date and time test initiated and completed.

6.7.6.3 Overview of records reviewed to obtain the amounts of product involved.

6.7.6.4 Completed Product Information Data Sheet or similar document as long as all relevant information is captured.

6.7.6.5 Documented review by the Recall Team of the test's effectiveness including amount of product recovered, outcomes, learning, issues and opportunities to improve system.

6.7.6.6 Mock recall should be completed within 4 hours.

6.7.6.7 In addition for bulk ingredients such as products stored/ received in silos, all the lots and quantities that were stored in that silo since the last detail clean up (silo was emptied and cleaned) within 4 hours.

6.7.6.8 There should be retesting for any part of the mock recovery that fails within 60 days.

6.7.7 Traceability exercise outside should be considered as well on weekends, holidays and outside normal business hours.

6.8 Disposal of Food

6.8.1 Products recalled or withdrawn that are found unsafe or unsuitable for consumption should be isolated or identified properly in quarantine areas. Please refer to FS-COP-PRP-025 Control of Nonconforming Products for details.

6.8.2 Decision on disposal of isolated or withdrawn product should be based on the evaluation and consultation of the Recall Team. Whenever applicable, local regulatory bodies should be contacted for the safe disposal of affected products.

6.8.3 Such food should be disposed of as quickly as possible and should never be used for human consumption.

6.8.4 If the affected product needs to be returned to the supplier, it should be returned as soon as possible with documentation of its status.

6.8.5 Details of rejected items should be documented and communicated to the supplier.

6.8.6 Legal formalities related to the product disposal or return to supplier should be completed by the Procurement and Supply chain department in liaison with the Legal department.

6.8.7 If applicable, there should be retained samples which can be used for inspection if specified by the customer or Product Recall team.

6.9 Corrective Action

6.9.1 Affected products for commercial customers should be replaced and responsibility for all documentation regarding reconciliation of quantities shipped, recovered, replaced and/or destroyed.

6.9.2 A complete, documented root-cause analysis should be undertaken in each case of product recall caused by the caterer.

6.9.3 If a food recall or mock recall identifies that food recall procedures are not appropriate, or any non-compliance with the requirements of this Code of Practice, appropriate and timely corrective actions should be documented.

6.9.4 All recalls or withdrawals should be documented with outcomes, root cause analysis, corrective actions and learning recorded.

VII. Documents

7.1 FS-COP-PRP-026-FRM-01 Product Recall and Withdrawal Form
7.2 FS-COP-PRP-025-FRM-01 Product Nonconformance Report
7.3 Root Cause Analysis Reports
7.4 Corrective and Preventive Action Reports
7.5 Wastage Records
7.6 Return to Supplier Records
7.7 SCS Form 70 – Material Return to Supplier Form

VIII. References

8.1 British Airways, Global Technical Standards for Inflight Caterers and Airport Lounges, Version 1.2, 12 April 2023.
8.2 Dubai Municipality Food Code 2.0, Final Draft 12 July 2023.
8.3 IFSA World Food Safety Guidelines for Airlines Catering, Version 5, 2022
8.4 ISO TS 22002-2. First Edition 2013-01-15. Prerequisite Programmes on Food Safety – Part 2: Catering
8.5 QSAI Catering Quality Assurance Programme, Food Processing Safety and Interpretation Guidelines, Version 10.0, 01 Jan 2019
8.6 FSSC 22000 Scheme Version 6.0, April 2023.
8.7 NSF Supplier Assurance Food Manufacturing (HACCP/Food Safety Plan and GMP) Audit Standard Program Requirements Manual Rev 02 May 2023

IX. Attachments

9.1 Product Recall Team

Refer attachment FS-ACH-019 Product Recall Team

9.2 Recall Contact List from External Groups

POSITION	NAME	CONTACT INFORMATION
Director of Food Safety Department, Dubai Municipality	SULTAN AL TAHER	Work: 055 440069
Up to date list of airline and retail customers is retained at COO/ SM Customer Service/ CCO office.		
Up to date list of commercial customer is retained by Customer Development team.		

X. Document Control

This is a controlled document. The copy of this document is issued according to the distribution list in FSSC 22000 Masterlist of Controlled Documents (MCD).

XI. Appendix

11.1 Hazard Identification and Risk Analysis

SN	HAZARD TYPE	HAZARD IDENTIFIED	RISK IMPACT
1	Microbiological	Cross contamination, multiplication and survival of pathogens	Adverse health effects if contaminated food is ingested
2	Physical	Foreign objects contamination in the food item	Presence of critical foreign objects can cause choking, bleeding or laceration
3	Chemical	Cross-contamination of toxic substances or cleaning chemicals	Presence of toxic substances during packaging or cleaning chemicals during cleaning can cause food poisoning or adverse health effects
4	Allergen	Allergenic materials	Presence of allergenic ingredients, undeclared allergens can cause adverse health consequences or death