Application for Food Establishment Permit

Alaska Department of Environmental Conservation
Division of Environmental Health
Food Safety and Sanitation Program

Permit ID: _____

Section 1- GENERAL INFORMATION *(All applicants complete entire section – please print).*

Purpose (check one) ☐ New ☐ Information Change ☒ Extensive Remodel ☐ Change of owner/operator ☐ Reactivate

Owner/Business Information

Name of Entity or Owner Responsible for Food Service: Axion Enterprises, LLC / James M.P. Thornton		AK Business License #: 1052541	
Business/Corporate Mailing Address: PO BOX 1611	City: Girdwood	State: AK	Zip: 99587
Business/Corporate Phone: 907-952-7070	Email: James@alaskaraw.com		
Owner(s) or Corporate Officer(s) & Title(s) or Responsible Party: James M.P. Thornton - Managing Member		Fax:	

Type of Entity ☐ Individual ☐ Partnership ☐ Corporation ☒ Other: LLC

Establishment Information

Establishment Name: Secret Garden Cannabis	Physical Location: 726 E. 15th Ave.	Nearest Community: Anchorage	
Establishment Mailing Address: PO Box 1611	City: Girdwood	State: AK	Zip: 99587
Establishment Phone: 907-952-7070	Fax:	Contact Person: James M.P. Thornton	
Establishment Physical Address: 726 E 15th Ave #3	City: Anchorage	State: AK	Zip: 99501

SEATING: (Food Service Only) ☒ N/A ☐ 25 or less ☐ 26-100 ☐ > 101

TYPE OF OPERATION *Please describe the type of facility you plan to open below (i.e. restaurant, bar, grocery store, etc.)*

Marijuana Product manufacturing facility

SECTION 2 – NEW OR EXTENSIVELY REMODELED FACILITIES

a. A plan review will be required if your facility has never been permitted by the Alaska's Food Safety and Sanitation Program; has not had an active permit in the last five years; will be extensively remodeled; or is a new construction. If any of these apply, a Plan Review Application is required to process your application. Have you attached the Plan Review Application? ☒ Yes ☐ No

SECTION 3 – COMPLETE FOR ALL FOOD ESTABLISHMENTS *(Check all that apply)*

FOOD SERVICE ESTABLISHMENTS

a. A copy of your menu will be required. Have you attached a copy of the proposed menu? Yes ☒ No

b. Attach appropriate label, placard, or menu notation for the consumer advisories if you serve:
☐ Wild Mushrooms ☐ Unpasteurized juices ☐ Farmed halibut, salmon, or sablefish
☐ Raw/undercooked animal foods such as beef, shell eggs, lamb, pork, poultry, seafood, and shellfish.

c. Methods of food preparation (check the one that most closely describes the establishment:
☒ Assembly of Ready to Eat Foods ☐ Cook and Serve
☐ Hot or cold Service for 2 hours or more is done
☐ Complex (Preparation 1 day or more in advance, cooling and reheating is done).

d. Style of Service: ☐ Counter Service ☐ Self Service (i.e. buffet line, salad bar) ☐ Table Service
☒ Other: delivery to retail establishments (wholesale)

e. Do you plan to operate as a caterer? ☐ Yes ☒ No
If **yes,** list all the equipment used to protect food from contamination and maintain product temperature during:
Transportation: Hot or Cold Holding:

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MAY 30 2017
State of Alaska DEC
Food Safety Program

Permit ID(s)_____ Establishment Name(s)_____

f.	Will your food establishment be a Kiosk or mobile unit ?	☐ Yes	☒ No
	Are employee toilets available within 200 feet? *If you have an agreement with another business to use their restrooms, please attach written verification.*	☒ Yes	☐ No
	Portable water tanks, plumbing, and hoses are NSF or FDA approved components?	☐ Yes	☐ No
	If you have a kiosk, is it located outside of a building?	☐ Yes	☐ No
	Will you have a service provide water or remove wastewater? *If yes, provide a letter of agreement from water hauler or wastewater hauler outlining services provided and frequency.*	☐ Yes	☐ No
g.	Will another permitted food establishment (commissary) provide support to your facility? If yes, attach a copy of the Commissary Agreement	☐ Yes	☒ No

Food Processors

a.	A copy of a label for each type of product you will produce is required. Have you attached food labels of each product to be produced?	☐ Yes	☒ No
b.	Describe who you will be distributing your product to (i.e. grocery stores, etc): retail marijuana establisments		
c.	Will you be doing any of the following processes? Check all that apply. ☐ Reduced Oxygen Packaging ☐ Smoking ☐ Other: ☐ Low Acid Canned Foods ☐ Curing ☐ Shelf Stable Acidified Foods ☐ Dehydrating *Be sure to check with your local Environmental Health Officer for any applicable forms and FDA requirements.*		
d.	Do you have a HACCP Plan? *Required for high hazard food processors such as smoking, curing, acidifying, dehydrating, thermally processing low acid foods, reduced oxygen packaging, etc.*	☒ Yes	☐ No ☐ N/A
e.	You are required to have a product coding system and a recall plan. Have you attached a copy of the coding system and recall procedures?	☒ Yes	☐ No

Mobile Retail Vendor Selling Seafood

a.	A list of products that you will be selling is required. Have you attached a copy of the list of products?	☐ Yes	☒ No
b.	Provide names of suppliers where you will be purchasing your product:		
c.	Will ***all*** of your product be prepackaged?	☒ Yes	☐ No
d.	Will another permitted food establishment (commissary) provide support to your facility? If yes, attach a copy of the Commissary Agreement	☐ Yes	☒ No

Machines Vending Potentially Hazardous Foods

a.	Have you attached the label that will be affixed to the front of each machine with name, physical address, and phone number of the permitted food establishment servicing the machine?	☐ Yes	☐ No

SECTION 4 – Food Managers Certification/Alaska Safe Food Worker Card

a.	Have you attached a copy of a Food Manager's Certification? *The operator of a food establishment that serves and prepares unwrapped or unpackaged food, except for a bar, tavern, or limited food service, must have at least one Certified Food Protection Manager who is involved in the daily operations of the establishment.*	☒ Yes	☐ No	☐ N/A
b.	Does everyone who works or will work at the food establishment have a Food Worker Card? *An operator of a food establishment shall keep on file a copy of the Food Worker Card issued by the department for each employed food worker and make the copy available to the Department upon request.*	☒ Yes	☐ No	☐ N/A

I declare, under penalty of unsworn falsification, that this application (including any accompanying statements) has been examined by me and to the best of my knowledge and belief is true, correct, and complete. I agree to pay all fees before operating.

Applicant's Signature James Thornton **Date** 5/10/17

Applicant's Printed Name James Thornton **Title** owner

Plan Review Application

Alaska Department of Environmental Conservation
Division of Environmental Health
Food Safety and Sanitation Program

Permit ID: _____

Section A- General Information *(All applicants complete entire section – please print).*

Purpose (check one) ☐ **New Construction** ☒ **Remodel of Existing Structure** ☐ **Reactivation**

General Information		
Establishment Name: Secret Garden Cannabis		Date 5/23/2017
Plan Review Contact Name James M.P. Thornton		
Phone Number 907-952-7070	Email jamesmaskaraw.com	
Address PO Box 1611 Girdwood AK 99587		
Operating Days/Hours 9-5 Mon-Sun	Proposed Opening Date September 1	

If you are proposing to build a new food establishment or extensive remodeling of an existing food establishment in Alaska (except in the Municipality of Anchorage), you must submit a **completed Plan Review Packet 30 days prior to construction.** Additional information regarding calculations and drawings can be found in the Plan Review Guide.

Please Note: Failure to provide all the required information may delay the plan review process and permit issuance.

REQUIRED DOCUMENTATION LIST (*Include the following in your packet*)

- ☒ Food Establishment Application
- ☐ Fees
- ☒ Plot Plan
- ☒ Floor Plan
- ☒ Plumbing Schematic
- ☒ Complete list of equipment (including manufacturer's specifications)

SECTION B – REQUIRED DOCUMENTATION

a. **Potable Water Supply.** Have plans been submitted to the Drinking Water Program as required by 18 AAC 80?
☐ **Yes*** ☐ **No** ☒ **N/A** (Municipal Water Supply) ***Specify in comments.***
Comments: Municipal water supply

Attach a confirmation email or letter from the Drinking Water Program stating that the system has been approved.

b. **Wastewater Disposal System.** Have plans been submitted to the Wastewater Program as specified by 18 AAC 72?
☐ **Yes*** ☐ **No** ☒ **N/A** (Municipal System) ***Specify in comments.***
Comments: Municipal Water Supply

Attach a confirmation email or letter from the Wastewater Program stating that the system has been approved.

c. **Solid Waste Disposal.** Please describe how you plan to dispose of your solid waste:
All marijuana waste will be made unusable according to AA 306.740. All solid waste will be disposed of by municipal solid waste disposal service.

d. **Plot Plan.** Have you included a detailed to scale drawing of the plot plan including: ☐ **Yes** ☐ **No**

- ☒ All buildings
- ☒ Refuse storage site
- ☒ Potable water supply
- ☐ Outside walk-in cooler(s)/freezer(s)
- ☐ Outside storage areas
- ☐ Oil/Fuel tanks
- ☒ Access for deliveries
- ☐ Sewage disposal system
- ☒ Identify nearby roads, streets, other landmarks, and/or give GPS coordinates

Permit ID(s)_____ Establishment Name(s)_____

e. **Floor Plan.** A floor plan with the listed components must be submitted as part of the application packet. Have you included a floor plan? ☒ Yes ☐ No

- ☒ Layout and purpose of each room
- ☒ Location of fixed equipment and plumbing features
- ☒ Size, construction, and design of fixed equipment
- ☒ Location of restrooms, including the number of toilets and handwash sinks.
- ☒ Type and location of lighting
- ☒ Type and location of ventilation, both building and local systems

f. **Plumbing Schematic.** A plumbing schematic with the listed components must be submitted as part of the application packet. Have you included a detailed drawing of the plumbing schematic? ☒ Yes ☐ No

- ☒ Plumbing schematic showing each hot, cold, and wastewater line.
- ☒ Plumbing connection to the wastewater line (direct vs. indirect)
- ☒ Hot water capacity

Have you contacted the State Plumbing Inspector? ☐ Yes ☐ No

G **Fire Marshall.** Have you contacted the State Fire Marshall? ☐ Yes ☒ No

Please describe your ventilation/hood system:

No range/stovetop will be used. Adequate ventilation will be provided by facility HVAC system

SECTION C – ADDITIONAL INFORMATION

a. **Storage.** How often will you receive food deliveries? Do you have adequate storage to support your operation? Consult the Plan Review Guide for information about storage capacity.

Marijuana deliveries will be made from an adjacent cultivation facility w/ adequate storage facilities on a daily basis depending on batch sizes. Food deliveries for production will be made on a weekly basis.

b. **Dressing Rooms and Locker Rooms.** Describe how employee clothing, belongings, etc will be stored:

Employee locker/dressing rooms are located in adjacent cultivation facility. Adequate employee storage for belongings will be provided.

c. **Poisonous/Toxic Materials.** Describe location and means to store poisonous or toxic materials:

Toxic cleaning chemicals will be stored near the sink in a dedicated storage cabinet seperate from consumable products.

d. **Floors/Walls/Ceilings.** Describe how the floors, walls, ceilings, and shelving will be finished (tile, paint, etc):

Floors will be finished as hard, smooth, non-absorbent material. Walls will be covered w/ vinyl or stain less steel sheeting or wainscotting. Ceilings will be finished w/ smooth, glossy painted drywall.

e. **Warewashing:** Describe how dishes, utensil, and equipment will be washed:

Dishes, utensils, and equipment will be washed in conformance to SOP SSOP 301 & 302, using FDA approved sterilization solution in water above 110F. A 3 compartment sink will be used.

f. **Linens.** Describe how soiled and clean clothing/linens will be stored and where they will be cleaned:

Soiled non-disposable clothing/linens will be stored temporarily in a receptacle near the sink and cleaned by a third party cleaning service weekly.

SECTION D

I declare, under penalty of unsworn falsification, that this application (including any accompanying statements) has been examined by me and to the best of my knowledge and belief is true, correct, and complete. I agree to pay all fees before operating.

Applicant's Signature James Thornton **Date** 5/24/17

Applicant's Printed Name James M. Thornton **Title** OWNER

High Production Series

5000psi Dual-Phase Pumping System

Specification Sheet

SYSTEM SPECIFICATIONS:

Extraction Vessel

- **Multiple vessel configurations available:** two 5 liter, two 20 liter, or two 40 liter vessels.
- **Volume:**
  - 5L vessel holds up to 3 pounds of dry, ground material
  - 20L vessel holds up to 12 pounds of dry, ground material
  - 40L vessel holds up to 24 pounds of dry, ground material

  NOTE: vessel does not need to be full in order to perform an extraction.
- **Pressure** – maximum pressure = 5000 psi (344 bar).
- **Temperature** – max 160F (71C)
- **Materials** – 304 stainless steel. Vessel interior is polished to food grade level.
- **Closures** – Threaded closure
- **Sealing mechanism** – self energized O-ring seals, Buna-90
- **Filter** – integral filters on closure heads. 20-micron standard, other sizes available.
- **Temperature measurement** – internal K type thermocouple senses actual extraction temperature
- **Jacket volume** – 5L vessel: 18 Liters (4.8 gallon), 20L vessel: 4.5 Liters (1.2 gallon)
- **Safety** – non-isolable spring loaded safety relief valve prevents accidental over-pressurization

CO2 Pumping System

- **Flowrate** – up to 2.5L/min flow
- **Construction** –Electrically driven diaphragm compressor and Variable Frequency Drive controlled liquid pump
- **Materials** – all wetted parts are 316 stainless steel
- **Filter** – suction side of gas pump filtered to keep oil and contaminants from internal pump components
- **Safety** – non-isolable spring loaded safety relief valve prevents accidental over-pressurization

Separators

- 2 separators on each unit.
- **Volume:** Separator 1 = 5L, Separator 2 = 2.5 Liters
- **Pressure** – Maximum pressure = 600 psi (41 bar).
- **Temperature** – up to 160F (71C)
- **Materials** – 304 stainless steel
- **Closures** – FDA sanitary style bolted
- **Sealing mechanism** – sanitary gasket, cured silicone
- **Safety** – non-isolable spring loaded safety relief valve prevents accidental over-pressurization

Separation Mechanism

- Valveless Expansion Technology (VET) –Separation occurs in 1st separator utilizing centrifugal separation and depressurization. Uses cold separation technology to preserve integrity of extracted oil

Heat Exchanger

- **Construction** – tube in tube style
- **Materials** – 304 stainless steel
- **Cooling/Heating media** – water

Chiller/Heater

- Two temperature zones using recirculating chiller/heater
- Temperature range: -10C to 50C (14F to 158F)

Dimensional Information

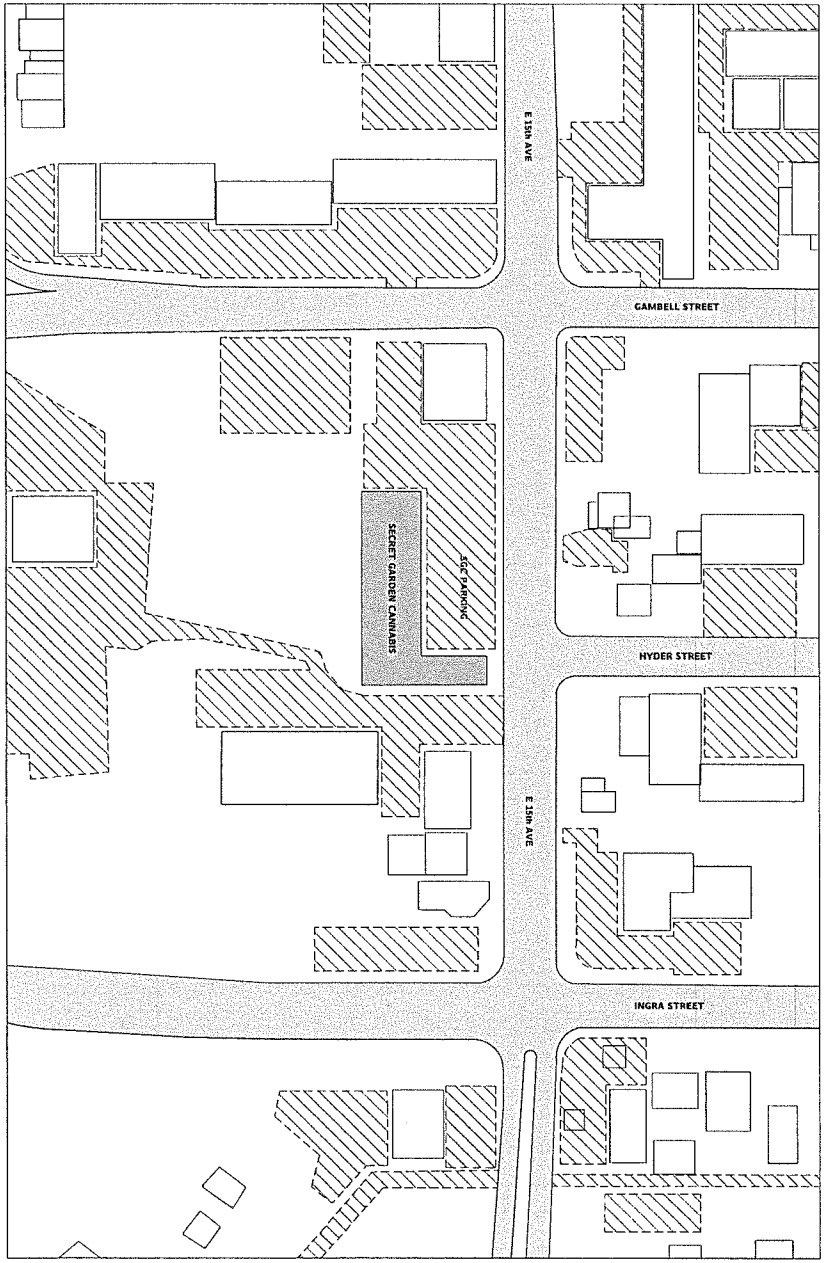
- Click here for the 5000DP-5Lx5L footprint
- Click here for the 5000DP-5Lx20L footprint
- Click here for the 5000DP-20Lx20L footprint
- Click here for the 5000DP-40Lx40L footprint

Control System

- **Functions** – Fully automatic Programmable Logic Controller (PLC) touch screen interface with first level safety functionality and user programmable pressure, temperature and time. Also has built in hour and maintenance timers, email messaging, data logging, and remote monitoring
- **Safety** – pressure transducers monitor system pressure and shut down system to prevent accidental over-pressurization

EY Entrepreneur Of The Year
2016 Award Winner

apeks® SUPERCRITICAL
The Power of CO_2 Extraction



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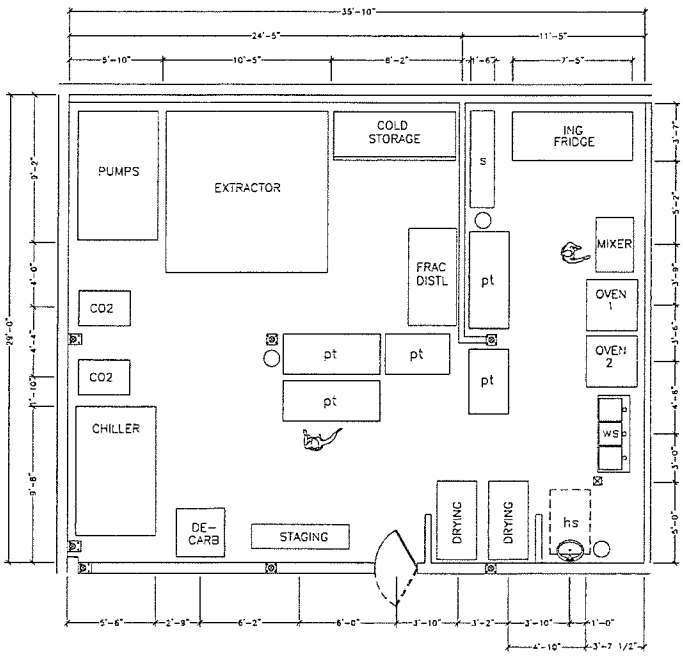

○	REFUSE / WASTE RECEPTACLE
PUMPS	DRUK ENGINEERING HII-5L-DD-30 & 925-2214 OR EQUIVALENT*
EXTRACTOR	APEKS SUPERCRITICAL 5000-20LX20L EXTRACTOR*
COLD STORAGE	ARCTIC AIR AF-72 FREEZER, 72 CU FT*
s	ULINE H-5455 WIRE SHELVING FOR DRY STORAGE, ~72 CU FT*
ING FRIDGE	VORTEX V-2R REFRIGERATOR, 72 CU FT*
CO2	AIRGAS CO2 6-PACK, 1,800 CU FT
FRAC DISTL	ROOT SCIENCES VKL 70-5 SHORT PATH EVAPORATOR*
pt	ULINE STAINLESS STEEL PREP TABLE, 72X30 & 48X30*
MIXER	HOBART HL800-1STD COMMERCIAL PLANETARY MIXER*
OVEN	2X VULCAN VC44GD-NAT OVENS*
CHILLER	DIMPLEX THERMAL SOLUTIONS SVI-10,000-M WATER CHILLER*
ws	GRIFFIN PRODUCTS MODEL T60-388 WARE WASHING SINK*
DE-CARB	VULCAN VC33ED ELECTRIC DECARBOXYLATING OVEN*
STAGING	ULINE H-5455 WIRE SHELVING FOR EXTRACTION STAGING, ~72 CU FT*
DRYING	2X REGENCY 600PR20316K COMMERCIAL BUN RACKS*
hs	AMERICAN STANDARD 0356.015 HAND WASH SINK*

* EQUIPMENT SUBJECT TO MANUFACTURER CHANGE UPON FINAL REVIEW. SPECIFICATIONS ARE TO BE CONSIDERED EQUIVALENT.

SECRET GARDEN CANNABIS
726 EAST 15TH AVENUE
DEC MANUFACTURING
FACILITY FLOOR PLAN

NO	REVISION	DATE
	REVISION 2	170528

726 E 15TH AVENUE
ANCHORAGE, AK 99501
61°12'36.5"N
149°52'48.5"W

DRAWN BY: AJ HERNDON
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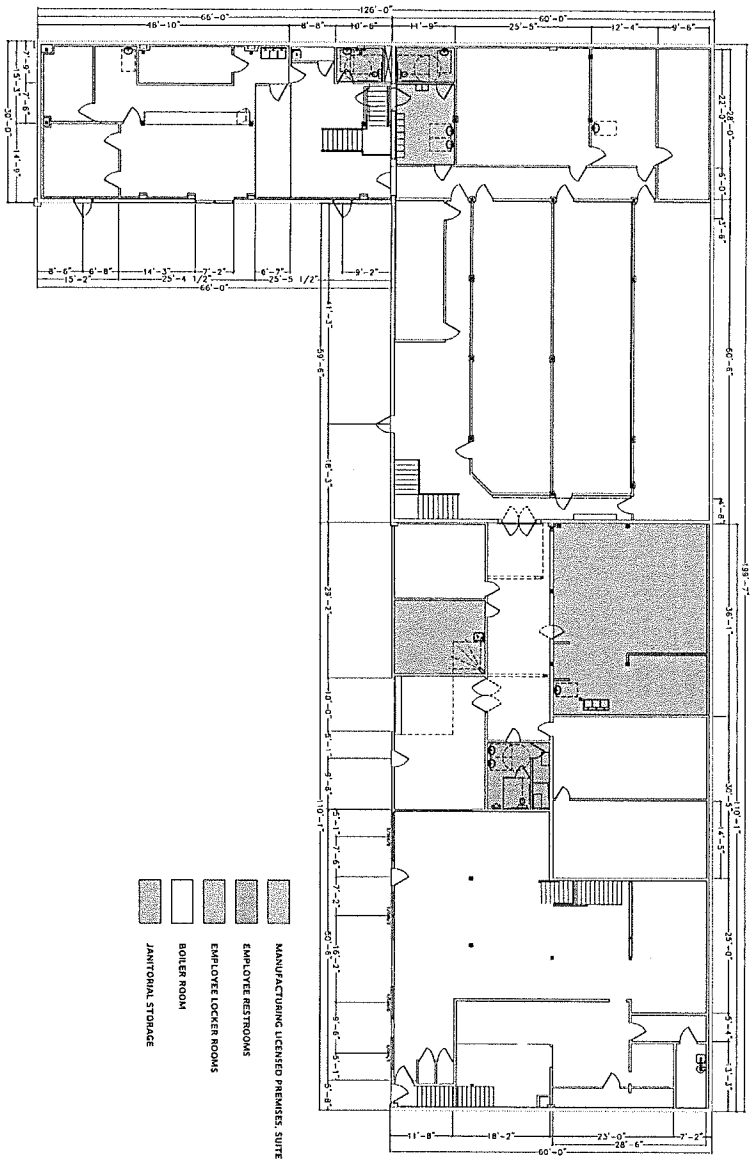
FILE NAME:
SCALE: NOT TO SCALE
SHEET: 2/6



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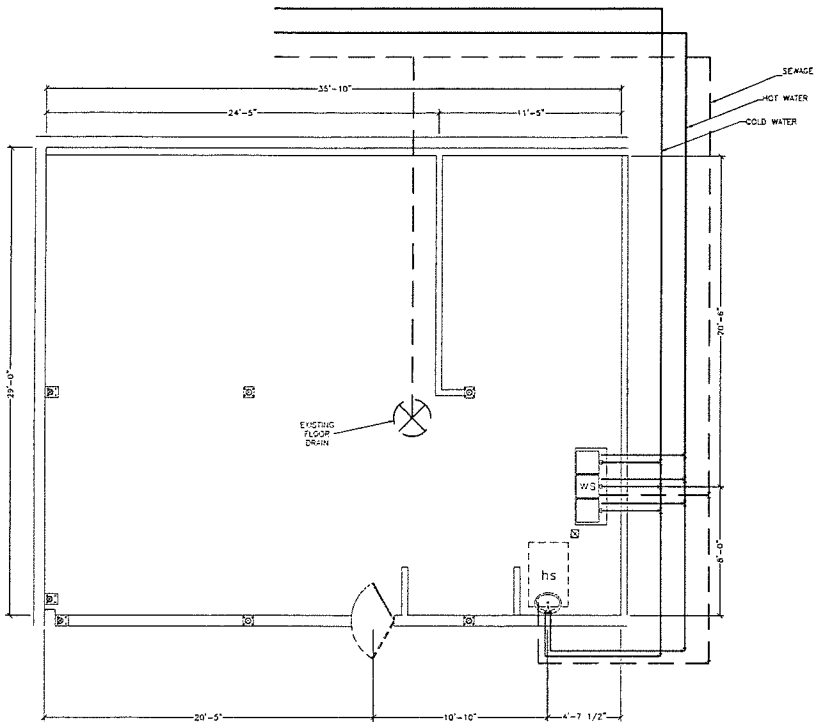


PLUMBING SCHEDULE

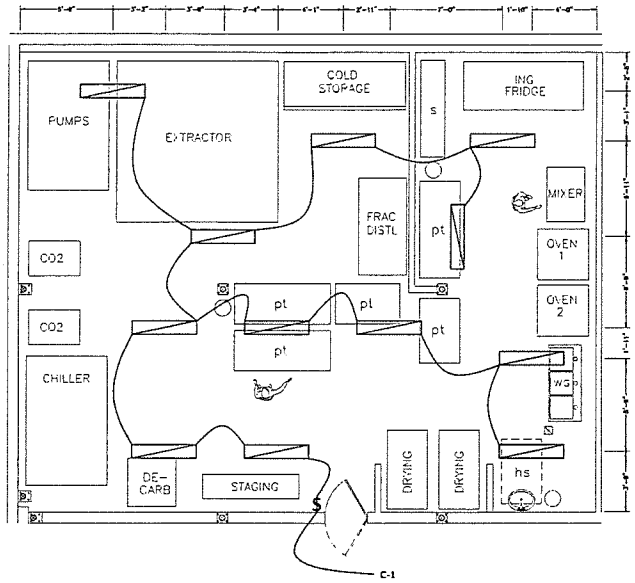
SYMBOL	DESCRIPTION	QTY
H / C	FITTINGS	TBD
	1/2" COPPER PIPE OR EQUIVALENT TO CODE	28 FT
	3/4" COPPER PIPE OR EQUIVALENT TO CODE	> 55 FT
	2" ABS DRAIN PIPE	> 74 FT

SECRET GARDEN CANNABIS
726 EAST 15TH AVENUE
DEC MANUFACTURING
PLUMBING SCHEMATIC

NO	REVISION	DATE
	REVISION 2	170518

726 E 15TH AVENUE
ANCHORAGE, ALASKA 99501
61°13'26.9"N
149°52'50.9"W

DRAWN BY: ALF THOMPSON
DATE: 170509
FILE NAME:
SCALE: NOT TO SCALE
SHEET 4/6



48" LED LUMINARY

S LIGHT SWITCH

LUMINARY SCHEDULE

QTY	DESCRIPTION	MAKE/MODEL	VOLTAGE/WATTAGE	LUMENS	MOUNTING
12	4' LED WRAPAROUND	LITHUANIA LBL4LF840*	120-227 / 50	4,000	CEILING MOUNTED

* EQUIPMENT SUBJECT TO MANUFACTURER CHANGE UPON FINAL REVIEW, SPECIFICATIONS ARE TO BE CONSIDERED EQUIVALENT.

SECRET GARDEN CANNABIS
726 EAST 15TH AVENUE
DEC MANUFACTURING
LIGHTING SCHEMATIC

NO	REVISION	DATE
	REVISION 2	1/22/26

726 E 15TH AVENUE
ANCHORAGE, AK 99501
61°12'38.5"N
149°52'08.9"W

DRAWN BY: ALF SHERWOOD
DATE: 1/22/26
FILE NAME:
SCALE: NOT TO SCALE
SHEET: 5/6

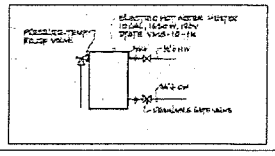
BOILER SCHEDULE

NOTES:

- EXISTING BOILER TO SERVICE MANUFACTURING AND ADJACENT WASHROOMS
- UNIT SPECIFICATIONS PENDING INSPECTION
- A UNIT WITH COMPARABLE SPECIFICATIONS MAY BE SUBSTITUTED FOR THE UNIT DESCRIBED BELOW AT THE TIME OF INSTALLATION

MANUFACTURER SPECIFICATIONS:

MODEL	TBD
STORAGE CAPACITY	10 GALLON
HEATING CAPACITY	TBD
HOT WATER DEMAND	15



SECRET GARDEN CANNABIS
726 EAST 15TH AVENUE
DEC MANUFACTURING
HOT WATER SCHEDULE

NO.	REVISION	DATE
	REVISION 2	170225

726 E 15TH AVENUE
ANCHORAGE, AK 99501
61°12'36.4"N
149°52'08.9"W

DRAWN BY: ALF / SHANNON
DATE: 170509
FILE NAME:
SCALE: NOT TO SCALE
SHEET: 6/6

TRAINING ACHIEVEMENT PROGRAM

TAP Series, LLC

Certificate Of Achievement

It is hereby certified that on May 09, 2017

James Thornton

having successfully completed the course of study

Municipality of Anchorage Food Handler

was awarded this certificate of achievement

This certificate is only valid for the person printed above.
Certificate is valid for three years from the date of issuance.

George Roughan, President
TAP Series, LLC

20-228829

Rose Obetz PhD.

info@tapseries.com To verify this certificate, go to tapseries.com/verify
(888) 826-5222

Municipality of Anchorage
Food Handler Card

To verify card, go to tapseries.com/verify

Name: James Thornton

Date: May 09, 2017

Number: 20-228829

This certificate is only valid for the person printed above.
Card is valid for three years from the date of issuance.
(888) 826-5222 info@tapseries.com

TAP Series

HACCP PLAN

Company Name: Secret Garden Cannabis
726 E 15th Ave Suite 3
Anchorage, AK 99501

Approved by:

Name: _____
Position: _____
Contact: James@SecretGardenAK.com

Sign: _____
Date: ___/___/___

Contents:

Process Flow Diagrams_____2

Hazard Study_____3

Critical Control Points_____6

Sanitation Standard Operating Procedures____7

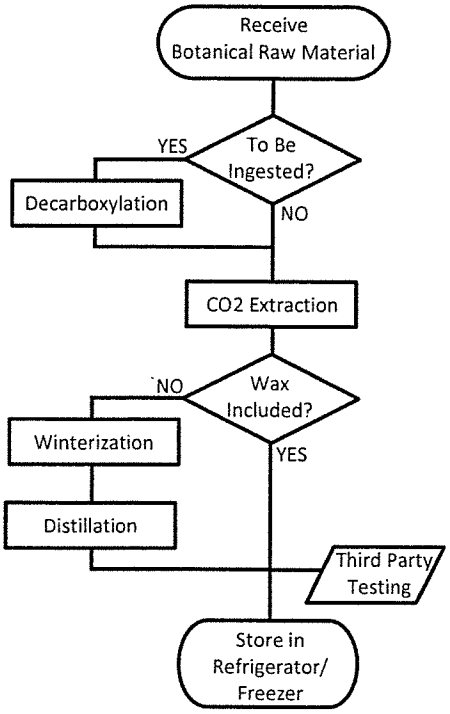
What is Covered by This Document:

PROCESS	PRODUCTS
Kief:	Kief
Rosin Press:	Rosin
CO2 Extraction:	Wax, Crumble, Shatter, Oil
Baking:	Snickerdoobie, Super Baked Alaska, Greenhouse Special, Pot Brownie
Preparing/Infusing:	THC Truffles, Secret Honey Sticks, High Hard Candy, Comatose Carmels, Secret Tincture, Secret Garden Gummie, Chocolate Bar

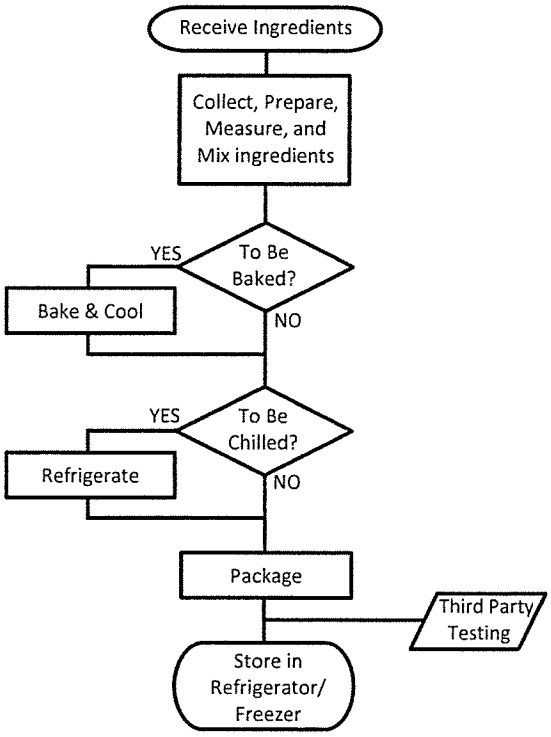
References: "Guidebook For the Preparation of HACCP Plans", US Department of Agriculture Food Safety and Inspection Service, April 1997

Process Flow Diagrams

CO2 Extraction



Baking/Preparing



Hazard Study

PROCESS STEP*	HAZARD**	PREVENTATIVE MEASURE	CCP
1 – Receive	B1 - Presence of biological pathogens on botanical raw material C1 - Presence of fertilizers/pesticides on botanical raw material C2 - Presence of hazardous chemicals on product ingredients P - N/A	B1 – Confirm and record results of biological pathogen testing from state licensed testing facility on botanical raw material prior to material processing C1 – Confirm and record results of chemical testing from state licensed testing facility on botanical raw material prior to material processing C2 – Only purchase ingredients from FDA and SGC approved sources	1B1 1C1 N/A
2 - Decarboxylation	B - N/A C - N/A P1 - Introduction of physical contaminants from packaging, transfer, or process, such as metal screen contaminants	P1 – Monitored adherence to SSOP's for cleaning and maintenance of extraction facilities and equipment, training, and PPE use	2P1
3 - CO2 Extraction	B - N/A C1 - Introduction of hazardous chemicals from extraction machine, such as pump lubricants P1 - Introduction of physical contaminants from extraction or transfer, such as metal from extraction vessel	C1 – Extraction equipment will only use FDA approved lubricants and chemicals, including pump oil, seals, etc. P1 – Monitored adherence to SSOP's for cleaning and maintenance of extraction facilities and equipment, training, and PPE use	N/A 3P1

*For each process step, diagnostics (temperature, pressure, etc.) and outputs (THC/THC-A ratios, etc.) must be calibrated as part of annual checklist.

**Hazards: Biological (B), Chemical (C), Physical (P)

PROCESS STEP	HAZARD	PREVENTATIVE MEASURE	CCP
4 - Winterization	B - N/A C1 - Introduction of hazardous chemicals from winterization equipment, such as seals and lubricants C2 - Introduction of hazardous solvents P1 - Introduction of physical contaminants such as filter media	C1 – Winterization equipment will only use FDA approved lubricants and chemicals, including pump oil, seals, etc. C2 – Winterization will only be done with pure ethanol, no methanol or other solvents will be allowed P1 – Monitored adherence to SSOP's for cleaning and maintenance of extraction facilities and equipment, training, and PPE use	N/A N/A 4P1
5 - Distillation	B - N/A C1 - Introduction of hazardous chemicals from winterization equipment, such as seals and lubricants P1 - Introduction of glass from distillation vessel	C1 – distillation equipment will only use FDA approved lubricants and chemicals, including pump oil, seals, etc. P1 – Monitored adherence to SSOP's for cleaning and maintenance of extraction facilities and equipment, training, and PPE use	N/A 5P1
6 - Collect, prepare, measure, and mix ingredients	B1 - Exposure to biological pathogens C1 - Introduction of hazardous cleaning chemicals P1 - Introduction of physical contaminants from kitchen equipment	B1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use C1 – kitchen cleaning will only be done with FDA approved chemicals and concentrations P1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use	N/A N/A 6P1
7 - Bake & Cool	B1 - Exposure to biological pathogens while cooling C - N/A P1 - Introduction of physical contaminants from oven or while cooling	B1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use P1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use	N/A 7P1
8 - Refrigerate	B - N/A C - N/A P1 - Introduction of physical contaminants from refrigerator	P1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use	8P1

PROCESS STEP	HAZARD	PREVENTATIVE MEASURE	CCP
9 - Package	B1 - Exposure to biological pathogens C1 - Introduction of hazardous chemicals on packaging P1 - Introduction of physical contaminants from packaging or packaging equipment	B1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use C1 – Products only to be packaged in food grade containers from reliable SGC approved vendors P1 – Monitored adherence to SSOP's for cleaning and maintenance of kitchen facilities and equipment, training, and PPE use	N/A N/A 9P1
10 - Storage	B1 - Pathogen (mold) growth risk C1 - Product cross-contamination P1 - Contamination from containers/exposure	B: 1 – Storage refrigerator temperature monitoring to ensure product is maintained below 41°F while stored to prevent pathogen growth C: 1 – Product only stored in sealed containers P: 1 – Product only stored in food grade, sealed containers	10B1 N/A N/A

Critical Control Points (CCP)

CCP*	PROCESS STEP	HAZARD DESCRIPTION	CRITICAL LIMITS	MONITORING	CORRECTIVE	RECORDS	VERIFICATION
1B1	Receive	Microbiological contaminants	3rd party testing pass/fail	Must pass to be received	N/A, product must be rejected or destroyed	Test results and receiving docs stored on site	Annual third party certification
1C1	Receive	Chemical contaminants	3rd party testing pass/fail	Must pass to be received	N/A, product must be rejected or destroyed	Test results and receiving docs stored on site	Annual third party certification
2P1	Decarboxylation	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
3P1	CO2 Extraction	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
4P1	Winterization	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
5P1	Distillation	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
6P1	Prep/Mix	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
7P1	Bake & Cool	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
8P1	Refrigerate	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
9P1	Package	Unkept facilities	1 inspection per day	Check points defined on SSOP documents	Maintenance request or clean on the spot	SSOP records and exceptions stored on site	Annual SSOP and exception review
10B1	Storage	Microbiological contaminants	Thermometers must read below 41°F	Check points defined on SSOP documents	Adjust temperature setting, note exception on SSOP	SSOP records and exceptions stored on site	Annual thermometer calibration

Sanitation Standard Operating Procedure (SSOP)

Secret Garden Cannabis 726 E 15th Ave Suite 3 Anchorage, AK 99501	**SSOP#: 301** **Date:** TBD **PERMIT:** Manufacturing

Title: Cleaning and Maintenance of Extraction Facilities and Equipment

---

Scope: Manufacturing facilities and equipment include but may not be limited to walls, ceiling, floors, staging racks, prep tables, rosin press, decarboxylation oven, all CO2 extraction equipment, pressure vessels, collection vessels, exterior of piping, steel frame, pump housing, valves, CO2 cylinders, etc., winterization prep table, winterization plumbing housing, Distillation equipment, labware including Buchner funnel and roto-evaporator, storage refrigerator, and any and all manufacturing equipment storage.

Schedule: Cleaning and maintenance as described in this document is to be done immediately prior to and following equipment use. Procedures are to be carried out before daily work has begun and under no circumstances should be done on equipment while in use or in a manner which increases risk of human injury or hazard exposure to product.

Steps:

As each step is completed, fill each check box completely (■). If a step is not completed, mark the box with an "x" (☒). Keep this completed document nearby until task is complete.

1. List equipment to be used: _____

_____

_____

_____

2. Manually Sanitize Equipment Surfaces
   - ☐ Fill a white five gallon bucket to the fill line with warm water
   - ☐ Mix one packet of sanitizing solution with water in bucket
   - ☐ Use the plastic brush and sponge to clean:
     - ☐ All prep tables
     - ☐ Machine enclosure and outer surfaces
     - ☐ Accessible machine inner surfaces (e.g. extractor vessel)

- ☐ (after equipment use only) If any material or liquid touched the walls or ceiling during the process, clean the walls and/or ceiling with the solution, plastic brush, and sponge after all other equipment surfaces have been sanitized

3. Manually Clean Parts
   - ☐ Dis-assemble parts to be used per equipment SOP (e.g. rosin press dies)
   - ☐ Fill a white five gallon bucket to the fill line with warm water
   - ☐ Mix one packet of sanitizing solution with water in bucket
   - ☐ Use a plastic brush to scrub all surfaces of each part
   - ☐ Empty bucket into compartment #3 of sink
   - ☐ Fill bucket with clean, warm water and rinse each part thoroughly once
4. Mop the floor
   - ☐ Fill the mop cart bucket to the fill line with warm water
   - ☐ Mix one (volume TBD) of floor cleaner (TBD) with water in bucket
   - ☐ Use proper mopping techniques to mop the entire extraction floor, regardless of which areas were used
5. Check maintenance schedule for equipment to be used
   - ☐ Review equipment SOP and preventative maintenance schedule

   Next scheduled preventative maintenance: _____
6. Record cleaning and maintenance, including exceptions:

   NAME: _____

   DATE: _____

   Notes/Exceptions: _____

   _____

   _____

   _____

   _____

   _____

   _____

Sanitation Standard Operating Procedure (SSOP)

Secret Garden Cannabis 726 E 15th Ave Suite 3 Anchorage, AK 99501	**SSOP#: 302** **Date:** TBD **PERMIT:** Manufacturing

Title: Cleaning and Maintenance of Kitchen Facilities and Equipment

---

Scope: Kitchen facilities and equipment include but may not be limited to walls, ceiling, floors, staging racks, prep tables, counters, storage refrigerator, storage freezer, and any and all kitchen storage, including pantries.

Schedule: Cleaning and maintenance as described in this document is to be done immediately prior to and following equipment use. Procedures are to be carried out before daily work has begun and under no circumstances should be done on equipment while in use or in a manner which increases risk of human injury or hazard exposure to product.

Steps:

As each step is completed, fill each check box completely (■). If a step is not completed, mark the box with an "x" (☒). Keep this completed document nearby until task is complete.

1. List equipment to be used: _____
_____
_____
_____
2. Manually Sanitize Equipment Surfaces
   - ☐ Fill a white five gallon bucket to the fill line with warm water
   - ☐ Mix one packet of sanitizing solution with water in bucket
   - ☐ Use the plastic brush and sponge to clean:
     - ☐ All prep tables
     - ☐ Equipment enclosure and outer surfaces
     - ☐ Accessible equipment inner surfaces (e.g. oven)
     - ☐ (after equipment use only) If any material or liquid touched the walls or ceiling during the process, clean the walls and/or ceiling with the solution, plastic brush, and sponge after all other equipment surfaces have been sanitized
3. Manually Clean Parts

- ☐ Dis-assemble parts to be used per equipment SOP (e.g. mixer whisks)
- ☐ Fill a white five gallon bucket to the fill line with warm water
- ☐ Mix one packet of sanitizing solution with water in bucket
- ☐ Use a plastic brush to scrub all surfaces of each part
- ☐ Empty bucket into compartment #3 of sink
- ☐ Fill bucket with clean, warm water and rinse each part thoroughly once

4. Mop the floor
   - ☐ Fill the mop cart bucket to the fill line with warm water
   - ☐ Mix one (volume TBD) of floor cleaner (TBD) with water in bucket
   - ☐ Use proper mopping techniques to mop the entire kitchen floor, regardless of which areas were used
5. Check maintenance schedule for equipment to be used
   - ☐ Review equipment SOP and preventative maintenance schedule

   Next scheduled preventative maintenance: _____
6. Record cleaning and maintenance, including exceptions:

   NAME: _____

   DATE: _____

   Notes/Exceptions: _____

   _____

   _____

   _____

   _____

   _____

   _____

Secret Garden Cannabis
Product and Concentrate List:

1. Ganja Bar
2. Super Baked Alaska
3. Snickerdoobie
4. Pot Brownie
5. Green Beans
6. Comfort Caramels
7. THC truffles
8. Greenhouse Special
9. High Hard Candy
10. Garden Gummies
11. Honey Sticks
12. Bubble Hash
13. Kief
14. Wax
15. Shatter
16. Rosin
17. Crumble
18. Green Acres Oil
19. Vape Cartridge Oil
20. Totem Tincture

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Secret Garden Cannabis
Version Verification

Secret Garden Cannabis Plan shall be reviewed annually and revised as necessary when personnel, procedures, processes, suppliers, or as other factors change. The Plan will also be reviewed after any company recall.

Version _____

Approved by _____

Title

Date Approved _____

Introduction

The primary goal of a food recall is to protect public health by removing products from commerce that have been determined to be unsafe. A recall plan can aid in the execution of a recall by apportioning duties, centralizing current contact information, and providing prewritten templates for communications. Key Individuals that will be participating in a company recall should review the recall plan and be familiar with the execution of the plan.

Statement of Recall Plan

Secret Garden Cannabis maintains a recall plan which provides specific procedures, defines terms, and assigns roles and responsibilities when a food safety issue arises with any of our products.

The plan will be activated whenever a potential recall requirement arises and includes the following elements:

1. Recall committee member designations
2. Recall responsibility assignments
3. Key personnel and external contact information
4. Recall procedures
5. Communication templates

Success of the plan relies on the proper execution of plan elements and up-to-date information.

Recall Plan Flow Charts

The following two diagrams are graphical representations of the various steps of a recall. Figure 1, illustrates the typical evaluation of complaints or conditions which may lead to a recall. Figure 2, outlines the various steps of a recall.

Figure 1: Complaint/Condition Evaluation Flow Chart

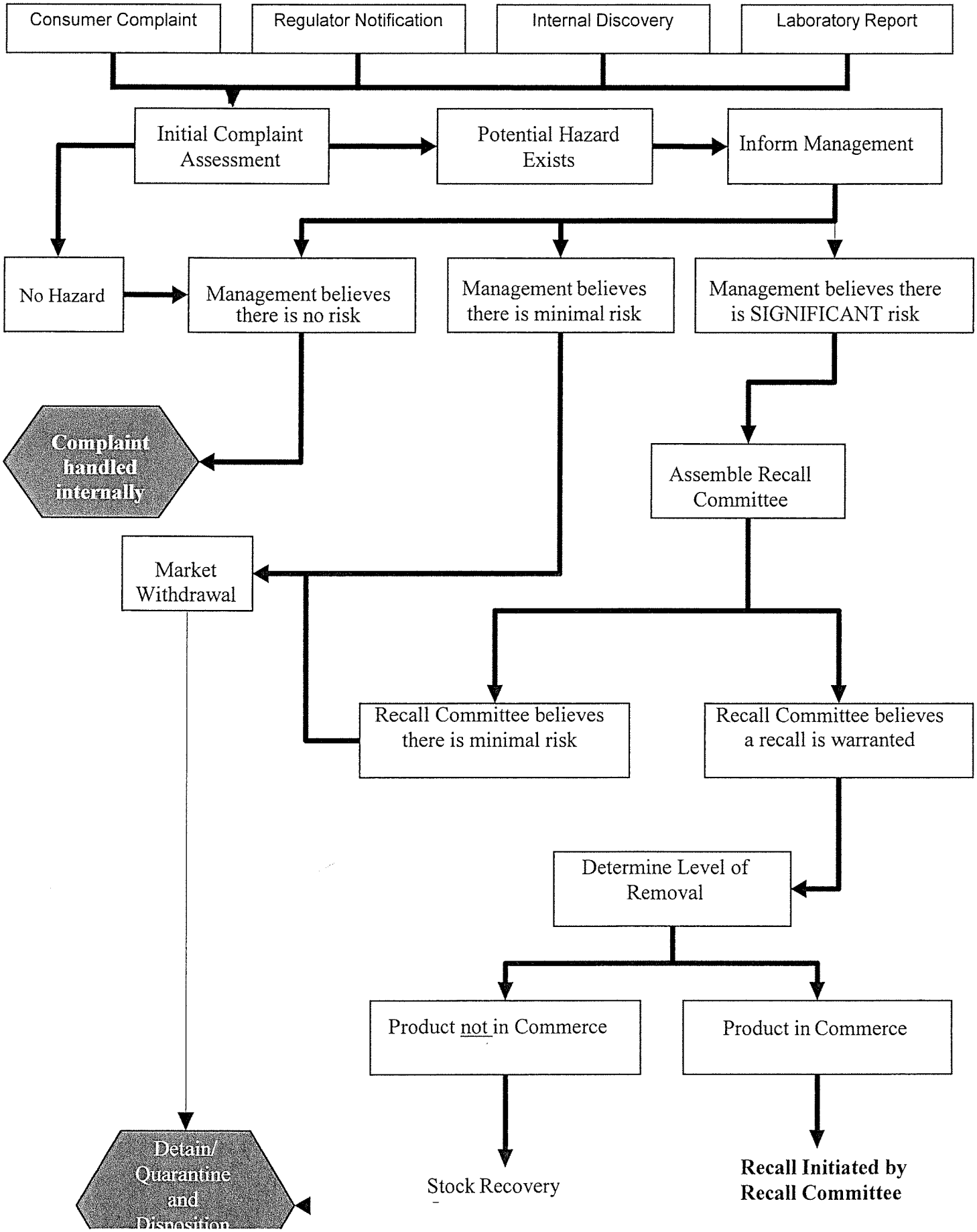
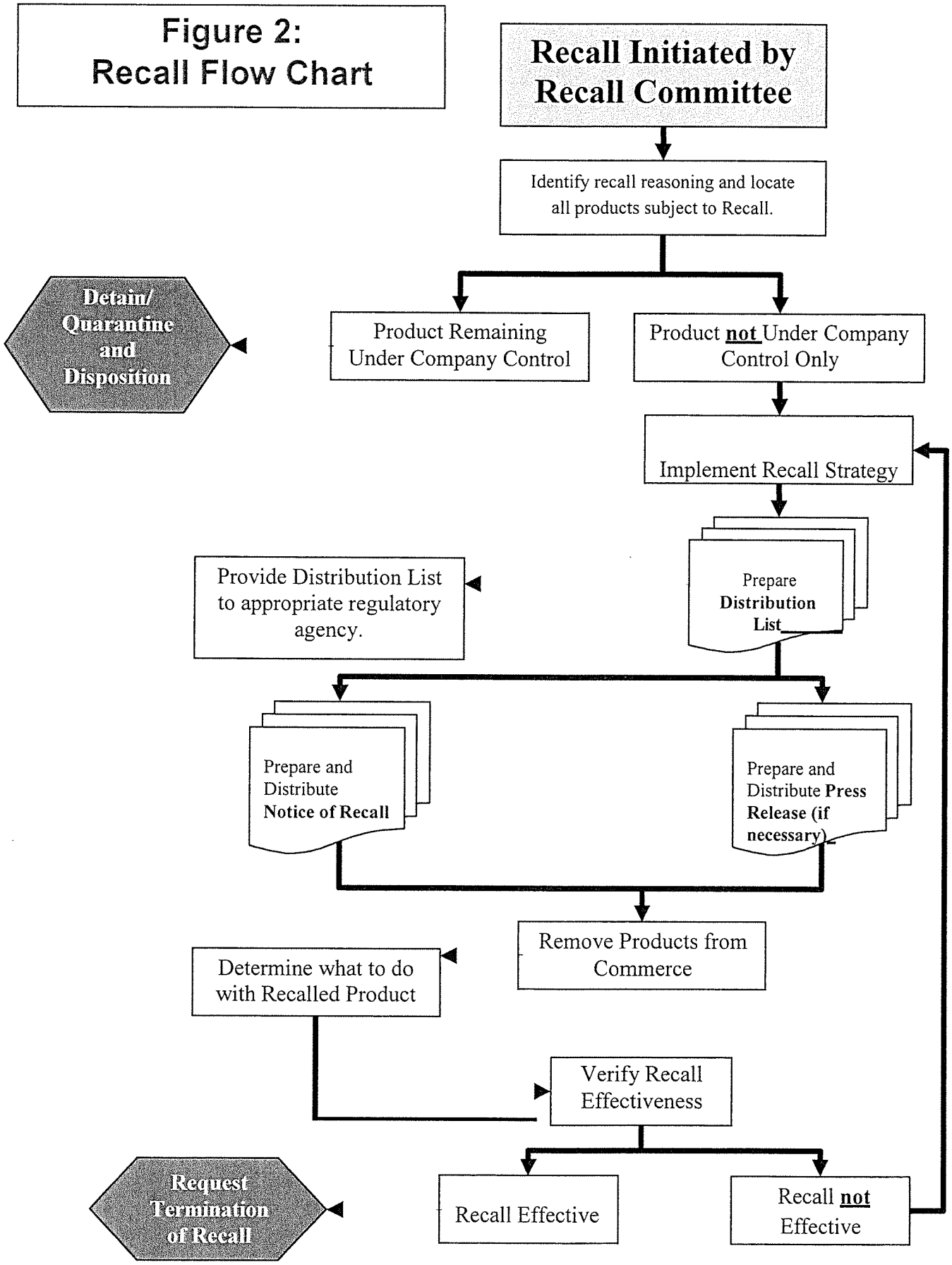


Figure 2: Recall Flow Chart



Recall Procedures

The recall procedure outlines the activities that Secret Garden Cannabis will take to manage the recall of our product(s) which has/have been determined to be unsafe and/or subject to regulatory action. The procedure contains the major recall elements below:

- **Assignment of Roles and Responsibilities**
- **Evaluation of the Complaint or Condition**
- **Identification of Implicated Products**
- **Notification of Affected Parties**
- **Removal of Affected Products**

Assignment of Roles and Responsibilities

The roles and responsibilities of every individual on the Recall Committee should be clearly defined in the recall plan. Oversight of the following recall elements should be assigned to a member of the Recall team. Note that individuals may be responsible for more than one recall element.

Recall Coordinator

The recall co-coordinator, has been given authority by the management of Southeast Essentials to execute the activities of the recall. Responsibilities of the Recall Coordinator include, but are not limited to:

- Assure the documentation of all recall decisions and actions in a master recall file.
- Initiate the formation of the recall committee.
- Activate various components within the company for priority assistance.
- Make recall decisions on behalf of our Company.
- Manage and coordinate the implementation of the company's product recall.
- Keep management informed at all stages of the recall.

Recall Committee

Secret Garden Cannabis Product Recall Committee is composed of the various components of the company's organization. The following functions should be represented on the committee (an individual may be responsible for more than one function):

- Management (Administration)
- Recall Coordinator
- Accounting
- Consumer Affairs/Public Relations
- Customer Service
- Distribution and Supply
- Information Technology
- Legal Counsel
- Marketing
- Operations
- Production
- Purchasing
- Quality Assurance
- Sales
- Maintenance
- Records Management
- Regulatory Affairs
- Sanitation

Note: Outside resources may need to be obtained for some of the functions.

Responsibilities

Individual recall activities should be assigned prior to a recall event to avoid confusion during a recall. Assignment of the recall responsibilities are found in Appendix D (assign an individual to each activity).

Evaluation of the Complaint or Condition

Complaint receipt, processing, and evaluation are the first steps in the recall process. The steps involved in the evaluation process are:

- Receive the complaint – A file should be maintained containing any product complaints the company receives. Information that should be maintained in the product complaint file is:
    - i. Complainant contact information
    - ii. Reported problem with the product
    - iii. Product Identification
    - iv. Product Storage
    - v. Product purchase date and location
    - vi. Illness and Injury details
- Provide the complaint to knowledgeable staff for initial evaluation. If an initial assessment indicates a recall may be necessary, the Recall Coordinator assembles the Recall Committee for a full evaluation.
- Determine the hazard and evaluate the safety concerns with the product.
- Determine the product removal strategy appropriate to the threat and location in commerce.
- Contact the appropriate regulatory authorities.
- Alert legal counsel, insurance, etc. as appropriate.
- Maintain a log of the events of the recall including information such as dates, actions, communications, and decisions.

Identification of Implicated Products

It is Secret Garden Cannabis' responsibility to ensure the identification of all products and quantities of products implicated in the recall. In addition, determination should be made if any other codes, brands or sizes of product handled by the company are affected.

A distribution list should be prepared as part of the Identification process. The distribution list should at minimum identify:

- Account name (consignees) that received the recalled product(s)
- Account addresses
- Contact names
- Contact telephone numbers
- Type of account (e.g., manufacturer, distributor, retailer)

Additional information relating to product information may include:

- Amount of product received/shipped
- Product ship date(s)
- Amount of product returned
- Amount of product consumed

A link to the FDA Distribution Template can be found in Appendix B.

Notification of Affected Parties

Notifications during a recall must be done in a timely manner and should include the appropriate regulatory agencies, the product distribution chain, and consumers when necessary. Recall notices are typically used to notify regulatory agencies and those businesses in the distribution chain. Press releases are generally oriented to consumers, but may be used to notify any affected party.

- Regulatory Agencies should be notified at the earliest opportunity after the decision has been made to conduct a recall. Regulatory guidance may be found at: http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129259.htm.
    - Subsequent to the initial notification, the regulatory authority should be updated throughout the recall process.
- Distribution Chain contacts will be notified by appropriate means (telephone, fax, email, letter, etc.). It is recommended that a written recall notice be provided to all consignees. The Recall Notice **must** include all relevant recall information (see Appendix B, section (1)(ii)).
    - Confirm receipt of the Notice of Recall with all accounts. A record of all account communications should be maintained.
- Consumers should be notified by the most effective method available. If appropriate, a press release can be used to notify consumers. Considerations for preparing a press release include:
    - Issuance of a press release should be the highest priority and should be issued promptly.
    - The local FDA District Recall Coordinator should be consulted before issuance of a press release whenever possible.
    - All relevant information should be included in the press release (see sample templates in Appendix B).

Removal of Affected Product

The procedure for product removal can be divided into five components including: removal, control, and disposition of affected product, recall effectiveness, and recall termination.

Removal

All reasonable efforts must be made to remove affected products from commerce.

- Products in commerce should be detained, segregated, and handled in a manner determined by the recalling firm.
- Products that are still in the recalling firm's control (e.g. inventory located onsite, in transit, in off-site storage, and in offsite distribution) should be detained, and segregated.
- All quantities and identification codes shall be documented to assist in the reconciliation of product amounts.

Control of Recalled Product

When Secret Garden Cannabis chooses to retain recalled product, control must be regained to prevent reentry of the product into commerce.

- All affected product returned will be clearly marked, not for sale or distribution, and stored in an area that is separated from any other food products.

All quantities and identification codes shall be documented to assist in the reconciliation of product amounts.

Product Disposition

The final disposition of the recovered product must be determined. The final disposition must be reviewed and approved by the regulatory agency. Options include:

- Redirection – Products may be redirected for uses other than human consumption.
- Destruction - Products determined to be unsafe for human consumption may be destroyed or denatured, and disposed by appropriate means.
- Recondition – Products may be reworked to remove the safety risk. For example, would be relabeling a product to declare an allergen originally omitted from the label.

All products will be recorded into the METRC marijuana inventory tracking system to ensure all disposed products are recorded properly and in compliance with the Marijuana Regulations.

All quantities, identification codes, and disposition shall be documented.

Recall Effectiveness

Secret Garden Cannabis is responsible for determining whether the recall is effective. Recall Effectiveness Checks verify that all consignees have been notified and have taken the appropriate action. Steps include:

- Verifying that all consignees have received the notification.
- Verifying that consignees have taken appropriate action.
- If the response from our consignees is less than 100%, then the recall should be deemed ineffective and the recall strategy should be reassessed. Certain circumstances (e.g. amount of product actually returned vs. expected, potential for consumption, shelf-life, etc.) may also require a reassessment of the recall strategy.

All verifications shall be documented.

Termination of a recall

Termination of the recall may be considered after all reasonable efforts have been made to remove the affected products from commerce, including reconciliation, recall effectiveness, and disposition.

A termination of the recall may be requested by submitting a written request to the regulatory authorities. Guidance for the termination of a recall is provided in Appendix C.

Mock Recall

In addition to an annual verification of the recall plan, Secret Garden Cannabis will conduct a mock recall annually or whenever there are significant changes to the plan or personnel. The mock recall will include the following elements:

- Selecting a product which has reached the consumer market.
- Tracing the product from the raw ingredient (e.g. source) level to the finished product in the marketplace.
- Verifying communications systems (e.g. contact information, test emails and faxes, etc.) to outside contacts.

- Modifying the recall plan to correct any problems encountered during the test.

Records of these mock recalls will be documented and filed appropriately.

Appendix A – Contact Information

Recall Committee and Key Personnel Contact Information

The contact information including phone number, fax number, email address, and alternate 24/7 information of all committee members, their alternates, and "outside" key personnel should be confirmed and updated as often as necessary to assure accuracy.

Contact Information

- Recall Committee (24/7)
    i. Recall Committee Members James Thornton 907-952-7070

Appendix B – Templates

1. Communication Templates
    i. Model Press Releases(FDA)
        a. Allergens (Allergy Alert)
           http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129262.htm
        b. Listeria monocytogenes
           http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129267.htm
        c. Clostridium botulinum
           http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129273.htm
        d. Salmonella (all serotypes)
           http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129275.htm
        e. E. coli 0157:H7
           http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129287.htm
    ii. FDA Guidance for Written Recall Notification Letters
        http://www.fda.gov/Safety/Recalls/IndustryGuidance/default.htm
    iii. FDB Distribution List Template
        http://www.cdph.ca.gov/pubsforms/Guidelines/Documents/fdb%20eru%20Gde%20DistListTemp.xls
2. Recall Events Log (should include the following information):
    i. Name of the person creating the action
    ii. Dates
    iii. Actions
    iv. Communications
    v. Decisions
    vi. Product disposition
3. Recalled Product Information Data Sheet (should include the following information):
    i. Product description: brand, product name, size, etc.
    ii. Lot codes
    iii. Quantity of recalled product
    iv. Date of the action
    v. Action taken for each product

Appendix C – Additional Resources

1. Industry Guidance: Information on Recalls of FDA Regulated Products
   http://www.fda.gov/Safety/Recalls/IndustryGuidance/default.htm

2. Recall policy – 21 CFR Recall Regulations Sec. 7.40
   http://edocket.access.gpo.gov/cfr_2004/aprqtr/21cfr7.40.htm

3. US Food and Drug Administration
   http://www.fda.gov/

4. USDA (FSIS)
   http://www.fsis.usda.gov/wps/portal/fsis/home

5. Center for Disease Control
   http://www.cdc.gov/

6. FDA District Recall Coordinators
   http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129334.htm

7. FDA Guidance: Action levels for Poisonous or Deleterious Substances in Human and Animal Feed
   http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/chemicalcontaminantsmetalsnaturaltoxinspesticides/ucm077969.htm

8. FDA Defect Levels Handbook
   http://www.fda.gov/food/guidanceregulation/guidancedocumentsregulatoryinformation/sanitationtransportation/ucm056174.htm

APPENDIX D – Assigned Responsibilities

Sample Assignments (may include, but not limited to the following)

Assignment

1. Management of the Recall – (**TBD**) is responsible for the coordination of all recall activities.
2. Assemble the Recall Committee – (**TBD**) is responsible for communicating the decision to recall to the members of the Recall Committee and that each member knows their responsibilities.

Evaluation

1. Management Approval of the Recall – (**TBD**) is responsible to decide if the recall should go forward.

Identification

1. Create a Product Recall Log – (**TBD**) is responsible to create and maintain a product recall log to document all events, when they occur and the company's response to each.
2. Identify all Products to be Recalled – (**TBD**) is responsible for identifying all products which need to be recalled.

Notification

1. Notify the Appropriate Regulatory Authority – (**TBD**) is responsible for notifying the appropriate regulatory authority (use the contact information in the Recall Plan).
   Contacts shall only be made through the designated committee member.
   Recommended information to be submitted can be found in the FDA guidance document at: http://www.fda.gov/Safety/Recalls/IndustryGuidance/ucm129259.htm
2. Prepare the Press Release (if required) – (**TBD**) is responsible for the recall press release if the decision to prepare a press release is made. Considerations for preparing a press release include:
   a. Issuance of a press release should be the highest priority and it should be issued promptly.
   b. Consult with your local District Recall Coordinator before issuance of a press release whenever possible.
   c. If the company decides to prepare the press release, include all relevant information (see sample templates in AppendixB)
3. Prepare the Distribution List – (**TBD**) is responsible for preparing the recalled product distribution list. The FDB distribution list template requests account type, name, address, phone number, and contactname.
4. Prepare the Notice of Recall – (**TBD**) is responsible for preparing the written notice includes all recall relevant information (see FDA Guidance for Written Recall Notification Letters inAppendix).
5. Distribute the Notice of Recall – (**TBD**) is responsible for distribution of the Notice of Recall to all accounts that received the recalled product. Responsibilities include:
   d. Confirm receipt of the Notice of Recall with allaccounts.
   e. Contact accounts that have not responded to the request for conformation.
   f. Maintain records of the accountcommunications.

Removal

1. Detain and Segregate all Products to be Recalled which are in your Firm's Control – (**TBD**) – is responsible to ensure that all products to be recalled in the firm's control are not distributed (identify, detain, and segregate products on-site, in transit, off-site storage, and off–site distribution).
2. Control the recalled product(s) – (**TBD**) is responsible to ensure that recalled products do not re-enter commerce. Responsibilities include:
    a. Quarantine and clearly identify recalled products.
    b. Reconcile quantities, identification codes, and monitor recalled products.
    c. Document the returned products.
3. Decide what to do with the recalled product(s) – (**TBD**) is responsible for determining the action to be taken on the recalled product (destruction, reworking, and redirection). Other related responsibilities include:
    a. Determine if the regulatory authority requires actions such as witnessing destruction of the recalled product.
    b. Verify that the action taken has been effective.
    c. Document the action(s) taken.
4. Verify Recall Effectiveness – (**TBD**) – is responsible for verifying the effectiveness of the recall. Responsibilities include:
    a. Verify that distribution of recalled products has ceased.
    b. Verify that all consignees at the recall depth specified by the recall strategy have received notification about the recall.
    c. Verify that consignees have taken appropriate action.
    d. Document all verifications.