



Introduction

An external third-party audit was conducted at Sizani, for Lunchbox Fund, a contractor, to evaluate the compliance and effectiveness of the Food Safety Management System (FSMS) against the requirements of ISO 22000:2018. The audit covered documentation, implementation, records, and operational controls across all relevant departments.

2. Scope

The scope of the audit included:

- Verification of FSMS documentation and implementation.
- Evaluation of prerequisite programs (PRPs).
- Review of the HACCP plan and hazard analysis.
- Assessment of monitoring, measuring, verification, and validation records.
- Evaluation of management responsibility, communication, and continual improvement processes.

3. Audit Objectives

- To verify conformity with ISO 22000:2018 requirements.
- To assess the effectiveness of the FSMS in ensuring safe food production.
- To identify non-conformities, opportunities for improvement, and areas of good practice.

4. Methodology

The audit was conducted through:

- Review of documented procedures and policies.
- Inspection of facilities and production areas.
- Interviews with management and operational staff.
- Examination of monitoring and verification records.

Food Safety Measures

1. Hazard Identification and Risk Assessment

The hazard analysis system, documented in FSMS 7.4 HS001, provides a detailed approach to evaluating risks across all processing steps. The system was updated on 29/04/2025. The risk assessment process included raw material evaluation, allergen management, monitoring of external service suppliers, and equipment verification. The HACCP analysis plan noted assessments of microbiological, physical, chemical, and allergen hazards, with each hazard evaluated in terms of both likelihood of occurrence and potential severity. The methodology applied was aligned with the principles of the Codex Alimentarius.



During the assessment, no Critical Control Points (CCPs) were identified. Two Operational Prerequisite Programs (OPRPs) were established to effectively manage identified risks. These OPRPs cover allergen control and sieve verification, ensuring that the associated hazards are adequately controlled within the FSMS.

2. Product Testing and Quality Assurance

Product sampling at Sizani is described in FSMS 7.8 PR002, which specifies the inclusion of physical, sensory, and microbiological testing. The procedure for applying product specifications is detailed in FSMS 7.3.3 PR001, with the practical application outlined in the policy *Product Sampling Procedure*, clause 4.

The facility conducts moisture analysis, with results observed in FSMS 7.10.R002.1 dated 10/03/2025, showing full compliance with moisture standards set for different products. Specific compliance was confirmed for soup powder and vanilla powder porridge. The final product testing sheet for dry products, FSMS 7.10PR002.1, details evaluations on smell, flavour, texture, and colour, with results for powdered milk and powdered porridge confirming compliance with moisture, flavour, and texture standards.

Microbiological testing results from the accredited service provider Merieux, dated 17/06/2025, covered, Blender A, air plates, hand swabs for William, and surface swabs in the packing area, all of which were compliant. Allergen cleaning validation is conducted using 3M allergen test kits, with results from 04–08/08/2025 confirming negative findings for cross-contamination.

3. Hygiene and Sanitation

Sizani has established comprehensive personal hygiene policies (FSMS 7.2.10 PR001) and cleaning schedules (FSMS 7.2.8.R004) to ensure consistent adherence to hygiene protocols across the facility. Verification of hygiene standards is carried out through internal hygiene audits and surface swab testing, with results from 17/06/2025 confirming acceptable cleanliness levels. A sanitation inspection (FSMS 7.2.8.R005.1 – “Hygiene Inspection Checklist: Kitchen”) was observed, dated 12–16/05/2025, covering 11 designated areas within the facility.

Chemical control was confirmed through the chemical concentration testing form FSMS 7.2.8 R002, dated 02–25/06/2025, for the chemical *Oneshot*, confirming compliance with concentration requirements.

The facility’s infrastructure, including changing rooms, toilets, and lunchrooms, was observed to comply with R638 requirements (certificate issued 01/12/2020), providing adequate support for staff hygiene and food safety. The certificate of compliance indicates that the establishment meets mandatory hygiene requirements, demonstrating its commitment to food safety and consumer protection.

Hygiene facilities include strategically placed handwashing stations and sanitizers, which promote proper hygiene practices throughout operations. Evidence of daily staff hygiene control was confirmed through the staff personal hygiene checklist FSMS 7.2.10 R.003,



dated 22/07/2025 to 01/08/2025. The Facilities Master Cleaning Schedule (MCS), documented in FSMS 7.2.8 R004, was reviewed, confirming structured and monitored sanitation practices.

4. Foreign Body and Allergen Control

Procedures for foreign body management are documented in FSMS 7.2.7 PR002, which require monthly inspections for glass, hard plastics, and other potential contaminants. Records from the inspection conducted on FSMS 7.2.7.R.001, dated 13/05/2025, indicated full compliance with these requirements. All inspection recordings were reviewed, checked, and formally signed off by the QA Manager, Israel, confirming adherence to the procedure.

Allergen Control

The facility has implemented detailed allergen control policies to ensure safe handling of allergenic raw materials. These measures include segregation of allergen-containing ingredients, routine cleaning validation, and compliance with allergen labelling requirements as set out in Regulation R146 of 2010. An observed label for NutriBright Green Split Peas 500 g confirmed that allergens such as gluten and soya were not present. The label for Sizani NutriBright Immunomeal Vanilla Flavoured included preparation instructions, ingredients, allergen information and warnings, address, product code, batch number, and best-before date.

Further validation was evidenced by the Allergen Control Swab Test recorded on FSMS 7.2.7 R004 with 3M allergen test kits, with results from 04–08/08/2025 producing negative findings. These results confirmed the absence of cross-contamination and demonstrated effective allergen management within the facility. Further allergen validation reports from FACTSA were observed, providing additional evidence of compliance with allergen management requirements. Validation was conducted on 23/07/2025 and described in validation report DOC FSMS 7.2.7.1R001, following production of Melsi Immunomeal Vanilla Porridge.

5. Pest Control

Sizani's pest control program is outsourced to Serach Hygiene, which provides monthly services in accordance with the Service Level Agreement dated 01/07/2025. An internal inspection was conducted by S. Rachoene (#P34548) on 08/08/2025 as the responsible person for pest control management. The procedure is documented in FSMS 7.2.9 PR001, which outlines the types of pests to be controlled, the responsibilities of the service provider, and site-specific requirements for monitoring and prevention.

A bait station site plan, signed by the QA Manager and dated 01/07/2025, supports systematic monitoring across the facility. The most recent pest control inspection report, dated 08/08/2025, indicated no pest activity. Supporting documentation was observed in the service provider's file, including site plans and inspection records. The file also contained the Certificate of Registration for S. Rachoene (#P34548) with valid certifications, including a Department of Labour certificate expiring 30/06/2026, Pest Control Federation of South



Africa membership (#PCFSA-SHP195) expiring 28/02/2026, and public liability insurance with OUTsurance for R1 million (valid until cancellation by the client).

Trend analysis reports indicated minimal infestation levels over the past three months. No pesticides are stored on-site; pest control chemicals are supplied and managed exclusively by Serach Hygiene in line with government regulations. MSDS documents for all pesticides used were available under the index heading Approved Product List. The service provider's file also included service procedures for the prevention of crawling insects, rodents, and flying insects.

6. Infrastructure and Water Management

The facility's infrastructure was observed to be in compliance with Good Manufacturing Practice (GMP) standards. Production areas are equipped with stainless steel surfaces and epoxy-coated flooring, both of which facilitate effective cleaning and ongoing maintenance. Chroma deck wall cladding and ongoing maintenance contribute to the structural integrity and durability of the facility.

Water quality is routinely verified through testing conducted by a SANAS-accredited laboratory. A water analysis report by SGS (SANAS T1054), dated 06/03/2025, confirmed compliance with local legislative requirements. As the facility primarily functions as a dry blending operation, water use is limited, but results confirmed that the water available for hygiene purposes meets required safety and quality standards.

7. Food Poisoning Prevention

Traceability and Recalls

Comprehensive recall and traceability protocols are documented in FSMS 7.3.3 and supported by the Traceability Procedure FSMS 7.9 PR001. These procedures ensure that all products can be traced effectively from raw materials through to finished goods.

A traceability exercise on form FSMS 7.9 R001 was conducted on 30/05/2025, demonstrating the facility's ability to retrieve and present records efficiently. From the auditor's perspective, this was a very detailed traceability exercise.

The exercise focused on the product NutriBright Samp and Bean *Mix*, Batch ENBSB/11525, Best Before 15/02/2026, consisting of 50 x 10 kg bags. Full traceability was established, with all records captured and compiled into a dedicated traceability file. The exercise verified that the product was distributed to three clients, with all 50 units successfully traced: 36 bags to Rustenburg schools, 7 bags to a Pretoria school, and 7 bags (10 kg each) still in stock.

8. Training and Competency

Staff training records demonstrate a detailed training program covering updates and refresher courses on essential food safety topics, including personal hygiene, allergen awareness, and cleaning protocols. The training matrix, documented in FSMS 7.1.R.01, details training needs for 2025. Evidence of compliance was confirmed through training certificates issued to 21 staff members on induction 07/01/2025, 18 employees on allergen management (06/02/2025), and 18 staff members on food safety policy 18/03/2025. This verifies that personnel are



trained to meet FSMS and regulatory requirements and reflects the organization's commitment to food safety culture.

9. Supplier and Raw Material Control

Supplier approval procedures are defined in FSMS 7.2.6 PR001, ensuring that all suppliers comply with required food safety certifications. As part of this process, Certificates of Analysis (COAs) and Certificates of Compliance (COCs) are verified prior to acceptance of raw materials.

Evidence of compliance was confirmed through review of the COA for Tomato Granular Flavouring (Product code NJ 0450P) from NicolaJ, dated 07/08/2025 with an expiry of 07/02/2026, for batch ZZ219971/08, and the COA for Iron Mix from MJ Labs, Batch 24J209, expiring 09/2025.

Sizani maintains segregated storage areas and designated quarantine zones, providing safeguards against cross-contamination and ensuring that only approved materials enter production.

10. Food Fraud and Defence

The facility has implemented Threat Assessment Critical Control Point (TACCP) and Vulnerability Assessment Critical Control Point (VACCP) policy FSMS 7.2.15 PR001. The policy addresses potential risks such as product substitution, mislabelling, and intentional contamination. A dedicated team was formally appointed on 21/06/2021, with documented responsibilities and control measures in place to ensure the integrity and authenticity of food handling processes.

Physical site security was observed to be effective, with the facility fully walled and secured, and intercom-controlled access used for entry, providing additional protection against unauthorised access and safeguarding the food defence system.

11. Operational Procedures

Cleaning and sanitation activities are meticulously documented, with compliance confirmed through swab tests and surface inspections. Records reviewed in FSMS 7.2.8 R005, dated 12–16/05/2025, showed full adherence to the facility's established cleaning schedules. Additional evidence was observed in the chemical issuing document FSMS 7.2.8 R002, dated 02–25/06/2025, which recorded the issuing of *Oneshot* to Thomas, confirming traceability and accountability in chemical management.

Transport operations follow strict FIFO (First In, First Out) and FEFO (First Expired, First Out) stock rotation practices to maintain product quality and safety. Compliance was supported by vehicle cleanliness inspection records, reviewed from 28/07/2025 to 01/08/2025, which verified that transport hygiene requirements were consistently upheld.

12. Infrastructure and Facility Observations

The facility layout has been designed with effective segregation measures to minimise cross-contamination risks. This includes allergen-specific processing areas and clearly designated



quarantine zones, ensuring that raw materials and finished products are handled under controlled conditions.

Environmental controls were observed to be effective, with ventilation systems and high ceilings maintaining a consistently cool working environment, a critical factor in ensuring food safety and product integrity.

Maintenance activities are managed through a combination of internal and outsourced services, ensuring that equipment and infrastructure are kept in optimal working condition. This approach supports operational continuity while minimising the risk of disruptions that could impact food safety.

Conclusion and Recommendations

Sizani's Food Safety Management System (FSMS) demonstrated a high level of compliance with food safety standards and reflects Sizani's commitment to producing safe, high-quality food products for the Lunchbox Fund. The system is built on a strong foundation of hazard identification and risk assessment, as documented in FSMS 7.4 HS001, with effective evaluation of microbiological, chemical, physical, and allergen risks. No Critical Control Points (CCPs) were identified, but two Operational Prerequisite Programs (OPRPs) — allergen control and sieve verification — were implemented to mitigate identified hazards.

Sizani's product sampling and testing programs are comprehensive, incorporating physical, sensory, microbiological evaluations, and moisture testing, supported by external laboratory results. Evidence from accredited laboratories and allergen validation exercises confirmed compliance with regulatory and internal standards. Allergen management practices, including accurate labelling per R146:2010 and validated cleaning procedures, reinforced the system's reliability.

A strong emphasis has been placed on personal hygiene, sanitation, and foreign body management, with policies, checklists, swab testing, and structured cleaning schedules consistently followed. Facilities were observed to meet the requirements of R638, which included handwashing stations, sanitizers, and segregated changing and lunchroom areas. Foreign body inspections, supported by glass and hard plastic monitoring, showed full compliance.

The pest control program, managed by Serach Hygiene, was verified as effective, with no evidence of infestation and all supporting certifications in place. The facility's infrastructure and environmental controls, including stainless steel surfaces, epoxy flooring, Chroma deck wall cladding, and ventilation systems, provide a hygienic and well-maintained environment for production. Water quality testing confirmed compliance with legislative requirements, with minimal usage due to the dry blending nature of operations.



Recall and traceability procedures were exceptionally detailed. A traceability exercise on NutriBright Samp and Bean Mix (Batch ENBSB/11525, BB 15/02/2026, 50 x 10 kg bags demonstrated complete traceability, confirming readiness for product withdrawals or recalls.

Staff training and competency records confirmed that employees are adequately trained in hygiene, allergen awareness, and cleaning protocols, with certificates reviewed. Supplier approval and COA verification are systematically managed, ensuring only compliant raw materials enter the facility.

Food defence and food fraud risks are addressed through documented VACCP and TACCP policies, supported by strong site security measures such as perimeter fencing and controlled access. Cleaning and sanitation documentation, chemical control, and adherence to FIFO/FEFO transport practices provide further assurance of system robustness. Segregated allergen areas, well-defined quarantine zones, systematic maintenance, and robust ventilation further support contamination control and operational efficiency.

Collectively, these systems reflect Sizani's dedication to continuous improvement and food safety culture. Evidence of this was noted in continuous facility upgrades over the past eight months and in the active involvement of management and staff in maintaining and strengthening the FSMS. This culture of responsibility and vigilance ensures that no food safety hazards threaten the well-being of consumers, whether children or adults.

The auditor acknowledges and appreciates the cooperation, professionalism, and hospitality shown by management and staff during the audit. This report provides a true and fair reflection of Sizani's operations, based on observed documentation, practices, and records.

It must be noted that the content of this report is confidential and intended solely for the purposes described in the introduction.

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