AUDIT REPORT

BRC
Global Standard for Food Safety
Issue 8
August 2018

Wabo Sp. z o.o.

June / 2019

DQS CFS GmbH

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Audit Report

Global Standard for Food Safety Issue 8: August 2018

1.Audit Summary			
Company name	WABO Sp. z o.o	Site Code	1933530
Site name	WABO Sp. z o.o		
Scope of audit	Productions of frozen fruits and vegetables intended to further processing packaged in sacks or cartons. Produkcja mrożonych owoców i warzyw przeznaczonych do dalszego przetwórstwa, pakowanych w worki i kartony.		
Exclusions from scope	no		
Justification for exclusion	n/a		
Audit Finish Date	2019-06-12		
Re-audit due date	2020-06-14		

Additional modules included			
Modules	Result	Scope	Exclusions from scope
FSMA Preventative Controls and FSVP Preparedness	Passed	Productions of frozen fruits and vegetables intended to further processing packaged in sacks or cartons. Produkcja mrożonych owoców i warzyw przeznaczonych do dalszego przetwórstwa, pakowanych w worki i kartony	n/a
Choose a module	Choose an item		

Head Office	No

2. Audit Results					
Audit result	Not Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	A	Previous audit date	2018-06-22		
Certificate issue date	2019-07-19	Certificate expiry date	2020-07-26		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	8

3.Company Details

Address	Ul. Opaczewska 69/18 02-201 Warszawa Plant : Pnie 76 26-803 Promna		
Country	Poland	Site Telephone Number	+48 691896060
Commercial representative Name	Afis Szabanow	Email	ramstrog@gmail.com mail
Technical representative Name	Marta Nowakowska	Email	marta.nowakowska@wabo.pl

4.Company Profile

Plant size (metres square)	<10K sq.m	No. of employees	1-50	No. of HACCP plans	1-3

Shift Pattern	1 (2 during the production peak)
Subcontracted processes	No
Other certificates held	Kosher, Eco, HACCP
Regions exported to	Europe Asia North America South America Africa Choose a region
Company registration number	499673
Major changes since last BRC audit	After the last audit, the plant purchased an X-Ray detector designed mainly for the detection of cherry pits. The device is currently under validation.

4.Company Profile

	Recently, the company purchased a second production plant in town Kraśnik.

Company Description

The company WABO Sp. z o.o. was established in 2010 year and it is registered in Warsaw. The processing plant is however located in small village Pnie in central Poland. Recently, the company purchased a second production plant in the town Kraśnik. The production was started in June 2010. In December 2010 the company achieved its first HACCP certificate. At present the company employs 22 permanent employees and about 20 seasonal workers who work in 1 (periodically 2) shift system in one production line. The production area is currently 3500 m2 and at present started works in aim to extension of production and storage areas. The company has got a line to prepare fruits or vegetables, a fluidized freezing tunnel with a capacity of 6 tonnes per hour as well as lines provided with metal detectors for weighing and packing of frozen products in sacks (25 kg) or cartons (10 kg). The current capacity of the cold store is 14,000 pallets. The products are intended to further processing. Before dispatching frozen fruits are kept in five refrigeration chambers with high rack storage system. The plant performs storage services for frozen food packed goods, belonging to other entities. About 90% of production goes to European Union countries such as Germany, Belgium, Netherlands, Austria. Run is also exported to Russia, Israel and the United States (the plant has been granted FDA approval no. 13189662474). Due to export to the USA, the company joined the FSMA module audit. Results in this area are described later in this report. Raw material used in production comes from Poland. Frozen are subjected to: strawberries, raspberries, cherries, currants, apples, gooseberries, rhubarb, plums. The audit according to Codex Alimentarius was carried out in the same time. The company did not apply the symbol BRC. The current audit has been conducted in originally scheduled time.044 Auditor Handout was submitted to the customer.
Witness audit :no

5.Product Characteristics

Product categories	06 - Prepared fruit, vegetables and nuts Category
Finished product safety rationale	Freezing tunnel at a temperature of minus 22 to minus 28 C, depending on the range of product. Control of storage temperature (for finished product ≤ -18°C). Shelf life 2 years from the date of manufacture. All products intended for further production require thermal treatment. Mrożenie w temperaturze od minus 22 do minus 28 C, w zależności od asortymentu. Przechowywanie w temperaturze < -18 C. Czas przydatności do spożycia 2 lata od daty produkcji.Wszystkie produkty przeznaczone są dalszej produkcji wymagającej obróbki termicznej.

High care	No	High risk	No	Ambient high care	No

Justification for area	Based on the BRC decision tree they were identified : low-risk areas, enclosed product areas, non-product areas
Allergens handled on site	None Choose an allergen
Product claims made e.g. IP, organic	Organic, kosher
Product recalls in last 12 Months	No
Products in production at the time of the audit	Freezing: strawberries. Cold stores: cherries, apple, rhubarb strawberries.

6.Audit Duration Details			
On-site duration	22 man hours	Duration of production facility inspection	11 man hours
Reasons for deviation from typical or expected audit duration	Added extra time for the FSMA module. Audit Doliczono dodatkowy czas na moduł FSMA. At the same time, the HACCP audit was carried out for compliance with Codex Alimentarius.		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2019-06-10	08:30	17:00
2	2019-06-11	08:30	17:00
3	2019-06-12	06:00	12:00

	Auditor (s) number	Name	Role
Auditor Number	038032	Anna Wronecka	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11) Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Afis Szabanow /President / CEO	x		x	x
Marta Nowakowska/ Quality Representative	x	x	x	x
Marcin Kostrzewa/ Shift Manager	x	x	x	x
Aneta Sulej / Administrator	x		x	x
Marciniak Dorota/operator		x		
Izabela Plesznowska/Operator		x		

Present at audit				
Paweł Wrzosek/operator		x		
Janusz Kozinski / Operator		x	x	

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No.	**Requirement ref.**	**Details of non-conformity**	**Critical or Major?**	**Anticipated re-audit date**

Critical			
No.	**Requirement ref.**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Requirement ref.**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	4.4.1	An unfinished plinth reported in the corridor by the freezing hall. W korytarzu przy mrożniach fragment niewykończonego cokołu.	Finishing the plinth. 2019/07/05 Wykończenie cokołu 05.07.2019	Supervision of other places in the newly build warehouse part – 2019/07/10. Kontrola pozostałych miejsc w niedawno	Photograph of the finished element, note from the supervision of other places. Zdjęcie wykończonego	2019-07-08	Anna Wronecka

				wybudowanej części magazynowej- 10.07.2019	elementu, notatka z kontroli pozostałych miejsc		
2	4.4.8	Leaking doors reported in the shipping area. Przypadek nieszczelnych drzwi przy ekspedycji.	Seal replacement 2019/06/30 Wymiana uszczelki 30.06.2019	Replacement of door seals etery six months or more frequently if necessary – 2019/07/08. Wymiana uszczelek w drzwiach co pół roku lub w przypadku konieczności częściej.- 08.07.2019	Door photograph, note from meeting with the technical department regarding setting a schedule of supervision and replacement. Zdjęcie drzwi, Notatka ze spotkania z działem technicznym w celu ustalenia harmonogramu kontroli i wymiany .	2019-07-08	Anna Wronecka
3	4.11.2	The plant cleaning schedule does not specify the frequency of ceiling cleaning. Harmonogram czyszczenia zakładu nie określa częstotliwości czyszczenia sufitów.	Addition of missing information in the schedule – 2019/07/05. Uzupełnienie brakujących informacji w harmonogramie - 05.07.2019	Schedule supervision – 2019/07/08. Kontrola harmonogramu- 08.07.2019	Finished schedule. Note from supervising the remaining schedules. Uzupełniony harmonogram. Notatka z kontroli pozostałych elementów	2019-07-08	Anna Wronecka
4	4.11.5	The visual assessment of equipment, e.g. pallets used as platforms in the	Replacement of dirty pallets – 2019/06/30.	Reporting the issue to the production manager. Better	Photograph of pallets, note from the conversation	2019-07-08	Anna Wronecka

		packing hall, was not conducted properly. Ocena wizualna czystości sprzętu jak np. palety stosowane jako podesty na hali pakowania nie została przeprowadzona rzetelnie.	Wymiana zabrudzonych palet-30.06.2019	supervision of cleanliness after washing – 2019/07/05. Zwrócenie uwagi kierownikowi produkcji Lepsza kontrola czystości po myciu-05-.07.2019	with the shift manager. Zdjęcie palet, notatka z rozmowy z kierownikiem zmiany		
5	4.12.2	Unlabeled containers for fruit which fell to the floor and were treated as waste were reported by the raw material washer. Przy płuczce surowca stwierdzono nieoznakowane pojemniki na owoce spadające na posadzkę i traktowane jako odpad.	Assigning single-coloured containers – 2019/07/03. Wyznaczenie pojemników w jednym kolorze -03.07.2019	Employee training – 2019/07/04. Szkolenie pracowników - 04.07.2019	Photograph of the assigned containers, protocol of the employee training. Zdjęcie wyznaczonych pojemników, protokół ze szkolenia pracowników	2019-07-08	Anna Wronecka
6	4.14.2	The frequency of Pest Control inspections (once a month) does not involve the increased insect activity during summer. Częstotliwość inspekcji raz w miesiącu Pest Control nie uwzględnia zwiększonej aktywności owadów w okresie letnim.	Contacting a DDD company in order to eliminate the excessive insect activity - 2019/06/12. Wezwanie firmy DDD w celu wyeliminowania nadmiernej aktywności owadów-12.06.2019	Increasing the frequency of Pest Control inspections in the summer to three times a month – 2019/06/30. Purchase of additional insect killer lamps for fruit flies – 2019/07/20.	Protocol from the conducted procedure, information about the agreement with a DDD company, photo of lamp. Protokół z przeprowadzonego zabiegu,	2019-07-08	Anna Wronecka

				Zwiększenie częstotliwości kontroli Pest Control do 3 razy w miesiąc w sezonie letnim. 30.06.2019 Zakup dodatkowych , specjalistycznych lamp na muszki owocówki- 20.07.2019	informacja o ustaleniach z firmą DDD.		
7	5.4.1	The methodology of conducting hazard analysis for food fraud was not described, the criteria taken into account in hazard analysis were not specified. Nie opisano metodyki przeprowadzania oceny ryzyka na zafałszowanie, nie doprecyzowano jakie kryteria zostały wzięte pod uwagę przy ocenie ryzyka	Addition of the missing information in the documentation – 2019/07/05. Uzupełnienie brakujących informacji w dokumentacji - 05.07.2019	Inspection of remaining hazard analyses in order to check whether all elements were taken into account – 2019/07/10. Kontrola pozostałych ocen ryzyka w celu sprawdzenia , czy wszystkie elementy zostały uwzględnione- 10.07.2019	Supplemented hazard analysis, note of inspection of remaining documents. Uzupełniona analiza zagrożeń , notatka z kontroli pozostałych dokumentów	2019-07-08	Anna Wronecka
8	6.2.3	The half-product labelling inspection is documented for every pallet, the finished product is labelled during loading onto the vehicle and the labelling inspection is documented	Introduction of the requirement of finished product labelling supervision at the beginning, in the middle and at the end oft he loading stage – 2019/06/24.	Training for employees responsible for supervision and inspection – 2019/07/05.	Note from HACP team meeting Training protocol. Scans of finished forms.	2019-07-08	Anna Wronecka

		once during shipping of each batch. Kontrola etykietowania półproduktu dokumentowana jest dla każdej palety, produkt gotowy etykietowany jest przy załadunku na samochód i kontrola etykietowania dokumentowana jest raz dla całej wysyłki.	Wprowadzenie obowiązku kontroli etykietowania wyrobu gotowego na początku załadunku w środku i na końcu załadunku. – 24.06.2019	Szkolenie osób odpowiedzialnych za nadzór i kontrolę- 05.07.2019	Uzupełniona procedura, Protokół ze szkolenia . Skany wypełnionych formularzy.		

Comments on non-conformities

A total of 8 non-conformities were found (and additional 2 to voluntary modules). The observed deviations are not essential for food safety. Analysed the evidence taken corrective actions. At this stage, they are sufficient.

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	**Requirement ref.**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Requirement ref.**	**Details of non-conformity**	**Corrective action taken**	**Root cause analysis and proposed action plan**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	13.1.18	Records from raw material control do not include an hour of inspection. Some formulas do not have a location name.((IP-01-A, IP-03-C)	Introduction of the obligation to record the inspection time. 2019.06.30	Exchange of documentation for new forms containing the name of the location Training of the person responsible for making records.	Report from the training of the person responsible for making records Acceptance documents of the raw material with time of inspection and forms .((IP-01-A, IP-03-C) with the address of the location.	2019-07-09	Anna Wronecka
2	13.3.1	Responsibility for Food defense is not shown in the organization's organizational chart.	Supplementing the organizational chart with missing information – 2019.07.02	Review of documents under the FSMA requirements	Updated organization chart A note from the document review	2019-07-09	Anna Wronecka

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company's quality policy is available in version 3 of 2019.01.04. Signed by the director general Afisa Szabanowa. Current policy includes a reference to raising food safety culture. During the test, the presence of politics was revealed, including in the rooms: dining room, meeting rooms. The goals include BRC elements and are in line with the quality policy. In addition, they contain elements of the environment and a commitment to meet the legal requirements and requirements of customers. The sheet targets for 2019 include 7 items. (The sheet approved in 2019.04.01 has been checked). The objectives are reviewed on a quarterly basis (reviewed review records of targets in 2019. The same sheet also records the achievement of objectives The management review is carried out at least once a year. The last management review took place in 2019. 06.05 was attended by 5 top executives , the provisions were checked, also issues related to raising the food safety culture were discussed, among others the aim is to increase the awareness and involvement of personnel, material control also includes sabotage, falsification and authenticity of raw materials (ver.2019.01.04) and the HACCP system update Weekly meetings have been implemented to discuss quality and efficiency (with the President) In addition, quality meetings are held every quarter (detail checked in the report from 2019.06.03) Quality problems are analyzed and presented. An effective problem solving system has been developed in accordance with the schedule and responsible financial resources (analyzed the recent investments and human resources). The management provides sufficient resources for the development of the system. Meetings of top management are held once a month (schedule from 2019.01.10). Note from the meeting of 2019.05.21 has been reviewed (topics discussed: discussion among employees, training, atmosphere at work, pay for work). The auditor was also acquainted with the note from the meeting of 201.11, November 02, which discusses the confidential system of reporting complaints, comments and motions of employees. The factory has provided a confidential telephone number under which employees can anonymously provide information and the doubts on food safety and other related problem eg. such as work conditions.
The company has access to BRC websites.
The plant has access to electronic and paper versions of BRC and relates guides. In legal matters, the company is supported by the quarterly magazine "Food law". A list of current regulations regarding the plant is available / 2019.04.16.
This year's BRC audit took place on the date specified in the certificate.
Senior management actively participated in the audit subject (including the opening and closing meeting and inspection of the establishment). In the previous BRC annual audit, 9 minor discrepancies were identified, the plant took effective corrective action

1.2 Organisational structure, responsibilities and management authority

There is a new general organizational chart dated 2019.01.10. There has been a change in the position of the deputy quality manager. Auditor examined the responsibilities of selected employees in the shift manager (mr MK/2012.01.02) and Quality Manager / 2015.06.02). Provided access to the guidelines and instructions, and the issues of substitution (substitution matrix). During the audit (during interviews and observations) checked knowledge of the acceptance of the raw material, monitoring of temperatures in the processes, of the cleaning , metal detection, methods of packaging and labeling. In the office manager changes were analyzed and discussed available procedures and instructions.

2 The Food Safety Plan – HACCP

HACCP Team is appointed on the basis of internal directive of 09.01.2019 Ms. Marta Nowakowska is Team Leader). The team is multidisciplinary, 6 people including staff responsible for the quality, production, technical issues, supply. Team members have adequate preparation and are responsible for activities related to quality management and food safety, quality control, technology, manufacturing, machinery, purchasing and sales. The team is well trained. The auditor was particularly acquainted with, the records of training in HACCP Chairman Marta Nowakowska. - QM
Last training on the BRC / HACCP on 2019.02.28
General product division at:
- Strawberries,
- Raspberries,
- Cherries (pitted or whole),
- Black and red currants,
- Apple frozen (cube),
- Rhubarb (cut),
- Plums,
-
General structure of the documentary:
- The Book of Food Safety Management System (issue dated 2019.01.04. with later changes)
- Detailed Book of HACCP
- The Book of procedures and instructions
- The Book of Health . As part of this book are described in the chapters: Hygiene employees, Hygiene surrounding the plant, the plant Hygiene of premises, supervision of drinking water, waste disposal, supervision of pest management chemicals.
Moreover, a detailed instruction.
Washing clothes is done in an external laundry Pretty from Białobrzegi. One employee has 2 sets of clothing.
Auditor analyzed in detail the descriptions of products (all last reviewed 2019.01.04):

- Strawberry frozen 2019.01.04
- Gooseberry frozen 2019.01.04
- Frozen plums 2019.01.04
- Frozen raspberries 2019.01.04
- Frozen appels 2019.01.04

Descriptions include: legal requirements, quality requirements the nutritional value, as well as the requirements for microbiology • maximum level of pollution, Brix, Ph. Contraindications: no allergens, no GMOs. After thawing, do not freeze.
Shelf life 2 years from date of manufacture (the shelf life for all product groups supported by studies. Detailed descriptions are included in the specifications of individual products.
Heavy metals in accordance with the EC 1881/2006, as amended
Plant protection products EC 396/2006 + additional requirements outside the EU (eg. USA: MRL).
There is no rework (no spin to the process). Intended use is described in specification – appropriate for every group of consumers for further production in as bakery products, jams, etc.
The plant has developed technological schemes for all products.
Technological schemes were tested:

- Plumbs , frozen (verified 2019.02.11)
- Strawberry, frozen (verified on 2019.06.06)

Verification of flow diagrams takes place in two stages, first preliminary, and then at the beginning of the harvest. Verifications of the technological scheme for strawberry frozen were checked (preliminary 2019.01.04 and in start 2019 harvest dated). The auditor became acquainted with the hazard and risk analysis carried out by the plant, incl
Hazard analysis for products / 2019.01.04
Hazard analysis in the field of GMOs and allergens / 2019.01.04

Hazard analysis for packaging / 2019.01.04
Hazard analysis Food Fraud /2019.04.01

Hazard analysis has been updated – last revision 2019.01.04. Likely occurrence of hazard, severity of the effects on consumer safety, vulnerability of those exposed, survival and multiplication of micro-organisms of specific concern to the product, presence of pesticides, heavy metals or foreign bodies have been taken into account when estimating the risk.
CP and CPSs have been identified on the basis of risk assessment and it was confirmed through decision tree.
Risk analyzes:
- Analysis to the strawberries, rhubarb, plums and processing of the finished product
- Cherry stoning separate analysis
- Allergens and GMO (separate analysis)
Determined following the CCP

CCP1 in step metal detector. The metal detector test with a frequency of 1 hour using testers 2.5 for Fe, non Fe 3.0 mm, SS-4,0 mm).

In addition, it sets the following CP (total 13): the adoption of raw materials, temperature control storage of raw materials, role of fruits, control seeds (cherry), control and exchange of knives slicer, temperature control freeze tunnel, weight control, temperature control in the packing, check the efficiency of the detector, quality control of the finished product, check the product sorter (optical sorter), replacement of water in the washer (control of mineral impurities). CCP and CPs monitoring instructions were implemented, e.g.

IP-01 Monitoring instructions CCP 1 and CP 9 2019.01.04
IP-02 Control of receiving raw materials 2019.01.04
IP-03 Temperature control in the raw material warehouse 2019.01.04

The documents were checked, e. g :
records of CCP monitoring and CPs for the a lots of product selected for traceability vertical test: cherry BB frozen" code:14.07.2018/24 boxes of 10 kg each and for Frozen strawberries production 2019.06.11.
Recent significant changes in the HACCP (verification) reported on 2019.04.01
The last revision of the HACCP plan was carried out on 2019.01.04
Minutes of the meeting HACCP team of 2019.01.04

3. Food safety and quality management system

3.1 Food safety and quality manual

General structure of the documentary:
- The Book of Food Safety Management System (issue dated 2019.01.04)
- Detailed Book of HACCP
- The Book of procedures and instructions
- The Book of Hygiene (valid from 2019.01.04). As part of this book are described in the chapters: Hygiene employees, Hygiene surrounding the plant, the plant Hygiene of premises, supervision of drinking water, waste disposal, supervision of pest management chemicals.
Moreover, a detailed instructions.
Documentation is available in Polish and electronic versions of the paper.
In the book quality as an attachment (PS-02 / B) functions list of current documents. The list contains 36 items of the main documents. Auditor examined the history of changes and new editions of selected instructions:
IP-01 Monitoring instructions CCP 1 and CP 9 / 2019.01.04
IP-02 Acceptance control of raw material / 2019.01.04

IP-03. Temperature control in raw stock warehouse / 2019.01.04
IP-05. Control of the pits / 2019.01.04

3.2 Document Control

The system version number, status, eg. withdrawn. All documents have a release version and release date. In addition, all documents are authorized.
New additions to the content of the procedure are displayed in red type.
Reasons and history of changes are recorded in the tables of changes in each of the procedures.
The rules of supervision over documentation are specified in the following documents system;
- Procedure Document control - PS-02/2019.01.04
Traced mode changes in the documents:
IP-11 Quality control of the finished product / 2019.01.04

3.3 Record completion and maintenance

Records (time specified for each procedure). Storage of not less than 3 years (the longest shelf life of products is 2 years). Details of the procedure to the records of procedure specifies:
- The procedure for creating and supervision records - PS-03 (version 2).

3.4 Internal audits

Internal audits are carried out in the company. There will be 17 internal audits planned for 2019/Plan of 2019.01.04. Auditors are independent of the audited areas. The criteria, scope and frequency of the audits were determined taking into account the importance of the processes, the results of previous audits, any updating activities. The production, including freezing, was considered the areas with the highest risk. Internal audit procedures (PS 05 v. 2019-01-04) define responsibility for planning, implementation and presentation of results. There are currently 2 approved internal auditors in the company. Auditing qualification for Marta Nowakowska (training on 2013.03.20-21 and 2019.12.11/ DQS) has been checked. Critical activity has not been identified on the basis of risk analysis. The company came to the conclusion that all processes are just as important, but without critical processes for food safety and product specifications. The audit report of 2019.05.20 concerning external areas was reviewed. The Auditor checked the records of the corrective actions taken and the non-conformities were removed 2019.05.20The auditor was also acquainted with the report of the internal audit of 2019.05.24,(carried out in the production department.
Audit reports describe both compliance and nonconformity. Incompatibilities with audits and corrective actions are recorded in the central register.
Activities are recorded a register of corrective and preventive measures Hygienic inspection at the beginning of the shift. Non-conformity cards issued: Action Sheet of 2019.04.25; The cause of nonconformity is described, Corrective actions were taken and their effectiveness was checked 2019.05.30.
Inspections of the whole plant take place at least once a month. They cover all areas (including external areas). The auditor became acquainted with the records of the Monthly Inspection of 2019.05.30 conducted by mrs. S.A.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

Suppliers of raw materials and services are evaluated and approved in accordance with established procedure, no PS 09 Purchasing (edition 3 from 2019-01-04), by the QMS Representative. It was made analysis and assessment of risks relating to raw materials and packaging materials taking into account microbiological, physic, chemical parameters as well as allergens and fraud / substitution. The

assessment will be reviewed on current basis and at least annually. Based on the analysis, all suppliers were classified as low risk suppliers.
Qualification four groups of suppliers:
- GLOBALGAP suppliers and Integrated Manufacturing
- suppliers of intermediaries ,
- purchasing from direct farmers
- purchasing collection point
Approval of purchase points "Declarations", "Specifications"
Risk analysis for raw materials in the HACCP Raw material safety assessment (last revive dated 2019.01.04).
Radiation hazards have also been considered.
Raw materials not controlled by the crop are included in the additional control lists.
The plant uses three classifications for fruit suppliers
GlobalGAP- certificate holders
Farmers without Global Gap
Purchase /collection points
Qualification of suppliers is based on supplier declaration + visit
Among the fruit suppliers is 54 farmers and 34 collection point
The suppliers' point evaluation is conducted annually. (3 levels of grade A (highest grade), B and C (weakest)) The criteria are: quality, timeliness, hygiene, quality control of the supplier, certificates held. On level A (rating 4.5-5.0 on a scale of 0-5 identified 42 Suppliers. Others were rated at level B.

Among others was checked:

Declaration of fruit producers - supplier Janusz Majewski (documents dated 2019.05.30)
Records from the visit to the plantation Mr. JM 2019.05.30- plant protection products, during which it was assessed
- compliance with law,
- Hygiene during harvest,
- Not using GMO.
- The prevention of allergen contamination
Records of plant protection products 2019 (JM)
Signed Strawberries specification 2019.04.02 (JM)
Declaration of the fruit producer 2018.04.10 (JM)
This year were audited 4 suppliers of fruits 5 collection points
All supplier are evaluated once a year.

Were checked:

- Purchasing procedure - edition of 2019.01.04
- Ukleja JAN records of visit to the plantation. Verification of the Producer's Declaration/2019.06.05
- Declaration on compliance with GAP, non-allergen, nonGMo for the fruit supplier Ukleja Jan / 2018.04.10
- Identification test carried out for the purchasing point of Kędziora Halina (batch of raw materials Rabarbar deliver to Waba 2019.05.20 , duration 20 minutes.
- Plant protection program for strawberries for 2019, signed by suppliers
- A separate list of suppliers of auxiliary materials and packaging (10 items in total).2019.01.15
- Records of rating auxiliary materials and packaging/2019.01.15
- Audit at the packaging supplier: in Orpak company of 2018.05.07- realization of Marta Nowakowska (during the audited audit provided the traceability test).
- A separate list of suppliers of auxiliary materials and packaging (10 items in total)
- Packaging Supplier Orpak - Bags and Cartridges (ISO 9001) This is a high risk supplier (The second-party audit of this supplier was completed by 2018.05.07, report was checked).

N/A 3.5.1.4 Not applicable for the exceptions from supplier’s acceptance procedures

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

The PS-10 Raw Material Acceptance Procedure (Issue3)2019.01.04 was developed and implemented. Requirements are communicated through raw material specifications.
The parameters of the collection (eg for agricultural raw materials calibration, freshness, pollutants, variety evaluation, Bx) were clearly defined. Each supply of raw material is subject to inspection. Evaluation reviews are reviewed by the Plant Manager.
There are standards and specifications concerning raw material auxiliary materials and packaging
Packaging inspection checks the following parameters: foreign contamination, presence, traces of pests, condition of pallets, and hygiene of delivery. The stamp from the carried out check is set on the document WZ .

Were checked records:

Quality control certificate Ascorbic acid, Standard 2018.10.02
Quality control certificate Citric acid, Standard 2018.10.02

Records from acceptance control cherry, 2018.07.11 (R-L supplier)
Records from the acceptance control of cartridges Orpak / 2018,03,06
Records from acceptance control of Schumacher carton boxes / 2018.07.09

3.5.3 Management of suppliers of services

Evaluation sheet for service providers lista i ocean z dnia 2019.01.15

- 3 laboratories: Eurocontrol, Hamilton, UO Technology
- Suppliers of training services: FreshMazowia, Suturamed
- DDD service – Insekt
- Pretty -laundry
- Service scales - Radwag company
- Chemical Supplier
- Loma System, service for metal detectors
- Technical companies: Poch-Rem and Urchel,Unimasz

Last rating of service providers 2019.01.15. Compliance with regulatory requirements is provided.

3.5.4 Management of Out sourced processing

N.A
Do not execute processes outside
Nie zleca się procesów na zewnątrz

3.6 Specifications

There are specifications / product descriptions for finish products. .

During the audit following specification concerning end product were verified in detail:

- Rhubarb frozen 2019.01.04
- Frozen plums 2019.01.04
- Frozen raspberries 2019.01.04

Specifications include sensory, physical, chemical and microbiological characteristics. There are as well as information about metal detection, allergens, GMO and storage). The clients' requirements are also included in contracts. The auditor checked the contract for the delivery of apple segments, frozen to Dirafrost signed 2018.11.21 the annex to the contract is specification specifying,

Auditor also read the contract for the delivery of frozen rhubarb to Berrymark/ 2019.03.04

Detailed and up-to-date specifications of raw materials are available at the plant. Raw material specifications include information on the absence of GMOs and allergens The Auditor has read the specifications in detail:

- Strawberries without a pedicle/2019.01.04
- Rabarbar fresh/2019.01.04
- Cherry fresh/2019.01.04

Packaging specifications are available. The auditor specifically checked for packaging: Oprpak, last revised 2017.07.10:

- open sack, sewn, with a PE layer
- Pockets blue 700/700 / 0.03/2019.01.04
- Report of analysys 253994/18/GDY Migration tests coated paper with polyethylene 2018.07.26 Hamilton
- Report of analysys 253993/18/GDY Migration tests LDPE FOIL Liner 2018.07.24 Hamilton

3.7 Corrective and preventive actions

A corrective and preventive action procedure has been developed and implemented PS 06. A corrective action register is being developed and implemented. The mode of activities related to the results of the internal audit (Action Sheet 4 / AW/2018) has been analyzed in detail. In addition, we reviewed the corrective actions after the BRC audits last year. For the year 2019, there were 9 corrective actions . In addition, a number of correction actions have been documented. The documentation of the activities includes an analysis of the causes, timelines for corrective actions, responsible persons, verification of corrective actions. The mode of corrective actions following the customer claims of 2019.03.12 were analyzed (card 3/R/2019). The reason for the complaint was the caterpillar in the product. Based on the analysis of the causes of the corrective actions taken as a slower sorting, change the settings sorter,
The actions resulting from the complaint regarding the piece of foil in the frozen cherry box were also analyzed, the non-conformity card 2 / R / 2019 was issued.
The plant also undertakes actions regarding internal non-conformities. The auditor acquainted himself with the card regarding the non-sealed doors (1 / P / 2019), the removal of the deviation was documented on 2019.02.06.

3.8 Control of non-conforming product

Developed and successfully implemented a procedure PS-04 - "Non conforms products." For all nonconformities, a detailed root causes analysis is carried out.
Non-conform materials at the stage of delivery are not accepted. Stamped on the document acceptance confirms the positive assessment. In the chamber the raw material takes physical isolation and labeling "Product compliant." Production lines labeled containers "Disposal".
Analysis and trends for products incompatible leads and presents QM.
Categorization (class) outside the choice is bought and transferred to another application. Trends are presented on management reviews.

3.9 Traceability

During the audit a traceability test was carried out for the product " cherry BB frozen" code:14.07.2018/24 boxes of 10 kg each and for Frozen strawberries production 2019.06.11. Duration of the tests 40 minutes. Available records, e.g.:

Records from acceptance control cherry, 2018.07.11 (R-L supplier)
Records from the acceptance control of cartridges Orpak / 2018,03,06
Records from acceptance control of Schumacher carton boxes / 2018.07.09
Register of monitoring of temperature cooler raw / 23.06-23.07.2018
Records from production and freezing / 2018.07.13
Records of temperature control in the freezing tunnel 23.06-23.07.2018
Records from the metal detector control CCP / 2018.07.14
Records of mass control CP7 / 2018.07.14
Seed inspection form /2018.07.14
Control of glass / 2018.07.14
Hygiene control before production starts week 28/2018
Packing and labeling card / 2018.07.14
Mass balance ok.
Currently, the company does not use barcodes.
The results internal traceability test:
Test conducted on 2019.05.23 rhubarb slices frozen, lot 22.05.2019/ 10 (15 minutes) and rabarbar fresh (from the raw material) carried out on 24.05.2019 (55 minutes) mass balance included.
Traceability tests are also carried out for suppliers (taken into account when evaluating eg Kędziora Halina dated.2018.05.11)
Rework in the process does not occur

3.10 Complaint-handling

A procedure for dealing with complaints PS 04 has been developed and implemented. The complaint register (electronic - Exel) is maintained. In 2018 recorded 13, complaints in 2019 recorded 4 complaints. The complaints were reviewed:

- from 2019.03.07, reason: foil from the packaging in the product.
- dated 2019.03.12, regarding the caterpillar in the product
- from 2019.03.14, the cause of too much skin in the peeled apple
- from 2019.02.11, the reason for not enough brix in the strawberry

The handling of complaints is correct, the causes have been analyzed and the corrective actions have been implemented. According to a statement of the QMS Plenipotentiary in the last year, there was no need to withdraw dangerous goods from the market. Complaints are discussed in the management review (trends).

3.11 Management of incidents, product withdrawal and product recall

Procedure Analysis of Crisis Situations of 2019.01.04
Important phone numbers: Afis Szbanow (tel. + 48 691696696). People are also available outside of working hours.
Crisis management analysis:
- loss of tension,
- failure of refrigeration equipment
- cheating sabotage,

- fire accident
 construction disaster
Withdrawal includes notification of certification body.
The list of external contacts includes, among others, the conciliation laboratories, lawyers.
Last year there was no need to withdraw or recall products from the market.
Simulation withdrawal of products from the market of 2019.06.04 for the product "frozen cherry" lot 22.07.2018/03/05 duration less then 2 hours Simulation was also notified to the certification body.
Simulation once a year.
In the past year there was no need to withdraw or recall products.
Checked:
Document appointment Crisis Team, 4 people, current composition, 2019.01.04
List of crisis contacts rev. 2019.01.10

4. Site standards

4.1 External standards

The plant is located far away from other industries. No negative environmental impact on the safety of products. Adequately protected against contamination. In good condition. Carried out regular planned renovations. Expensive exterior locations are properly paved and maintained in good condition. External protection of buildings is appropriate. The location is approved by the competent authorities. Objects tight, well protected against pests.

4.2 Site security and food defence

The food defense plan is suitable. (Procedure Food Defence 2019.01.04) Company is protected against unauthorized access from outside. Monitoring system is installed - cameras are placed in sensitive areas of environment (e.g. gates, purchase, entry to production, storage) and production area. Monitoring data are recorded and stored for a period of12 months. There were training in Food Defense (Security) last training of 2019.03.29. During the audit auditor checked securing their own water intake for the plant (well). Movement of people and vehicles (register) is monitored. Only authorized persons have access to designated areas of production. The plant conducted an analysis of food defence (last revision 2019.01.04), The company is approved by the FDA no. 13189662474. Security system is regularly tested (last test documented 2019.05.22)

4.3 Layout, product flow and segregation

Factory layout and production equipment guarantees the applicable requirements. The plant layout does not create any risk of contamination. They were:
• low-risk areas
• enclosed product areas
• non-product areas.
 Flow of raw materials, preparing the recipe composition and the subsequent process steps for shipment are held in separate rooms. Dear movement of workers as well as raw materials and products and wastes have been identified for the establishment Plan. Plans for the plant include the place of the flow of raw materials, personnel, waste collection (ver. from 2019.01.04).
Visitors are informed about all admission procedures.

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

The general condition of the building is good. Opening windows are covered with wire. On the shop floor with no windows or skylights. Doors are tight. The loading docks are equipped with additional rubber seals. The doors are also equipped with a self-closing walls and floors are kept in good condition. Suspended ceilings do not apply. Lighting is adequately (however, the deviation was found) protected

against breakage (transparencies and additional lenses). The position of the optical control with the appropriate light intensity. Ensured adequate ventilation in the washing zone (AHU EU 7). Other rooms do not require ventilation. The plant is not assigned to high-risk zones. Sewage system in the washing area of the product is constructed in a way that constitutes no hazard to the products.

In this area two minor NC were found:

Minor NC to requirements 4.4.1: An unfinished plinth reported in the corridor by the freezing hall/
Minor NC to requirements 4.4.8: Leaking doors reported in the shipping area.

4.5 Utilities – water, ice, air and other gases

The water used for production comes from the recognition of their own. The water is subjected to initial purification. At the plant 9 water collection points (marked on the plan). It does not apply to water additives chlorine or hydrogen peroxide. The water is tested twice a year (basic tests) and every two years - extended monitoring. The auditor became acquainted with the water tests schedule from 2018.02.13 During the audit acquainted with the results of tests of water dated 2019.03.21. Microbiological tests and physicochemical carried out by the laboratory PSSE Radom or Hamilton twice a year (OLD, E coli, enterococci, TVC, Coliforms bacteria, turbidity, color, odor, taste, pH, ammonia, calcium, magnesium, chloride, nitrite, nitrate, manganese, iron, mercury , bromines, cyanides and others).
Mn Recycled water is not used for technological purposes. The air used to control systems (pneumatic) is filtered and de-oiling. The current system of internal water distribution is shown on the current plan of establishment (issue dated 2019.01.15).

4.6 Equipment

The materials constituting the production equipment are of good quality and enable efficient washing. Machine configuration provides the freedom to carry out maintenance and cleaning. During inspection the plant was verified these requirements for scrubber and conveyor (meeting the requirements of EC 1935). Most installations made of stainless steel.

4.7 Maintenance

Repair and maintenance tasks are specified in the schedule of inspection and overhaul of machines and equipment. All major machinery and equipment are included in the plan. The machine card (Urschel slicer and Sortex) was analyzed. Equipment and fittings, including fittings and fittings, are in good condition and properly maintained. Maintenance plans and checks are documented. Hygiene procedures are maintained before and during work. External services are supervised. The requirements for purchased machines are clearly specified. New machines are allowed to move after pre-receipt The materials used for maintenance are suitable. Lubricating oils are used: H1 (NSF). The Urschel grease card also includes the allergen declaration. Failures are logged (crash sheets). Workshops are kept clean and fitted with appropriate mats. Technical and maintenance requirements are specified when purchasing new equipment.
Device Control Card for 2018:2018.01.09
Total items 23 items
There were records checked:
Service / maintenance of the metal detector Loma, External service KG Solution / 2019.04.11
Service / maintenance Optical Sortex, External service Achimedes / 2018.10.18
Technical inspection of krajalnica / 2019.05.17
Technical inspection of freezer /2018.05.24

4.8 Staff facilities

Equipment Social meets the requirements of the standard. Provided separate storage of outerwear and workwear. The contents of the two cabinets was tested in the presence of employees. Besides cupboards for clothes they provided a locker for personal items. Provided adequate facilities for washing hands. Liquid soap Manosoft- company Ecolab. Water temperature for washing hands is correct. pictograms are talking about washing your hands and place setting clothing. Food is not paid to the areas of production and storage. Canteen is supervised. Waste from the canteen are emptied after each break. Toilets are adequately separated from production areas. The entire production facility non-smoking also applies to electronic cigarettes. Social facilities are subject to daily inspection. The plant is not assigned to zones of high risk.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

The company has implemented procedures to supervise the product in order to avoid the threat contamination physical and chemical. Developed a risk analysis, which takes into account the risk of potential contamination of the physical and chemical, caused by the use of chemical materials. The company uses equipment to detect metal. Employees are trained from the proceedings aimed at preventing contamination in the product. Auditor examined the list of the substances used. For example, the disinfectant (p3 alkodes Ecolab) examined ways of storage used and MSDS of 2017.. Card characteristics are consistent with the guidelines of EC 907/2006, as amended. Storage of chemicals is closed and made available only by trained personnel. Preserved section of acidic and alkaline. Chemical operates only trained personnel of the plant. Staff went last training in this area on 2018.05.20 (Sutermed)

4.9.2 Metal control

Knives are supervised. The inspection knives with a slicer takes place every 2 hours. Do not use knives with breakable blades. In the areas of production does not apply to paper clips. Auditor during the audit received detectable pen. Metal detection is used and tested (2 testers 2.5 for Fe, non Fe 3.0 mm, SS-4,0 mm).). The metal detector is placed at the end of the production line, the subject of control of each product packaging. A metal detector is tested. The frequency of each hour. The detector has a signal light and a system to stop the belt. The company also uses SORTEX - optical equipment with a laser to detect foreign objects. It does not apply to magnets. Moreover, there are records documented removed of pits. Pited fruits (IP-05-D)

4.9.3 Glass, brittle plastic, ceramics and similar materials

They are in place documented procedures for dealing with glass, brittle and hard plastic, ceramics and other similar materials to ensure that the necessary precautions. They developed a procedure for PS 14. It is available the full list of objects from glass and similar materials. The frequency of inspections on a risk basis (weekly / monthly) determined a procedure dealing with broken glass / hard plastic. For cleaning bumps dedicated tools available. The staff understanding of the glass breakage procedures what was confirmed by conversation. There were no glass breakages in the last year.

Checked:

List of glass 2019.01.04

Records of the control of fragile elements 2x daily, dated 2019.06.10

4.9.4 Products packed into glass or other brittle containers

N.A

There shall be no glass containers or other fragile

4.9.5 Wood

The use of wood is limited. They fixed the equipment with wooden handles. Technological containers are made of steel. Only finished products (closed) are stacked on wooden pallets with cardboard washers (in palettes). Developed and implemented a manual identification and classification of EUR pallets; (PS14).

4.9.6 Other physical contaminants

Physical contamination of products may come from packaging including soft foil, preventive measures have been taken, such as the use of a blue colour film resistant to damage, visual inspection.

An important physical threat may be the presence of a stone in pitted fruits. Appropriate measures have been developed to minimize the risk of seeds in fruits where they should not occur. Seed inspection is carried out every day during the production of cherries, 8 times a day (for cherries chilled cherry chilled) and 5 times a day for cherry frozen. The plant also purchased an X-Ray detector to better control this hazard (the device is being validated).

Pens used in open product areas are controlled to minimise the risk of physical contamination.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

They are in place documented procedures for dealing with glass, brittle and hard plastic, ceramics and other similar materials to ensure that the necessary precautions. In the areas of production does not apply to paper clips. Auditor during the audit received detectable pen. The plant used two metal detectors. During the audit conducted test the detector while packing strawberries. Metal detection is used and tested (2.5 for Fe, non Fe 3.0 mm, SS-4,). The metal detector is placed at the end of the production line, the subject of control of each product packaging. A metal detector is tested. The frequency of each hour. The detector has a signal light and a system to stop the belt. The company uses SORTEX - optical equipment with a laser to detect foreign objects. Sorter control takes place every 2 hours, both cameras are checked, a laser is tested, an ejection test is carried out,

It does not apply to magnets. As part of the supervision of foreign bodies are carried out the following records:

- IP-01-A - Form pollution monitoring metal detector
- IP-05-D - Form of control seeds
- IP-06-E - Form knives control
- IP-13-K - Form of control of mineral impurities

4.10.2 Filters and sieves

A register of sieves and filters used in the plant has been developed. This is the total of 14 items (last list dated 2019.01.04). List includes sieves on water and washing equipment and inspection tables.

Detailed analysis of the roller on the vibrating table Cleaning on each shift e. Technical reviews twice a year. The records from the filter inspection in the on the vibrating table 2019.06.03 were checked.

4.10.3 Metal detectors and X-ray equipment

During the audit conducted test the detector while packing strawberries. Metal detection is used and tested (2.5 Non Fe, Fe 2.0 mm, 3.5 mm SS). The metal detector is placed at the end of the production line, the subject of control of each product packaging. A metal detector is tested. The frequency of each hour. The detector has a signal light and a system to stop the belt. Detectors are serviced by an external service at least once a year (the last survey of 2017.05.18). The procedure provides for measures in the event of incorrect response of the detector (it takes into account, inter alia, re-examine all the products and control on the second detector). In the last year there were no complaints on the presence of metals in products. Based on the interview, the auditor stated that the employees know and understand the methodology of checking the detector

4.10.4 Magnets

N.A

It does not apply magnets.

Nie stosuje się magnesów

4.10.5 Optical sorting equipment

The company few years used an optical sorter Sortex. It is applied to small fruit. Sorter is mobile and set the line where applicable (strawberries are not subjected to sorting). The device has a "memory of products." Sortex is operated by trained personnel. Inspections during operation at the beginning of the change. The correctness of the action Sortex also ensure an external company Archimedes.

Complex control minimum every 2 years in case of failure contact by telephone.

Checked:

Optical sorter control - by Achimedes (minutes of 2017.09.26)

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

N.A
Plastic crates are used at the stage of supplying raw materials and for collecting waste in production areas. Glass containers do not apply.

4.11 Housekeeping and hygiene

During the audit, the procedures for maintaining order and hygiene were developed and effectively implemented. Washing and disinfection reports are being run. With the supplier of chemicals, documented validation of the washing technique was carried out. The selected cleaning and disinfection report was examined (activities carried out by trained company employees / training provider of chemicals - Ecolab). The effectiveness of the cleaning procedures is checked and written. Corrective actions are documented. Measurements of pH and swabs are used (cleaning of the tunnel was examined).
Results are recorded and analyzed for improvement. Cleaning schedules determine the responsibility for the individual cleaning operations. Auditor analyzed the records:
- KH / F- Washing schedule,
- KH / G - Cleaning unit
- KH / H - Cleaning card-production
- KH / I - Cleaning card - social rooms
- KH / L - Visual inspection card

A list of applicable chemical agents is available from 2019.01.10.
Checked:

- General instructions for cleaning the entire production line dated 2018.01.01
- Records of the plant washing for 2019.06.10

There are no high-risk zones. The cleaning equipment is adequate. During the audit, the cleaning of the containers for raw materials was observed.

In this area two minor NCs were found:

Minor NC to requirement 4.11.2: The plant cleaning schedule does not specify the frequency of ceiling cleaning.
Minor NC to requirement 4.11.8: The visual assessment of equipment, e.g. pallets used as platforms in the packing hall, was not conducted properly.

4.11.7 Cleaning in place (CIP)

N.A
The CIP system is not applicable.
System CIP nie ma zastosowania

4.11.8 Environmental monitoring

The cleaning efficiency check is carried out by the visual method (every day) and by testing the swabs (every 3 months).

The results of swabs performed by Hamilton's accredited laboratory (mesophilic aerobic bacteria count, mold, yeast, Enterobacteriaceae, Listeria Monocygones) were checked:

- The result of swabs from 2019.05.15 (from gloves and work shoes)
- The result of swabs from 2019.05.15 (drainage grid)
- The result of swabs from 2019.05.15 (Stalk removing machine)
- The results of the effectiveness control of the washing swab method (molds, yeast, listeria, enterobacteriacae /) sorting table, wall, gloves 2019.04.01

4.12 Waste

Sorting waste contains a breakdown of waste: paper, plastic, metal, production waste, municipal and other required by national law. There was no excessive accumulation of waste. Waste collection supports a specialist company. Acquainted with the rules of documenting the transfer of production waste. The plant has an initial treatment plant for sewage. Organic and municipal waste contract – Tonsmeier agreement 08.01.2016,

In this area one minor NC was found:

Minor NC to requirement 4.12.2: Unlabeled containers for fruit which fell to the floor and were treated as waste were reported by the raw material washer.

4.13 Management of surplus food and products for animal feed

N/A There is no waste for animal feed

4.14 Pest management

Pest Control DDD - External company INSEKT Leszek Dymiński annex to the agreement dated 2010.01.15 (annex dated 2014.09.20). Service scope is defined and includes protection against rodents and insects. There is map of pest control station (edition 2019.05.07) including bait stations (34 units), rodent traps 36 units, fly-killer lamps (7 devices), traps for cockroaches 11 pcs, cathers for fruit flies 11 pcs,
Visit once a month. Last records of 2019.06.05, 2019.05.08.
Trend analysis every 2 months, the results of the periodic analysis and the annual analysis for the previous year of 2019.03.15 were checked.
Auditor has checked the Material Safety Data Sheet, Trapit / 2017.08.14
Technical measures related to pest control are documented (eg replacement of lamps once a year).
No intervention checks were found. In the last year there was no sudden appearance of pests.
During the audit the auditor verified the correctness of the arrangement and compliance with the map station bait station 30, and lamps LO1 .
Workers responsible for receiving raw materials have undergone pest identification training (updated from 2019.05.20). The field biologist's report of 2019.05.08 was checked.

In this area one minor NC was found:

Minor NC to requirement 4.13 .2: The frequency of Pest Control inspections (once a month) does not involve the increased insect activity during summer.

4.15 Storage facilities

The plant has cold stores for raw materials for production (maintained temperature from 0 ° C to 2 ° C), a separate packaging warehouse and warehouses for semi-finished products and frozen products with a storage temperature below -18 C. Ensured proper storage conditions. Records have been kept of temperature monitoring. Temperature monitoring is carried out continuously in cold stores. Electronic chart is generated temperatures. The raw material warehouse and store packaging materials are carried out analog measurements. When storing materials are maintained required distances from the walls. When rotation is used FIFO principle. It does not apply outside storage products.
Checked:
Records (electronic form) from the control of temperatures in freezers for January 2018 and May and June 2019.

4.16 Dispatch and transport

Transportation of raw materials is done by suppliers. The company defines the requirements in this regard. Finished products are transported at bellow -18 C. The products are transported by the recipient Vehicles are checked before loading at an angle of hygiene and temperature conditions. Distribution of pallets on the vehicle is marked. Carriers submit to the recipient of the results of measurements of temperatures from transport.
A report on the loading from 2019. 12.14 containing records of temperature and hygiene control was checked, car WPR 35360/WZ 6890R customer Berrymark.
The transport of raw materials is carried out by suppliers. The company has set requirements in this regard.

5. Product control

5.1 Product design/development

The procedures of product development. (PS 15 of 2019.01.04 All changes in the composition, packaging and methods of expressing opinions by the HACCP team. Card design takes into account the principles of the HACCP team, validation and evaluation of test results. Shelf life 2 years from date of manufacture (the term for all product groups supported by studies eg. Studies Frozen cherry for 24 months: study of 22.06.2015 laboratory UO technologia), Frozen strawberry and rhubarb for 24 months: study of 26.06.2014 laboratory Euro Control AB 444 (coli bacteria, moulds, yeast, Enterobacteriacae, Escherichia Coli, Staphylococcus, Listeria M, TVC, Salmonella, sensory tests). Take into account the conditions of transport. Since the last audit no work related to the development of the product has been carried out.

5.2 Product labelling

The products are labelled in accordance with current legal requirements (currently on the compliance with the EC 1169/2011) and the specific requirements of individual customers. During the audit examined in detail the compliance labels with customer requirements for Piekarnia Ostrowa date of filling 2019.12.05. Checked label Dirafrost 10.10.2018.Products entirely goes to further processing. They provide information on the origin of raw materials. The plant is not packaged mixes (single component). Cooking instruction no necessary.

5.3 Management of allergens

PS 19 2019.01.04. No allergen is used in the company. Accidental presence of allergens was considered in hazard analysis. Special attention is paid to the food brought by employees. In the canteen there is information about allergens.
Product safety, legality and quality procedures are kept in relation to allergens. A risk assessment for allergens was implemented. The food is brought into by the workers – there is a canteen in the factory - monitoring. All necessary actions were taken to minimize the contamination. The staff is trained on dealing with allergens and minimization of product contamination. Training Allergy / GMO policy 2019.01.04
The products manufactured by the plant do not contain allergens.
Allergens (milk, eggs, nuts) occur only in closed packages with goods for service storage. The products stored in service are stored in dedicated chambers, and measures to prevent contamination have been implemented
Procedure PS 19 Storage of goods / 2019.01.04

5.4 Product authenticity, claims and chain of custody

The team analyzed the authenticity of all raw materials. The company has access to industry information and legal (including RASFF, Food Fraud). It takes into account issues such as adulteration. Country of origin, GMO. The analysis was performed on 2017.01.06/rev.2019.01.10. Sets out the methodology of research. The system takes into account legal requirements as well as requirements for GMOs. It does not apply to raw materials (goods) GMO. During the audit familiarized itself with the statements and Non-GMO each signed by suppliers of raw materials and additives. Status and identification of raw materials is ensured at all stages. History of individual raw materials is contained in the declarations of the various suppliers and tabbed boxes.
The plant keeps records of each purchase of raw materials. The plant does produce a product with a certain status (Kosher certificate valid to 2020.03. and Eko certificate issued by DQS valid to 2019.12.11). For products labeled Kosher end Eco conducted separate mass balance.
Checked: ECO Globsad S.A supplier certificate, valid until 2020.03.31.

In this area one minor NC was found:
Minor NC to 4.5.1: The methodology of conducting hazard analysis for food fraud was not described, the criteria taken into account in hazard analysis were not specified.

5.5 Product packaging

Identified all the key parameters for the packaging of the assessment of risk and destination. Work is control card packaging: Presented tests for the migration of packaging: bags with inserts ORPAK foil and cardboard - Schumacher. Provided declarations of compliance are in accordance with the 10/2011 and takes into account the freezing of the packaged products. Packages are stored in dedicated storage facilities with controlled conditions (temperature, humidity, pest control).
Checked:

- Packaging specifications Oprpak, last revised 2017.07.10:
- Declaration of Conformityopen sack, sewn, with a PE layer
- Declaration of Conformity Pockets blue 700/700 / 0.03/2019.01.04
- Report of analysys 253994/18/GDY , migation test coated paper with polyethylene 2018.07.26 Hamilton
- Report of analysys 253993/18/GDY migration tests LDPE FOIL Liner 2018.07.24 Hamilton

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

A plan for inspection and testing for 2019/rev.09.10.2019, each raw material is tested at least once a year, and the finished product of each assortment is tested 3 times in the production season. Tests are carried out at a basic level in place (organoleptic assessment, Brix, caliber). It is also important for safety, quality, legality studies are carried out in external accredited laboratories (mainly Hamilton The tests plan is consistent with legal requirements and to customer requirements in the field of microbiology, physical chemistry, heavy metals (As, Hg, Pb,Cd), storage tests, organoleptic, pesticide residue, radioactivity, nutritional values etc. Developed and implemented a research agenda tailored to the specifications of individual customers.

The test results were checked:

- for frozen rhubarb, result from 2019.06.03, laboratory Hamilton (Cs137, Cs134, pesticide screening,
- for frozen apples eco, result from 2018.11.16, Hamilton laboratory (PQ4GC screening pesticides, PQ4LC,
- for apples frozen Eco, result from 2018.11.16, laboratory Hamilton (Ar, Cd. Pb, Hg
- for apples frozen Eco, result from 2018.11.16Hamilton laboratory (microbiology, Bacillus Cereus, Listeria M, Salmonella sp, E. Coli and others
- for frozen cherry, result from 2018.11.16, (Hepatis, Norovirus group, Microbiology, Ar, Cd, Pb, Hg PQ4GC screening pesticides, PQ4LC.

The plant has provided a system of continuous assessment of the durability of products 24 months. Shelf life 2 years from date of manufacture (the term for all product groups supported by studies eg. Studies Frozen cherry for 24 months: study of 22.06.2015 laboratory UO technologia), Frozen Frozen cherry for 24 months: study of 24.06.2015 laboratory UO technologia
laboratory UO technologia). Samples of archive are stored. Test results are trended and used to plan improvements. The testing system is appropriate and refers to the risk.

5.6.2 Laboratory testing

The plant does not have its own laboratory. A simple test are carried out by its own staff (organoleptic assessment base) For some raw materials for delivery Brix is checked.
It is also important for safety, quality, legality studies are carried out in external accredited laboratories .

5.7 Product release

Developed procedure for releasing the finished product for sale. The products are released after the organoleptic and microanalysis and/or pesticides and research. Responsibility for release - QM . No stopping means relase for trade. The record from the release of the product protocol from 2019.06.03 has been checked.

5.8 Pet Food

n / a The factory does not produce animal feed.

6. Process control

6.1 Control of operations

Developed and implemented manufacturing instructions specific to each product. Process monitoring includes parameters such as: organoleptic control, temperature control, control on a conveyor inspection, control Bx control packaging, marking batch production, compliance labels, control of metal detection. Acquainted with the system of validation of the temperature distribution in the chambers of freezing and validation of cleaning processes. During the audit, interviews were conducted with employees responsible for individual operations control and analyzed records and calibration of equipment used. Detailed rules are described in the procedures:
- Validation of the food safety system (2019.05.21)
- Check the temperature in the warehouse of raw materials
- Check the temperature of the IQF tunnel
- Quality control of the finished product
- Control changing of water and mineral impurities
- User monitoring CCP 1

During the audit, the strawberry operations were scrutinized in detail:
- washing (water exchange, showers)
- control on the inspection table (including lighting, personnel experience)
- parameters of freezing
- CCP monitoring 1 - metal detection

Validation processes are also described in chapter 4.10.1 for metal detector, 4.11 for cleaning and disinfection, and 5.1 for design.

6.2 Labelling and pack control

A system of content labels agreeing with the client. The labels are printed in the enterprise Wabo (Zebra printer and the other in the hand labelling). During the audit traced compliance labels for frozen cherry without stone, batch 14.07.18/24
A system control labelling. Examined the balance

The control is in the form of PS-10 / D in the framework of controls and checks are analyzed:
- Date codes
- Codes party
- Raw material supplier code
Used packaging
- Equipment for the optical control labels do not apply. It does not apply to systems, In-Line
Record Label control on the production takes place 3 times per shift ("PCI packaging and labeling": PS-10 / D).
The labelling and identification are used following forms:
- PS-10 / A - Card PZ
- PS-10 / B - Data download on production
- PS-10 / C - Card packaging Octabins
- PS-10 / E - Card W
-PS-10 /H-Raport z załadunku place 3 times per loading etykiety naklejane przy załadunku
No optical label control is used.

One minor NC was found in this area:
Minor NC to reqiments 6.2.3 The half-product labelling inspection is documented for every pallet, the finished product is labelled during loading onto the vehicle and the labelling inspection is documented once during shipping of each batch.

6.3 Quantity, weight, volume and number control

The weight measurement of packaged goods is consistent with the reference methods for packaged goods. The company uses the mark on finished products. The study collected a representative sample of the finished product produced from each batch of production in line with the law. There is no measurement in line. It is used stationary weight. At the beginning of change in the weight check is to be verified weights. Records of weight control are conducted by employees in the Charter of control packaging and labelling - PS-10 / D and IP-08 G. During the audit weight control records were checked, apple frozen cubes, batch cherry without stone, batch 14.07.18/24.

6.4 Calibration and control of measuring and monitoring devices

A list of control and measuring devices (Exel register) is available in the plant. The list counts in total of 20 items (PS 11 / 2019.01.04. These devices are legalized and validated in accordance with the applicable national regulations. The inventory of equipment was grouped into groups. Control and measuring equipment is suitably marked. QM oversees the regulation and regulation of metrology. Detailed measurement of temperature on the freezing tunnel was analyzed.
The scales are verified according to the regulations in force. In addition, weighs verified by certified weight once a month.
Auditor have. been acquainted with the:

- Records of the weight control of the reference weight and internal control of thermometers of 2019.05.20 once a month
- Calibration certificate of thermometer no 16031 of 2019.04.06-)
- Calibration certificate of reference thermometer no 510596 04/612 valid to 2020.04.03
- legalization documents 81.94 - UniMasz
- Scale Radwag WPT 6060C2 , legalization valid until 2020.04.30

Procedures determine the actions to be taken in case of nonconformance caused by failure of measuring equipment. Such failures in the past year have not been reported.

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Company has appropriate training plans. Frequency of training concerning maintenance of basic awareness of employees, e.g. in field of GMP is scheduled in procedure PS-01 Employees' competences and training (edition 3 from 2019.01.04). Annual internal training plan is developed/2019.01.04(for 2019 the company planned 15 internal trainings which includes training on specific issues related to performed responsibilities, safety (including HACCP), cleaning and disinfection of production facilities, equipment. Records of training are available – it was examined on example of protocol of training from 2019-02-15 „ topic allergens, and training records:

- Dated 2019.02.28 for HACCP team,
- Dated 2019.01.30 (topics: system for reporting comments and employee requests, packaging and labeling.
- Dated 2019.03.29 (Topic GMP/GHP)
- Dated 2018.07.03 (training of seasonal workers)

Newly recruited staff is trained according to relevant plans within a few days after start of work. Then, with continuation of work are including of systematic internal or external training taking place according to a set up plan.
Effectiveness of training is tested and evaluated, and competence employees are assessed (test of knowledge about training, periodic assessment of the employee). External training are carried out according to needs. Based on interviews with employees, the auditor stated that the level of understanding of operating procedures is good.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Developed a comprehensive package of procedures and instructions GHP Księga Higieny 2019.04.01 They are respected by the employees and guests of the plant. The requirements are communicated. At ga Higieny/least once a year there are refresher training (refresher). Employees adhere to the principle of personal hygiene, ban on wearing jewelry, hand-washing techniques and handling of drugs. Workers do not apply false fingernails. The facilities available are a number of pictograms reminiscent of the applicable rules of hygiene.
Checked:

- The result of swabs from 2019.05.15 (from gloves and work shoes) Hamilton Lab

7.3 Medical screening

There is Complete Book of Hygiene. Procedure lists the symptoms, which must be reported by employees. All employees have a current medical examination (Test 3 for selected employees for example mrs K.A and mrs M.D). Was studied on the example of documentation of selected employees. Guidelines regarding Direct conditions contained in the procedures GHP. Guests complete a questionnaire on the state of health (PS -14 / B). There are guidelines for visitors and contractors. The state of hygiene and health of workers is checked at the beginning of each ("Card of day control" - KH / C).

7.4 Protective clothing: employees or visitors to production areas
Each worker is equipped with interchangeable sets of clothing. Comprehensive leasing clothing is carried out by an external laundry (Pretty Laundry - Agreement dated July 1, 2013 with price list Change of clothing takes place 3 times a week. Employees working with production areas and warehouse use caps. They are used gloves in blue. It is used appropriate footwear. Provided adequate facilities for storing shoes. Do not set at the factory zones of high risk.

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
N/A There are no high risk zones, high care and ambient high care in the plant.
8.2 Building fabric in high-risk and high-care zones
N/A There are no high-risk zones, high care and ambient high care in the plant.
8.3 Maintenance in high-risk and high-care zones
N/A There are no high-risk zones, high care and ambient high care in the plant.
8.4 Staff facilities for high-risk and high-care zones
N/A There are no high-risk zones, high care and ambient high care in the plant.
8.5 Housekeeping and hygiene in the high-risk high-care zones
N/A There are no high-risk zones, high care and ambient high care in the plant.
8.6 Waste/Waste disposal in high risk, high care zones
N/A There are no high-risk zones, high care and ambient high care in the plant.
8.7 Protective clothing in the high-risk high-care zones
N/A There are no high risk zones, high care and ambient high care in the plant.

Details of non-applicable clauses with justification	
Clause/section reference	**Justification**
1.1.13	No BRC logo
3.5.1.7	Not applicable for the exceptions from suppliers acceptance procedures
3.5.2.3	No live animals
3.5.4.1	No outsourced production and final packaging.
3.5.4.2	No outsourced production and final packaging.
3.5.4.3	No outsourced production and final packaging.
3.5.4.4.	No outsourced production and final packaging.
3.9.4	There is no rework in the plant
4.3.5	There were no temporary structures during the audit.
4.9.1.2	No chemical substances with intensive odor are applied.
4.9.4.1	No packages from glass and hard plastics applied at the plant.
4.9.4.2	No packages from glass and hard plastics applied at the plant.
4.9.4.3	No packages from glass and hard plastics applied at the plant.
4.10.4.1	No magnets are applied
4.10.6.2	There are no packages made of glass and brittle materials in the plant.

4.11.7.1	No CIP in the plant.
4.11.7.2	No CIP in the plant.
4.11.7.3	No CIP in the plant.
4.11.7.4	No CIP in the plant.
4.13.1	Products are not used for animal feed
4.13.2	Products are not used for animal feed.
4.13.3	Products are not used for animal feed.
4.14.3	The pest control is performed by the external company.
4.15.5	No external storage is performed at the plant.
5.2.5	No cooking instruction necessary
5.3.5	There is no rework in the plant
5.3.6	No allergens used in products
5.3.7	No claims related to allergens are used
5.6.2.2	The plant does not have its own laboratory
5.6.2.4	The plant does not have its own laboratory
5.8	The factory not produced the pet food.

6.2.4	No optical equipment is applied for labels content control.
6.3.2	Products are not sold in bulk .
7.4.6	No metal gloves in use
8.1-8.7	Only low risk

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers/packers of traded food products

9.2 Specifications

9.3 Product inspection and laboratory testing

9.4 Product legality

9.5 Traceability

Module 11: Meat supply chain assurance

Scope	

11.1 Traceability

11.2 Approval of meat supply chain

11.3 Raw material receipt and inspection

11.4 Management of cross-contamination between species

11.5 Product testing

11.6 Training

Module 12: AOECS Gluten-free Foods

Scope	

12.1 Senior management

12.2 Management of suppliers of raw materials and packaging
12.3 Outsourced production
12.4 Specifications
12.5 Management of gluten cross-contamination
12.6 Management of incidents, product withdrawal and product recall
12.7 Labelling
12.8 Product inspection and laboratory testing

Module 13 FSMA Preventive Controls Preparedness Module

Version 2 July 2018

Item no.	Clause	Module item	Conforms (Y/N) or Not Applicable (NA)	Comments
1	13.1.1	Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting.	Y	The factory provided adequate lighting of the work areas, and staff areas. The auditor familiarized himself with the results of the LCs /1-67/18/11/2lighting measurements, made in June 2018, carried out by PSSE Radom. The lighting in the changing rooms and locker is about 500 lux.

2	13.1.2	Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.	Y	The company has a plan for the water system of the 23.08.2009 rev.2019 which revealed backflow preventer installed at the entrance to the plant (EA Danfos DIN65 _1 251 MPa and Backflow preventers installed at branches which are connected hoses to the washer product. Cut-off valves and other protection against water retraction were used. There is no other water installation in the plant than the drinking water system.
3	13.1.3	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant. Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.	Y	Used machines and production equipment correspond to contemporary knowledge. Equipment is made of smooth, non-absorbent, non-corrosive materials such as stainless steel and plastics approved for food contact.
4	13.1.4	Ice used in contact with food must be manufactured in accordance with Good Manufacturing Practice (GMP) requirements of 21 CFR 117.	n/a	The plant does not use ice in contact with food. W zakładzie nie używa się lodu w kontakcie z żywnością.
5	13.1.5	Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.	Y	Factory-led controls, including laboratory tests and procedures based on BRC v. 8 procedures, reduce the risk of exceeding the defect action levels (DALs) to an acceptable level.
6	13.1.6	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: • Economic adulterants which affect food safety	Y	Hazard and risk analyze for manufactured products are available. Auditor reviewed the Hazard Analysis for products 2019.01.04 assessment includes significant hazards including falsification , radiological hazards, • environmental pathogens and allergenic contaminants. Separate risk analyzes have been developed for allergens and GMOs (2019.01.04, and for packaging. After reviewing these documents,

		• Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological hazards • Unintentional adulterants which affect food safety		the Auditor assessed that risk analysis is sufficient.
7	13.1.7	All identified known or reasonably foreseeable hazards must be evaluated to determine “hazards requiring a preventive control” (i.e., significant hazards).	Y	In addition to the CCP identified at the metal detection stage, the company identified significant hazards and assessed the risks associated with them. All identified, known, or reasonably foreseeable hazards was evaluated to determine ‘hazards that require a preventive control’
8	13.1.8	Establish one or more preventive control(s) for each identified “hazard requiring a preventive control” (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.	Y	The plant has established control measures for significant hazards, including Laboratory tests for Hepatitis, Norowirus, patulin, heavy metals, residues of plant protection products, radiological contamination. Inspections include, among others, acceptance of raw materials, storage temperatures of raw materials and products, hand sorting and sorting using optical sorter, freezing, weighing. Were checked records of monitoring e.g : CP1, CP6, CP9, CP10 CCP1 cherry BB frozen" code:14.07.2018/24
9	13.1.9	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out	Y	The withdrawal and recall procedure was updated after the last BRC audit (update date 2019.01.04) and meets the requirements of 117.139

		• Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product		
10	13.1.10	Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRC section 2.10.	Y	Monitoring of product safety-related activities is based on written procedures such as, IP-01 CCP 1 and CP 9 Monitoring Manual IP-02 Control of raw material intake IP-04 Inspection of the raw material on the inspection table IP-05 Inspection of stone IP-06 Checking the condition of knives P-09 Temperature control of the packing room IP-10 Temperature control of finished product warehouses IP-11. Quality control of the finished product IP-07 Frost tunnel temperature control IP-11 Quality control of finished product I P-12 Sorter product control IP-13. Water control in washers, control of mineral impurities The last revive of documents took place 2019-01-04.
11	13.1.11	Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRC sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).	Y	The corrective action procedure established by the plant foresees the implementation of actions in the event of any deviation of the process or product parameters. /Procedure: PS-06 Działania korygujące i zapobiegawcze/2019.01.04.
12	13.1.12	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.	Y	All process control operations carried out at the plant have been validated, for example, on the basis of scientific literature, product tests, laboratory tests of products./ The last validation of the CPs and CCP was carried out on 2019.01.04.
13	13.1.13	The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification.	Y	All records are reviewed by PCQI or president of the plant once a week. Checked records for cherry BB frozen" code:14.07.2018/24

		The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.		
14	13.1.14	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Sampling procedure to include method, quantity, frequency, and number of samples • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected	Y	The product testing procedure take into account the quantity of sampling, the sampling method, the analytical method, corrective action procedures.
15	13.1.15	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Adequate number and location of sample sites • Timing and frequency of sampling • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected	Y	The environmental test procedure take into account the quantity of sampling, the place of collection, the sampling method, the analytical method, corrective action procedures in case of exceeding the limits./ Ref.doc. Instruction I-12-01, Badania
16	13.1.16	Devices used to verify preventive controls must be calibrated.	Y	Control equipment used in the plant is properly supervised. Auditor reviewed the verification records: Records of the weight control of the reference weight and internal control of thermometers of 2018.05.25 Calibration certificate of the reference thermometer of 2017.04.06) legalization documents 81.94 - UniMasz

				Scale Radwag WPT 60 , legalization valid until 2020.04.30
17	13.1.17	Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training and qualification via job experience.	Y	The person appointed for PCQI has participated in numerous IFS / BRC / ISO 22000 trainings (eg DQS training 21-23.03.2013). In 2018.12.11, she participated in external training courses in BRC 8. Mrs. Marta Nowakowska has 8 years of professional experience. She knows about FSMA draws from the FDA website and also on the basis of training materials developed by Profood Consulting llc, which she got acquainted with on 2018.02.15.
18	13.1.18	All records required by 21 CFR § 117 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable	N	NC: Records from raw material control do not include an hour of inspection. Some formulas do not have a location name.
19	13.1.19	The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.	Y	Food Safety Plan signed 2019.01.10 Quality documents are signed by the president and signature date. The Auditor has specifically checked the document "updated Plan HACCP dated 2019.01.04
20	13.1.20	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food safety plan, which must remain onsite.	Y	Quality documents are signed by the president and signature date. The Auditor has specifically checked the document "updated Plan HACCP dated 2019.01.04 All records of a food safety plan are kept at the establishment for 3 years and retrievable within a few hours.

21	13.1.21	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.	Y	The plant has established and implemented procedures and qualification, validation and verification providers (eg questionnaires, traceability tests, visits to plantations, audits of suppliers, its certification, testing of samples./
22	13.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.	Y	The plant uses permanent suppliers which are always assessed before the first delivery. (In addition, for the delivery of agricultural produce in accordance with Polish law, you must sign the contract at least 24 hours before delivery.Umowa z 2018.01.03 Narożnik Krzysztof. Na lata 2018/2019.
23	13.1.23	One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter at an adequate frequency.	Y	Suppliers are evaluated before purchasing materials. Auditor was acquainted with the initial evaluation of the chosen suppliers All supplier are evaluated once a year Were checked: • Purchasing procedure - edition of 2019.01.04 • Ukleja JAN records of visit to the plantation. Verification of the Producer's Declaration/2019.06.05 • Declaration on compliance with GAP, non-allergen, nonGMo for the fruit supplier Ukleja Jan / 2018.04.10 • Identification test carried out for the purchasing point of Kędziora Halina (batch of raw materials Rabarbar deliver to Waba 2019.05.20 , duration 20 minutes. • Plant protection program for strawberries for 2019, signed by suppliers

				• A separate list of suppliers of auxiliary materials and packaging (10 items in total).2019.01.15 • Records of rating auxiliary materials and packaging/2019.01.15 • Audit at the packaging supplier: in Orpak company of 2018.05.07- realization of Marta Nowakowska (during the audited audit provided the traceability test). • A separate list of suppliers of auxiliary materials and packaging (10 items in total) • Packaging Supplier Orpak - Bags and Cartridges (ISO 9001) This is a high risk supplier (The second-party audit of this supplier was completed by 2018.05.07, report was checked).
24	13.2.1	Human food by-products held for distribution as animal food must be held under conditions that will protect against contamination, including the following: - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with	N/A	The plant does not manufacture products intended for animal feed

		a third party to transport the human food by-products for use as animal food.		
25	13.3.1	A Qualified Individual (QI) is responsible for developing the site's food defense plan, conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on the site's organizational chart. One or more QI's shall be responsible for implementing mitigation strategies at actionable process steps.	N	Food Defence plans have been developed and implemented. The plant is fenced and protected against unauthorized access. NC Responsibility for Food defence is not shown in the organization's organizational chart.
26	13.3.2	The site shall have a written food defense plan, which includes the following: • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification	Y	Ref doc. Procedure PS 20 Procedure Food Defence/2019.01.04
27	13.3.3	A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates the following key criteria (at a minimum): • Scale and severity of threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including	Y	The plant conducted an analysis of food defense (last revision 2019.01.04),. Security system is regularly tested (last test documented 2019.05.22)

		consideration of an inside attacker A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each point, step or procedure in the operation was or was not identified as an actionable process step.		
28	13.3.4	Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment. Justification shall be documented explaining how the strategy significantly minimizes or prevents the vulnerability.	Y	The plant conducted an analysis of food defence (last revision 2019.01.04), The company is approved by the FDA no. 13189662474. Security system is regularly tested (last test documented 2019.05.22)
29	13.3.5	Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies. Procedures shall include recordkeeping requirements for all monitoring activities.	Y	Ref doc. Procedure PS 20 Procedure Food Defence/2019.01.04
30	13.3.6	Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria: • Method for identifying and correcting a lack of implementation • Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions	Y	Ref doc. Procedure PS 20 Procedure Food Defence/2019.01.04 Procedure PS 06 Corrective and preventive actions
31	13.3.7	Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to procedures. Verification procedures shall describe activities	Y	Security system is regularly tested (last test documented 2019.05.22) Ref doc.: • Procedure PS 20 Procedure Food Defence/2019.01.04

		to verify implementation of mitigation strategies. Verification procedures shall include: • A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days) • Other verification activities as appropriate (e.g., internal audit) • Method for verifying that reanalysis of the food defense plan was conducted • Frequency for verification activities • Recordkeeping requirements of all verification activities		• Procedure PS 06 Corrective and preventive actions
32	13.3.8	Reanalysis of the food defense plan shall be documented and performed every three years or whenever • A change in facility operations which creates a new significant vulnerability • Knowledge about a new threat applicable to the food or facility becomes known • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence	Y	The plan is reviewed at least once a year and with all changes.
33	13.3.9	All records required by 21 CFR § 121 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location)	Y	Fullfilled

		• Identity of the product and lot code where applicable		
34	13.3.10	The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any changes following reanalysis.	Y	Fulfilled
35	13.3.11	All documents and records relating to the food defense plan (i.e., all records required by 21 CFR § 121) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite.	Y	All records are stored for minimum of 3 years.
36	13.4.1	Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used. A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.	N/A	The plant does not have its own cars. The suppliers of raw materials and recipients of the products are responsible for transport.
37	13.4.2	The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule. Responsibilities shall ensure transportation operations are conducted in a manner to prevent food from becoming unsafe during	Y	Ref.doc. Contract 2019.03.04 Berrymark FCA. Contract Diafrost

		transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.		
38	13.4.3	Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier. Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the shipper documents sanitary specifications of vehicles for the loader and carrier, which are appropriate for the type of food.	Y	The plant does not have its own cars and does not arranges transportation. The suppliers of raw materials and recipients of the products are responsible for transport.Ref.doc. Contract 2019.03.04 Berrymark FCA. Contract Diafrost
39	13.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary specifications provided by shipper.	Y	As above
40	13.4.5	Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse.	Y	Checked for selected deliveries,
41	13.4.6	Contracts with carriers shall specify that the carrier is responsible for the following sanitary activities where agreed to in writing with shipper. • Sanitary condition of vehicles and transportation equipment • Following shipper's sanitary specifications (including pre-cooling requirements where applicable) • Recording compliance with operating temperature where critical to food safety • Procedures for the use of bulk vehicles, which	Y	The plant does not arrange transport. Contracts with suppliers of raw materials specify the conditions for means of transport.

		includes recording the previous cargo and most recent cleaning for the shipper		
42	13.4.7	Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers • Awareness of potential food safety problems that may occur during food transportation • Basic sanitary transportation practices to address those potential problems • Responsibilities of the carrier	Y	The plant does not arrange transport. Contracts with suppliers of raw materials specify the conditions for means of transport.
43	13.4.8	The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours.	Y	All records are kept for a minimum of 3 years and are available within 48 hours.
44	13.4.9	The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite records are retrievable within 24 hours.	N/A	The plant does not arrange transport.
45	13.5.1	Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: • Principles of food hygiene and food safety Produce safety standards applicable to an individual's job	Y	Fulfilled ref doc records from the training Dated 2019.03.29 (Topic GMP/GHP):
46	13.5.2	Personnel (permanent and temporary) who conduct harvest activities (including washing and	N/A	The plant does not have its own crops and does not carry out harvests. Training for growers is conducted every year.

		cooling) must receive additional training on the following: • Recognizing produce contaminated with known or reasonably foreseeable hazards • Inspecting harvest containers and equipment to ensure that they are clean, maintained and do not contaminate produce with hazards • Correcting problems with harvest containers or equipment		
47	13.5.3	One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.	N/A	The plant does not have its own crops and does not carry out harvests. Training for growers is conducted every year. Each plantation is visited at least once a year. Training and visits are conducted by qualified employees of the facility.
48	13.5.4	A supervisor shall be identified with responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart.	N/A	There is no animal production in the plant.
49	13.5.5	Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals.	N/A	There is no animal production in the plant.
50	13.5.6	The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to prevent the system from being a source of contamination to produce and food contact surfaces. The system shall be inspected for conditions, which could introduce known or foreseeable hazards into or onto produce. Where testing of the water source or system inspection reveals contamination, deficiencies shall be	N/A	The plant does not have its own crops.

		corrected such as the repair of well caps or sanitary seals.		
51	13.5.7	Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL.	N/A	The plant does not have its own crops.
52	13.5.8	Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL.	Y	Fulfilled
53	13.5.9	Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria. Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be conducted followed by the identification of conditions leading to the introduction of hazards into or onto produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.	N/A	No agricultural water in the factory.
54	13.5.10	Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency (EPA), ‘‘Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA–821–R–09–007),’’ December, 2009 or equivalent method.	N/A	No agricultural water in the factory.

55	13.5.11	During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include establishing and following a water-change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to minimize infiltration of pathogens into produce.	N/A	No agricultural operations in the factory.
56	13.5.12	Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed.	N/A	No such a product in the plant
57	13.5.13	Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces.	Y	Pozwolenie wodno prawne 18.04.2016, wyniki badania BZT CHTz
58	13.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.	Y	Fulfilled
59	13.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the supervisor or responsible party.	Y	Fulfilled
60	13.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours. Records related to equipment or processes used by the site for	Y	All necessary records are stored in the plant for a minimum of 36 months,

		analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.		
61	13.5.17	Specific additional requirements for the harvesting, packing, and holding of sprouts. Establish and implement a written Environmental Monitoring plan for the testing of Listeria spp or Listeria monocytogenes. The environmental monitoring plan shall include the following criteria: • Target test (i.e., Listeria spp. or L. mono) • Sample frequency (no less monthly) • Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) The plan shall describe aseptic methods for sample collection and testing according to FDA's ‘‘Testing Methodology for Listeria species or L. monocytogenes in Environmental Samples,’’ Version 1, October 2015 (or equivalent).	N/A	The plant do not handle of sprouts
62	13.5.18	Specific additional requirements for the harvesting, packing, and holding of sprouts. The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono. If Listeria spp. or L mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of the corrective action process:	N/A	The plant do not handle of sprouts

		• Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of Listeria spp. or L. mono • Conduct finished product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce		