QUALITY AND FOOD SAFETY STANDARD

EUROCASH GRUPA

Version 1.0, 02.12.2024

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Introduction

Due to the desire to improve the health safety of food, increasing legal requirements as well as customer expectations and awareness, Eurocash decided to develop a quality standard.
The standard provides guidelines for producers/ distributors to help produce safe food and monitor the quality of products, in line with Eurocash's expectations.
Meeting the requirements of the standard allows the company to start and then continue cooperation with Eurocash and related entities.
The requirements of the Eurocash standard are based on the principles of Good Manufacturing and Hygienic Practice (GMP/GHP) and the HACCP system.
The entire content of the document, including phrases such as: should, belong, recommended, etc. mean a requirement (to be realized, implemented and maintained).
Compliance with the standard does not exempt Suppliers from the obligation to comply with the legislation applicable in the country of production or the country of intended sale.
The degree of implementation, maintenance and improvement of the requirements specified in the Eurocash standard is assessed during quality audits. Audits are carried out by Eurocash employees or cooperating units and should be understood as a control sample.
The standard has been created by a team of employees from various units responsible for management and quality control at Eurocash and ha been approved by the Quality Representative and the Management Board of Eurocash.

1. Quality and Food Safety Management Systems

1.1. Approval of the facility by the relevant supervisory national authority.

Each company operating in the food sector, in accordance with the legal requirements, should be approved to operate by the relevant supervisory authorities.

1.2. Quality Management System / Food Safety Management System - Introduction

The company should establish, document, implement and maintain an effective food quality and safety management system. In the case when the company has certified food quality and safety management system, continuity of certification should be maintained.

1.2.1. Quality policy

The company should have a documented quality policy that includes a commitment to meet the requirements for the production of safe and legally compliant products of specified quality and responsibility to customers. The content of the quality policy should be divided into individual goals related to specific departments of the company. The document should be signed by the person managing the company and communicated to all employees.

1.2.2. Quality goals

The quality goals included in the quality policy should be:
- documented,
- measurable,
- communicated to employees,
- monitored.

The evaluation of the achievement of quality goals should be communicated to top management.

1.2.3. Organizational structure

The company should have a developed organizational structure as well as the scope of duties and powers for employees, including replacement employees.

1.2.4. Management review

A management review of the food quality and safety management system should be carried out at least once a year.
The review should include an assessment of, among others:
- the level of implementation of the actions identified during the previous review,
- results of internal audits, client audits, certification audits,
- complaints and results of any customer feedback,
- incidents, product recalls, non-compliances and corrective actions taken,
- review of the HACCP system,
- implementation and effectiveness of training,
- cooperation with suppliers and service providers,
- conducted product tests,
- results of external audits.

Records of the management review should be kept. Post-review activities with deadlines should be established.

1.3. HACCP - Introduction

In accordance with the applicable legal requirements, each company in the food industry should have implemented and maintained the requirements of Good Manufacturing Practice (GMP), Good Hygienic Practice (GHP) and the HACCP system (Hazard Analysis and Critical Control Points). This is a mandatory requirement.

1.3.1. HACCP team

Based on the order of the top management, the HACCP team should be established.
The team leader and team members should have appropriate qualifications and specialized knowledge of the system, products and processes, which should be confirmed by appropriate evidence.

1.3.2. Facility layout

Company should have an up-to-date facility plan approved by top management with marked flow-charts of e.g. raw materials, semi-finished products, auxiliary materials, finished products, waste and personnel. Paths should not cross. If necessary, risk zones should be separated.

1.3.3. Product Description/ Product Specifications

Company should have descriptions/ specifications of the products manufactured at the facility approved by top management/ responsible employees.
The product description should contain all relevant product safety information, at a minimum:
- ingredients
- physical, organoleptic, chemical and microbiological parameters,
- food safety legal requirements,
- processing methods,
- packaging,
- shelf life period,
- storage conditions, method of transportation and distribution.

1.3.4. Identicication of the intended use/ application of the product

The intended use of the product by the customer should be specified, the target groups of consumers, including vulnerable groups (e.g. children, elderly, allergy sufferers).

1.3.5. Process flow diagram

Flowcharts of the production process should be developed. Flowcharts should cover all aspects of the food processing process in relation to the scope of the HACCP system, from receipt of raw materials, through processing, storage and distribution, and should cover final products, semi-finished products, additives, by-products and waste, and should include the stages of retururning products (re-processing).

1.3.6. Verification of the process flow diagram/ flowchart

The HACCP team should verify that the process flow-chart is correct and up-to-date. Evidence confirming that the flow-chart has been verified should be available.

1.3.7. Hazard analysis/ Hazard identification

A hazard analysis should be carried out at each stage of the production process, taking into account biological (especially microbiological), physical and chemical hazards, including risks from GMO’s, and allergenic substances and adulteration.

1.3.8. Critical Control Point identification

For critical control points (CCPs) identified on the basis of risk assessment and analysis, critical limits and a monitoring system should be defined.

1.3.9. Critical Limits/ for CCPs:

Critical limits should be measurable. When considering critical limits, the margin of measurement error of the CCP monitoring device should be taken into account.

1.3.10. Monitoring system for CCPs

The monitoring records of each CCP should contain the date, time, measurement result, as well as the signature of the person responsible for monitoring and the person verifying. If the records are electronic, there should be evidence that they have been checked and verified.

1.3.11. Determination of corrective actions

The corrective actions should be identified and documented in the event of loss of control at a particular CCP. These are actions taken by designated employees for all products produced during the period in which the process was not under control.

1.3.12. HACCP system verification

A documented verification of the HACCP system should be carried out at a minimum once a year.

1.3.13. Quality and food safety management system documentation

The processes and procedures used by the company to comply with the requirements of the quality and food safety management system should be documented. Rules for the supervision of documentation should be developed to ensure that it is up to date. Documentation of the food safety management system should be kept for a period determined in accordance with the scheme: 1 year + the longest shelf life of the product.

2. Trainings

2.1. Introduction

The company should ensure that all employees performing work affecting safety, compliance with legal requirements and product quality have the necessary competences to perform the work, acquired through training, professional experience or appropriate qualifications.

Evidence confirming the competence of the trainers (certificates, education) should be available.

2.2. Job description/ scope of responsibilities

All employees should have a clear understanding of what is expected of them in the performance of their duties. All personnel should have access to documented and agreed job descriptions (or work instructions) and responsibilities. Substitutions should be clearly defined.

2.3. Newly hired employee

Any newly recruited employee (including agency employee, temporary workers, subcontractors) should be properly trained before starting work and properly supervised during the work.
Initial training should cover the following topics:
- food safety,
- GHP/GMP (Good Hygienic Practice, Good Manufacturing Practice),
- health and safety (BHP),
- quality policy,
- procedures/ instructions applicable to the position.

2.4. Training plan

The company should maintain a documented training plan covering the training needs of all employees. Refresher training on GHP/GMP, HACCP and CCP should be held at least once a year. The training program should be reviewed and updated on an ongoing basis, taking into account: company specific issues, food safety and food regulatory requirements and product/ process modification.

2.5. Training record/ trainer competency

Records of all training/instructions conducted should be available and include:

- list of participants with signatures,
- date,
- duration,
- content of the training,
- name of the trainer conducting the training.

Training should be delivered by competent trainers.
All employees (including agency and casual workers) should demonstrate an appropriate level of understanding of the language of training.

2.6. Specialized trainings

Documentation of hygiene or other specialized training should be available (copies of certificates may be part of this data, e.g. safe handling of chemicals, pesticides, use of certain equipment).

2.7. Knowledge verification

Documented verification of training effectiveness should be carried out (e.g. on-the-job assessment, knowledge tests).
Re-training should be provided for those topics that are not understood.

3. Receipt of raw materials and additives

3.1. Introduction

Controls on the reception of raw materials, additives, packaging including products should ensure that the safety, legality, quality of the products and, where applicable, claims of authenticity are not compromised.

3.2. Receipt of raw materials/ packaging/ additives

All raw materials, packaging, additives and products should be controled upon receipt by trained personnel in accordance with documented procedures. Receipt records should be kept.
Inspection should include:
- hygienic condition of the vehicle,
- completeness and compliance of the packaging,
- traces of pest infestation,
- product inspection to show compliance with specifications,

- marking with the date/ batch of production (complies with the specification and certificate of analysis and certificate of conformity, where provided),
- temperature (if required),
- condition of pallets,
- verification of expiration dates.

3.2.1. Date coding control

All raw materials, packaging, additives and products intended for use should have a sufficiently long shelf life until their final use.

3.2.2. Raw materials, packaging, additives, non-conforming products

Raw materials, packaging, additives and products that do not meet the requirements should be returned on receipt. If this is not possible, the procedure for dealing with non-conformities should be followed. Records of non-conformities at reception should be kept.

3.3. Specifications of raw materials, packaging

Specifications for all raw materials (raw materials/ ingredients, additives, packaging, reprocessing) should be in place. Specifications should be up-to-date, clear, available and always in compliance with applicable legislation and customer requirements.
The company should obtain formal approval of specifications from relevant parties. If specifications are not formally approved, the company should demonstrate that it has taken appropriate steps to obtain such approval.

3.3.1. Specification availability

Specifications and/or their content should be available in appropriate locations and to appropriate personnel.

3.3.2. Procedure for creating and reviewing specifications

Specifications should be reviewed whenever there is a change in the product (e.g. ingredients, processing method), or at least once every 3 years. The date of review and approval of any changes should be recorded.

3.4. Materials in contact with food

The Declaration of Compliance (DoC) or other evidence should be available to confirm that packaging complies with food legislation requirements and its intended use.

3.4.1 Testing and intended use of packaging

The company should ensure that the packaging used is appropriate for the product being packaged. The company should verify the suitability of the packaging material for each product through, e.g. organoleptic tests, storage tests, chemical analyses, migration tests, at least once every 3 years or in the event of changes.

3.4.2. Labelling

The labelling should be legible, indelible and consistent with the specifications of the products intended for customers. This should be checked regularly and the checks should be documented.

3.4.3. Color of packaging

Absorbent pads and foil purchased by the company for direct use with ingredients or products during processing, should have the appropriate color and tear-resistant to prevent product contamination.

3.5. Animal welfare

The company should ensure the welfare of the animals.

4. Warehousing process

4.1. Introduction

The plant should have procedures/ instructions in place to ensure proper storage of raw materials, additives, packaging and finished products. The company should ensure required storage conditions while maintaining appropriate warehousing management.

4.2. Conditions and method of storage of raw materials, additives, packaging, finished products

Raw materials, semi-finished products, packaging, additives and goods should be stored in accordance with their storage requirements and properly protected and should not have a negative effect on other products. They should be stored in such a way to minimize the risk of cross-contamination and should be properly protected when opened. Adequate ventilation in storage areas should be provided to prevent condensation and excessive dust. All raw materials, additives, packaging should be stored on complete pallets, maintaining a distance from the walls and in the appropriate hygienic conditions.

4.3. Monitoring system for storage conditions

The company should have a system for monitoring of storage conditions in the form of continuous electronic recording with the possibility of viewing archived records, or use a system of manual temperature/humidity measurements. Manual measurements and records should normally take place at least 3 times a day for microbiologically sensitive raw materials, semi-finished and finished products, in other cases once a day. The frequency of monitoring should be determined on the basis of a risk assessment.

4.4. Inventory management system

All raw materials, semi-finished products, additives, packaging and goods should be clearly marked. Warehousing should be based on principles of FiFo (first-in-first-out) and/ or FeFo (first-expired-first-out).

4.5. Quality of stored raw materials

All stored raw materials, semi-finished products, additives, final products, packaging should be complete, without signs of spoilage, foreign odors and mechanical damage.

4.6. Outdoor storage of products

Outdoor storage of products possibility should be kept to a minimum. When products are stored outdoor, a hazard analysis and assessment of the associated risks should be carried out to ensure that there is no possibility of contamination or adverse impacts on product safety and quality.

5. Approval of suppliers/ service providers

5.1. Introduction

The company should have a procedure for qualifying and evaluating suppliers, including service providers.

5.2. Approval of suppliers

The approval and monitoring procedure should have clear assessment criteria (including audits, certificates, complaints, reliability of deliveries, quality, safety, timeliness of deliveries) and the rules for assigning such criteria (producer`s assessment, categorization, scoring). Each company should have an up-to-date list of approved suppliers, including service providers.

5.2.1. Assessment of approved suppliers

The frequency of evaluation of suppliers, including service providers, should result from risk assessment or other regulations.

6. Laboratory tests

6.1. Water, ice, air

Water used in food production as an ingredient or for washing raw materials or for cleaning should meet the requirements of drinking water. Drinking water supply should be available at all times. The quality of air, steam and other gases used directly in contact with the product or as an ingredient should be monitored to ensure that they are not hazardous. Compressed air used directly in contact with the product should be filtered.

6.1.1. Water/ ice testing frequency

Water testing should be conducted by accredited laboratories and should include microbiological, physico-chemical parameters. The frequency of water testing should depend on the risk assessment at least once a year for facilities using water for production and at least once every three years in other cases. Ice used in the plant should be tested for microbiology at least once a year.

6.2. Testing of raw-materials and products

The company should conduct tests on raw materials and products. There should be a testing schedule, developed and updated on the basis of the results obtained, risk analysis, etc., at least once a year. Test results should be available. Tests should be carried out in accordance with the legislation. The results should be reviewed or compared to legal assumptions, possibly internal assumptions. In the case of agricultural production, testing for residues of pesticides, heavy metals, nitrates and nitrites should be conducted.

6.3. Durability of products

The shelf life of finished products should be determined on the basis of storage tests and/or regulations. Testing should include: microbiological test and sensory evaluation. In case of internal testing, method should be externally periodically validated. The Eurocash Group's Private Label Department may additionally reserve the necessity to archive "counter samples" of finished products from each batch.

7. Allergen monitoring

7.1 Allergen contamination risk management system

Food allergens - allergens are defined as allergens regulated by legislation. The company should have a documented, effective, risk-based allergen control procedure to minimize an acceptable level the risk of unintentional release of allergens into products, which do not contain allergens, and minimize the need for warning food labeling. Regulatory principles and changes are included in existing processes on an ongoing basis for consumer safety. The supervision procedure should cover all areas of the company and process steps where allergens are present, taking into account their physical state. The procedure should consider allergens from food consumed by employees on the factory premises. The company should have a complete list of all allergenic substances used in the facility.

8. Production process, release of finished product

8.1. Monitoring of manufacturing, production and storage processes. Personnel responsible

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The company should supervise and monitor the production process, the parameters of the production processes and results recording system. The person responsible for the production processes should have required competences.

8.2. Tightness control of packaging

Rules for checking the tightness of packaging should be developed. Determination of the frequency and type of control method should be made according to the packaging process used, e.g. vacuum packaging, modified atmosphere packaging (MAP), tightness of cans, plastic packaging, etc. In the case of modified atmosphere packaging (MAP), the gas mixture control should be conducted and the tightness of packages should be assessed by measuring the residual oxygen in the package. Records of packaging tightness control should be kept.

8.3 Control of mass/quantity in compliance with the declaration on the label

The company should have a mass/ quantity control system for its products that complies with current legal requirements and other additional industry codes or specific customer requirements. The frequency and methodology of mass/ quantity control should comply with the requirements of applicable legislation. Records of on the weight of the product for compliance with that declared on the label should be kept. Records of checks on the weight/quantity of the product to match that declared on the label should be kept.

8.4. Labelling/ Legal compliance

Information declared on labels should comply with legal requirements and customer specifications.

9. Identification and traceability, product recall from the market

9.1. Introduction

According to current legal requirements, the company should have a traceability system in place, i.e. the ability to trace batches of products. The company should be able to identify all batches of raw materials (including packaging materials and additives) from suppliers through all stages of processing and delivery to customers.

9.1.1. Identification

In order to ensure an effective traceability system, the facility should have a system for identifying raw materials, including direct packaging, and all other substances/ auxiliary materials, semi-finished products, final products (e.g. use of identification labels, product codes, etc.).

9.1.2. Traceability

The traceability system should be tested periodically at least once a year and each time the system is changed. The test should be carried out in two directions: from finished product to raw materials and from raw material to finished product, taking into account quantity control (mass balance). All records of the processes carried out should be included in the traceability system. The traceability test should be conducted within a maximum of 4 hours. The traceability test should be documented.

9.2. Recall process

The company should have an effective procedure for the recall and return of all products that ensures that the customers involved are informed as soon as possible. The procedure should include:
- the appointment of key personnel, with clearly defined responsibilities, that form the recall management team;
- guidelines for deciding whether there is a need for a recall or withdrawal and what records should be maintained;
- an up-to-date list of key contacts;
- a communication plan to communicate effectively and as soon as possible with relevant parties, e.g. clients, consumers, official units entities;
- details of external bodies providing advice and adequate support if required (e.g. specialist laboratories, official bodies and legal advisors);
- logistical planning with regard to product traceability, product collection/ take-back or disposal, and stocking arrangements.

Product recall and withdrawal procedures should be tested at least once a year to ensure their effectiveness. Records of simulated recalls should be made.

10. Transport

10.1 Introduction/ Loading

The facility should have procedures in place to ensure that dispatch, the vehicles and containers used to transport products out of the facility are managed so as not to create a risk to product safety and quality. These may include, where appropriate:
- temperature control of loading ramp areas,
- use of covered ramps for loading or unloading vehicles,

- securing loads on pallets to prevent movement during transport,
- controlling the load before dispatch.

10.2 Approval of vehicles used for transport

The vehicles should be approved by the relevant supervisory authorities for the transport of the relevant product group.

10.3 Controlling the vehicles before loading regarding hygienic contamination, physical contamination and correct temperature

All vehicles or containers used for the transport of products should be checked before loading to ensure that they are in a good condition. It is necessary to check that they are:
- kept clean,
- free from foreign odours that could contaminate the product,
- in a good technical condition to prevent damage to the product during transport (bulbs covered, proper condensate drainage from the refrigeration unit, leak-proof loading compartment of the means of transport),
- protected against pests,
- in case the goods require a specific temperature during transport, the temperature inside the vehicle should be checked before loading.

Records of control should be maintained.

10.4 Temperature monitoring

In case the goods require a specific temperature during transport, it should be ensured that an appropriate temperature range is maintained according to the specifications of the product at minimum and maximum loading.

The driver is required to provide evidence of the maintenance of the correct temperature conditions during transport in the form of an automatic record (a temperature record of the loading and a printout from the refrigeration unit at a minimum frequency of every 15 minutes is required).

Evidence of technical inspection of the efficiency of the refrigeration units and calibration of the sensors at a minimum frequency of once a year should be provided.

10.5 Vehicle washing book, sanitary and epidemiological examinations

Vehicles used for transport should be in an appropriate hygienic condition.

Cleaning and disinfecting of the vehicle loading compartment should be carried out and recorded in a vehicle washing book at a frequency of at least once a month. Records should be kept and should include the name and concentration of working solution of detergent. The detergent used should be approved for the food industry. The delivery driver should have a valid medical certificate (if needed) and a reflective vest.

10.6 Breakdown

Procedures for vehicle refrigeration unit breakdown should be in place. All incidents of refrigeration unit breakdown should be recorded and completed corrective actions should be documented.

10.7 Transport order

In case when the company uses a third party transport service, all the requirements specified above should be clearly defined in the transport contract/ transport order and verified.

11. Company`s cleanliness system

11.1 Cleanliness system requirements

The company should have a cleaning system for the relevant areas e.g.: OCP (Open-Cleaning-Place), CIP (Cleaning-In-Place) or manual cleaning. Responsibilities should be clearly separated, e.g. according to implementation by an external or internal company, dedicated employees. At least once a year there should be personnel trainings confirming knowledge of cleaning and disinfection processes.

Cleaning personnel should have the support of technical staff for operations carried out in unusual conditions: in machines/ equipment requiring specific cleaning methods, e.g. entry into the machine, washing at height, cleaning of cleaning equipment, e.g. box washer, trolley washer, box cleaning machine, shoe cleaner machine, CIP, e.g. with acidic descaling chemicals.

The company's cleanliness system should cover all production, warehouse, warehouse-related and social areas, including the outdoor areas. The system should define the scope of duties and responsibilities. There should be procedures describing cleaning processes in particular areas. In case of cleaning production machines and equipment, instructions should also include guidelines for dismantling the machine for effective cleaning. In case of hiring a third-party maintenance and repair service provider, the scope of duties, responsibilities should be defined in the contract.

11.2. Company`s cleaning schedule

Company should have a cleaning schedule for the entire plant including, among others: area, place, equipment, concentration of working solution of detergent, person responsible, frequency, method, type of chemical product.

Completed activities should be confirmed by records (records confirming the release of the area to work in it after carrying out cleaning and disinfection activities, records of cleaning and disinfection activities carried out, confirmation that cleaning and disinfection activities are carried out in accordance with the cleaning schedule). The schedule should be available at the person responsible for facility cleaning.

11.3 Storage of detergents

Chemical products should be stored in a secured and designated area (restricted access, ventilation system, drainage, sorbents or drip trays, availability of running water, personal protective equipment). Detergents should be stored in accordance with the manufacturer's recommendations. Detergents should not be poured into substitute/ non-dedicated packaging for hazardous substances. Substitute packaging should be labelled. Alkaline and acidic chemical products should be stored separately. Safety data sheets should be available at the place where chemical products are stored. Storage of detergents in production halls should be kept to a minimum and properly secured. Information should be available on how to read coded expiration dates (if applicable). Cleaning and disinfecting products should have up-to-date documentation, e.g. safety data sheets.

11.4. Cleaning equipment

Separate cleaning equipment should be used in production areas, social areas and toilets. Cleaning equipment should be used and stored in such a way as to prevent contamination. Cleaning hoses,

cleaning tips, handles, etc. should not be left in contact with the floor after use. Devices, equipment should not be cleaned on dirty surfaces/ workstations.

11.5. System for assessing the effectiveness of cleaning processes

Assessment of the effectiveness of cleaning processes should be carried out according to the risk analysis through, among others: visual methods, microbiological testing, ATP bioluminescence techniques. In justified cases, measurement of residues of the applied cleaning products should be carried out. The company should have cleaning control schedules and documentation confirming their realization, results and acceptable limits.

11.6. Safety data sheets, specifications, suitability for use in food industry

The chemicals should be dedicated to applications in the food industry. For products that do not require rinsing, it is necessary to have confirmation from the manufacturer. Each product should be properly labeled.

11.7. Technical inspections of cleaning equipment. Detergents concentration.

Technical inspections should be carried out in automatic dispensing machines and equipment. Control of detergents concentration used in those machines and equipment should be conducted. CIP systems should be hygienically designed with no "blind spots" and with continuous flow of detergents. Flowcharts/ plans of CIP, air flow and drainage should be available. Instructions for making working solutions of chemical products should be available to responsible employees.

11.8. Production equipment

Knives should be cleaned and disinfected. The water temperature in the sterilizer should be at least 82^0C. If heat sterilisation method is not possible to apply, another appropriated disinfection method should be used.

12. Staff hygiene

12.1. Sanitary and hygienic condition of social areas

The company should have procedures in place for: staff hygiene, protective clothing, hand washing and disinfection, eating and drinking, smoking/tobacco, injuries, nails, jewelry and other personal belongings, hair, facial hair, etc. The requirements for admitting/allowing staff to work should be formalized. Conditions in changing rooms, canteens, sanitary facilities, should be provided at an appropriate level, i.e., to ensure the possibility and comfort of preparation to perform work. The social space should be appropriately adapted to the number of employees and proportional in size. Social areas should be properly designed, kept clean and maintained in an appropriate infrastructural condition. Directions of personnel movement should be followed. There should be separate lockers for work clothes and lockers for personal clothes or split double lockers, divided into clean (work clothes) and dirty (personal clothes) sections. There should be benches/ chairs in the changing rooms. The temperature in the social areas should guarantee the comfort of employees. Employees should be able to shower after work. Work clothes are only allowed to be used/worn in areas intended for this purpose. It is prohibited to move wearing work clothes in outdoor areas and other office areas, due to the fact that this may pose a risk to product safety. There should be clothes hangers at toilets/ canteens. Toilets should not open directly into production areas (if this is not possible, then it is necessary to implement appropriate hygiene procedures and instructions). Separate smoking areas (including electronic cigarettes) should be designated, separate from production areas, and rules on smoking should be formulated into a procedure. Food and personal belongings of employees should not be allowed into storage, processing and production areas. Regulations should be developed relating to the presence of internal/ company`s technical employees and external services in production/ storage areas.

12.2 Hygiene maintenance

Depending on the food industry the company should have hygiene locks. Washing stations/ hygiene locks should have products for hand washing and disinfection.

12.3. Work clothes

Work clothes should be adequate for the type of work and position. A sufficient number of sets of clothing should be provided. A system for keeping work clothes clean and in proper condition should be formalized.

12.4. Medical examinations, health condition

People working in food industry (food trade or food and beverages production) should have valid medical certificate (if needed).

13. Pest control system

13.1. Introduction

An effective pest control system should be in place throughout the plant to minimize the risk of pest infestation and to prevent the risk of product contamination.

13.2. Pest infestation hazard analysis

The pest control system should be based on hazard analysis and risk assessment of associated risks.

13.3. Pest control system scope

The company should have a system in place to control the presence of pests or potential presence of pests, taking into account the plant surroundings and buildings.

13.4. Frequency of inspections

The frequency of inspections should be based on the assessment of pest activity and should be documented.

13.5. Pest control inspections

The company should outsource the pest control service to a qualified third-party service provider and/ or should have properly trained employees who are responsible for conducting regular inspections, preventing and eliminating pest infestation.
If the company uses an outside service for pest control, then the scope of work should be precisely defined in the terms of the contract.

If the company decides to control pests on its own, it should demonstrate that the pest control operations are carried out by trained and appropriately qualified employees with the necessary knowledge to select the appropriate chemicals and methods to protect the facility.

13.6. Insurance

The pest control company should have valid insurance.

13.7. On-site coordinator

The company should appoint and train a person responsible for pest monitoring at the plant.

13.8. Pest control devices map

There should be an actual detailed plan of the facility with the location of pest control devices (bait map). The pest control location plan should be regularly updated.

13.8.1 Pest monitoring devices

Baits, rodent traps, and insect traps, should be in appropriate numbers and should be located in a proper place and/ or position, protected from movement. They should be made and positioned so as to prevent potential contamination of materials, products or areas. Toxic rodent baits should not be used in production or storage areas where open product is present, except in actions taken during an active pest infestation. Toxic baits should be properly secured. Trap marking should be placed directly on the traps and nearby the traps (on the wall).

13.8.2 Information on agents applied

Detailed information should be in place for each pest control agents, including their instructions for use and safety. Records should be kept on an ongoing basis including:

type, amount and concentration of agent used, date, location, method of application and against which type of pests where agents used.

13.9. Pest inspection records

Pest control inspections and actions resulting from these inspections should be documented. Implementation of actions should be monitored and recorded.

13.9.1 Trend analysis

The results of pest inspections should be regularly analysed for trends, at least once a year and always in case of increased pest activity.
This should include analysis of pests found in specific traps to identify vulnerable areas. The analysis should be used as a basis for improving pest control procedures.

13.10. Review of the pest control system

A review of the pest control system should be conducted at the facility. The review should be conducted by an expert and should include a thorough inspection of the facility for the presence of pests and include a review of the control measures in place and any recommendations for changes. The review should be conducted at a frequency of not less than once a year and documented.

13.11. Action in case of pests infestation

In the case of the presence of pests or signs of pests activity, immediate actions should be taken to identify the products at risk and to minimize the risk of product contamination.
Any action taken should be documented. In the case of hydrogen phosphide gassing of plants, the areas should be ventilated after treatment and raw materials/products should be checked for any residual foreign odour. In case of fogging/ spraying the plant, the raw material/ finished product should be protected against pesticides.

13.12. Securing of buildings

Buildings should be kept in good condition. Doors, windows or ventilation openings should be designed or secured in such a way as to reduce the possibility of pests entering the facility.

14. Non-conformities management/ corrective actions

14.1. Non-conformities management system

The rules for managing of non-conformities should be formulated, including among others: management of personnel, raw materials, semi-finished products, final products, additives, equipment, packaging, etc.
Actions appropriate to the seriousness and frequency of the determined non-conformities should be carried out promptly and effectively. There should be a documented procedure that regulates the authority and responsibility for taking action against non-conforming or possibly non-conforming products.
The actions taken should be recorded and evaluated in terms of their effectiveness.

14.2. Storage of non-conforming products

A system for marking and blocking non-conforming goods should be developed.

14.3. Verification, correction and corrective action plan.

All non-conformities should be analyzed, their causes identified and the results of their analysis should be recorded. Correction and corrective action plan are intended to prevent the problem from reoccurring. Actions taken should be recorded and evaluated in terms of their effectiveness. The results should be made available to the people responsible and to senior management. There should be a procedure describing the possibility of restoring out-of-specification products to conformity with the requirements (e.g.: beverage industry brix, acidity) and guidelines for the release of non-conforming product until all agreed procedures will be followed.

15. Customer complaints/ customer returns

15.1. Introduction

Customer grievances and customer complaints should be handled effectively and the information obtained should serve to reduce them in the future.

15.2. Complaints procedure

A procedure for handling complaints should be developed, also taking into account management of customer returns.

15.3. Registration and analysis of complaints. Corrective actions and evaluation of their effectiveness

All customer complaints/ returns should be recorded, analyzed and the results should be kept. Actions appropriate to the seriousness and frequency of the problems determined should be carried out promptly and effectively by appropriately trained personnel, in order to prevent recurrence. The actions taken should be recorded and evaluated in terms of their effectiveness.

15.3.1. Trends

Complaint trends should be monitored. The number of complaints should be compared to the number of units sold and the type of complaint.

15.3.2. Targets

The company should set targets and have a plan in place to reduce the overall level of complaints and for the categories/ products causing the most problems.

15.3.3. Reporting of complaints

The results of complaints/ returns analysis should be available to the relevant responsible persons and senior management.

16. Supervision of machinery/ devices/ equipment/ control and measuring equipment

16.1. Introduction

An effective, documented procedure should be in place throughout the plant for the supervision of machinery/ equipment.

16.2. Staff responsible for technical inspection

The company should have its own on-site staff responsible for technical inspections and/or have available contracts or formal orders with service providers, with clearly defined terms of services.

16.3 Certificates of Conformity for direct food contact equipment

The company should have certificates of compliance with the relevant legal requirements for equipment for direct food contact. In case where no specific legal requirements apply, evidence should be available to confirm that all equipment is fit for use.

16.4. Design and layout of equipment

Equipment should be designed and arranged in such a way that maintenance and cleaning operations can be carried out effectively.

16.4.1. Maintenance schedule

The company should have a documented schedule of planned technical inspections or a schedule for monitoring the technical condition of all machinery and equipment having a direct impact on food safety.

16.4.2. Technical inspection instructions

Technical inspection instructions should always be established when a new machine is started up. Maintenance work should be carried out on all equipment used to monitor and/ or control food safety hazards, e.g. metal detectors, filters, X-Ray. In case there is a risk of contamination with foreign bodies, inspection of the equipment should be carried out at a specific time (at least once a year).

16.5. Records

Records of inspections and appropriate action taken should be kept.

16.5.1. Release of equipment

Releases of equipment for re-operation after completed maintenance should include cleaning, disinfection (where specified) and pre-inspection.

16.6. Ongoing repairs

During ongoing repairs it should be ensured that product safety and product compliance are not at risk. It should also be ensured that adjacent production lines or equipment are not at risk of contamination.

16.7. High risk areas

If high risk areas are identified, it should be ensured that repairs/ maintenance are carried out with respect of segregation requirements of the area, e.g. tools intended for high risk area only.

16.8. Materials, greases

Materials, greases, etc. that may pose a risk in direct or indirect contact with the product should be intended for contact with food and have a known allergen content, which should be documented.

16.9. Workshop

Workshops should be kept clean and tidy. There should be measures in the workshop to prevent the transfer of technical pollutants into the production/ storage areas.

16.10. Training

Maintenance personnel should be trained in the risks related to their activities.

16.11. Control and measuring equipment

Process monitoring, including factors such as temperature, time, pressure and chemical parameters, should be implemented, properly controlled and recorded to ensure that products are produced in accordance with the required process specification.

16.11.1 Identification of control and measuring equipment

It should be ensured that control and measuring equipment is registered and appropriately marked. The calibration status of the control and measuring equipment should be marked in a legible way, e.g. a label on the equipment or information on the list of equipment to be calibrated.

16.11.2. Calibration and verification

Control and measuring equipment requiring validation should be legalized in accordance with current legal requirements. Where it is necessary to ensure reliable results, equipment and measuring methods should be calibrated or verified against measurement standards, at appropriate intervals or before use. The frequency of calibration or verification of control and measuring equipment should be determined on the basis of a risk analysis.

16.11.3. Effectiveness of monitoring and measurement procedures

Evidence should be provided that the specified monitoring and measurement methods and equipment are adequate to ensure the effectiveness of the monitoring and measurement procedures.

16.11.4. Monitoring process parameters or product quality

Where process parameters or product quality are monitored by equipment installed in the production line, this equipment should be connected to an appropriate alarm system, which should be checked regularly.

16.11.5. Method of use

Control and measuring equipment should be used only as intended.

16.11.6. Records

The results of inspections, adjustments and calibrations should be documented and corrective actions should be taken if necessary.

16.11.7. Breakdown of control and measuring equipment

In case the results of the measurements indicate deviations or damage of the equipment, concerned equipment should be immediately serviced or replaced. Confirmation of the service carried out should be documented.

17. Foreign bodies risk

17.1. Introduction

The company should have a procedure to monitor foreign bodies (wood, plastic, glass, metal). Glass and wooden elements should me excluded from areas where open products are handled and where this is not possible, appropriate measures should be put in place to monitor them against breakage.
The company should ensure that all production equipment is in good technical condition and does not have a negative impact on product safety. Process rooms should be designed to ensure food safety. Surfaces should be easily washable, complete, with no cracks or damage, maintained in good technical condition, with no possibility of water stagnation.

17.2. Regulations for managing foreign bodies

In case there are elements made of glass or other fragile material, documented procedures should be in place to handle a breakage incident. Procedures should include: the installation of marked equipment to remove breakage, a method to remove and dispose of the exposed product near the breakage site, cleaning of the production area, changing of work clothes, appointing personnel responsible for these activities, recording the incident.

17.2.1. Control of glass, metal, wooden and plastic elements

All lighting devices should be protected with an unbreakable cover and installed to minimise the risk of damage. All windows should be protected against damage and breakage. Wooden, glass, metal, plastic elements should be controlled regularly according to the detailed list. The frequency of control of the elements' condition should depend on the risk level of the product. The use of elements containing staples or other objects that pose a risk of foreign body contamination should be minimised. The use of paper clips, pins, staples, knives with a breakable blade should be prohibited in open production areas. A list of tools in the toolbox, shadow boards should be available.

17.2.2. Control of sharp tools

The company should have a documented procedure to control the use of sharp tools, e.g.: knives, equipment with blades, needles, wires. The company should develop rules to control the quantity and technical condition of the tools used. The use of snap-off blade knives in open production areas is prohibited.

17.2.3. Foreign body detectors. Calibration

The risk of product contamination should be eliminated or minimised by the effective use of foreign body removal or detection equipment. Foreign body detection equipment should be tested at specified intervals taking into account customer requirements, the ability of the plant to identify, hold and prevent the release of contaminated products in case of equipment failure. There should be procedures in place for the operation and testing of foreign body detection equipment.
There should be procedures in place for the operation and testing of foreign body detection equipment. These procedures should include:
- responsibility for testing the equipment,
- methods and frequency of controls,
- registering the control results.

Personnel responsible for supervision of the control and foreign body removal stage should be trained and qualified in this area.

18. Waste management

18.1. Introduction

An effective sewage disposal system and waste management procedure should be in place throughout the plant.

18.2. Sewage system - design and construction

Sewage system should be designed and constructed to prevent materials or products contamination. Drainage should not run above production lines.

18.2.1. Sewage system – capacity

The sewage system should have a capacity appropriate for the expected amount of waste.

18.2.2. Sewage system - direction of the flow

The flow direction of the sewage system should not run from the contaminated zone to the clean one.

18.3. Waste segregation

A procedure should be developed for the segregation (including the breakdown of waste types), storage and disposal of waste, taking into account the aspect of avoiding cross-contamination.

18.3.1. Waste containers

Waste should be collected in separate containers, depending on the assumed method of removal. Waste containers should be clearly marked, properly designed, in good condition, easy to clean.

18.3.2. Waste disposal

Food waste and other waste should be disposed of as soon as possible from food processing areas.

18.3.3. Waste collection rooms

Waste collection rooms (including compactors) should be designed in such a way to facilitate cleaning and limit the access and interest of animals and pests.

18.3.4. Products intended for animal feed

By-products, reduced quality or surplus products intended for animal feed, during the storage process should be separated from other waste and protected against contamination.

18.4. Legal requirements

Legal requirements related to waste management should be met in the plant.

18.5. Waste collection contracts

Contracts with specialized waste collecting companies should be signed. Collection of waste should be managed by authorized waste collecting companies.

18.5.1. Documentation of waste collection

Each collection of waste should be confirmed by an appropriate record. Records should be kept and accessible.

18.6. The surroundings of the plant

Attention should be paid to possible contamination hazards from the nearby surroundings. Food production processes should not be carried out in areas where potentially harmful substances could get into the production area. The plant environment should be kept tidy.

18.6.1. Green areas around the plant

Green areas should be cared for and maintained in good condition.

18.6.2. External roads

External roads should have a proper surface and should be repaired on a regular basis.

18.6.3. Drainage system

If a natural drainage system is insufficient, an adequate one should be installed.

18.7. Plant buildings

Buildings should be designed, constructed and maintained in a way that is appropriate for the type of processes carried out, the food safety hazards that result from these processes and possible sources of contamination from the plant's surroundings.

19. Food defense

19.1. Introduction

Identified potential risks to the security of the products i.e. risks identified in the food defense assessment like the acts of the sabotage, vandalism or terror, should aim to implement appropriate preventive measures in the food trading company.

19.2. Assessment of security systems and potential risks

The company should have a documented assessment of the security systems and the potential risks in case of intentional contamination or damage to the product.

19.2.1. Assessment of plant areas according to identified risk.

Areas of the plant should be assessed according to risk: higher risk areas or areas with restricted access should be identified and marked, monitored and controlled.

19.2.2. Access to production and storage areas

Measures should be in place to ensure that only authorized persons have access to production and storage areas. Where applicable, access should be physically restricted through the use of locks, smart cards (keys) or alternative systems. External tanks, silos and all external inlet pipes should be closed.

19.3. System for registering the visitors of the plant

A system for registering visitors of the plant should be provided.

19.3.1. Informing about company policy and controlled access

Visitors of the plant should be informed about the company's policy and the rules of hygiene and movement around the plant.

20. Food Fraud - vulnerability and potential risk of food adulteration

20.1. Introduction

Assessment of vulnerability to possible adulteration of raw materials/ additives used during production process should be conducted.

20.2. Food fraud vulnerability assessment and potential risks

A food fraud team should be appointed and a food fraud mitigation plan should be documented. In the beginning it is necessary to identify the level of potential food fraud risk throughout the supply chain until delivery of the final product to the customer. A documented food fraud vulnerability assessment should be undertaken on all raw materials, additives, food products, packaging and processes with a frequency minimum once a year.

20.3. Tools for assessing adulteration

The tools which are used to assess adulteration:
- supplier management procedures, including supplier's assessment, qualification and audits at the supplier's premises,
- quality certificates, certificates of analyses, laboratory tests results provided for particular raw materials,
- risk assessment for each supplier, including all data regarding the authenticity and reliability of the contractor.

21. Food safety culture

21.1. Introduction

The term "food safety culture" informs that entities operating in food businesses obtain, maintain and provide evidence of an appropriate food safety culture. Food safety culture enhances food safety by increasing awareness and improving employee behavior in food plants.

21.2. Food safety culture declaration

The company should have a documented declaration regarding the implementation, maintenance and improvement of food safety culture.

21.3. Evidence confirming an implemented and maintained food safety culture

The company should have evidence confirming implemented and maintained food safety culture (e.g. a plan for continuous improvement of the food safety culture covering all areas of the company that affect product safety, planned time frames for activities, methods of their implementation and measurement tools).

21.4. Top management commitment

The company should have documented evidence of meeting the requirements regarding the involvement of top management in building, maintaining and improving the food safety culture in the organisation.