SQF Quality Audit Edition 8.1
Beston Pure Dairies - Beston Pure Dairies Pty Ltd - Jervois

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
FSM44430 | 117724

DECISION DATE
09/08/2020

AUDIT TYPE
RECERTIFICATION

RECERTIFICATION DATE
07/12/2021

AUDIT DATES
08/03/2020 - 08/07/2020

EXPIRATION DATE
09/25/2021

ISSUE DATE
09/11/2020

Facility & Scope

Beston Pure Dairies (44347)
Beston Pure Dairies Pty Ltd - Jervois
2571 Jervois Road
Jervois, SU 5259
Australia

Food Sector Categories:
10. Dairy Food Processing

Products:
10. Dairy Food Processing: Mozzarella cheese, Creams, Whey Powder, Butter, Dairy Proteins

Scope of Certification:
10. Dairy Food Processing: Mozzarella cheese, Creams, Whey Powder, Butter, Dairy Proteins

Certification Body & Audit Team

SAI Global
680 George Street
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Australia

CB#: CB-1-SAI
Accreditation Body: JAS-ANZ
Accreditation Number: Z1440295AS

Lead Auditor: Juergens, Thomas (9141)
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Hours Auditing: 40
Hours Writing Report: 12

Section Responses

2.1.1 Quality Policy

The company Food Safety & Quality Policy is in place and is signed by the CEO – J Hicks, the policy is dated 22 March 2019. SQF requirements are covered by the policy. The policy commits the company to the supply safe, good quality foods compliant with customer, legal and regulatory requirements and is displayed in the reception area/lunch rooms.

2.1.1.1 The policy statement prepared and implemented by senior site management to communicate the commitment to food safety shall also include at a minimum: i. The site's commitment to establish quality objectives; ii. The site's commitment to comply with customers' quality requirements; iii. The methods used to measure the site's quality objectives, and iv. The site's commitment to continually improve its quality performance.

RESPONSE: COMPLIANT

2.1.1.2 The site's vision and mission statement shall also be displayed in a prominent position and communicated to all staff. The vision and mission statement may be included in, or separate from, the organization's food safety policy.

RESPONSE: COMPLIANT

2.1.2 Management Responsibility

Organizational structure is documented and reflective of the site structure FSP 1.3.8 dated 26/06/20, from CEO to Operations Manager, Manufacturing Manager (vacant), Site Manager, Q&E Manager, QA Manager, Maintenance Manager, Operational Leaders, Lab QA Team. Management Authorities & Responsibilities are clearly documented in the Quality Management Systems (Alternate Delegates). Deputies for positions are documented for all positions although provisions to cover the absence of the key personnel have been documented in the QMS. i.e. Ops Manager deputy –Q & E Manager, Quality & Environmental manager deputy – Jervois QA manager, Team Leader Cheese Deputy – Manufacturing Manager. The Senior Management have put the resources in place to achieve food safety objectives and to support the development, implementation, maintenance, and ongoing improvement of the SQF system. The SQF Practitioner L. Haebich who is a full-time employee and completed a formal HACCP training on 27/03/2014 and again Principles and Application of HACCP SAI Global Cert C301033 issued 24/04/2019. The audit demonstrated that the SQF Practitioner has the competencies to implement and maintain the SQF Ed. 8 standard including SPC control. The responsibility for establishing and implementing the training needs has been documented in the FSP 4.4.-4. - Job Descriptions are detailed and clear with documented responsibilities, objectives and expected experience and qualifications to perform the role. Records sited for Team Leader Cheese FSP 1.4.10.2.1, 24/05/18 and Powder and Butter Plant Leader FSP 1.4.10.4.1, 24/05/18 , Quality and Environment Manager FSP 1.4.5-3, 26/09/18, Quality Manager Jervois FSP 1.4.6.3, 26/09/18 including key accountabilities and responsibilities. SQF Practitioner responsibilities are stated into SQF Practitioner FSP 1.3.2.3. There is no use of the SQF Quality Shield.

2.1.2.1 The senior site management shall develop quality objectives and a process by which quality performance is measured.

RESPONSE: COMPLIANT

2.1.2.2 The reporting structure shall identify personnel performing key process steps and responsible for achieving quality objectives.

RESPONSE: COMPLIANT

2.1.2.3 The senior site management shall ensure adequate resources are available to achieve quality objectives and customer quality requirements, and to support the development, implementation, maintenance and ongoing improvement of the SQF Quality System.

RESPONSE: COMPLIANT

2.1.2.4 Senior site management shall designate an SQF quality practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review and maintenance of the SQF Quality System including quality fundamentals outlined in 2.4.2, and the quality plan outlined in 2.4.3; ii. Take appropriate action to ensure the integrity of the SQF Quality System; iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF Quality System; and iv. Ensure that site personnel have the required competencies to carry out those functions affecting product quality.

RESPONSE: COMPLIANT

2.1.2.5 In addition to the SQF Food Safety Code requirements, the SQF quality practitioner shall: i. Be competent to implement and maintain HACCP-based food quality plans; ii. Understand the SQF Quality Code and the requirements to implement and maintain a quality management system; and iii. Be competent in process control and/or other quality tools (e.g. process control charts, histograms, process capability etc.) to reduce process variation and achieve customer requirements.

RESPONSE: COMPLIANT

2.1.2.6 Senior site management shall ensure site personnel responsible for performing key process steps and meeting customer requirements, and corporate quality requirements where applicable, have the required competencies to carry out those functions.

RESPONSE: COMPLIANT

2.1.2.7 Senior site management shall develop and implement a quality communication program to ensure that all staff are informed of their quality responsibilities, are aware of their role in meeting the requirements of the SQF Quality Code and are informed of the organization's performance against quality objectives. The program shall include: i. the defined vision and mission statement of the site; ii. the site's quality objectives and the process by which quality performance is measured, and iii. The methods by which customer quality requirements, and corporate quality requirements where applicable, are met.

RESPONSE: COMPLIANT

2.1.2.8 Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provision to cover for the absence of key personnel.

RESPONSE: COMPLIANT

2.1.2.9 Senior site management shall establish a process to trend progress in quality performance against agreed measures and objectives. The performance data including comparisons with external sources (e.g. industry, customers) shall be reviewed at least annually (see also 2.1.3.2) to demonstrate effectiveness of the quality management System and continuous improvement. Results shall be part of communication program to staff (see also 2.1.2.7). Senior site management shall establish a process to trend progress in quality performance against agreed measures. Benchmarking shall be part of this process and the performance data shall be reported at least annually to demonstrate effectiveness of the quality management system and communicated to all staff.

RESPONSE: COMPLIANT

2.1.2.10 Sites that are certified to the SQF Quality Code may use the SQF quality shield. Use of the SQF quality shield shall follow the requirements outlined in Appendix 5: SQF Quality Shield Rules of Use

RESPONSE: COMPLIANT

2.1.3 Management Review

Management Review Procedure FSP 1.5.1-7. The Quality Manager is responsible for reviewing the SQF system with the site management team, this has been performed on a 6 monthly basis for both Jervois and Murray Bridge Sites combined . It was sighted Management Review meeting conducted 14/05/20 involving senior Murray Bridge and Jervois site personnel and included review of logistics and purchasing, new raw materials and trials, production issues, new product trials, planning and results (Veg Oil Mozzarella), general issues and discussion, customer needs, customer complaints (no new Le Rice complaints, low level mozz and cheddar mould complaints, Whey Powder some issues with lumpiness, Mozzarella soft complaints), product non conformity, internal audit results, external audit results, summary of 2019 CARS in all areas (CI improvement process working, issues identified , for corrective action), housekeeping and GMP audits, non-conforming environmental pathogen monitoring results, pest control, training plans, trade waste, contract packing/suppliers, Quality KPI's -Cheese Moistures, Mozzarella cook score average, cheese grading points % per grade score, customer complaints, maintenance, general discussion and action items. Previous meeting was held 19/09/19 with review of the above agenda items. Further Review meetings held at Jervois involving the Management Team as sighted meeting held 20/07/07, included review of software, mozzarella -improved reporting and analysis of events, yield improvement, pasteuriser temperature reduction to 74C (divert remains 72.5), salt % focus, high acid whey recovery, Happy Valley fat recovery, Powder Plant PH control of LF, Butter Plant Moisture analysis. Weekly and daily meetings held to review quality and operational performance eg sighted daily meetings 20/03/20, 27/01/20 included review of GMP, bag and Bucket walk results, Quality holds, Production issues, purchasing, maintenance, logistics, weekly meeting 9/07/20 - next weeks production, product analysis results, production and quality issues, maintenance issues, quality/lab-internal and external audits, customer complaints, GMP/Housekeeping all areas, actions closeout, non conforming product, environment, NCR's (13 open), training (GMP, CCP training), regulatory and certification updates, maintenance -work requests, Mainpac, major projects/capitol works, HR-recruitment, Covid -19.

2.1.3.1 Senior site management shall be responsible for reviewing the SQF Quality System. Reviews shall include actions required to: i. Monitor compliance to specifications; ii. Measure and reduce process and product variation; iii. Meet customer requirements; iv. Take appropriate corrective action where applicable, and v. Ensure sufficient resources are allocated to maintain and improve the performance of the Quality System.

RESPONSE: COMPLIANT

2.1.3.2 The SQF practitioner(s) shall update senior site management on a minimum monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented. The SQF Quality System in its entirety shall be reviewed at least annually.

RESPONSE: COMPLIANT

2.1.3.3 The Quality System, including food quality plans, shall be reviewed when any changes are implemented that have an impact on the site's ability to meet customer requirements and corporate quality requirements where applicable.

RESPONSE: COMPLIANT

2.1.3.4 Senior site management shall ensure the integrity and continued operation of the Quality System in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.3.5 Senior site management shall document and implement a change management process that details how changes in specifications, materials, equipment or resources are evaluated for their impact on quality, communicated to customers and effectively implemented.

RESPONSE: COMPLIANT

2.1.3.6 Records of all Quality System reviews and reasons for amending documents, and changes to the SQF Quality System shall be maintained. Records shall include decisions for actions related to improvement of the Quality System and process effectiveness.

RESPONSE: COMPLIANT

2.1.4 Complaint Management

Customer complaint management is detailed in Non- Conformance Program FSP 4.2.10 dated 6/02/20; this details the requirements for trending, handling, timescales and root cause analysis investigation of complaints. Customer complaints are initially received by phone or/and emailed to the site for investigation. Root cause is identified where relevant and corrective action implemented where necessary. Trended analysis is monthly and managed via a spreadsheet system and Management review system includes trending 2020-Mozzarella Quality (20 NCR's), Butter Cream (3 NCR's), Lactoferrin (0 NCR's), Whey Powder (4 NCR's), Foreign Matter (5 NCR's), Supplier Failures (3 NCR's). It was sighted the complaints and corrective action register 15/07/20 to 8/01/20 as well as corrective action responses, eg 15/07/20 NCR 91 Pink Cleaning Glove found in Mozzarella, could not determine whether happened at shredding plant or at Jervois plant, the same pink gloves are used at Jervois for cleaning and gloves now issued and returned to Supervisor after use, and blue disposable gloves not to be left on equipment after use, to be disposed of as per tool box meeting and notice to employees 26/06/20. NCR 79 Mould complaints multiple customers, pierced by sharp edges on black plastic boxes used to transfer cheese through the cooling tunnel, all plastic boxes replaced in May 2020 and notice to employees re visual inspection. 16/06/20 NCR 74 Mozzarella cheese found with hairs, notice issued to employees 26/06/20 re wearing of hair nets and beard snoods, also covered in tool box meeting included photos of complaint.

2.1.4.1 The complaint management process shall include a requirement to identify and resolve the cause of all quality complaints resulting from activities at the site.

RESPONSE: COMPLIANT

2.1.4.2 Trends in quality complaints shall be included in the performance measures established for the Quality System.

RESPONSE: COMPLIANT

2.1.4.3 Corrective action shall be implemented based on the seriousness of the incident and as outlined in 2.5.3.

RESPONSE: COMPLIANT

2.1.4.4 Records of quality complaints, their investigation and resolution (if applicable) shall be maintained.

RESPONSE: COMPLIANT

2.1.5 Crisis Management Planning

Business Continuity Plan FSP 4.21 Jervois 18/05/20, was updated to include pandemic risk (now rated as medium risk), details the business process and procedures around continuation of supply. The elements required by the SQF Edition 8 have been addressed in the procedure (responsibilities, BCP team, protocols, flowcharts, response plan for each scenario -man made and natural events including IT, Pandemic, Power Loss, Malicious contamination, loss of RM supply etc, and risk assessment undertaken, control measures identified for each risk). The procedure documents the requirement to test, review and verify the plan annually. The plan also includes a detailed key contact list. A Business Continuity Plan Mock Exercise was conducted on 13/03/20 relating to the Covid -19 pandemic, responses and control measures documented and implemented, contingencies reviewed and no impact on production or product. Mock Excersize also undertaken 30/07/20 using scenario power outage, reviewed BCP requirements and Hi Level Process flow diagram to determine actions required, responsibilities were designated to the relative crisis and site personnel, responses in 1 st hour, 1st day, 1st week documented, back up generator used for critical power requirements, and sourcing of SA Power Networks emergency pad mount transformers (with in 12 hours) and actions relating to each areas activities and contingencies documented, including restoration of normal operations, was an effective excersize, 5 opportunities for improvement identified.

2.1.5.1 The crisis management plan prepared by senior site management shall include the methods by which the site shall, in the event of a crisis, maintain continuity of supply that meets the customers' product and service quality requirements.

RESPONSE: COMPLIANT

2.1.5.2 The site shall contact their customers in the event of a crisis that impacts their ability to supply quality product.

RESPONSE: COMPLIANT

2.2.1 Quality Management System

The Quality/FS manual is documented and maintained in electronic and in hard copy form. It outlines the methods the site uses to meet the requirements of the SQF Quality Code. The manual is available to staff, and include the following: the organization's quality policies, the FS & Quality policy, current site organization chart, iii. A list of the products covered under the scope of certification; the manual includes the HACCP plan covers food safety and regulatory requirements are appropriate to the facility and there is no need for a risk assessment for any exclusion. PRPs are documented and implemented into the site food safety management system. The HACCP/food safety plan covers food safety and regulatory requirements. Also includes Finished product specifications agreed with customers and Statistical process control methods and other quality tools that are used to control and reduce process variation.

2.2.1.1 A quality manual shall be documented and maintained in either electronic and/or hard copy form. It shall outline the methods the site uses to meet the requirements of the SQF Quality Code, be made available to staff, and include: i. A summary of the organization's quality policies and the methods it will apply to meet the requirements of the ii. SQF Quality Code; iii. The policy statement and site organization chart; iv. A list of the products covered under the scope of certification; v. Finished product specifications agreed with customers' or corporate quality requirements where applicable; and vi. A description of the applications of process control methods and other quality tools that are used to control and reduce process variation and meet customer specifications The quality system manual may be incorporated into, or independent from the SQF food safety system manual.

RESPONSE: COMPLIANT

2.2.2 Document Control

Document Control is detailed in the Control of site Management Procedures FSP 1.7.1-2. Documents were observed to be managed electronically using the company shared server. Hard copies are kept, and the system details a document log and records of amendments and the reason for the change is in place. System register FSP 1.7-2 is kept electronically as well as on hard copy for reference if required. All the documents and records are securely and accessibly stored.

2.2.2.1 The methods and responsibility for maintenance, storage, and distribution of quality documents shall be the same as those required for SQF Food Safety System documentation.

RESPONSE: COMPLIANT

2.2.3 Records

The control of records is stated in the Records management Procedure FSP 1.7.1 which includes the methods and responsibility QA & E Manager, Unit Managers and Receptionist) maintaining and retaining records. All records sighted during the audit were deemed legible and were suitably authorized by those undertaking monitoring activities. The hard copies and soft copies of records were readily accessible, retrievable, securely stored to prevent damage and deterioration during the audit, the retention time for records are 7 years. (Records are boxed, labelled and archived and deemed controlled. Electronic records are backed up on a regular basis by a 3rd Party IT company.

2.2.3.1 The methods and responsibility for authorization, accessibility, retention and storage of quality records shall be the same as those required for SQF Food Safety System records.

RESPONSE: COMPLIANT

2.3.1 Product Development and Realization

Product Development and Specification management is detailed in the Specification and Product Development Procedure BPF FSP 1.16.1 dated 21/03/19. The ultimate responsibility belongs to the Site Management Team (GM, QA manager, Ops Manager, Marketing Exe) the process covers product develop & design (hazard analysis study, site trials, specs checked, customer signoff, shelf life trials), label review & specification review, NIP, RM & Packaging spec. If there are any new products or processes which may influence the food safety and quality of the products manufactured, the facility's food safety plans are reviewed. New product development is managed by a corporate team in the head office in Adelaide and at the actual site. There has been no new product development in the last 12 months. The handover and validation process are documented in a Change Management Review Procedure FSP 1.5.2 (Changed planned, assess risk to change, plan & ID risk mitigation activities, undertake risk mitigation, implement changes, verify risk mitigation activities).

2.3.1.1 The methods for designing, developing and converting product concepts to commercial realization shall include a comparison of process controls with specification limits (process capability analysis) to ensure that processes are able to consistently supply products that meet customer specifications

RESPONSE: COMPLIANT

2.3.1.2 Product formulation, manufacturing processes and the fulfillment of product quality requirements shall be validated by facility trials and product testing.

RESPONSE: COMPLIANT

2.3.1.3 Shelf life trials shall be conducted to establish and validate a product's packaging, handling, storage and customer use requirements through to the end of its commercial life and consumer use.

RESPONSE: COMPLIANT

2.3.1.4 A food quality plan shall be validated and verified for each new product and its associated process from conversion to commercial production and distribution, or where a change to ingredients, processes, or packaging occurs that may impact food quality.

RESPONSE: COMPLIANT

2.3.1.5 Records of all quality tests, product design, process development, and shelf life trials associated with product changes or new product development shall be maintained.

RESPONSE: COMPLIANT

2.3.2 Raw and Packaging Materials

Approved Supplier Procedure FSP 4.9.5 dated 13/08/19 details suppliers' approval process, contingency arrangements, emergency approvals, contract service providers, how suppliers are risk assessed, approved and reviewed, provision of certifications, raw material and packaging specifications as well as raw material receival inspection requirements and provision of C of A. An approved supplier list is a 'live' document which includes RM suppliers, service providers, packaging suppliers. The vendor assurance program is managed by a Quality Team. Approval of a supplier is based on a supplier being at least HACCP certified and the credential must be kept in file. Copies of a raw material specification for the material supplied must also be kept on file. Packaging suppliers must demonstrate that the material complies with the relevant legislation. Supplier issues are raised directly with the supplier via an external CAR system and the QA team reviews these on a regular basis. Raw materials are delivered with a COA where applicable. Records reviewed via vertical trace excersize demonstrated compliance with COA. Specifications raw material and packaging specs are available on the central shared drive & hard copies are kept on site. All specifications are controlled by the Site Quality Team. Finished product specifications form part of the factory documentation. Raw material and packaging specifications were observed during the audit and were readily accessible. Packaging conforms to local legislative requirements. A register of raw materials and packaging specifications is maintained live. A register of raw materials and packaging is maintained live on the system with specifications and certifications maintained eg Records sighted: DSM Rennet Maxiren 600 Spec 21/08/13, HACCP expiry dated 15/10/21 DSM Culture CP-122 PIF 16/01/15, HACCP expiry dated 15/10/21 Crown PDV Salt PIF 16/11/17, Cheetham Salt HACCP expiry dated 15/11/20 Mermaid Premium Salt PIF 12/04/16, Cheetham Salt HACCP expiry dated 15/11/20 Multivac Film 150 micron/300micron Product Data sheet 15/09/15, Food Grade Compliance Declaration 20/06/17 complaint to EC Reg 1935/2004, 2023/2006, 10/2011, 1895/2005, EC Dir 94/62/EC.

2.3.2.1 Specifications for all raw and packaging materials, including, but not limited to ingredients, additives, agricultural inputs (where applicable), hazardous chemicals and processing aids that impact on finished product quality shall be documented and kept current.

RESPONSE: COMPLIANT

2.3.2.2 Raw and packaging materials quality parameters shall be verified upon receipt to ensure they meet specifications (see also 2.5.2 and/or 2.5.4).

RESPONSE: COMPLIANT

2.3.2.3 Product labels that are designed or specified by customers shall be approved by those customers. Records shall be maintained of customer approvals.

RESPONSE: COMPLIANT

2.3.2.4 The register of current raw and packaging material specifications shall include those raw and packaging materials impacting product quality and customer labels.

RESPONSE: COMPLIANT

2.3.3 Contract Service Providers

Approved Supplier Procedure FSP 4.9.5 details suppliers' approval process, contingency arrangements, emergency approvals, supplier audit frequencies and how suppliers are risk assessed and how they become approved. A 'Live' approved supplier list includes contract Service Providers. Sighted service agreements: Veolia Waste 01/06/2018 Adams Pest Control 22/12/2017 Eades Transport – Finished product transport 25/07/18

2.3.3.1 Specifications for contract services that have an impact on in-process or finished product quality shall be documented, current, include a full description of the service to be provided and detail relevant training requirements of contract personnel.

RESPONSE: COMPLIANT

2.3.3.2 The register of contract service specifications shall include those services impacting product quality.

RESPONSE: COMPLIANT

2.3.4 Contract Manufacturers

No Contract Manufacturers

2.3.4.1 The methods and responsibility for ensuring all agreements relating to customer product requirements and their realization and delivery are specified and agreed shall be documented and implemented.

RESPONSE: NOT APPLICABLE

EVIDENCE: No Contract Manufacturers

2.3.4.2 The site shall: i. Ensure that the processes in place at the contract manufacturer are capable of consistently meeting customer requirements, or corporate quality requirements where applicable; ii. iii. Verify compliance with the SQF Quality Code and that all customer requirements are being met at all times; iv. Audit the contract manufacturer annually at a minimum to confirm compliance to the SQF Quality Code and agreed arrangements, or accept the manufacturer's certification to the SQF Quality Code or equivalent; and v. Ensure changes to contractual agreements are approved by both parties, agreed with customers where necessary, and communicated to relevant personnel.

RESPONSE: NOT APPLICABLE

EVIDENCE: No Contract Manufacturers

2.3.4.3 Records of all contract reviews and changes to contractual agreements and their approvals extend to quality records.

RESPONSE: NOT APPLICABLE

EVIDENCE: No Contract Manufacturers

2.3.5 Finished Product Specifications

Food Safety and Quality attributes for finished products and finished product specification are in place which details labelling, packaging requirements & product quality attributes. Shelf life testing has been completed and this is clearly documented include in the finished product specifications. A register of finished product specifications is maintained and constantly being updated, sighted the following Finished Product Specifications: Edwards Crossing -Dairy Country Mozzarella Block Cheese 10kg (4x2.5 kg) issue 1, 4/08/20 Bulk Pasteurised Cream Issue 7, 11/09/19 Bulk Salted Fresh Cream Butter 25kg issue 7, 12/06/20 Whey Powder 25kg Bag, issue 9, 20/12/19. Lactoferrin Powder 90-95% RW, issue 4, 13/07/20

2.3.5.1 Finished product specifications shall be documented, current, approved by the site and their customer, accessible to relevant staff and shall include product quality attributes, service delivery requirements, and labelling and packaging requirements.

RESPONSE: COMPLIANT

2.3.5.2 Customer product specifications and delivery requirements shall be communicated to appropriate departments and staff within the site.

RESPONSE: COMPLIANT

2.4.1 Customer Requirements

Customers requirements and expectations are continually reviewed to ensure the accuracy of specifications and compliance to product specifications are met as per review of product specifications covered under the audit scope

2.4.1.1 The requirements and expectations of customers and final consumers shall be continually reviewed to ensure the accuracy of specifications and the ability to supply to customer needs. A full review of customer/consumer expectations for product and delivery shall occur at least annually and shall illustrate how the site is conforming to those expectations and/or requirements that are part of legal contracts or corporate policy. The site shall have a procedure in place to notify essential customers where their ability to supply product that meets customer specifications is temporarily suspended or halted.

RESPONSE: COMPLIANT

2.4.1.2 Where customer products, materials or equipment are used within the facility, the site shall have measures in place to safeguard customer property and ensure its correct and proper use.

RESPONSE: NOT APPLICABLE

EVIDENCE: No customer products, materials or equipment used.

2.4.2 Quality Fundamentals

Buildings and equipment are constructed (built for purpose for dairy processing), designed and maintained to facilitate the manufacture, handling, storage and dispatch that meets customer specifications and internal quality requirements . These requirements are managed through the Good Manufacturing Requirements Policy (FSP 4.3-1) , verification activities in place documented and implemented in compliance with SQF requirements

2.4.2.1 The buildings and equipment shall be constructed, designed and maintained to facilitate the manufacture, handling, storage and/or delivery of food that meets customer specifications or corporate quality requirements.

RESPONSE: COMPLIANT

2.4.2.2 The methods and responsibility for the calibration of measuring, test and inspection equipment used for quality testing of raw materials, work-in-progress, and finished product, food quality plans and other process controls, or to demonstrate compliance with customer specifications shall be documented and implemented. Software used for such activities shall be validated as appropriate.

RESPONSE: COMPLIANT

2.4.2.3 Storage and transport of raw materials, work-in progress, and finished product shall be suitable to maintain the integrity of the product without loss, waste or damage.

RESPONSE: COMPLIANT

2.4.3 Food Quality Plan

The HACCP plan covers food safety & quality and regulatory requirements are appropriate to the facility and there is no need for a risk assessment for any exclusion. PRPs are documented and implemented into the site food safety management system. The HACCP Team is multidisciplinary with L. Haebich being the team leader and suitably trained, as well as Quality and Operations personnel with considerable dairy industry experience. HACCP/food safety plans are based on CODEX HACCP principles. Each product has its own Food safety plan. Each HACCP/food safety plan covers food safety and regulatory requirements, product descriptions and intended use, Flow charts with all steps and process inputs/outputs, floor plans, identification of micro, physical, chemical, quality, traceability hazards and risk assessment using likelihood and severity matrix, as well as decision tree to determine CCP's and CQP's. PRPs are documented and well established. They are implemented into the site food safety management system. HACCP plan reviews and updates were as follows: HACCP plans reviewed: Mozzarella Processing – FSP 2.4 19/06/20 V9 (SS test piece size changed to 5.5mm, to prevent false rejects due to salt on cheese). Whey Powder– FSP 2.15.1, 16/06/20 V6 (amended step 11c fluid bed) Fresh Cream – FSP 2.14.1 16/06/20 V7 (amended to pasteuriser divert at 74.8C, minimum 15 seconds, validation via ANZDAC Pasteuriser validation and verification guideline June 2007 Ch 4 pg7, appendix b pg 11 Heat treatment equivalent to pasteurisation of dairy produce <10% fat, <200 micron, AS 3993-2003 (Appendix A) A2.1 (a) pg 16). Butter FSP 2.14.1 16/06/20 V5 (amended to pasteuriser divert at 74.8C, minimum 15 seconds , validation as above). Lactoferrin & Lactoperoxidase (Protein Powders) FSP 2.17.1 V3 14/01/2019 (currently under review) PRPs are documented and well established. They are implemented into the site food safety management system. CCP's relate to: CCP 1 - Raw Milk Receival – Antibiotics – Antibiotics <0.0025mg/kg (Limit of Detection), <0.25IU, Approved Supplier Program CCP 2 - Pasteurisation > Diverts at 72.2°C, min 15 seconds, current 35000 L /H (18.8 seconds) max 39000L/H pressure differential diversion <0.1 bar CCP 3 – Evaporator, Preheat 78 - 83°C, max 35,000 L/hr CCP 4 – X Ray Detector - No Metal – product identified Test pieces SS 5.5mm CCP5 -Cream Pasteurisation > 74.8 C Diversion temperature, min 15 seconds, 5700Lh flow CCP 6 - Butter Cream Pasteurisation >74.8 C Diversion temperature, min 15 seconds, 5700Lh flow Lactoferrin & Lactoperoxidase: CCP 7 – Refrigeration Stored 0-4°C, daily record. CCP 8 – Thaw frozen bulk wet product 0-4°C up to 7 days QCP/RCP's Cheese whey PH during cheese make and mill, salting, weight checks Validation and Effectiveness include monitoring and measuring, validation of control measures, food safety plan updates, and food quality plan updates. The responsibilities of this process are managed by Quality Manager. The frequency of HACCP review is documented as annually with the last review dated June 2020 X-Ray machine detector test piece sizes have been validated via supplier calibration records, calibration by Mettler Toledo dated 14/05/20, Holding Tubes 5 yearly validation – dated 23-3-2018, other CCP's are validated by reference to the Food Standard 1.4.2 Schedule 1 pg. 50, ANZDAC Pasteuriser Validation and Verification Guideline June 2007, Ch 4 pg. 7 & AS 3993-2003 (Appendix A) A2.1(a) pg 16) Heat treatment equivalent to pasteurisation of dairy produce <10% fat, <200 micron, AS 3993-2003 (Appendix A) A2.1 (a) pg 16). Sighted monitoring records CCP1 Tanker antibiotic testing records 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19 <0.0025mg/kg CCP 2 Milk Pasteurisation records 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19 compliant to temperature and pressure differentials. CCP3 Evaporator Preheat temperature records verified 5/08/20, 28/07/20, 17/12/10 compliant to temperature CCP 4 X Ray Detector records verified 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19 compliant to testing of metal detector with 5.5 mm stainless steel ball start/middle and end of shift as well as independent verification by team leader CCP 5 Cream Pasteuriser temperature records verified 4/08/20, 10/06/20, 9/06/20, 25/02/20 compliant to temperature limits. CCP 6 - Butter Cream Pasteurization temperature records verified 4/08/20, 10/06/20, 9/06/20, 25/02/20 compliant to temperature limits. CCP 7 – Refrigeration Stored 0-4°C, Sighted monitoring records between 4/08/20 to 2/01/20 <4C Compliant. CCP 8 – Continuous Thawing - 0-4°C up to 7 days, no thawing has occurred in last 12 months QCP/RCP's Cheese whey PH during cheese make and mill, salting, weight checks, sighted records 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19 compliant

2.4.3.1 A food quality plan shall be developed, effectively implemented, and maintained in accordance with the Codex Alimentarius Commission HACCP method. The food quality plan may be combined with, or independent from, the food safety plan, but must separately identify quality threats and their controls, and critical quality points.

RESPONSE: COMPLIANT

2.4.3.2 The food quality plan shall outline the means by which the site controls and assures the quality attributes of the products or product groups and their associated processes.

RESPONSE: COMPLIANT

2.4.3.3 The food quality plan shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and marketing knowledge of the relevant products and associated processes. Where the relevant expertise is not available on site, advice may be obtained from other sources to assist the food quality team. The composition of the food quality team may be different from the food safety team.

RESPONSE: COMPLIANT

2.4.3.4 The scope of the food quality plan shall be developed and documented including the start and endpoint of the process under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

2.4.3.5	Product descriptions shall be developed and documented for all products included in the scope of the food quality plan. This shall include information in the finished product specifications (refer to 2.3.5.1) plus any additional quality or service attributes established by agreement with the customers. **RESPONSE:** COMPLIANT
2.4.3.6	The intended use of each product shall be determined and documented by the food quality team. This shall include as appropriate target consumer groups, ease of use by consumers, consumer instructions, tamper evidence, and other applicable information affecting product quality. **RESPONSE:** COMPLIANT
2.4.3.7	The food quality team shall review the flow diagram developed and confirmed as part of the food safety plan, and ensure process steps, process delays, and inputs that impact product quality are included. **RESPONSE:** COMPLIANT
2.4.3.8	The food quality team shall identify and document all quality threats that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs. **RESPONSE:** COMPLIANT
2.4.3.9	The food quality team shall conduct a quality threat analysis for every identified quality threat, to identify which threats are significant, i.e. their elimination or reduction to an acceptable level is necessary to ensure or maintain product quality. The methodology for determining threat significance shall be documented and used consistently to assess all potential quality threats. **RESPONSE:** COMPLIANT
2.4.3.10	The food quality team shall determine and document the control measures that must be applied to all significant quality threats. More than one control measure may be required to control an identified threat, and more than one significant threat may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.11	Based on the results of the threat analysis (refer to 2.4.3.9), the food quality team shall identify the steps in the process where control must be applied to eliminate a significant threat or reduce it to an acceptable level. These steps shall be identified as Critical Quality Points or CQPs. **RESPONSE:** COMPLIANT
2.4.3.12	For each identified CQP, the food quality team shall identify and document the quality limits that separate acceptable from unacceptable product. The food quality team shall validate the critical quality limits to ensure the designated level of control of the identified quality threat (s); and that all critical quality limits and control measures individually or in combination effectively provide the level of control required. **RESPONSE:** COMPLIANT
2.4.3.13	The food quality team shall develop and document procedures to monitor CQPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT
2.4.3.14	The food quality team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CQP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the quality failure. **RESPONSE:** COMPLIANT
2.4.3.15	The documented and approved food quality plan shall be fully implemented. The effective implementation shall be monitored by the food quality team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, specifications or inputs occur which may affect product quality. **RESPONSE:** COMPLIANT
2.4.3.16	Implemented food quality plans shall be verified as part of SQF Quality System verification (refer to 2.5). **RESPONSE:** COMPLIANT

2.4.4 Approved Supplier Program

Approved Supplier Procedure FSP 4.9.5 dated 13/08/19 details suppliers' approval process, contingency arrangements, emergency approvals, contract service providers, how suppliers are risk assessed, approved and reviewed, provision of certifications, raw material and packaging specifications as well as raw material receival inspection requirements and provision of C of A. An approved supplier list is a 'live' document which includes RM suppliers, service providers, packaging suppliers. The vendor assurance program is managed by a Quality Team. Approval of a supplier is based on a supplier being at least HACCP certified and the credential must be kept in file. Copies of a raw material specification for the material supplied must also be kept on file. Packaging suppliers must demonstrate that the material complies with the relevant legislation. Supplier issues are raised directly with the supplier via an external CAR system and the QA team reviews these on a regular basis. Raw materials are delivered with a COA where applicable. Records demonstrated compliance with COA. A register of raw materials and packaging is maintained live on the system with specifications and certifications maintained eg DSM (Cultures and Rennet) HACCP expiry dated 15/10/21 Cheetham Salt HACCP expiry dated 15/11/20 Multivac (Film) Sunrise packaging BRC Expiry 1/06/21

2.4.4.1 Raw materials, ingredients, packaging materials, and services that impact on finished product quality shall be supplied by an approved supplier.

RESPONSE: COMPLIANT

2.4.4.2 Material suppliers shall be selected and approved based on their ability to supply materials that meet quality specifications. The evaluation program shall require suppliers to: i. Maintain controlled and current copies of specifications; ii. Have processes that are capable of consistently supplying materials that meet specification and other defined quality metrics (e.g. delivery. service, adherence to specifications, etc.); iii. Provide evidence that supplied product meets agreed specifications; and iv. Have a complaints and corrective action process in place.

RESPONSE: COMPLIANT

2.4.4.3 Material suppliers shall only be accepted into the facility based on either certificates of analysis for every lot received, or inspection at receipt to ensure materials comply with specification.

RESPONSE: COMPLIANT

2.4.4.4 The approved supplier program shall include an agreement with suppliers for the return or disposal of materials that fail to meet specifications or are damaged or contaminated.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Product or Equipment

Non- Conformance Program FSP 4.2.7 details requirements and management of non-conforming raw materials, work in progress, finished products and equipment. The procedure details quarantine requirements, labelling requirements, communication channels and release and/or disposal procedures. Actions are allocated to the most appropriate area manager and closed by the original issuer of the Corrective Action Register. Non conforming product and corrective action register maintained as sighted 15/07/20 to 8/01/20 eg 24/01/20 NCR 13 Lumpy Whey Powder internal failure, draining issue in bag house when CIP, bags became wet causing lumpy powder, bags were removed and CIP drain time extended to ensure adequate drainage.

2.4.5.1 Non-conforming product shall include products that fail to meet in-process or product requirements for quality.

RESPONSE: COMPLIANT

2.4.5.2 Non-conforming equipment shall include equipment that is not suitable for use and is not capable of producing products that meet in-process or product requirements for quality.

RESPONSE: COMPLIANT

2.4.5.3 The site shall document and implement a procedure to accept returned product that does not meet finished product specifications. The procedure shall include handling of returned goods to prevent redistribution or contamination of other products.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Product Rework Procedure FSP 4.24.1 details the requirements of responsibilities (QA Manager and Manufacturing) rework guidelines, conditions of use, rework WIP, product returned for rework, assessment of product. The main rework complies to the left overs/end of run cheese that gets reworked with the same product the following day or days. Traceability is via production logs and signage.

2.4.6.1 Procedures shall be documented and implemented to ensure product quality or formulation is not compromised by the rework process.

RESPONSE: COMPLIANT

2.4.7 Product Release

Product Hold and Release Procedure FSP 4.15.1-2 detail requirements and management of releasing non-conforming raw materials, work in progress & finished products. The procedure details labelling requirements, inspections, communication channels and authorized personnel. Product release is based on finished product micro being within specification. Records are maintained via a spreadsheet. Product cannot be picked for dispatch until unlocked in the SAP system. Note: Quarantine stickers and designated areas are used, this system was demonstrated during the audit. Micro Testing includes pathogens Listeria and Salmonella.

2.4.7.1 The site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer requirements including, but not limited to, product specifications, sensory, packaging and package integrity, labelling, delivery and service requirements.

RESPONSE: COMPLIANT

2.4.7.2 Records of all product release shall be maintained.

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness

Validation and Effectiveness include monitoring and measuring, validation of control measures, food safety plan updates, and food quality plan updates. The responsibilities of this process are managed by Quality Manager. The frequency of HACCP review is documented as annually with the last review dated June 2020 X-Ray machine detector test piece sizes have been validated via supplier calibration records, calibrated by Mettler Toledo dated 2/06/20 , Holding Tubes 5 yearly validation – dated 23-3-2018, other CCP's are validated by reference to the Food Standard 1.4.2 Schedule 1 pg. 50, ANZDAC Pasteuriser Validation and Verification Guideline June 2007, Ch 4 pg. 7 & AS 3993-2003 (Appendix A) A2.1(a) pg 16)

2.5.1.1 Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.

RESPONSE: COMPLIANT

2.5.1.2 Records of validation of quality criteria shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities

Verification activities are documented in the individual Verification and Validation Table under each specific product and stated in the Internal Audit schedule FSP 6.26.3. Records sighted demonstrate CCP's have been monitored and compliance with critical limits observed or corrective action demonstrated to be undertaken. Monitoring records are verified by an internal auditing system and record cited demonstrated that these have been completed as per documented schedule. Verification activities have been performed as per documented schedule. Records sighted: HACCP Review June 2020, GMP bi monthly Audits 3-29/06/20,15-28/04/20, 19-28/02/20, Metal Detection Calibration 2/06/20, X Ray Calibration 2/06/20. Pre-Operational Checks: daily – completed as per records sighted 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19, Glass Audits – monthly - wc 27/07/20, 20/07/20, 13/07/20, through to 8/01/20 (weekly), 22/06/20, 5/05/20, 21/04/20, 17/03/20, 10/02/20, (Monthly). Internal audits undertaken as per schedule 2019/20. HACCP plans reviewed: Mozzarella Processing – FSP 2.4 19/06/20 V9 (SS test piece size changed to 5.5mm, to prevent false rejects due to salt on cheese). Whey Powder– FSP 2.15.1, 16/06/20 V6 (amended step 11c fluid bed) Fresh Cream – FSP 2.14.1 16/06/20 V7 (amended to pasteurizer divert at 74.8C, minimum 15 seconds, validation via ANZDAC Pasteurizer validation and verification guideline June 2007 Ch 4 pg7, appendix b pg 11 Heat treatment equivalent to pasteurisation of dairy produce <10% fat, <200 micron, AS 3993-2003 (Appendix A) A2.1 (a) pg 16). Butter FSP 2.14.1 16/06/20 V5 (amended to pasteurizer divert at 74.8C, minimum 15 seconds, validation as above). Lactoferrin & Lactoperoxidase (Protein Powders) FSP 2.17.1 V3 14/01/2019 (currently under review)

2.5.2.1 The verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.

RESPONSE: COMPLIANT

2.5.2.2 The methods, responsibility and criteria for verifying the effectiveness of monitoring critical quality points and other process and quality controls shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each record.

RESPONSE: COMPLIANT

2.5.2.3 Verification activities shall include a comparison of process control limit with specification limits to ensure alignment and appropriate process control corrections.

RESPONSE: COMPLIANT

2.5.2.4 Records of the verification of quality activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action

Non conforming product and corrective action register maintained as sighted 15/07/20 to 8/01/20 eg 19/06/20 NCR 77 Internal Audit HACCP, some documentation updates required and checks not completed as required. 6/05/20 NCR 63 Hygiene non compliance, unauthorised drink bottle in red production cupboard, cupboard has been removed, and there is continual monitoring of employee practices. 24/01/20 NCR 13 Lumpy Whey Powder internal failure, draining issue in bag house when CIP, bags became wet causing lumpy powder, bags were removed and CIP drain time extended to ensure adequate drainage. 27/03/20 NCR 55 Pest Control Mouse in cheese production room, root cause-gaps in roller doors in loading dock, WR 1267 raised, Issue escalated to pest control contractor, increased number of traps inside areas, including packing area and sticky pad traps in cheese room, thorough inspection undertaken for evidence of mice and pest proofing, also reinforced pest sighting and reporting requirements with employees, escalated again 18/06/20 with 2 mice captured in loading dock area, and escalated fixing of loading dock doors, and 2 further traps placed in the area, gaps on bottom of loading dock doors have not as yet been fixed however.

2.5.3.1 Corrective and preventative action methods shall include the identification of the root cause and resolution of non-compliance of critical quality limits and deviations from quality requirements.

RESPONSE: COMPLIANT

2.5.4 Product Sampling, Inspection and Analysis

Sampling and testing as per schedule. Jervois product testing by Murray Bridge Proficiency testing - Lab – sampling and testing requirements and ALS NATA Lab Acc 1247 utilised for chemical analysis and micro analysis. Mozzarella Cheese: Micro testing E.Coli <10, Listeria/25g – 0, Salmonella /25g – 0, Staph <10, Yeast <100, Mould <100, confirmed micro test results from ALS Nata Lab and in house results for dates 20/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19, compliant Chemical Testing guidelines are in Cheese Parameters SOP 5.2.1, Includes (Mill times, pH, acidity guidelines, recipes, calculations, cultures & whey off pH standards, salt settings, cut duration, pump out) sighted records 3/08/20, 28/07/20, 9/06/20, 23/04/20, 25/02/20, 18/12/19. Chemical analysis 31/07/20 Moisture (spec is 46-49% max): actual (Range 47.1 to 48.76%), Fat (spec is 20-24%): actual (Range 21.63 to 22.17%), Salt (spec is 1.0-1.5%): actual (Range 1.25 to 1.44%), pH (spec is 5.0-5.4): actual (Range 5.29 to 5.36), Results compliant Current SPC processes relate to Product Quality & Composition parameters Mozzarella Cheese moisture Averages Aim 48.0 LCL 46.0%, UCL 49.0% results 2020 July 47.0-48.3, June 46.2 – 48.2, Mar 47.6 -49.0% , Butterfat LCL 20.0%, UCL 24.0 % results July 20.9-20.4, June 20.8 - 23.8, Mar 19.8 – 23.7 % , PH Aim LCL 5.0 UCL 5.4 results July 5.2 – 5.4, June 5.2 – 5.4, Mar 5.2 – 5.4, Salt LCL 1.0 UCL 1.5 % results July 1.2-1.4, June 1.2-1.5, Mar 1.2-1.4% Also sighted standard deviations achieved eg June 2020 Moisture 0.788, Salt 0.160, Fat 0.747, PH 0.04. Mozzarella Cook Score, Aim monthly LCL 2.5, UCL 2.80, results June 2.6-2.8, Mar 2.3-2.8 Whey Powder: DOM 16/06/20, 23/04/20, 18/12/20 E. coli 95%, Ash 4.0%, PH 5.5 to 6.5, Iron <350mg/100g, Moisture <4.0% sighted results 1/01/20 to 19/06/20 generally good compliance to specification, full compliance with micro specification, occasional LF protein <95% (sold as lower grade) .

2.5.4.1 Processing parameters or in-process measurements shall be established, validated, and verified at a determined frequency to meet all customer requirements.

RESPONSE: COMPLIANT

2.5.4.2 On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer expectations and meet quality objectives.

RESPONSE: COMPLIANT

2.5.4.3 Process control methods shall be used to effectively control and optimize production processes to improve process efficiency and product quality and reduce waste. Control charts and/or other quality tools shall be in use for control of key processes.

RESPONSE: COMPLIANT

2.5.4.4 A sensory evaluation program shall be in place to ensure alignment with agreed customer requirements. Sensory evaluation results shall be communicated with relevant staff and with customers where appropriate

RESPONSE: COMPLIANT

2.5.4.5 Records of all quality inspections and analyses, and statistical analyses, shall be maintained.

RESPONSE: COMPLIANT

2.5.5 Internal Audits

These requirements are managed through an Internal Audits Procedure FSP 4.3.1 This includes how Internal audits are scheduled, non-conformance grading, corrective actions, communication routes and how records are maintained. The responsibilities of this process are managed by Quality Manager. There are 6 trained Internal auditors that conduct the audits throughout the year. Internal Audits cover all aspects of the SQF standard. All aspects of the food safety system are subject to an Internal audit on an annual basis by the Quality manager. Records demonstrated good level of detail and reporting of both compliance and non-compliance. Any issues found fall into the Corrective and Preventative Action procedure. Sighted completed audits: Pest Control 5/05/20, Cleaning and sanitation 5/05/20, Calibration 5/05/20, Rework 20/02/20, Mozzarella HACCP 18/06/20, Management Responsibility 28/01/20, Potable Water 8/01/20, BCP plan 18/05/20 (Added Pandemic response). GMP audits undertaken bi monthly and includes all areas including cheese plant, protein plant, maintenance, butter and cream plant, whey powder plant, cool rooms, amenities areas and includes review of walls, floors, ceilings, drains, foot baths, lighting, work benches, pest activity, cleanliness and hygiene, foreign objects, glass, ceramics and hard plastics, PPE, external areas. Sighted undertaken in the various areas 3-29/06/20,15-28/04/20, 19-28/02/20 with detailed corrective action requirements noted and work orders raised.

2.5.5.1 Internal audit plans and methods shall include food quality plans, process controls, quality tests, and other activities implemented to meet finished product specifications and customer requirements.

RESPONSE: COMPLIANT

2.5.5.2 Staff conducting the quality internal audits shall be trained and assessed in internal audit procedures and have knowledge and experience in the quality process and process control methods as they relate to the scope of certification.

RESPONSE: COMPLIANT

2.6.1 Product Identification

These requirements are managed through a Product & Identification Procedure FSP 4.12-8 . This includes how raw materials, work in progress and finished product are clearly identified during all stages of receipt, production, storage and dispatch, finished product is labelled to the customer specification and/or regulatory requirements. The responsibilities of this process are managed by Site Management Team. Product at all stages of the process was observed to be labelled appropriately. Records demonstrated that traceability is maintained i.e. Milk receival files and milk tanker dockets, cheese - batch #, packed date, pallet #.

2.6.1.1 Finished product shall be labeled to the agreed customer, company or corporate requirements.

RESPONSE: COMPLIANT

2.6.1.2 Product changeover procedures shall include quality attributes required to meet finished product specifications and customer requirements.

RESPONSE: COMPLIANT

2.6.2 Product Trace

These requirements are managed through a Product & Identification Procedure FSP 4.12-8 dated. This includes how raw materials, work in progress and finished product are clearly identified during all stages of receipt, production, storage and dispatch, finished product is labelled to the customer specification and/or regulatory requirements. The responsibilities of this process are managed by Site Management Team. Product at all stages of the process was observed to be labelled appropriately. Records demonstrated that traceability is maintained i.e. Milk receival files and milk tanker dockets, cheese - batch #, packed date, pallet #. Bestons Jervois Mock Recall and Trace excersize was undertaken 23/07/2020 traced from raw milk silo (scenario antibiotic in milk 17/06/20), stock placed on hold, through to all products processed and packed including mozzarella, cream, whey powders, whey protein, as well as production and quality logs, through to ingredients and batch numbers, as well as distribution, and mass balance completed, all completed in 2.5 hours. Opportunities identified including recording of packaging batch codes, protein plant batch code recording and traceability records, evaporator top up vat recording (have been summarised and communicated to employees via Mock Recall summary on notice board).

2.6.2.1 Finished product shall be traceable forward to the final customer, such as the retailer, distributor, or manufacturer.

RESPONSE: COMPLIANT

2.6.2.2 All raw materials, ingredients, and packaging materials used in manufacturing a finished product, and processing aids associated with the product, shall be identified with the finished product lot number and traceable back to the supplier (one back).

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall

Product Recall and Withdrawal Procedure FSP 4.14 details the business process and procedures around the event of a product recall or withdrawal. The elements stated are comprehensive and meet the requirements of the SQF Ed 8 standard. SQF & CB details were observed to be current and correct. The procedure documents the requirement to test, review and verify the system annually. Bestons Jervois Mock Recall and Trace excersize was undertaken 23/07/2020 traced from raw milk silo (scenario antibiotic in milk 17/06/20), stock placed on hold, through to all products processed and packed including mozzarella, cream, whey powders, whey protein, as well as production and quality logs, through to ingredients and batch numbers, as well as distribution, and mass balance completed, all completed in 2.5 hours. Opportunities identified including recording of packaging batch codes, protein plant batch code recording and traceability records, evaporator top up vat recording (have been summarised and communicated to employees via Mock Recall summary on notice board).

2.6.3.1 The site's recall and withdrawal procedures shall apply to product recalled or withdrawn due to failure to meet customer specifications or corporate quality requirements.

RESPONSE: COMPLIANT

2.7.1 Food Fraud Vulnerability Assessment

These requirements are managed through the Food Fraud Risk Procedure FSP 4.20.1 outlines requirements for VACCP methodology and steps, and Food Fraud reduction strategies. VACCP Food Fraud Risk Assessment was reviewed 16/07/20. This includes how raw materials, work in progress and finished product are managed to prevent concealment, counterfeiting, dilution, mislabelling, grey market diversion, substitution & emerging concerns. The responsibilities of this process are managed by Quality Manager and the VACCP team. As part of review have assessed Historical incidents eg melamine contamination of milk in China, economic/price fluctuations, geographical origin, length and complexity of supply chain, storage and distribution, ease of access to materials, material value and market size, physical form, emerging concerns-nil identified for dairy ingredients, existing controls, standards, availability. All raw materials associated with the finished product have been assessed including raw materials and packaging, assessed for likelihood of occurrence, likelihood of detection, likelihood of profitability from food fraud and controls including approved supplier program, purchased from reputable suppliers, good supplier relations ships, C of A's, Food Safety/Food Quality/Operational controls, finished product testing and assessment. No immediate potential for food fraud risks have been identified including ingredients reviewed during the audit, salt, culture, rennet, milk, primary packaging all low probability.

2.7.1.1 2.7.1.1 The food fraud vulnerability assessment shall include the site's susceptibility to ingredient or product substitution, mislabeling, dilution and counterfeiting that could adversely impact food quality.

RESPONSE: COMPLIANT

2.7.1.2 A food fraud mitigation plan shall be developed and implemented which specifies the methods by which the identified food fraud vulnerabilities that could adversely impact food quality shall be controlled.

RESPONSE: COMPLIANT

2.8.1 General Requirements for Identity Preserved Foods

Identity preserved product procedure FSP 4.12-8 Product ID and Traceability, Section 7 includes segregation and traceability requirements for identity preserved products. Specifications for finished product EC-Dairy country mozzarella 202403, Issue 6, 30/08/19 - halal , vegetarian, kosher, coeliac suitable for consumption, but not labelled as claim. Halal (ICCV)cert 2019631 expiry 8/11/20 for bulk mozzarella , bulk butter, whey powder, cream and lactoferrin. Raw material specifications for mozzarella product were verified with Halal suitable status. HALAL not required for labelling , status provided to customer via product specification and HALAL certification upon customer request. Also Kosher Certificate 50771749 expiry 21//03/21, cert of Kashrut.

2.8.1.1 The methods and responsibility for the identification and processing of food and other products requiring the preservation of their identity preserved status (e.g. Kosher, HALAL, organic, GMO-free, regional provenance, free from, free trade etc.) shall be documented and implemented.

RESPONSE: COMPLIANT

2.8.1.2 Identification shall include a statement of the product's identity preserved status of all ingredients, including additives, preservatives, processing aids and flavorings.

RESPONSE: COMPLIANT

2.8.1.3 Raw material and ingredient specifications to identity preserved foods shall include requirements for their handling, transport, storage and delivery prior to use.

RESPONSE: COMPLIANT

2.8.1.4 Assurances concerning the raw material or ingredient's identity preserved status shall be by agreement with the supplier of the material.

RESPONSE: COMPLIANT

2.8.1.5 The process description shall allow for a product's identity preserved status to be maintained during manufacturing.

RESPONSE: COMPLIANT

2.8.1.6 The processing of identity preserved foods shall be conducted under controlled conditions such that: i. Ingredients are physically separated from ingredients identified as incompatible with the identity preserved food; ii. Processing is completed in separate rooms; or scheduled as the first production run; or carried out after the completion of a thorough sanitation of the area and equipment; and iii. Finished product is stored and transported in separate units or isolated by a physical barrier from non- specialty product.

RESPONSE: COMPLIANT

2.8.1.7 The identity preserved status shall be declared in accordance with regulatory requirements.

RESPONSE: COMPLIANT

2.8.1.8 Additional customer-specific requirements concerning identity preserved foods shall be included in the finished product specification described in 2.3.5, or label register, and implemented by the site.

RESPONSE: COMPLIANT

2.9.1 Training Requirements

Requirements addressed as per FSP 4.4 Training Procedure. This covers all requirements of the SQF standard. The procedure includes highlighting of critical tasks, specific training requirements, effective implementation of the food management system, the provision for refresher training & records in the form of a current training matrix (for each personnel) and training records. The responsibilities of this process are managed by the Site Management Team. Training plan implemented and records sighted: The Quality and Food Safety training plan 2019/20 4.4 F1 includes training course, trainer/responsibility, duration, frequency, employees required to train, includes re induction (3 years), GMP/Food Safety and HACCP (yearly), Tanker Driver training Beta Star, Milk cooling and unloading (2 years), Maintenance handover procedure (2 years), Glass and Hard Plastics (yearly), Equipment Breakage and Loss policy (Yearly), AMRA training (once of by key personnel), HACCP and CCP training (yearly), HACCP Refresher training (yearly), Internal Auditor (3 years), GMP auditing (3 years).

2.9.1.1 Appropriate training shall be provided for personnel carrying out the tasks critical to the effective implementation of the SQF Quality System and the maintenance and improvement of quality requirements.

RESPONSE: COMPLIANT

2.9.2 Training Program

It was sighted training records for employees interviewed/observed during the audit: Milk Tanker Driver CY, Beta Star Antibiotic testing (CCP) Training completed 26/02/2020. Milk Pasteuriser operator DS SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 6/03/20. Trained in milk pasteuriser and CCP/QCP procedures 30/07/20. Cheese Maker VvE, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 6/01/20, 6/03/20, cheesemaker training FSP 5.14.1 to 5.14.6. 16/01/19. Cream Processing and Buttermaker CP SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 9/07/20, trained in cream pasteurising QCP's/CCP's 23/06/20, Butter and Cream procedures 12/06/19. Lactoferrin Protein plant operator WH, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 3/12/19. Lactoferrin protein CCP/QCP procedures 18/12/19, Protein plant procedures training 13/01/20, 18/12/19. Mozzarella Packing and X ray operations, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 8/07/20, Multi vac procedures training 15/07/20, X ray operations/CCP requirements, corrective action 19/07/19, refresher training 7/08/20. Whey Powder Operator JH, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 27/07/20. Evaporator Operations and CCP training 23/06/20. Maintenance personnel ND, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 20/05/20 GMP and Food Safety Questionnaire is very detailed, includes quality policy, company quality philosophy (Right 1st time every time), records, CCP's, allergens, illness, GMP specific requirements, hand washing, gloves, hair covering, boots, clothing, lockers, personal hygiene, pest control reporting, pest proofing, foreign objects, breakages, cleaning and sanitation, colour coding, chemical labelling, traceability, rework, maintenance handover, tools and metal items, raw materials acceptance, food defence. SQF Practitioner Lorraine Haebich who is a full time employee and formal HACCP training (SAI global) Principles and Application of HACCP 24/04/19, certificate C301033. Also has experience in SPC control - moisture. fat, salt and pH.

2.9.2.1 The employee training program shall include the necessary competencies for specific duties and the training methods to be applied for those staff carrying out tasks associated with: i. Process control and monitoring of critical quality points (CQPs); ii. Steps identified as critical to effective implementation of the food quality plan and the maintenance of food quality, and iii. Product inspection and testing.

RESPONSE: COMPLIANT

2.9.2.2 The employee training program shall include applicable process control and quality tools training for line operators, quality inspectors and supervisory staff responsible for operating and inspecting key manufacturing processes.

RESPONSE: COMPLIANT

2.9.2.3 The training program shall include training, calibration and proficiency testing of internal laboratory personnel.

RESPONSE: COMPLIANT

2.9.3 Quality Instructions

SOP and training instructions were observed to be in English and understood by all staff interviewed.

2.9.3.1 Instructions shall be available explaining how all tasks critical to meeting customer specifications, and quality and process efficiency are to be performed.

RESPONSE: COMPLIANT

2.9.4 HACCP for Quality Training Requirements

SQF Practitioner Lorraine Haebich who is a full time employee and formal HACCP training (SAI global) Principles and Application of HACCP 24/04/19, certificate C301033.

2.9.4.1 Training in the application of HACCP principles for the identification and control of quality threats shall be provided to staff involved in development and maintenance of the food quality plan.

RESPONSE: COMPLIANT

2.9.5 Language

Instructions were observed to be in English and understood by all staff interviewed.

2.9.5.1 Training materials and the delivery of training shall be provided in language understood by staff.

RESPONSE: COMPLIANT

2.9.6 Refresher Training

It was sighted training records for employees interviewed/observed during the audit: Milk Tanker Driver CY, Beta Star Antibiotic testing (CCP) Training completed 26/02/2020. Milk Pasteuriser operator DS SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 6/03/20. Trained in milk pasteuriser and CCP/QCP procedures 30/07/20. Cheese Maker VvE, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 6/01/20, 6/03/20, cheesemaker training FSP 5.14.1 to 5.14.6. 16/01/19. Cream Processing and Buttermaker CP SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 9/07/20, trained in cream pasteurising QCP's/CCP's 23/06/20, Butter and Cream procedures 12/06/19. Lactoferrin Protein plant operator WH, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 3/12/19. Lactoferrin protein CCP/QCP procedures 18/12/19, Protein plant procedures training 13/01/20, 18/12/19. Mozzarella Packing and X ray operations, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 8/07/20, Multi vac procedures training 15/07/20, X ray operations/CCP requirements, corrective action 19/07/19, refresher training 7/08/20. Whey Powder Operator JH, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, Food Fraud/VACCP, Food Defence GMP and Food Safety Questionnaire completed 27/07/20. Evaporator Operations and CCP training 23/06/20. Maintenance personnel ND, SQF Code, GMP and personal hygiene, tools, rework, designated eating areas, floor contact, protective clothing, HACCP Refresher, Foreign Matter prevention, equipment breakage policy, maintenance hand over to production, allergens, corrective action, GMP and Food Safety Questionnaire completed 20/05/20 GMP and Food Safety Questionnaire is very detailed, includes quality policy, company quality philosophy (Right 1st time every time), records, CCP's, allergens, illness, GMP specific requirements, hand washing, gloves, hair covering, boots, clothing, lockers, personal hygiene, pest control reporting, pest proofing, foreign objects, breakages, cleaning and sanitation, colour coding, chemical labelling, traceability, rework, maintenance handover, tools and metal items, raw materials acceptance, food defence. SQF Practitioner Lorraine Haebich who is a full time employee and formal HACCP training (SAI global) Principles and Application of HACCP 24/04/19, certificate C301033. Also has experience in SPC control - moisture. fat, salt and pH. All personnel have received Refresher GMP/Hygiene training ie GMP/Hygiene Procedures FSP4.3.1.1-4, Protective clothing 8.5, Designated eating areas 8.9, Floor Contact 8.3, Hoses 8.0, tools 11.0, rework 11.0, Foreign Matter Prevention FSP 4.1.15, Maintenance handover FSP 6.21.3, Allergen Management FSP 4,2,2,1, Lunch box control FSP 4.2.2.3, undertaken 27/03/19 to 24/06/19

2.9.6.1 The training program shall include provision for identifying and implementing the refresher training needs of site personnel.

RESPONSE: COMPLIANT

2.9.7 Training Skills Register

Training skills register maintained by site Quality manager - updated accordingly for each staff with training dates and competency status

2.9.7.1 A training skills register describing who has been trained in relevant skills shall be maintained. The register shall indicate the: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Supervisor's verification the training was completed, and that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT