FOOD RECALL FAILURE

Will your supermarket warn you about hazardous food?

PIRG CONSUMER WATCHDOG

Arizona PIRG | Education Fund

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U.S. PIRG EDUCATION FUND

FEBRUARY 2020

ACKNOWLEDGMENTS

Arizona PIRG Education Fund thanks the Colston Warne program of Consumer Reports for supporting our work on consumer protection issues. Additional thanks to individual contributors for their generous support of our work on public health and consumer issues.

The authors bear responsibility for any factual errors. Policy recommendations are those of Arizona PIRG Education Fund. Thanks to Linus Lu of Frontier Group for his review of this report and editorial support. The views expressed in this report are those of the authors and do not necessarily reflect the views of our funders or those who provided review.

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Cover photo by pch.vector/Freepik

Report design by Alec Meltzer/meltzerdesign.net

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EXECUTIVE SUMMARY

THE CENTER FOR DISEASE CONTROL (CDC) estimates that 48 million Americans contract a food borne illness yearly with 128,000 people hospitalized and 3,000 dead as a result of these illnesses.[1]

The food safety system uses two lines of defense to help prevent this threat. First a series of inspections and enforcement measures identify hazardous products before they make it to store shelves and Americans' plates. Second, when a foodborne pathogen or other threats are still sold for consumption, the recall system attempts to remove the food from store shelves as quickly as possible and alerts consumers about the hazard. While not all illnesses are connected to a source, removing contaminated food from the market helps protect the public.

A myriad of actions could improve both lines of defense, but this report focuses on the second--and specifically efforts to notify the public of recalls.

A successful recall system aims to notify everyone who delivers, serves or purchases poisoned food. Effective communication about recalls is more important than ever to combat foodborne illness. Between 2013-2019, the most hazardous meat and poultry recalls increased 85% while recalls overseen by FDA such as produce and processed food has decreased by 8.4%.[2] Whether it's *Salmonella* in beef, or *E. coli* in flour, communication with consumers has clearly been an issue because of the number of cases where consumers continue to get sick after a recall is issued.[3]

Despite this trend, and regular foodborne illness outbreaks, the current food safety system focuses heavily on getting recalled food off of store shelves quickly through a well-defined process followed by regulatory agencies, manufacturers and retailers for removing products.[4] It is the last audience, the individual consumer, who is often left unaware because the recall system requires either proactive action to find alerts or hearing about a recall through media coverage. This can leave contaminated food in pantries, refrigerators and freezers for days or months after a recall.

Stores can play a key role in customer notification as they are access points in the food safety system that consumers most regularly and frequently interact with. And often, customers return to the same store again and again so understanding that stores notification policies are critical.

U.S. PIRG Education Fund attempted to survey the 26 of the largest grocery stores in the United States to determine the efficacy of their policies and practices notifying consumers about food recalls.[5] In late August of 2019, we mailed a detailed survey to the head of food safety about stores standard practices on recall

Food Recall Failure: 2020 Scorecard

Grading 26 of the largest U.S. supermarkets on efforts to warn customers about food recalls through clear policies, direct notification, and in-store posters.

notification including their overall policies on recalls, in-store notification, and direct customer notification programs. For more than a month afterwards, our researchers attempted to obtain responses through emails and phone calls. Our effort attempted to contact the individual in charge of food safety, customer service departments, individual stores and other departments at each grocery store chain.[6]

Unfortunately, most stores declined to answer the survey--and the few respondents only answered a handful of questions. This response is insufficient. Consumers have a right to know about food recalls to protect their health from dangerous pathogens, chunks of metal, and unlabeled allergens. With stores unwilling to share information about their notification policies with the public, U.S. PIRG Education Fund researchers did what any concerned consumer might if they had significant amounts of free time: a comprehensive review of all publicly available information about store recall policies by examining company websites, terms of service, and privacy policies.[7] The scorecard evaluates three different areas of recall notification: store policies, in-store customer notification, and direct customer notification.

Our research found that publicly available information on recalls is woefully inadequate:

- Only four stores—Target, Kroger, Harris Teeter, and Smith's—received a passing grade by providing adequate information about their recall notification policies to the public.

- 84% of grocery store chains failed to provide any public description of their process for notifying customers about recalls. This critical failure leaves consumers to seek out this information and risk inconsistent implementation by individual stores.

- More than half (58%) of surveyed grocery store chains report some program to directly notify consumers about recalls through email or phone. For seven of the fifteen stores that disclose a direct notification program, we were unable to find out when the program is activated, how customers participate, or what information is included in the notifications—limiting it's potential effectiveness.

- No store provided information online about where recall notices are located in stores. Notices may be placed at customer service desks, checkout counters, store shelves or elsewhere in the store. Customers shouldn't have to go on a scavenger hunt to find out if food they recently purchased was recalled.Most people shop frequently at a single store, so knowledge of how that store conducts in-store notification would allow consumers to regularly check for product recalls.

Grocery stores are in a unique position to keep shoppers safe by effectively informing shoppers about food recalled due to a variety of hazards, filling gaps in the nation's recall system. Through loyalty programs and purchase histories, stores have unique information about consumers that should allow them to provide targeted alerts to customers about recalled products.[8] Stores can see sales of products drop after recalls and may receive some blame for failing to notify consumers.[9] But, proactively warning customers they may have purchased recalled food is more than a critical mechanism to protect public health--it could help inoculate the grocery store from consumer outrage.

Until customers can easily find information on recall notification programs many people will remain in the dark, putting their health at risk.

Recommendations

Protecting public health from contaminated food is a top priority of grocery stores, food safety regulators, and consumer groups. To ensure food recalls reach the people who need to know about the potential hazards most, we recommend the following policies are implemented for all Class 1 and Class 2 recalls.

Any recall notification to customers through in-store postings or direct notification should include the name of the product, a picture, the reason for recall, the Universal Product Code (UPC) and instructions for how consumers should handle the product.[10]

Grocery Stores

- Post the food recall notification process on their website, and make it easy to find.

- Signs for Class 1 and Class 2 recalls should be posted at the cash register and on the store shelf where the product would normally appear for at least 2 weeks for perishable food and for at least 1 month for frozen foods. Use the information collected through loyalty programs or purchase histories to directly alert customers of recalled products within 48 hours of a recall. Alerts should be sent using the method of communication that is most prompt and most likely to be seen by customers.

Policy

- The FDA and USDA should require that stores make their recall notification policies available to the public on their website and upon request.

- The FDA and USDA should require that stores post signs about Class 1 recalls at the cash register and on the store shelf where the product would normally ap-

pear in the store for at least 2 weeks for perishable food and for at least 1 month for frozen foods.

- The FDA and USDA should require stores to create direct customer notification programs that alert consumers of recalled products within 48 hours of a recall.

Consumer

- Sign up for recall alerts on the FDA website (https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts) and USDA website (https://www.fsis.usda.gov/wps/portal/fsis/home).
- Follow FDA and USDA social media accounts for updated information about recalls.
- Ask the customer service desk at their local grocery store for information about how they can be notified about recalls for food they purchase.
- Ask the customer service desk at their local store where recall notices are posted in the store. This will allow consumers to proactively follow recalls when they make return trips to their local grocery store.

Foodborne illness remains a public health threat

WHILE OUR FOOD SAFETY SYSTEM HAS improved since the passage of the FDA Food Safety Modernization Act (FSMA) in 2011, 48 million Americans continue to get sick from the food they eat every year according to the Center for Disease Control (CDC)--3,000 of them die.[11] Most of the time these illnesses pass quickly but some can have longer lasting health consequences including, kidney failure, nerve damage, or chronic arthritis. *E. coli*, Salmonella and other bacteria can cause long-term health impacts by spreading to the bloodstream, kidneys, or liver--even killing some people in the worst cases.[12]

A study by Cambridge University determined that foodborne illness causes a loss of 100,000 "life years" every year in the United States. A "life year" is a unit used in public health studies to quantify the impact of different diseases that could mean 10,000 people losing 10 years of life, or 100,00 people losing 1 year of life, or another variation.[13] Foodborne illness remains an enduring issue in our society.

Foodborne illness exposure continues after recalls

The spread of foodborne illnesses associated with produce may slow after the source is identified and a recall is issued because most contaminated perishable produce is consumed soon after purchase. This can reduce exposure soon after the cause is identified and the problem is resolved.

However, frozen or non-perishable items such as meat, flour or crackers, often remain unconsumed for weeks or months. Meat for instance, can be safely stored for months in the freezer.[14] This means that consumers could continue to get sick from products that have been recalled for weeks because they purchased them before the recall was initiated.

Looking at two recent cases helps illustrate this point. In the outbreak of *E. coli* linked to Romaine lettuce in 2019, cases of sickness fell within a three month window.[15] That is a small time frame when compared to the JBS beef recall for *Salmonella* contamination in 2018 where illnesses spanned nearly six months.[16]

The JBS Tolleson beef recall of 2018 underscores the danger of failing to notify consumers directly about recalls. For nearly four months after the voluntary recall began on October 4th, 2018 for beef from JBS, the Center for Disease Control continued to identify new cases connected to the meat.[17] More than 100 cases, 25% of the total tracked illnesses from this recalled food, were reported with illness dates more than a month after the recall.[18]

People likely defrosted beef for consumption after the recall and then got sick. The fact that illnesses continued to occur even after the recall was initiated proves that the recall system didn't do an effective job of alerting consumers that the beef that was in their freezer could be contaminated with *Salmonella*. Recall notification can have a big impact on recalls of frozen or non-perishable products, potentially saving lives.

Recall system often relies on mass media

Our current recall system usually succeeds at removing contaminated food from store shelves, but inadequately alerts consumers that they may have hazardous food they've already purchased.[19] Mostly, consumers find out about recalls through news coverage. When it comes to how consumers find out about food recalls, television, newspapers and magazines, and radio dramatically outpace other sources of information.[20] But in a fragmented media system whose 24/7 news cycle often forces important public health alerts to the bottom of the news, many never hear about a recall. And smaller recalls may never receive any coverage.

In 2019, there were a number of high profile food recalls, including a nationwide recall of romain lettuce, and millions of pounds of chicken products contaminated with metal, plastic and other material. WRAL Channel 5 News, WRIC Channel 8 News, WRAL Channel 5 News, CBS This Morning

The FDA and Food Safety and Inspection Service (FSIS) decide the hazard level classification while a recall investigation is occurring based on the below system, but the agencies can also change (upgrade or downgrade) the level of the recall over time.

CLASS	USDA FSIS Definitions[21]	FDA Definitions[22]
I	Involves a health hazard situation in which there is a reasonable probability that eating the food will cause health problems or death.	Situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious adverse health consequences or death.
II	Involves a potential health hazard situation in which there is a remote probability of adverse health consequences from eating the food.	A situation in which use of, or exposure to, a violative product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequences is remote
III	Involves a situation in which eating the food will not cause adverse health consequences.	Situation in which use of, or exposure to, a violative product is not likely to cause adverse health consequences.

Grocery stores can help protect public health

CONSUMERS RELY ON THE FOOD SAFETY system when they buy groceries to cook at home, purchase pre-cooked meals, order delivery or eat at restaurants. Their frequent visits to grocery stores, often the same few stores, make these businesses a perfect place to warn consumers about potentially recalled food that could endanger their health.

Consumers are more likely to expect the store where they buy their food would alert them if it has been recalled than the producer, who they do not directly intract. And in some cases the recall is so expansive or vague that consumers cannot easily identify the product without assistance.[23]

In the age of Big Data and constant communication from businesses, grocery stores often have unique information about purchase habits. Many grocery stores collect customer's purchase history through receipts or voluntary loyalty reward programs.[24] Some may even utilize additional data on shopping habits or interests in the world to market products to customers. Stores also regularly collect contact information of their customers.

This vast trove of data may be used for targeted advertisements to improve sales.[25] But, if a store is going to collect it, they should use this information to text, email, call, or otherwise notify a customer about a recall.

Grocery stores have an incentive to alert consumers about recalls as quickly as possible. Stores are often blamed for food contamination even when they do not initiate the recall because the contamination happens during the growing, slaughtering or manufacturing of the product. Stores can follow all proper food handling procedures and still end up selling a product to someone that makes them sick through no fault of their own. Like customers, they assume that the food that they are given from producers is safe to consume. And when a large scale recall or foodborne illness outbreak occurs, the store often receives the blame. Stores aren't always the party responsible for food contamination, but the fact that they often receive blame means that they should have an incentive to be a part of the solution by providing more effective recall notification to consumers.[26]

Consumer-facing transparency keeps people healthy

Any effort to inform customers about new products, sales, problems or other matters begins with transparency--after all if customers cannot uncover how to receive information, then how can they opt-in or locate the necessary information. In the case of food safety, the failure to publicly and clearly reveal information about recall policies could delay recall notices reaching customers or make it harder for concerned shoppers to track recalls. And the lag, or complete failure, to notify customers can have significant impact on customers health.

Between October and December of 2018, JBS Tolleson beef recalled more than 12 million pounds of beef due to *Salmonella* contamination.[27] Because meat is often frozen for later consumption, the CDC and USDA alerted the public to check their freezers for the recalled meat. And yet months after the meat was removed from stores, Americans continued to get sick.[28]

There are two likely scenarios. First, customers may have never heard about the recall. Even those looking for recall information may be unaware of where to look or seeing no postings at butcher counters, decide their food was safe. Second, the most significant communication about the recall, mass media, often noted it was a recall of JBS beef. But the actual meat labels included a variety of brands including Laura's Lean Beef, Kroger and Private Selection.[29] Many purchasers of contaminated meat may never have made the connection to the meat in their freezer.

Clear policies directly notifying or posting recall information would help alleviate some of these problems.

First, more people would get notified about recalls if they knew where and how to find such information. or the value of signing up for direct notification. The reliance on media reports leaves many gaps. Consumers may not see the story or media many not even cover it until large numbers of people get sick. Stores could help address this problem by posting clear, accurate, and timely information.

Second, publicly revealing information about recall notification policies would allow customers to hold stores accountable. Some shoppers may choose to frequent stores that do a better job protecting their health. In fact, it's reasonable to assume grocery stores could provide notification as a service, helping them attract more business. And, if policies require clear posting or direct notification, food safety organizations, shoppers and nonprofits can make sure that they live up to that promise. This method of accountability is critical to ensure that grocery stores are doing all that they can to notify consumers of recalled products.

Food safety policies should be an area of competition between stores and consumers should be able to use these kinds of policies to choose the store that works best for them.

TYPES OF RECALL NOTIFICATION

Store policies: Stores don't often explain their process for notification in a publicly available policy. This leaves customers guessing where to learn about food recalls. Stores should include when they notify the public, where notifications can be found, and how to sign up for direct notifications.

In-store notification: Some grocery stores post recall notices at the store such as signs by the customer service desk, register or in the aisles. Instead of sending shoppers on a scavenger hunt for such notifications, or wonder if there are any recalls, stores should publicly state where such recall notifications are posted and what information is provided. In addition, such posters can help inform store employees about recalled food, providing a check to ensure it's removed from store shelves.

Direct customer notification: Customers may be directly notified about recalls of food they purchased, or more broadly all Class I and II recalls, by phone, email or text. Informing shoppers if such notifications are available and how to sign up, would increase utilization of such programs and make it more likely notifications will be seen.

Findings

U.S. PIRG EDUCATION FUND SET OUT TO evaluate how 26 of the largest grocery store chains by number of stores in the United States notified consumers about recalls including what policies they used, in-store notification, and direct customer notification.[30] Unfortunately, most of the stores didn't answer our survey-- and the few that did only answered a handful of questions.

U.S. PIRG Education Fund researchers next attempted what any concerned consumer would do given enough time—we reviewed publicly available information by examining company websites, terms of service, and privacy policies.[31]

While robust recall notification policies would be best, it is also important that customers can easily find information about recall notification procedures. This will make sure that consumers have the ability to keep themselves informed and protect themselves from potentially dangerous recalled food that they have purchased, and can identify stores that will better protect them. In light of the failure of most stores to engage in the survey, we undertook a significant review of all publicly available information about store recall policies by examining company websites, terms of service, and privacy policies. The information found on publicly available sources was woefully inadequate and would leave the average consumer with very little understanding of what stores would do to notify them of recalls in stores or directly.

Most stores failed on recall notification scorecard

Eighty-four percent of surveyed grocery store chains failed to provide adequate information about their recall notification programs to the public. This is largely due to a lack of specificity and transparency in store policies, in store programs, and direct to consumer notifications.

Only Target, Kroger, Harris Teeter, and Smith's received a passing grade by providing an explanation regarding their process for notifying consumers of recalls. The disclosures included information about what the store would do in the case of a recall, including information about notification in-store and direct to consumers.

Still, these and other stores failed to provide a large amount of information on their recall notification policies. And, as discussed later, if we had graded them on available information about their in-store postings, all stores would have failed.

84% percent of stores did not disclose information on recall policies

The vast majority of surveyed stores did not provide customers a document or webpage that explained the store's process for notifying consumers of recalls. Researchers looked for a document that would simply explain the store's recall policies, including how they notify consumers.

Researchers found Target's recall policies on its corporate website after contacting the customer service line and intensively searching the company' website.[32] Researchers found Kroger, Harris Teeter, and Smith's recall policies when a representative from those companies reached out and provided us those policies in a location on the website we didn't initially search. Still such information should not require a scavenger hunt to uncover.

Food Recall Failure: 2020 Scorecard

Grading 26 of the largest U.S. supermarkets on efforts to warn customers about food recalls through clear policies, direct notification, and in-store posters.

Informing customers about food recalls starts with consumers understanding what to expect from stores when a recall happens and when notification efforts may be triggered.

More than half of grocery stores offer direct notification programs

Slightly more than half of the stores, 15 out of 26, indicate they have a direct notification program for recalls, probably the most effective tool to warn consumers. That is encouraging, but the information we found usually failed to include how to sign up, when notifications are sent out, or the contact methods used. These programs are under marketed, decreasing the likelihood many will sign up. Aggressive marketing along with clear guidelines would help stores better serve their customers, protecting their health from contaminated food.

Previous attempts to survey grocery stores about direct notification programs have revealed mixed participation. In the Center for Science and the Public Interest's (CSPI) 2016 survey eight of the twenty-one supermarket and dollar-store chains they surveyed had direct notification programs.[33] This despite the fact that 52% of consumers top preference for communications about recall notification is email.[34]

Eight of the stores in U.S. PIRG Education Fund's survey inform customers how they could be contacted about recalls.[35] The stores that fail to clearly disclose notification methods increase the likelihood customers may ignore or miss critical information on hazardous food by the store--especially considering how many spam emails and calls people receive. The effectiveness of direct notification programs are maximized when stores disclose such programs and clearly inform customers about when and how they will be contacted during recalls. It also would increase confidence in the food safety system and store, as shoppers are more confident their food is safe.

No surveyed grocery store reveal where recall notices are located in the store

No surveyed stores indicated where customers could find recall alert posters in the store, or whether they use them. We reviewed information on their websites, contacted customer service operations, and attempted to reach food safety departments about a number of policies related to this issue including: if there were standard policies regarding in store notification, where to find notifications inside stores, when notifications are posted, and what information would be posted. and what information was included on those recall notices.

We were unable, however, to personally visit a significant number of physical locations of each grocery store to see if we could locate these notices. And, we decided that evaluating a store's policies based solely on our experience at a single location would have been such a miniscule sample that it could not represent the full policy of the store brand. We, therefore, chose to not grade stores on this criteria this year. If we had every store would have failed on this scorecard. We chose to omit these questions this year as we were unable to visit a significant number of stores across the country to see if there were postings. Still these results leave us questioning the uniformity or success of such programs and may include the results in future scorecards.

In store notifications are a critical part of a comprehensive recall notification system. Some customers may decline to participate direct notification program or miss the notification when sent. In both cases, because most people frequently shop at the same stores, so grocery stores taking steps to be more transparent about how they notify consumers of recalls in the store could go a long way. As one of the most important tools in a grocery stores arsenal to warn their customers, we plan to include such scoring in future years.

Improving grocery store recall notification programs

GROCERY STORES HAVE A CRITICAL ROLE to play in notifying consumers of recalls on products that they have already purchased. Reliance on media reports has created a system where consumers can't be sure if they will be told if a product that they purchase is recalled. Grocery stores are in the unique position of possessing the information necessary to quickly notify consumers.

For grocery stores to improve recall notification, U.S. PIRG recommends:

- Post the process for notifying customers of a recall on a publicly available website and provide it to customers upon request.
- Signs about Class 1 recalls should be posted at the cash register and on the store shelf where the product would normally appear in the store for at least 2 weeks for perishable food and for at least 1 month for frozen foods. Signs should include the name of the product, a picture, the reason for recall, the U.P.C., and instructions for how consumers should handle the product.
- Use the information collected through loyalty programs or purchase histories to directly alert customers of recalled products within 48 hours of a recall. Customer alerts should include the name of the product, the reason for recall, the U.P.C., and instructions for how consumers should handle the product. Alerts should be sent using the method of communication that is most prompt and most likely to be seen by customers.

Policy recommendations

The FDA oversees a wide variety of recalls across the food system. The agency oversaw 517 food recalls in 2019. The USDA oversees recalls related to meat and poultry recalls at federally inspected establishments. From 2013-2019, dangerous class I meat and poultry recalls increased 85%.[36] Our bifurcated food safety system is far from perfect, but both agencies could adopt policies that would dramatically improve our recall notification system.

For the FDA and USDA to improve recall notification, U.S. PIRG recommends:

- The FDA and USDA should require that stores make their recall notification policies available to the public on their website and upon request.
- The FDA and USDA should require that stores post signs about Class 1 recalls at the cash register and on the store shelf where the product would normally appear in the store for at least 2 weeks for perishable food and for at least 1 month for frozen foods. Signs should include the name of the product, a picture, the reason for recall, the U.P.C., and instructions for how consumers should handle the product.
- The FDA and USDA should require stores to create direct customer notification programs that alert consumers of recalled products within 48 hours of a recall.

Consumers can protect themselves

Until our recall system improves, both towards being more transparent and more effective, consumers need to do what they can to avoid contaminated food products.

For consumers to protect themselves from dangerous food products, U.S. PIRG recommends:

- Sign up for recall alerts on the FDA website (https://www.fda.gov/safety/recalls-market-withdrawals-safety-alerts) and USDA website (https://www.fsis.usda.gov/wps/portal/fsis/home).
- Follow FDA and USDA social media accounts for updated information about recalls.
- Ask the customer service desk at their local grocery store for information about how they can be notified about recalls for food they purchase.
- Ask the customer service desk at their local store where recall notices are posted in the store. This will allow consumers to proactively follow recalls when they make return trips to their local grocery store.

Methodology

IN AUGUST OF 2019, U.S. PIRG Education Fund mailed a survey on how grocery stores notify customers of food recalls to food safety directors at the 26 largest grocery store chains in the United States. Over the next month, researchers attempted to collect answers to the survey through a variety of methods including calling customer service lines, sending emails to publicly available addresses, and searching company websites for the information.

Unfortunately, most stores either notified researchers they would not respond or failed to respond after repeated efforts to contact them.

Consumers deserve to know how different grocery stores address recall notification because it helps protect their health. At that point, we looked at what information was publicly available to customers on each stores recall notification policies. Our investigation looked at store recall policies by examining company websites, terms of service, and privacy policies.

Below are the pages that we covered on each website. Most sites had a version of each of these pages. Some sites didn't have a couple of the listed sites. We found each one that we could by using the sitemap function at the bottom of the web page.

- Home page
- Contact us page
- Customer service page
- News/press releases section
- Recalls section
- Loyalty program page
- Terms and conditions of loyalty program
- Privacy policies of loyalty program
- Privacy policies of their website
- Search "recalls", "recall policy" and "recall notification"

Researchers archived all applicable pages (see appendix) of each website above for when it was searched. Researchers used the information available on these pages to answer the questions in our survey. When we went to each page we looked for answers to our questions. We used in-browser searches for the keywords "recall", "recall notification", "recall policy", "notification", and "policy". If that yielded no helpful information to answer a question, we would read through the web page entirely. The only exception to this were the terms of service and privacy policy webpages. For those pages, we read the entire section about what the store does with your information and the section about what data they collect, in addition to doing the searches provided above.

More information about specific questions is provided below. This information includes where we found the answer to each question in the vast majority of cases and any additional steps that we had to take in order to verify the answer to the question.

Point values for individual answers to questions were determined based off of the value of that information or the likelihood that it would reach consumers. If a store were to follow all of the best practices that

we laid out in our policy recommendations they would receive the full number of points for each question.

In cases where we are asking for stores to "mark all that apply", options were assigned point values based off of how important we thought the information provided was to consumers. This also applies to the question about the method of contact. Methods that we thought were more likely to reach consumers were given higher point values. This also applies to the question about where stores post notifications of recalls. Places that are more likely to be seen by consumers were given higher point values.

If a store provided us with additional policies before the release of this report, we included it in their score even if that information was not found in initial attempts to contact the store or search the portions of the website listed above.

Appendix: Supermarket Scores

Store Name	Score Transparency Qs	% Score Transparency	Direct Notification Disclosed?	Provides Recall Policies	Transparent Programs to Directly Notify Consumers	Reveals location of in-store posters
Albertson's	19	42.22%	Y	N	N	N
Aldi Food Store	13	28.89%	N	N	N	N
Bi-Lo	14	31.11%	N	N	N	N
Food Lion	13	28.89%	N	N	N	N
Giant Eagle	13	28.89%	N	N	N	N
H-E-B	18	40.00%	N	N	N	N
Hannaford	11	24.44%	N	N	N	N
Harris Teeter	34	75.56%	Y	Y	Y	N
Harveys	14	31.11%	N	N	N	N
Hy-Vee	16	35.56%	Y	N	N	N
Kroger	33	73.33%	Y	Y	Y	N
Meijer	21	46.67%	Y	N	N	N
Price Rite Marketplace	17	37.78%	Y	N	Y	N
Publix	16	35.56%	N	N	N	N
Safeway	19	42.22%	Y	N	N	N
ShopRite	17	37.78%	Y	N	Y	N
Smith's	33	73.33%	Y	Y	Y	N
Stop & Shop	16	35.56%	N	N	N	N
Target	32	71.11%	Y	Y	N	N
The Fresh Grocer	17	37.78%	Y	N	Y	N
Trader Joe's	14	31.11%	Y	N	Y	N
Vons	19	42.22%	Y	N	N	N
Walmart	16	35.56%	Y	N	N	N
Wegmans	24	53.33%	Y	N	Y	N
Whole Foods	12	26.67%	N	N	N	N
Winn-Dixie	14	31.11%	N	N	N	N

Appendix: Initial Survey

RESPONDENT INFORMATION

1. Name of the Person Filling out this Survey:_____
2. Title:_____
3. Company Name:_____
4. Address:_____
5. Phone:_____
6. Email:_____
7. Approximately how many Class I recalls does your company manage each year?
   a. 1-20
   b. 21-50
   c. 51-100
   d. 100-300
   e. 301-500
   f. 500 or more
   g. No recalls
8. Approximately how many Class II recalls does your company manage each year?
   a. 1-20
   b. 21-50
   c. 51-100
   d. 100-300
   e. 301-500
   f. 500 or more
   g. No recalls
9. Approximately how many Class III recalls does your company manage each year?
   a. 1-20
   b. 21-50
   c. 51-100
   d. 100-300
   e. 301-500
   f. 500 or more
   g. No recalls

STORE POLICIES

10. Does your company have a written policy describing its process for notifying customers in the event of a recall?

    a. Yes

    b. No

11. If yes to the previous question, please provide a hardcopy or a link to the policies online.

12. How do you provide those policies to the public? Mark all that apply.

    a. On request

    b. Website

    c. When they sign up for emails from us

    d. We don't

    e. Other_____

13. Which employees receive these policies? Mark all that apply.

    a. Regional Managers

    b. Store Managers

    c. Store Department Managers

    d. All employees

    e. None of the above

14. What actions does your company take to ensure the effectiveness of recall notifications? Mark all that apply.

    a. Recall notification procedures are included in manager training

    b. Internal checks are conducted to ensure individual store compliance with recall notification procedures.

    c. Third party audits are conducted to ensure individual store compliance with recall procedures.

    d. None of the above

    e. Other_____

IN STORE CUSTOMER NOTIFICATION

15. Does your store maintain a 24/7 hotline to answer customer questions about recalls?

    a. Yes

    b. Yes, but only during customer service hours

    c. No

16. Does your store publish notification of all Class I and II recalls on the company website when the recalled product was distributed in your stores?

    a. Yes

    b. No

    c. Only for some recalls

17. Where on your website are notifications published? Mark all that apply.

    a. Front page

    b. Recall section of the website

    c. Not applicable

    d. Other_____

18. Does your store publish a press release in cases where you have initiated a Class I and/or II recall? (This does not include recalls initiated by third parties)

    a. Yes

    b. No

    c. Only for some recalls

19. Does your recall policy require that in-store signage is posted in stores for Class I and/or II recalls?

    a. Yes

    b. No

    c. Only for some recalls

20. If yes to the previous question, does the company centrally produce or distribute signage regarding the recall?

    a. Yes

    b. No

    c. Not applicable

21. Which of the following information is included in the in-store signage? Mark all that apply.

    a. Notification that the product has been recalled

    b. Key characteristics of the recalled product (e.g., U.P.C., lot, date, distribution center where the product was shipped)

    c. Reason for recall

    d. Instructions on how to handle the recalled product or seek reimbursement

    e. Not applicable

22. Where in the store are these posted? Mark all that apply.

    a. At the front register

    b. On the shelf where the recalled food was sold

    c. Some other specified location in the store

    d. The location is left to the discretion of the store manager

    e. Not applicable

23. Does your policy require in-store signage to remain posted for a minimum of 2 weeks for Class I and II recalls?

    a. Yes

    b. No

    c. Not applicable

DIRECT CUSTOMER NOTIFICATION

24. Does your store retain contact information for consumers through a store loyalty program or purchase history?

    a. Yes

    b. No

25. Do you use this contact information to provide direct-to-consumer communications in the event of Class 1 and/or 2 recalls?

    a. Yes, all consumers are notified for all recalls

    b. Yes, only consumers who have a purchase history that includes the recalled product are notified

    c. No

    d. Not applicable

26. If so, which of the method(s) are used by your store? Mark all that apply.

    a. Text

    b. Email

    c. Phone call

    d. Postal mailing

    e. Not applicable

27. Which of the following information is included in your direct recall notifications?

    a. Notification that the product has been recalled

    b. Key characteristics of the recalled product (e.g., U.P.C., lot, date, distribution center where the product was shipped)

    c. Reason for recall

    d. Instructions on how to handle the recalled product or seek reimbursement

    e. Not applicable

Appendix: Final Survey

STORE POLICIES

1. Does your company have a written policy describing its process for notifying customers in the event of a recall?

   a. Yes

   b. No

2. If yes to the previous question, please provide a hardcopy or a link to the policies online.

3. How do you provide those policies to the public? Mark all that apply.

   a. On request

   b. Website

   c. When they sign up for emails from us

   d. We don't

   e. Other_____

IN STORE CUSTOMER NOTIFICATION

4. Does your store maintain a 24/7 hotline to answer customer questions about recalls?

   a. Yes

   b. Yes, but only during customer service hours

   c. No

5. Does your store publish notification of all Class I and II recalls on the company website when the recalled product was distributed in your stores?

   a. Yes

   b. No

   c. Only for some recalls

6. Where on your website are notifications published? Mark all that apply.

   a. Front page

   b. Recall section of the website

   c. Not applicable

   d. Other_____

7. Does your store publish a press release in cases where you have initiated a Class I and/or II recall? (This does not include recalls initiated by third parties)

    a. Yes
    b. No
    c. Only for some recalls

DIRECT CUSTOMER NOTIFICATION

8. Does your store retain contact information for consumers through a store loyalty program or purchase history?

    a. Yes
    b. No

9. Do you use this contact information to provide direct-to-consumer communications in the event of Class 1 and/or 2 recalls?

    a. Yes, all consumers are notified for all recalls
    b. Yes, only consumers who have a purchase history that includes the recalled product are notified
    c. No
    d. Not applicable

10. If so, which of the method(s) are used by your store? Mark all that apply.

    a. Text
    b. Email
    c. Phone call
    d. Postal mailing
    e. Not applicable

11. Which of the following information is included in your direct recall notifications?

    a. Notification that the product has been recalled
    b. Key characteristics of the recalled product (e.g., U.P.C., lot, date, distribution center where the product was shipped)
    c. Reason for recall
    d. Instructions on how to handle the recalled product or seek reimbursement
    e. Not applicable

Appendix: Individual Store Response

#	Question	Answer A	Answer B	Answer C	Answer D	Answer E	Possible Pts
1	Does your company provide a written policy describing its recall policies to the public?	5	0				5
2	If yes to the previous question, please provide a hardcopy or a link to the policies online.						
3	How do you provide those policies to the public? Mark all that apply.	1	3	1	0	0	5
4	Does your store maintain a 24/7 hotline to answer customer questions about recalls?	5	3	0			5
5	Does your store publish notification of all Class I and II recalls on the company website when the recalled product was distributed in your stores?	5	0	3			5
6	Where on your website are notifications published? Mark all that apply.	3	2	0	0		5
7	Does your store publish a press release on your website in cases where you have initiated a Class I and/or II recall? (This does not include recalls initiated by third parties)	5	0	3			5
8	Does your store retain contact information for consumers through a store loyalty program or purchase history?						
9	Do you use this contact information to provide direct-to-consumer communications in the event of Class 1 and/or 2 recalls?	5	3	0	0		5
10	If so, which of the method(s) are used by your store? Mark all that apply.	2	1	1	1	0	5
11	Which of the following information is included in your direct recall notifications?	1	2	3	1	0	5
TOTAL							45

Store	Question #	1	2	3	4	5	6	7	8	9	10	11	Total
GIANT EAGLE	Responses	B		D	B	A	AB	B	A	C	E	E	
	Points	0		0	3	5	5	0		0	0	0	13
WEGMANS	Responses	B		D	B	A	B	C	A	B	C	ABCD	
	Points	0		0	3	5	2	3		3	1	7	24
TARGET	Responses	A		AB	A	A	AB	A	A	B	E	E	
	Points	5		4	5	5	5	5		3	0	0	32
WHOLE FOODS	Responses	B		D	A	A	B	B	A	C	E	E	
	Points	0		0	5	5	2	0		0	0	0	12
H-E-B	Responses	B		D	B	A	AB	A	A	C	E	E	
	Points	0		0	3	5	5	5		0	0	0	18
HY-VEE	Responses	B		D	A	C	D	A	A	B	E	E	
	Points	0		0	5	3	0	5		3	0	0	16
MEIJER	Responses	B		D	B	A	AB	A	A	B	E	E	
	Points	0		0	3	5	5	5		3	0	0	21
PUBLIX	Responses	B		D	B	C	AB	A	A	C	E	E	
	Points	0		0	3	3	5	5		0	0	0	16
TRADER JOE'S	Responses	B		D	B	A	B	B	A	B	B	E	
	Points	0		0	3	5	2	0		3	1	0	14
SHOPRITE	Responses	B		D	B	A	AB	B	A	B	C	E	
	Points	0		0	3	5	5	0		3	1	0	17
PRICE RITE	Responses	B		D	B	A	AB	B	A	B	C	E	
	Points	0		0	3	5	5	0		3	1	0	17
FRESH GROCER	Responses	B		D	B	A	AB	B	A	B	C	E	
	Points	0		0	3	5	5	0		3	1	0	17
WINN-DIXIE	Responses	B		D	B	C	AB	C	A	C	E	E	
	Points	0		0	3	3	5	3		0	0	0	14

Store	Question #	1	2	3	4	5	6	7	8	9	10	11	Total
BI-LO	Responses	B		D	B	C	AB	C	A	C	E	E	
	Points	0		0	3	3	5	3		0	0	0	14
HARVEY'S	Responses	B		D	B	C	AB	C	A	C	E	E	
	Points	0		0	3	3	5	3		0	0	0	14
KROGER	Responses	A		B	B	A	AB	A	A	B	C	AB	
	Points	5		3	3	5	5	5		3	1	3	33
HARRIS TEETER	Responses	A		B	B	A	AB	A	A	B	BC	AB	
	Points	5		3	3	5	5	5		3	2	3	34
SMITH'S	Responses	A		B	B	A	AB	A	A	B	C	AB	
	Points	5		3	3	5	5	5		3	1	3	33
SAFEWAY	Responses	B		D	B	C	AB	A	A	B	E	E	
	Points	0		0	3	3	5	5		3	0	0	19
ALBERTSON'S	Responses	B		D	B	C	AB	A	A	B	E	E	
	Points	0		0	3	3	5	5		3	0	0	19
VONS	Responses	B		D	B	C	AB	A	A	B	E	E	
	Points	0		0	3	3	5	5		3	0	0	19
HANNAFORD	Responses	B		D	B	C	AB	B	A	C	E	E	
	Points	0		0	3	3	5	0		0	0	0	11
FOOD LION	Responses	B		D	C	C	AB	A	A	C	E	E	
	Points	0		0	0	3	5	5		0	0	0	13
STOP & SHOP	Responses	B		D	B	C	AB	A	A	C	E	E	
	Points	0		0	3	3	5	5		0	0	0	16
ALDI	Responses	B		D	C	C	AB	A	A	C	E	E	
	Points	0		0	0	3	5	5		0	0	0	13
WALMART	Responses	B		D	A	C	AB	B	A	B	E	E	
	Points	0		0	5	3	5	0		3	0	0	16

Appendix: Reviewed web pages

GIANT EAGLE

https://web.archive.org/web/20191001131531/https%3A%2F%2Fwww.gianteagle.com%2F
https://web.archive.org/web/20191001131754/https%3A%2F%2Faccount.gianteagle.com%2Fcontact%3F_ga%3D2.153075135.729017322.1569935065-2134429861.1567525397
https://web.archive.org/web/20191001132126/https%3A%2F%2Fwww.gianteagle.com%2Fabout-us%2Fpress-room
https://web.archive.org/web/20191001132158/https%3A%2F%2Fwww.gianteagle.com%2Fproduct-recall
https://web.archive.org/web/20191001132430/https%3A%2F%2Faccount.gianteagle.com%2FTermsOfUse
https://web.archive.org/web/20191001132406/https%3A%2F%2Faccount.gianteagle.com%2FPrivacyPolicy

WEGMANS

https://web.archive.org/web/20191001134341/https%3A%2F%2Fwww.wegmans.com%2F
https://web.archive.org/web/20191001135126/https%3A%2F%2Fwww.wegmans.com%2Fservice%2Fcontact-us.html
https://web.archive.org/web/20191001134431/https%3A%2F%2Fwww.wegmans.com%2Fnews-media.html
https://web.archive.org/web/20191001134457/https://www.wegmans.com/news-media/product-recalls.html
https://web.archive.org/web/20191001134658/https%3A%2F%2Fwww.wegmans.com%2Fterms.html
https://web.archive.org/web/20191001134732/https%3A%2F%2Fwww.wegmans.com%2Fprivacy.html
https://web.archive.org/web/20191001135929/https%3A%2F%2Fwww.wegmans.com%2Fnews-media%2Fpress-releases%2F2018%2Fwegmans-issues-voluntary-recall-of-fresh-cauliflower-rice--veggi.html

TARGET

https://web.archive.org/web/20191001141651/https%3A%2F%2Fwww.target.com%2F
https://web.archive.org/web/20191001142140/https%3A%2F%2Fcorporate.target.com%2Fabout%2Fcontact-us
https://web.archive.org/web/20191001143652/https%3A%2F%2Fcorporate.target.com%2Fpress%2Freleases%2F2018%2F03%2Ftarget-voluntarily-recalls-some-frozen-food-items
https://web.archive.org/web/20191001141756/http://http%3A%2F%2Fhelp.target.com%2Fhelp%2Fproductrecallpage%3Fchildcat%3DProduct%2Brecalls%26parentcat%3Dnews%2B%26%2Bsafety%26searchQuery%3Dsearch%2Bhelp/help/error
https://web.archive.org/web/20191001213043/https%3A%2F%2Fwww.target.com%2Fc%2Fterms-conditions%2F-%2FN-4sr7l
https://web.archive.org/web/20191001213006/https%3A%2F%2Fwww.target.com%2Fc%2Ftarget-privacy-policy%2F-%2FN-4sr7p
https://web.archive.org/web/20191001143652/https%3A%2F%2Fcorporate.target.com%2Fpress%2Freleases%2F2018%2F03%2Ftarget-voluntarily-recalls-some-frozen-food-items
https://web.archive.org/web/20191001142552/https%3A%2F%2Fcorporate.target.com%2Fcorporate-responsibility%2Fresponsible-sourcing%2Fproduct-safety-quality-assurance%2Ffood-safety-and-quality-assurance-tools-and-proces

WHOLE FOODS

https://web.archive.org/web/20191001213309/https%3A%2F%2Fwww.wholefoodsmarket.com%2F
https://web.archive.org/web/20191001213647/https%3A%2F%2Fwww.wholefoodsmarket.com%2Fcustomer-service%2Fcontact-us
https://web.archive.org/web/20200206002054/https://media.wholefoodsmarket.com/news/P20
https://web.archive.org/web/20191001213353/https%3A%2F%2Fwww.wholefoodsmarket.com%2Fproduct-recalls
https://web.archive.org/web/20191001214741/https%3A%2F%2Fwww.wholefoodsmarket.com%2Fus-conditions-of-use
https://web.archive.org/web/20191001214705/https%3A%2F%2Fwww.wholefoodsmarket.com%2Fprivacy-notice

H-E-B

https://web.archive.org/web/20191001214955/https%3A%2F%2Fwww.heb.com%2F
https://web.archive.org/web/20191001215103/https%3A%2F%2Fwww.heb.com%2Fstatic-page%2Fcontact-us
https://web.archive.org/web/20191001220433/https%3A%2F%2Fnewsroom.heb.com%2Fheb-news%2F
https://web.archive.org/web/20191001215031/https%3A%2F%2Fnewsroom.heb.com%2Fheb-news%2Frecalls%2F
https://web.archive.org/web/20191001215314/https%3A%2F%2Fwww.heb.com%2Fstatic-page%2Farticle-template%2FTerms-and-Conditions
https://web.archive.org/web/20191001215307/https%3A%2F%2Fwww.heb.com%2Fstatic-page%2Farticle-template%2Fprivacy-policy

HY-VEE

https://web.archive.org/web/20191002130215/https%3A%2F%2Fwww.hy-vee.com%2F
https://web.archive.org/web/20191002130242/https%3A%2F%2Fwww.hy-vee.com%2Fcontact.aspx
https://web.archive.org/web/20191002130339/https%3A%2F%2Fwww.hy-vee.com%2Fcorporate%2Fnews-events%2F
https://web.archive.org/web/20191002130632/https%3A%2F%2Fwww.hy-vee.com%2Fcorporate%2Fpolicy%2Fprivacy%2F
https://web.archive.org/web/20191002130650/https%3A%2F%2Fwww.hy-vee.com%2Fcorporate%2Fpolicy%2Fterms-of-use%2F
https://web.archive.org/web/20191002131556/https%3A%2F%2Fwww.hy-vee.com%2Fcorporate%2Fpolicy%2Fhyvee-terms-of-use%2F

MEIJER

https://web.archive.org/web/20191002132057/https%3A%2F%2Fhelp.meijer.com%2Fapp%2Fanswers%2Fdetail%2Fa_id%2F5619
https://web.archive.org/web/20191002132146/https%3A%2F%2Fcommunity.meijer.com%2Fmeijer%2Fb%2Frecalls
https://web.archive.org/web/20191002132229/https%3A%2F%2Fwww.meijer.com%2Fprivacy-policy.html
https://web.archive.org/web/20191002132239/https%3A%2F%2Fwww.meijer.com%2Fterms.html
https://web.archive.org/web/20191002132304/http%3A%2F%2Fnewsroom.meijer.com%2F
https://web.archive.org/web/20191002132328/http%3A%2F%2Fnewsroom.meijer.com%2Fnews-releases
https://web.archive.org/web/20191002132543/https%3A%2F%2Fwww.meijer.com%2Ffood-safety.html
https://web.archive.org/web/20191002133259/http%3A%2F%2Fnewsroom.meijer.com%2Fnews-releases%3Fkeywords%3Drecall

PUBLIX

https://web.archive.org/web/20191002133955/https%3A%2F%2Fwww.publix.com%2F
https://web.archive.org/web/20191002135252/https%3A%2F%2Fcorporate.publix.com%2Fcontact
https://web.archive.org/web/20191002135435/https%3A%2F%2Fcorporate.publix.com%2Fabout-publix%2Fnewsroom%2Fnews-releases
https://web.archive.org/web/20191002135445/https%3A%2F%2Fcorporate.publix.com%2Fabout-publix%2Fnewsroom%2Frecalls
https://web.archive.org/web/20191002135552/https%3A%2F%2Fww4.publix.com%2Fpublix-website-policies
https://web.archive.org/web/20191002140033/https%3A%2F%2Fcorporate.publix.com%2Fabout-publix%2Fnewsroom%2Fnews-releases%2Farchive

TRADER JOE'S

https://web.archive.org/web/20191002140315/https%3A%2F%2Fwww.traderjoes.com%2F
https://web.archive.org/web/20191002140747/https%3A%2F%2Fwww.traderjoes.com%2Fcontact-us
https://web.archive.org/web/20191002140821/https%3A%2F%2Fwww.traderjoes.com%2Fhome%2Fterms-of-use
https://web.archive.org/web/20191002140838/https%3A%2F%2Fwww.traderjoes.com%2Fhome%2Fprivacy-policy
https://web.archive.org/web/20191002141053/https%3A%2F%2Fwww.traderjoes.com%2Fannouncement%2Fcategory%2Frecalls

SHOPRITE

https://web.archive.org/web/20191002143910/https%3A%2F%2Fshop.shoprite.com%2F
https://web.archive.org/web/20191002143959/https%3A%2F%2Fshop.shoprite.com%2Frecalls
https://web.archive.org/web/20191002144014/https%3A%2F%2Fnewsroom.shoprite.com%2F
https://web.archive.org/web/20191002144040/https%3A%2F%2Fnewsroom.shoprite.com%2Fshoprite%2Fnews%2F
https://web.archive.org/web/20191002144106/https%3A%2F%2Fshop.shoprite.com%2Fglobaldata%2Fbanner-pages%2Fpolicy-pages%2Fprivacy-policy
https://web.archive.org/web/20191002144122/https%3A%2F%2Fshop.shoprite.com%2Fglobaldata%2Fbanner-pages%2Fpolicy-pages%2Fprice-plus-privacy-policy
https://web.archive.org/web/20191002144531/https%3A%2F%2Fshop.shoprite.com%2Fcontact-us

PRICE RITE

https://web.archive.org/web/20191002145958/https%3A%2F%2Fwww.priceritesupermarkets.com%2F
https://web.archive.org/web/20191002150007/https%3A%2F%2Fwww.priceritesupermarkets.com%2Fprivacy-policy%2F
https://web.archive.org/web/20191002150019/https%3A%2F%2Fwww.priceritesupermarkets.com%2Fwebsite-terms-and-conditions%2F
https://web.archive.org/web/20191002150041/http%3A%2F%2Fnewsroom.priceritesupermarkets.com%2F
https://web.archive.org/web/20191002150051/https%3A%2F%2Fwww.priceritesupermarkets.com%2Fproduct-recalls%2F
https://web.archive.org/web/20191002150219/https%3A%2F%2Fwww.priceritesupermarkets.com%2Fwp-content%2Fuploads%2Fsites%2F139%2F2019%2F08%2FWeaver-Chicken-Breast-Patties-Price-Rite-Sign.pdf
https://web.archive.org/web/20191002150307/https%3A%2F%2Fwww.priceritesupermarkets.com%2Fcontact-us%2F

FRESH GROCER

https://web.archive.org/web/20191002152839/https%3A%2F%2Fshop.thefreshgrocer.com%2F
https://web.archive.org/web/20191002153923/https%3A%2F%2Fshop.thefreshgrocer.com%2Frecalls
https://web.archive.org/web/20191002154010/https%3A%2F%2Fshop.thefreshgrocer.com%2Fglobal-data%2Fglobal-banner-pages%2Fprivacy-policy
https://web.archive.org/web/20191002155947/https%3A%2F%2Fshop.thefreshgrocer.com%2Fglobal-data%2Fglobal-banner-pages%2Fiframes%2Fava-contact-us
https://web.archive.org/web/20191002160020/http%3A%2F%2Fnewsroom.thefreshgrocer.com%2F

WINN-DIXIE

https://web.archive.org/web/20191002170328/https%3A%2F%2Fwww.winndixie.com%2F
https://web.archive.org/web/20191002170402/https%3A%2F%2Fwww.winndixie.com%2Fabout%2Fproduct-recall
https://web.archive.org/web/20191002170424/https%3A%2F%2Fwww.winndixie.com%2Fabout%2Fprivacypolicy
https://web.archive.org/web/20191002170438/http%3A%2F%2Fwww.segrewards.com%2Fterms
https://web.archive.org/web/20191002170507/https%3A%2F%2Fwww.winndixie.com%2Fabout%2Fcontact
https://web.archive.org/web/20191002170634/https%3A%2F%2Fwww.winndixie.com%2Fabout%2Fpress

BI-LO

https://web.archive.org/web/20191002171544/https%3A%2F%2Fwww.bi-lo.com%2F
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