SQF Food Safety Audit Edition 9
Beston Pure Dairies - Beston Pure Dairies

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
FSM43898 | 135612

AUDIT RATING
90
Good

DECISION DATE
07/29/2021

AUDIT TYPE
RECERTIFICATION

RECERTIFICATION DATE
06/11/2022

AUDIT DATES
06/28/2021 - 06/30/2021

EXPIRATION DATE
08/25/2022

ISSUE DATE
08/02/2021

Facility & Scope

Beston Pure Dairies (44347)
Beston Pure Dairies
128 Maurice Road
Murray Bridge, SU 5253
Australia

Food Sector Categories:
10. Dairy Food Processing

Products:
10. Dairy Food Processing: Flavoured Cream Cheese, Hard Cheese, Semi Hard Cheese, Rice Dairy Dessert

Scope of Certification:
10. Dairy Food Processing: Flavoured Cream Cheese, Hard Cheese, Semi Hard Cheese, Rice Dairy Dessert

Certification Body & Audit Team

SAI Global
680 George Street
Sydney, NSW
Australia

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

Lead Auditor: Juergens, Thomas (9141)
Technical Reviewer: Grabczak, Anna (204862)

Hours Spent on Site: 24
Hours of ICT Activities: 0
Hours Spent Writing Report: 4

Non-Conforming

2.4.8 Environmental Monitoring

Environmental monitoring requirements are managed through the Environmental Monitoring Procedure and program. The procedure details the requirements of the SQF standard. The program is based on a risk assessment. Highlighted issues are addressed via a re-swabbing process and documented as a corrective action with a root cause investigation. Cream Cheese – monthly listeria swabs, min 12 swabs taken from random areas within the HC area, contact, non contact, floor, drains, equipment etc. Sighted records monthly results January to May 2021 Listeria Negative. Hard Cheese - monthly Listeria swabs (5) Sighted records monthly results January to May 2021 Listeria Negative. Le Rice - monthly Listeria swabs (8) Sighted records monthly results January to May 2021 Listeria Negative. Cheddar monthly Listeria swabs (8) Sighted records monthly results January to May 2021. 18/02/21 +ve Listeria Species detection, under cross over bridge, however there was no evidence of retest/corrective action. General all areas: Le Rice, Processing areas, Tanker Bay etc Sighted records monthly January to May 2021 Listeria Negative. Aerial plates are also used to monitor potential aerial contamination in cream cheese high care area, yeast and mould, as well as Enterobacteriaceae, for equipment, utensil, boots, floors, trays, crates, door handles etc, as were test results January to June 2021, with majority of results demonstrating high quality conditions being maintained and reclean of areas and review of results next round if results are out of specification.

2.4.8.3 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

RESPONSE: MINOR

EVIDENCE: Cheddar monthly Listeria swabs (8) Sighted records monthly results January to May 2021. 18/02/21 +ve Listeria Species detection, under cross over bridge, however there was no evidence of retest/corrective action.

ROOT CAUSE: RC Inadequate supervision, training & resources. CA : FSP 4.15.3 updated to include specific requirements on positive swabs. One Point lesson conducted with all quality staff

CORRECTIVE ACTION: FSP 4.15.3 updated to include specific requirements on positive swabs and OPL conducted

VERIFICATION OF CLOSEOUT: Sighted updated Environmental Hygiene Monitoring Standard 4.15.3-2, updated 6/07/2021, inclusive of updated section for action on +ve swabs including immediate notification of Quality Manager and Production Manager, raising of NCR by Quality Manager, full clean of area, reswab and retest, detailing of any actions and changes to cleaning procedure on NCR form, maintain records of results electronically. Sighted training completed for personnel involved 7-19/07/21.

COMPLETION DATE: 07/19/2021 **CLOSEOUT DATE:** 07/27/2021

11.1.2 Building Materials

Floors are constructed of acid resistant tiles and epoxy flooring sealed and are sloped towards the floor drainage system, Floor drainage is designed for ease of cleaning, well maintained and functional. Waste traps are located externally and they were observed to be well managed. Walls, partitions, ceilings and doors are constructed of suitable manufacturing materials (cold room paneling) and or materials which are smooth and impervious with a light in coloured finish and observed to be clean and satisfactorily maintained. Wall to wall and wall to floor junctions appropriately designed and maintained. Conduit and pipes that convey services in the main appropriately concealed designed for ease of cleaning. Product and handling areas have suitably designed ceilings. Floors were observed to be in good condition. There Stairs, Catwalks and Platforms throughout the facility and are designed / constructed not to pose a risk product, areas obtaining stairs, catwalks and platforms were free from waste and were deemed acceptable.

11.1.2.1 Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

RESPONSE: MINOR

EVIDENCE: Floors cracked in a number of areas within the Le Rice processing room hence floors not fully impervious in these areas.

ROOT CAUSE: Lack of Resources. Additional maintenance staff have been employed across both sites (previously 4 fitter and 3 electricians), now 6 fitters and 5 electricians and a administrator to help with PM scheduling.

CORRECTIVE ACTION: Holes filled, GMP audits to follow up

VERIFICATION OF CLOSEOUT: Sighted Photos of completed floor repairs. GMP audits include review of floors in all areas, actions now captured by Maintenance Up Keep program, Maintenance personnel trained 20/07/21, and now have additional resources.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.1 Repairs and Maintenance

Maintenance responsibilities are managed by the Maintenance Manager. The preventative and reactive maintenance program is managed via an electronic database Up Keep with a detailed list of assets now incorporated on the system and repairs/PM's logged via I Pad. It was sighted repairs and preventative maintenance task recorded eg Refrigeration Bi Monthly Service conducted by Cold Logic 1-2/06/21, Cream Cheese Air Conditioner serve and sanitation and Hepa Filter checks completed 14/05/21. Post Engineering Clearance is via the maintenance handover production form includes tools accounted for, no breakages, food contact surfaces cleaned and sanitised, completed via I Pad, signed by the Production Supervisor as was sighted after light replacement on the Le Rice Filler 4/06/21. The food processing equipment at the site is specified and designed to not present risk to product. Prior to purchase the equipment is specified to ensure its suitability in a food manufacturing environment and information is maintained in the maintenance department. The engineering /maintenance workshop was observed clean and tidy during the audit, and FG lubricants appropriately stored and segregated and labelled in the dedicated cabinet. Food Grade lubricants in use included Silicone Acetate FG NSF ANSI-61G and Lube Central Grease LE 4024, NSF H1 reg 125745. The workshops are located away from the processing areas and are subject to housekeeping audits as sampled and reviewed, swarf matts are also located at each work bench area.

11.2.1.1 The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

RESPONSE: MINOR

EVIDENCE: Whilst new maintenance program Up Keep, has now been updated with all site assets, there were not PM’s recorded for some assets on the new system eg Le Rice Osgood Filler, Cream Cheese Ulmer Slicing and Pack machine.

ROOT CAUSE: New system implementation, lack of training

CORRECTIVE ACTION: Pm's put in, examples attached. Training of maintenance staff in Upkeep procedures carried out, training from attached

VERIFICATION OF CLOSEOUT: Up Keep Maintenance program now implemented, sighted work orders generated eg WO 1326 Osgood 2 monthly service, WO 1325 Osgood Hopper Inspection, WO 1327 Osgood Filler Hose replacements, WO 1328 Involvo glue unit service, WO 1329 Involvo 2 monthly service, WO 1330 Mead Sleever 2 monthly service, WO 1331 Osgood O Ring replacements. Maintenance personnel trained Up Keep program 20/07/21.

COMPLETION DATE: 07/20/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.3 Calibration

The site maintains a register of measuring and monitoring devices at the site to ensure the delivery of safe and quality products compliant with regulatory and legislation requirements. Monitoring and measuring equipment are logged on the Calibration Register 2020/21 includes department, model number, serial number, calibration frequency, date of last calibration, date of next calibration and calibration tolerances. The calibration procedure documents protocols to be taken when equipment is out of calibration and the identification of the equipment and any non-conforming products that may have been produced during that time and its isolation and review. Approved calibration contractors are used for the calibration of the instruments and equipment around the site as well as trained internal staff. Records reviewed demonstrate that measuring and monitoring equipment have been maintained as per scheduled requirements. Sighted records: Holding Tubes (5 yearly) by Matrix Process Solutions 15 March 2021 Milk Pastueriser maximum flow rate 350000L/H, 20.9 seconds, LeRice Cooker Holding Tubes 4/01/2016 maximum flow rate 350000L/H, 783 seconds, (now due for reverification), LeRice Cooker Integrity test 21/12/20 passed at 600kpa, Holding Tubes Milk Pasteuriser Temperature probes ex holding tube TT1151 and TT152 25/06/21 by Active Instruments and Controls, Pasteuriser Gas Integrity pressure check at 600kpa pass, no internal or external leaks, LeRice Cooker Hold Tubes out TT 7023, 25/06/21, Cooker pressure guages 23/10/20, L e Rice Hold Tank TT 7042 25/06/21, X ray 1.2 SS, 3.0 glass, 1.2 Ferrous calibrated by Mettler Toledo 1/03/21. Incubators internal calibration with reference probe 23/11/20 Anti Biotic Water Bath internal calibration with reference probe 23/11/20 Cool rooms dated 27/09/20 by Active Instruments and Controls.

11.2.3.3 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: MINOR

EVIDENCE: Internal calibration of a number of temperature probes eg LeRice pack room, Cream Cheese pack room not calibrated 6 monthly according to schedule ie last recorded calibration 21/05/2020. Also 5 yearly holding tube verification on the Rice Cooker has not been completed since 4/01/16 now due. Calibration of milk Pastueriser pressure gages was also not evident during the audit.

ROOT CAUSE: Inadequate Supervision and verification processes. Corrective Action 1. Added additional documents to check on Internal audit register. Ensured Holding Tube and pressure transducer planned calibration are in the Preventative Maintenance software

CORRECTIVE ACTION: Internal - CA - added additional documents to check on Internal Audit Schedule Hold time verification of Rice cooker, pressure test calibration of BHX1 26/07/21 Thermometers completed 05/07/21 Matrix onsite tomorrow 20/07/21 to do hold tube. Ensured calibrations in UpKeep _PM

VERIFICATION OF CLOSEOUT: Sighted calibrations completed 5/07/21 cream cheese temperature probe 905-T1 against reference probe, 20/07/21 LeRice Cooker Holding Tube verification by Matrix Process Solutions, 9 minutes 13 seconds hold time, Pastueriser Pressure Gauge BHX1 calibrated by Active Instruments 26/07/21. Internal audit schedule 2021 also now includes audit of calibration schedule and associated records. Calibrations also included in PM maintenance Up Keep schedule.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.5 Cleaning and Sanitation

These requirements are managed through the Cleaning and Sanitising Procedures FSP 4.5.2-3. This covers requirements of the SQF standard. Procedures include what and how to clean each machine and area as well as methods used to verify the effectiveness of cleaning (Cleaning procedures, cleaning schedules, Cleaning WI's, Monitoring & Verification) eg FSP 5.4.7 V 4.0 Cleaning Cream Cheese includes cleaning and sanitation chemicals, cleaning chemical guidelines, cleaning and sanitation procedures, cleaning materials, as well as ATP Hygiene Testing for Cream cheeses Production includes preoperational swabbing program for equipment and utensils (Pass<2.5, warning 2.5-3.0, Fail >3.0 (reclean, sanitise and retest). The responsibilities of this process are managed by the Departmental Managers & Quality Team. SDS register is also maintained for cleaning chemicals stored in secured compounds. Cleaning records are in the form of a Pre-Operational checks as cleaning is performed by the production team after production hours. Records sighted from November 2020 to June 2021. Corrective actions are clearly documented. Chemical usage including batch numbers, location used, and quantity are documented. CIP Procedure FSP 4.5.3-2 includes CIP parameter register, plant/process, caustic cycle, acid cycle, sanitiser, validations, flow rates temp and conductivity. CIP Validation references relate to: DFSV note 5 CIP and AS/NZS 2541.1998 Guide to CIP for dairy processing. Sighted CIP records for the areas – Pasteurizers, Cheddar Master 1 & 2 Areas, Cheddar Tower Hoppers, & Vat Room, Le Rice Processing - records November 2020 to June 2021. Verification of cleaning is performed via the use of environmental swabbing (ATP swabs), highlighted issues are addressed via a re-swabbing process and documented as a corrective action with a root cause investigation. Environmental Listeria (Monthly) & Rapid ATP swabbing (Daily) is undertaken as sighted records November 2020 to June 2021. CIP validation is conducted by Chemical Supplier Integra.

11.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: MINOR

EVIDENCE: It was observed during audit water spray from wash down of equipment/floors in the cream cheese processing and packing room went onto moulded plastic wrapped product being staged ready for cutting and sealing operations, hence potential for cross contamination

ROOT CAUSE: Inadequate supervision & training, lack of following procedures

CORRECTIVE ACTION: Has been tool boxed with the team to ensure the understanding of the team. We will also be covering the pallets of logs with a plastic liner like we do for finished mozz. Tool box to be imbedded ND

VERIFICATION OF CLOSEOUT: WIP Procedure amended and implemented to include covering of all WIP with Plastic liners to prevent any risk of contamination during changeovers, all personnel trained 26/07/2021.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.5.3 Water Quality

These requirements are managed through the Potable Water Testing Procedure FSP 4.16-3. This covers all requirements of the SQF standard (water sampling plan NBLAMM.013) which covers hand washing stations, RO plant, Reverse Omisisi, condensate, Mains all areas 5 samples per month. Water testing is conducted monthly by a NATA lab 1247 - ALS (Coliforms & E. coli) Records sighted 21/05/21, 29/04/21, 31/03/21, 25/02/21,28/01/21(29/04/21, 31/03/21 several low level coliform results, rechecks ND) all other results ND /100ml. Water supply are sourced from municipal water supply and used for processing and cleaning with supplies of hot and cold water readily available. Water at the site complies with water drinking guidelines. The delivery of water within the premises is protected and identified to ensure that the water systems are not contaminated.

11.5.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: MINOR

EVIDENCE: Brine water in Brine tank used for hard cheese manufacture, observed mould on surface of tank. There had been no hard cheese manufacture for a long period.

ROOT CAUSE: Inadequate supervision, lack of procedure. Corrective Cation: Brine tank cleanliness added to FSP 5.8 Form 2 Brine Tanks

CORRECTIVE ACTION: Mould removed, amended FSP 5.8 Form 4-2 to capture and remined on cleaning & condition

VERIFICATION OF CLOSEOUT: Sighted amended FSP 5.8 Form 4- 3 has been updated 2607/21 to review brine tank cleanliness and condition, no visible mould or dust, weekly verification when not running and before use. Also sighted photo of clean brine solution.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.6.2 Cold Storage, Freezing and Chilling of Foods

Temperature controlled storage facilities are effective in maintaining product quality and safety and observed well maintained and clean. There are several temperature-controlled storage facilities available to store the maximum capacity of product and to allow for cleaning of cold stores. Chillers and freezers have been designed and constructed for the safe handling of food. Discharge from defrost and condensate lines are discharged directly to the drainage system. The refrigeration is calibrated annually (18/09/20) and monitored daily. Data Logging records sighted for cold rooms 1a and 1B 1/01/21 to 28/06/21 compliant in the main 25 to 3.5C. Also maintenance record all Cool rooms and freezer temperature readouts sighted 29/06/21 to 12/05/21 compliant and are also alarmed.

11.6.2.3 The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: MINOR

EVIDENCE: The room used tray packing of cream cheese products and storage of small amounts of work in progress cream cheese sealed packs is not currently on the temperature monitoring program to ensure temperatures do not exceed limits for these products.

ROOT CAUSE: Management oversight, CA, One point Lesson conducted on need to remove all product into cool room at end of packing shift

CORRECTIVE ACTION: Removed product out of room, end of pack shift all product will be moved to cold room, One Point Lesson conducted that all product to be moved to coolroom at end of production

VERIFICATION OF CLOSEOUT: Procedure now to move product to Main cold room, no storage in tray pack room, main cold room is monitored via data logger and manual temperature log as sighted during audit. Sighted training record for all relative employees 26/07/21.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.7.1 High-Risk Processes

The cream cheese area is a High Care area, the requirements are managed through the Good Manufacturing Procedure FSP 4.3.1.1-6 , Transfer of packaging and raw materials is suitably controlled into the packing facility. Changing procedures are clearly documented including cross over bench, appropriate signage is in place at all entrances to the facility, waste chute for removal of waste. Microbiological records demonstrate that the cleaning program is effectively implemented, Cream Cheese – monthly listeria swabs, min 12 swabs taken from random areas within the HC area, sighted records January to June 2021 compliant. Pre-operational checks (Pre-Operational Checks June to Jan 2021 have been completed daily to ensure that hygiene standards prior to start up are satisfactory. Personnel were observed to follow the high care and low risk principles as documented for the site. There is clear demarcation of high care and low risk areas.

11.7.1.4 Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.

RESPONSE: MINOR

EVIDENCE: Whilst staff change into clean boots after cross over bench in high risk cream cheese room entry, temporary protective outer wear or clean clothing is not donned when entering the high risk area (laundered clothing is donned in non high risk change room).

ROOT CAUSE: Different interpretation of High Care compared to previous, Management oversight. One Point Lesson conducted to explain need to wear over coat/jacket to reduce risk

CORRECTIVE ACTION: Disposable coats ordered, and a toolbox held to ensure understanding of what is required.

VERIFICATION OF CLOSEOUT: Procedure amended to include use of disposable coats at high care cross over change area at entry to high care room to ensure no exposed pre donned clothing when entering the room. Employees trained in new procedure 26/07/21. Sighted photo of employee in clean outer garment (disposable coat), hair net, clean boots and disposable gloves, covid mask.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.7.3 Control of Foreign Matter Contamination

Foreign matter controls are documented in the HACCP plans and appropriate control measures and monitoring documentation have been maintained. Controls are also detailed in the Foreign Matter Prevention Procedure FSP 4.3.1.5 dated 27/04/20. Policies for metal, glass and brittle materials, wood and chemical controls are implemented throughout the facility with operators aware of the requirements and initiatives. Cleaning chemicals and equipment lubricants and greases are stored in a secured area and current SDS's available. Pre-operational checks include an assessment for hygiene, labels, functionality of equipment is completed by the trained operatives and clearance for packing processes to commence. Records sighted Pre-Operational Checks 28/06/21, 1/06/21, 19/04/21, 31/03/21, 7/01/21, 3/11/20. The site performs GMP Audits sighted audit 2/02/21 all areas included pest control, CCP's, Foreign matter, basic GMP, jewellery compliance etc, 4/05/21 different format with separate audits conducted for foreign matter, Hand washing, door audits and other focus areas, with scoring system used, corrective actions are clearly documented. Issues requiring action are logged in the maintenance system. Glass and Brittle plastics are controlled on site and managed via preoperational checks and GMP audits. Glass and Hard Plastics registers maintained per area, as sighted Le Rice wash area and packing 30/03/20 Processing and fill room 2/03/20, Cheddar production areas and vat room 12/05/20 , cream cheese 12/05/20, Le Rice 11/05/20 investigation and corrective action noted. Glass Breakage Procedure documents the requirements for glass breakage kits as observed at key locations around the facility. Register of permissible items allows registered items at the site. All products are subject to being metal detected. This process was observed to be well managed during the audit.

11.7.3.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: MINOR

EVIDENCE: Glass and hard plastic register condition inspection has not occurred annually as required by schedule eg Le Rice Room last completed in March 2020. High Risk items are inspected during preoperational inspections and GMP audits.

ROOT CAUSE: Inadequate training and handover to new QM

CORRECTIVE ACTION: Lists updated and added in Internal Audit schedule to ensure completion

VERIFICATION OF CLOSEOUT: Sighted glass and hard plastics register audit 6-12/07/21, all areas, all items, condition of each item checked, if condition deteriorating or unsatisfactory, reported and Up Keep maintenance request completed. Has now been included in Internal Audit schedule dated 26/07/21.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.7.4 Detection of Foreign Objects

Documented protocols in place which includes inspection and disposition of affected product. All products are subject to being metal detected or X Rayed. This process was observed to be well managed during the audit and is a CCP requirement. Sighted Records 28/06/21, 1/06/21, 19/04/21, 31/03/21, 7/01/21, 3/11/20 were compliant. Team members using the X Ray and MD machines were noted to be suitably trained. Procedures are clearly documented in the Good Manufacturing Procedure.

11.7.4.3 Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

RESPONSE: MINOR

EVIDENCE: The cream cheese line metal detector has swing reject arm into stainless steel cage, however cage is not secured/locked to ensure isolation of product.

ROOT CAUSE: Different interpretation of the SQF requirement, management oversight. Corrective Action: Locked box in place, verified that FSP 5.4.20 Cream Cheese Metal detector correctly describes procedure

CORRECTIVE ACTION: Locked box completed 16/07/21, verified that FSP 5.4.20 correctly describes use of Locked Box

VERIFICATION OF CLOSEOUT: Sighted Photo of locked Metal detector cage for when test pieces are tested and securing of packs with potential metal. Metal Detector use and Calibration procedure FSP 5.4.20 updated 26/07/21 to include rejections into locked box, authorised release by Production Supervisor.

COMPLETION DATE: 07/16/2021 **CLOSEOUT DATE:** 07/27/2021

Audit Statements

SQF Practitioner Name	Name the designated SQF Practitioner **RESPONSE:** Lorraine Haebich: Quality Manager
SQF Practitioner Email	Email of the designated SQF Practitioner **RESPONSE:** lorraine.haebich@bestonpurefoods.com.au
Opening Meeting	People Present at the Opening Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Wayne Austin: Beston Pure Dairies Group Quality Manager, Nicole Dunn: Production Supervisor, Lorraine Haibich: Quality Manager, Sukhminder Toor, Quality Manager, Frank Baldi:COO, Brenton Smith: Site and Supply Chain Manager, Tom Juergens: SAIG Lead Auditor, Troy Arnold SAIG Verifying auditor
Facility Description	Auditor Description of Facility (Please provide facility description include # of employees, size, production schedule, general layout, and any additional pertinent details **RESPONSE:** The facility is in Murray Bridge, SA. The current site is approximately 50 years old with Beston Pure Foods operating there since 2016. The site manufactures bulk milk, semi hard cheese, flavoured (sweet and savoury) cream cheese and a rice dairy dessert. The scope of SQF certification is flavoured cream cheese, semi hard cheese as well as rice dairy dessert. Cream cheese is not manufactured on site, it is bought in and mixed with other ingredients as required by the specific product requirements. The cream cheese manufacturing area is physically segregated (HC Area) from the other operational areas of the facility and adjacent to a finished product boxing area- Rice Dairy Desert is processed, filled and packed via enclosed system. Other product streams do not present a risk to the manufacture of flavoured cream cheese products. During the week of the audit Pepato Cheese, Cream Cheese and the Rice dessert was in process. Manufacturing operates a day shift 5 days a week, hygiene activities performed after production. Maintenance operations are covered during operational hours. There are approximately 19 staff employed on site. The total size of the facility is 43,000 sq. feet.
Closing Meeting	People Present at the Closing Meeting (Please list names and roles in the following format Name: Role separated by commas) **RESPONSE:** Wayne Austin: Beston Pure Dairies Group Quality Manager, Nicole Dunn: Production Supervisor, Lorraine Haibich: Quality Manager, Sukhminder Toor, Quality Manager, Brenton Smith: Site and Supply Chain Manager, Tom Juergens: SAIG Lead Auditor, Troy Arnold SAIG Verifying auditor
Auditor Recommendation	Auditor Recommendation **RESPONSE:** Recertification is recommended once all the NCR's have been addressed and closed out

Section Responses

2.1.1 Management Responsibility (Mandatory)

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. The policy is written in English and understood by all staff interviewed. Organizational structure is documented and reflective of the site structure FSP 1.3.13 dated 17/03/21, from COO to Site Manager, Technical Services Manager, Quality Manager, Reliability Manager. Management Authorities & Responsibilities are clearly documented in the Quality Management Systems FSP 1.3.3-4 10/12/20 (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. eg. Group Quality Manager delegates are Quality Manager Jervois and Quality Manager Murray Bridge. 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, alternate Practitioner S Toor has Completed Principles and Application of HACCP 9/06/2021 with SAI Global. The audit demonstrated that the SQF Practitioner has the competencies to implement and maintain the SQF Ed. 8 standard. 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 24/05/18 and Cream Cheese Leader 24/05/18 , including key accountabilities and responsibilities. SQF Practitioner responsibilities are stated into SQF Practitioner FSP 1.3.2.3. Food Safety Culture Procedure FSP 4.3.2 10/05/21 is inclusive of responsibilities for the Factory Manager, Quality Manager, Team Leader and Production personnel, introduction and objectives, definition including FSI working group definition of shared values, beliefs and norms that impact on food safety throughout the organisation, Food Safety Culture Dimensions – Vision and Mission, People, Consistency, adaptability, hazard and risk assessment, food safety culture review and plan, FSANZ Food Safety Code Of Practice, FSANZ FS Culture maturity assessment across all levels and scoring matrix, actions for review and continual improvement. Food Safety Culture Survey was conducted based on FSANZ culture survey, in relation to food safety Knowledge, workplace culture, management behavior, staff behavior, day to day operations, communication, use of technology and tools, approach to problem solving, enjoyment regulators. A cross section of personnel completed the survey. Food Safety Culture Questionnaire matrix completed initially June 2020 and then May 2021, for all questions answered and summary of scores, with maturity index rated for each section . Action plan was developed for scores of sections <4 required actions to improve over the next 12 months and included People-Communication-Communications and Approach to problem solving, Learning Organisation --Use of Technology, tools and resources, staff behavior, approach to problem solving, Constancy -Documentation-Staff Behavior. Specific Actions included regular updates at daily handovers/toolbox, use of technology tools eg I Leader, RCA and involvement of technicians, Food Safety Culture Communications on notice board eg FSC 1 How many Food Poisoning incidents in Australia and reasons for food poisoning cases, FSC 2 Recall Incidents. Every Friday Managers have Food Safety/GMP conversations with employees. Is also reviewed as part of weekly QA Meeting.

2.1.1.1 Senior site management shall prepare and implement a policy statement that outlines at a minimum the commitment of all site management to: i. Supply safe food; ii.Establish and maintain a food safety culture within the site; iii. Establish and continually improve the site's food safety management system; and iv. Comply with customer and regulatory requirements to supply safe food. The policy statement shall be: v. Signed by the senior site manager and displayed in prominent positions; and vi. Effectively communicated to all site personnel in the language(s) understood by all site personnel.

RESPONSE: COMPLIANT

2.1.1.2 Senior site management shall lead and support a food safety culture within the site that ensures at a minimum: i. The establishment, documentation, and communication to all relevant staff of food safety objectives and performance measures; ii. Adequate resources are available to meet food safety objectives; iii. Food safety practices and all applicable requirements of the SQF System are adopted and maintained; iv. Employees are informed and held accountable for their food safety and regulatory responsibilities; v. Employees are positively encouraged and required to notify management about actual or potential food safety issues; and vi. Employees are empowered to act to resolve food safety issues within their scope of work.

RESPONSE: COMPLIANT

2.1.1.3 The reporting structure shall identify and describe site personnel with specific responsibilities for tasks within the food safety management system and identify a backup for the absence of key personnel. Job descriptions for the key personnel shall be documented. Site management shall ensure departments and operations are appropriately staffed and organizationally aligned to meet food safety objectives.

RESPONSE: COMPLIANT

2.1.1.4 Senior site management shall designate a primary and substitute SQF practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF System; ii. Take appropriate action to ensure the integrity of the SQF System; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the SQF System.

RESPONSE: COMPLIANT

2.1.1.5 The primary and substitute SQF practitioner shall: i. Be employed by the site; ii. Hold a position of responsibility related to the management of the site's SQF System; iii. Have completed a HACCP training course; iv. Be competent to implement and maintain HACCP based food safety plans; and v. Have an understanding of the SQF Food Safety Code: Food Manufacturing and the requirements to implement and maintain an SQF System relevant to the site's scope of certification

RESPONSE: COMPLIANT

2.1.1.6 Senior site management shall ensure the training needs of the site are resourced, implemented, and meet the requirements outlined in system elements 2.9 and that site personnel meet the required competencies to carry out those functions affecting the legality and safety of food products.

RESPONSE: COMPLIANT

2.1.1.7 Senior site management shall ensure the integrity and continued operation of the food safety system in the event of organizational or personnel changes within the company or associated facilities.

RESPONSE: COMPLIANT

2.1.1.8 Senior site management shall designate defined blackout periods that prevent unannounced re-certification audits from occurring out of season or when the site is not operating for legitimate business reasons. The list of blackout dates and their justification shall be submitted to the certification body a minimum of one (1) month before the sixty (60) day re-certification window for the agreed-upon unannounced audit.

RESPONSE: COMPLIANT

2.1.2 Management Review (Mandatory)

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. It was sighted Management Review meeting conducted 8/06/2021 involving senior Murray Bridge and Jervois site personnel and included review of logistics and purchasing, NPD, production issues, new product trials, general issues and discussion, quality and environment, customer needs, customer complaints (no Murray Bridge significant issues), product non conformity , internal audit results, external audit results, NCR trends, summary of 20/21 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, SQF V9 implementation, FY 2022 objectives. Daily review of Quality KPI's -Cheese Fat and Moistures, Mozzarella cook score average, cheese grading points % per grade score, customer complaints, quality failures.

2.1.2.1 The SQF System shall be reviewed by senior site management at least annually and include: i. Changes to food safety management system documentation (policies, procedures, specifications, food safety plan); ii. Food safety culture performance; iii. Food safety objectives and performance measures; iv. Corrective and preventative actions and trends in findings from internal and external audits, customer complaints, and verification and validation activities; v. Hazard and risk management system; and vi. Follow-up action items from previous management reviews. Records of all management reviews and updates shall be maintained.

RESPONSE: COMPLIANT

2.1.2.2 The SQF practitioner(s) shall update senior site management on at least a monthly basis on matters impacting the implementation and maintenance of the SQF System. The updates and management responses shall be documented.

RESPONSE: COMPLIANT

2.1.3 Complaint Management (Mandatory)

Customer complaint management is detailed in Non- Conformance Program FSP 4.2.10 ; 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. It was sighted the complaints and corrective action register 5/01/21 to 24/06/21, sighted complaint 22/03/21 Le rice Foreign matter complaint, plastic capsule, reviewed all of operation, 0.5m filter in place, cooker would have melted plastic capsule, no like plastic used with in the facility, reviewed with line operators, and raised with packaging supplier and response provide, no further like incidents.

2.1.3.1 The methods and responsibility for handling, investigating, and resolving food safety complaints from commercial customers, consumers, and authorities, arising from products manufactured or handled on-site or co-manufactured, shall be documented and implemented.

RESPONSE: COMPLIANT

2.1.3.2 Adverse trends of customer complaint data shall be investigated and analyzed and the root cause established by personnel knowledgeable about the incidents.

RESPONSE: COMPLIANT

2.1.3.3 Corrective and preventative action shall be implemented based on the seriousness of the incident and the root cause analysis as outlined in 2.5.3. Records of customer complaints, their investigation, and resolution shall be maintained.

RESPONSE: COMPLIANT

2.2.1 Food Safety Management System (Mandatory)

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. The HACCP Plan scope is dated 2/02/21, Hazard Analysis Table, HACCP Process Flow, the plans were verified in 2020/21. The site has identified CCP's/RCP's/CQP'sand the HACCP/food safety plan is based on CODEX HACCP principles. PRPs are documented and well established. They are implemented into the site food safety management system. The company subscribes to industry bodies which include dairy industry, training industry, certification industry and regulatory bodies which include notifications of changes to legislation and customer-based websites. Changes verified and validated by the HACCP Team include:Le Rice 9/03/21 Changes included Broad spectrum antibiotic testing was in practice but missing in hazard analysis as a control measure for CCP. Flavoured Cream Cheese 2/06/20 Minor Changes included improved numbering system, internal audit anomalies. Cheddar Cheese 23/09/20 Amended due to changes identified by internal audit. Pepato and Romano 11/05/21 Amended step MD not used for Pepato and Romano is used for 20 kg cheddar block

2.2.1.1 The methods and procedures the site uses to meet the requirements of the SQF Food Safety Code: Food Manufacturing shall be maintained in electronic and/or hard copy documentation. They will be made available to relevant staff and include: i. A summary of the organization's food safety policies and the methods it will apply to meet the requirements of this standard; ii. The food safety policy statement and organization chart; iii. The processes and products included in the scope of certification; iv. Food safety regulations that apply to the manufacturing site and the country(ies) of sale (if known); v. Raw material, ingredient, packaging, and finished product specifications; vi. Food safety procedures, prerequisite programs, food safety plans; vii. Process controls that impact product safety; and viii. Other documentation necessary to support the development, implementation, maintenance, and control of the SQF System.

RESPONSE: COMPLIANT

2.2.1.2 Food safety plans, Good Manufacturing Practices, and all relevant aspects of the SQF System shall be reviewed, updated, and communicated as needed when any changes implemented have an impact on the site's ability to deliver safe food. All changes to food safety plans, Good Manufacturing Practices, and other aspects of the SQF System shall be validated or justified prior to their implementation. The reasons for the change shall be documented.

RESPONSE: COMPLIANT

2.2.2 Document Control (Mandatory)

Document Control is detailed in the Control of site Management Procedures FSP 1.7.2 12/02/21. 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 maintaining document control and ensuring staff have access to current requirements and instructions shall be documented and implemented. Current SQF System documents and amendments to documents shall be maintained.

RESPONSE: COMPLIANT

2.2.3 Records (Mandatory)

The control of records is stated in the Records management Procedure FSP 1.7.1 -3 11/02/21 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, frequency, and responsibility for verifying, maintaining, and retaining records shall be documented and implemented.

RESPONSE: COMPLIANT

2.2.3.2 All records shall be legible and confirmed by those undertaking monitoring activities that demonstrate inspections, analyses, and other essential activities that have been completed.

RESPONSE: COMPLIANT

2.2.3.3 Records shall be readily accessible, retrievable, and securely stored to prevent unauthorized access, loss, damage, and deterioration. Retention periods shall be in accordance with customer, legal, and regulatory requirements, at minimum the product shelf-life or established by the site if no shelf-life exists.

RESPONSE: COMPLIANT

2.3.1 Specification, Formulation and Realization

New product development is managed by a corporate team and the new Technical Manager. The handover and validation process are documented in a NPD Gate Procedure 1.5.5 -1 Feasibility, 2 Cost Review, 3 Trials and R&D, 1 Commercialization as well Change Management Review Procedure FSP 1.5.3 (Changed planned, assess risk to change, plan & ID risk mitigation activities, undertake risk mitigation, implement changes, verify risk mitigation activities), sighted Gate process commenced for Contract Manufacturing Opportunity, expansion of current cream cheese line, risk assessment to be completed and signed off by stakeholders by 2/07/21, including Quality and Site Management, before progression to stage 2.

2.3.1.1 The methods and responsibility for designing and developing new product formulations and converting product concepts to commercial realization shall be documented and implemented.

RESPONSE: COMPLIANT

2.3.1.2 New product formulations, manufacturing processes, and the fulfillment of product requirements shall be established, validated, and verified by site trials and product testing as required to ensure product safety. Product formulations shall be developed by authorized persons to ensure that they meet the intended use. Where necessary, shelf life trials shall be conducted to validate and verify a new product's: i. Pre-consumer handling and storage requirements, including the establishment of "use by," "best before dates," or equivalent terminology; ii. Microbiological criteria, where applicable; and iii. Consumer preparation, where applicable, and storage and handling requirements.

RESPONSE: COMPLIANT

2.3.1.3 A food safety plan shall be validated and verified by the site food safety team for each new product and its associated process through conversion to commercial production and distribution or where a change to ingredients, process, or packaging occurs that may impact food safety.

RESPONSE: COMPLIANT

2.3.1.4 Product formulations and manufacturing processes for products included in the scope of certification shall be reviewed when there are changes in materials, ingredients, or equipment.

RESPONSE: COMPLIANT

2.3.1.5 The process flows for all new and existing manufacturing processes shall be designed to ensure that product is manufactured according to approved product formulations and to prevent cross-contamination.

RESPONSE: COMPLIANT

2.3.1.6 Records of product design, formulations, label compliance, process flows, shelf life trials, and approvals for all new and existing products shall be maintained.

RESPONSE: COMPLIANT

2.3.2 Specifications (Raw Material, Packaging, Finished Product and Services)

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 C of A where applicable. Records demonstrated compliance with COA. Sighted Raw material specifications for Cream Cheese PIF issued 29/11/17, Mango Spec issued 13/02/17, Spring Onion Rolls 25/06/19 Potassium Sorbate PIF issued 27/01/18, Cream Cheese Film spec 301, compliant with CFR 21 FDA parts 170-199, EU Regs 1935/2004, 10/2011. Certifications also sighted for approved suppliers Tatura Milk (Cream Cheese) – HACCP cert HCV 20130 exp 8/07/2023, Fruitex (Spring Onion Rolls)-SQF Cert 100361 exp 22/04/22, Globus Viscofan (film supplier) ISO 22000 cert 100183, exp 15/06/21. 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: Melon and Mango Cream Cheese dated 27/04/20 issue 6, Spring Onion Cream Cheese dated 30/09/19 issue 6, Sweat Chilli Cream Cheese dated 30/09/19 issue 5, Apricot and Almond Cream Cheese dated 30/09/19 issue 5, Pepato Cheese 4.9kg dated 3/06/19 issue 9. Approved Supplier Procedure FSP 4.9.6 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. Service agreements are in place for Service Providers: Barossa Fine Foods 26/06/2019 Eades Transport 25/07/2018

2.3.2.1 The methods and responsibility for developing, managing, and approving raw material, finished product, and packaging specifications shall be documented.

RESPONSE: COMPLIANT

2.3.2.2 Specifications for all raw materials and packaging, including, but not limited to, ingredients, additives, hazardous chemicals, processing aids, and packaging that impact finished product safety shall be documented and kept current.

RESPONSE: COMPLIANT

2.3.2.3 All raw materials, packaging, and ingredients, including those received from other sites under the same corporate ownership, shall comply with specifications and with the relevant legislation in the country of manufacture and country(ies) of destination if known.

RESPONSE: COMPLIANT

2.3.2.4 Raw materials, packaging, and ingredients shall be validated to ensure product safety is not compromised and the material is fit for its intended purpose.

RESPONSE: COMPLIANT

2.3.2.5 Site management shall require approved raw materials suppliers to notify the site of changes in product composition that could have an impact on product formulation (e.g., protein content, moisture, amino acid profiles, contaminant levels, allergens, and/or other parameters that may vary by crop or by season).

RESPONSE: COMPLIANT

2.3.2.6 Verification of packaging shall include a certification of all packaging that comes into direct contact with food meets either regulatory acceptance or approval criteria. Documentation shall either be in the form of a declaration of continued guarantee of compliance, a certificate of conformance, or a certificate from the applicable regulatory agency. In the absence of a certificate of conformance, certificate of analysis, or letter of guarantee, analyses to confirm the absence of potential chemical migration from the packaging to the food contents shall be conducted and records maintained.

RESPONSE: COMPLIANT

2.3.2.7 Finished product labels shall be accurate, comply with the relevant legislation, and be approved by qualified company personnel.

RESPONSE: COMPLIANT

2.3.2.8 Description of services for contract service providers that have an impact on product safety shall be documented, current, include a full description of the services to be provided, and detail relevant training requirements of all contract personnel.

RESPONSE: COMPLIANT

2.3.2.9 Finished product specifications shall be documented, current, approved by the site and its customer, accessible to relevant staff, and shall include, where applicable: i. Microbiological, chemical, and physical limits; ii. Composition to meet label claims; iii. Labeling and packaging requirements; and iv. Storage conditions.

RESPONSE: COMPLIANT

2.3.2.10 Specifications for raw materials and packaging, chemicals, processing aids, contract services, and finished products shall be reviewed as changes occur that impact product safety. Records of reviews shall be maintained. A list of all the above specifications shall be maintained and kept current.

RESPONSE: COMPLIANT

2.3.3 Contract Manufacturers

The business uses a contract manufacturer to soften dry fruit. Dry fruit is weighed on site into bags, sealed then transferred to Barossa Fine Foods who steams the fruit in the sealed bag. This is not a pathogen reduction step; this step is designed to soften fruit only. Service agreements in place for Barossa Fine Foods and there is provision with each batch fruit packing log, Cooked Fruit CCP record, cook and cooling record and temperature recorder evidence, product assessment and label verification as was sighted for records provided in trace excersize for fruit batch 19/04/21.

2.3.3.1 The methods and responsibility for ensuring all agreements with contract manufacturers relating to food safety, customer product requirements, their realization, and delivery shall be documented and implemented.

RESPONSE: COMPLIANT

2.3.3.2 The site shall establish a method to determine the food safety risk level of contract manufactured product and shall document the risk. The site shall ensure that: i. Products and processes of co-manufacturers that are considered high-risk have undergone an audit by the site or third-party agency to confirm compliance with the SQF Food Safety Code: Food Manufacturing and regulatory and customer requirements; ii. Products and processes of co-manufacturers that are considered low-risk meet the requirements of the SQF Food Safety Code: Food Manufacturing, or other GFSI benchmarked certification programs, and regulatory and customer requirements; and iii. Changes to contractual agreements are approved by both parties and communicated to relevant personnel.

RESPONSE: COMPLIANT

2.3.3.3 Contractual agreements with third party storage and distribution businesses shall include requirements relating to customer product requirements and compliance with clause 2.3.3.2 of the SQF Food Safety Code: Food Manufacturing. Contractual agreements shall be approved by both parties and communicated to relevant personnel. The site shall verify compliance with the SQF Code and ensure that customer and regulatory requirements are being met at all times.

RESPONSE: COMPLIANT

2.3.3.4 Records of audits, contracts, and changes to contractual agreements and their approvals shall be maintained.

RESPONSE: COMPLIANT

2.3.4 Approved Supplier Program (Mandatory)

Approved Supplier Procedure FSP 4.9.6 details suppliers' approval process, contingency arrangements, emergency approvals, supplier audit frequencies and how suppliers are risk assessed and how they become approved. 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 C of A where applicable. Records demonstrated compliance with COA. Sighted Raw material specifications for Cream Cheese PIF issued 29/11/17, Mango Spec issued 13/02/17, Spring Onion Rolls 25/06/19 Potassium Sorbate PIF issued 27/01/18, Cream Cheese Film spec 301, compliant with CFR 21 FDA parts 170-199, EU Regs 1935/2004, 10/2011. Certifications also sighted for approved suppliers Tatura Milk (Cream Cheese) – HACCP cert HCV 20130 exp 8/07/2023, Fruitex (Spring Onion Rolls)-SQF Cert 100361 exp 22/04/22, Globus Viscofan (film supplier) ISO 22000 cert 100183, exp 15/06/21.

2.3.4.1 The responsibility and procedure for selecting, evaluating, approving, and monitoring an approved supplier shall be documented and implemented. A current record of approved suppliers, receiving inspections, and supplier audits shall be maintained.

RESPONSE: COMPLIANT

2.3.4.2 The approved supplier program shall be based on the past performance of a supplier and the risk level of the raw materials, ingredients, processing aids, packaging, and services supplied, and shall contain at a minimum: i. Agreed specifications (refer to 2.3.2); ii. Reference to the level of risk applied to raw materials, ingredients, packaging, and services from the approved supplier; iii. A summary of the food safety controls implemented by the approved supplier; iv. Methods for granting approved supplier status; v. Methods and frequency of monitoring approved suppliers; vi. Details of the certificates of conformance, if required; and vii. Methods and frequency of reviewing approved supplier performance and status.

RESPONSE: COMPLIANT

2.3.4.3 Verification of raw materials shall include certificates of conformance, certificates of analysis, or sampling, and testing. The verification frequency shall be identified by the site.

RESPONSE: COMPLIANT

2.3.4.4 The receipt of raw materials, ingredients, processing aids, and packaging from nonapproved suppliers shall be acceptable only in an emergency situation and provided a receiving inspection or analysis is conducted and recorded before use.

RESPONSE: COMPLIANT

2.3.4.5 Raw materials, ingredients, and packaging received from other sites under the same corporate ownership shall be subject to the same specification requirements (refer to 2.3.2), approved supplier requirements, and receiving inspections as all other material providers.

RESPONSE: COMPLIANT

2.3.4.6 Supplier audits shall be based on risk (as determined in 2.3.4.2) and shall be conducted by individuals knowledgeable of applicable regulatory and food safety requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.1 Food Legislation (Mandatory)

Food Legislation Requirements are clearly documented in the Food Legislation Procedure FSP 4.23.1. The Quality Manager has final responsibility for Food Safety and clearly demonstrated knowledge of the requirement to inform the Certification Body (SAIG) and SQFI within 24 hours of a food safety event. The business is kept up to date of any legislative changes via the local health department and regular contact with Diary Authority South Australia. The site is registered with the Dairy Safe expiry dated 30/06/2022. The site is also registered for export. Accreditation No 1356. The company subscribes to industry bodies which include dairy industry, training industry, certification industry and regulatory bodies which include notifications of changes to legislation and customer-based websites.

2.4.1.1 The site shall ensure that at the time of delivery to customers finished products shall comply with food safety legislation applicable in the country of manufacture and sale. This includes compliance with legislative requirements applicable to maximum residue limits, food safety, packaging, product description, net weights, nutritional, allergen, and additive labeling, labeling of identity preserved foods, any other criteria listed under food legislation, and to relevant established industry codes of practice.

RESPONSE: COMPLIANT

2.4.1.2 The methods and responsibility for ensuring the site is kept informed of changes to relevant legislation, scientific and technical developments, emerging food safety issues, and relevant industry codes of practice shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.1.3 SQFI and the certification body shall be notified in writing within twenty-four (24) hours as a result of a regulatory warning or event. Notification to SQFI shall be by email to foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.4.2 Good Manufacturing Practices (Mandatory)

These requirements are managed through the Good Manufacturing Requirements FSP 4.3.1.1.9. This covers all requirements of the SQF standard it was well demonstrated at the time of the audit.

2.4.2.1 The site shall ensure the applicable Good Manufacturing Practices described in Module 11 of this Food Safety Code are applied or exempted according to a written risk analysis outlining the justification for exemption or evidence of the effectiveness of alternative control measures that ensure food safety is not compromised.

RESPONSE: COMPLIANT

2.4.2.2 The Good Manufacturing Practices applicable to the scope of certification outlining how food safety is controlled and assured shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.3 Food Safety Plan (Mandatory)

The HACCP plan reviewed and updated 2/02/21 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 (Principles and Application of HACCP Cert 24/04/19 C301033) being the team leader and SQF Practitioner and back up Practitioner S Toor (Completed Principles and Application of HACCP 9/06/2021), 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: Le Rice 9/03/21 Changes included Broad spectrum antibiotic testing was in practice but missing in hazard analysis as a control measure for CCP. Flavoured Cream Cheese 2/06/20 Minor Changes included improved numbering system, internal audit anomalies. Cheddar Cheese 23/09/20 Amended due to changes identified by internal audit. Pepato and Romano 11/05/21 Amended step MD not used for Pepato and Romano is used for 20 kg cheddar block CCP's/CQP's/RCP's identified were as follows: Le Rice Dairy Desert: CCP 1 Raw Milk Receival – Antibiotics <0.0025mg/kg (Limit of Detection), <0.25IU, Approved Supplier Program CCP 3 – Pasteurisation >72.5°C for >15 seconds - Diverts at 80°C continuous recording CCP4 – Le Rice cooker >119C for 13 minutes at 1250L/H (max 1500L/hr, continuous recording CCP5 – Base Hopper temperature prior to filing >70C per 15 minute check CCP 6 -Seal Integrity Checks, fully sealed no more than 1mm tub exposed. CCP 7 – X-ray start up and hourly test piece verification with certified test pieces. CCP 8 – Refrigerated storage <5C, 7 days, daily checks CCP 8 – Product Test and release Bacillus Cereous, Y&M, TPC testing per batch. QCP/RCP's – Ingredients blending, Composition, Label and Code checks per 15 minutes, weight checks (12) per 30 minutes Validation references include FSC 1.4.2 schedule 1, ANZDAC Pasteuriser validation and verification guideline 2007, Ch4 pg 7. AS 3993-2003, Lion Compliance Manufacturing Specification, Thermal and X ray calibration schedules, Export control Orders 2008 pg 107,109, SA Health Food Act 2 hour/4hour rule. Cream cheese micro testing criteria DASA 2015. Flavoured Cream Cheese: CCP 1 Receival Temperature for refrigerated ingredients <5C, receival log CCP2 Cold room storage <5C, temperature monitoring log. CCP 3 Incorrect label on product-Allergen Declaration, Cream Cheese cutting and Packing log CCP 4 Metal Detection, per hourly checks 1.5mm F, 2.5mm NF, 3.5mm SS CCP 5– Refrigerated storage <5C, temperature log sheet CCP6 – Refrigerated transport <5C vehicle monitoring log QCP/RCP's Ingredients blending, Composition, seals, label, code checks, weight checks checkweigher and hourly checks, finished goods micro testing. Semi Hard Cheese Processing and Packing: CCP 1 & 2 Raw Milk & Cream Receival– Antibiotics <0.0025mg/kg (Limit of Detection), Approved Supplier Program CCP 3 – Pasteurisation >74°C +/-1°C for >15 second/37000L/H - Diverts at 72.5°C, pressure differential diversion <10kpa CCP 4 - Metal Detector - No Metal – product rejected Test pieces Cheddar, 7.0mm Non-ferrous, 6.00mm ferrous, 7.0mm ss QCP/RCP's Cheese whey PH during cheese make and mill, salting, weight checks, maturation temperature. Sighted monitoring records November 2020 to June 2021 including specific dates 28/06/21, 1/06/21, 19/04/21, 31/03/21, 7/01/21, 3/11/20 were compliant to monitoring and CCP/RCP/CQP critical limit requirements.

2.4.3.1 A food safety plan shall be prepared in accordance with the twelve steps identified in the Codex Alimentarius Commission HACCP guidelines. The food safety plan shall be effectively implemented and maintained and shall outline how the site controls and assures food safety of the products or product groups included in the scope of the SQF certification and their associated processes. More than one HACCP food safety plan may be required to cover all products included in the scope of certification.

RESPONSE: COMPLIANT

2.4.3.2 The food safety plan or plans shall be developed and maintained by a multidisciplinary team that includes the SQF practitioner and those site personnel with technical, production, and engineering knowledge of the relevant raw materials, packaging, processing aids, products, and associated processes. Where the relevant expertise is not available on-site, advice may be obtained from other sources to assist the food safety team.

RESPONSE: COMPLIANT

2.4.3.3 The scope of each food safety plan shall be developed and documented including the start and endpoints of the processes under consideration and all relevant inputs and outputs.

RESPONSE: COMPLIANT

2.4.3.4 Product descriptions shall be developed and documented for all products included in the scope of the food safety plans. The descriptions shall reference the finished product specifications (refer to 2.3.2.9) plus any additional information relevant to product safety, such as pH, water activity, composition, and/or storage conditions.

RESPONSE: COMPLIANT

2.4.3.5 The intended use of each product shall be determined and documented by the food safety team. This shall include target consumer groups, the potential for consumption by vulnerable groups of the population, requirements for further processing if applicable, and potential alternative uses of the product.

RESPONSE: COMPLIANT

2.4.3.6	The food safety team shall develop and document a flow diagram covering the scope of each food safety plan The flow diagram shall include every step in the process, all raw materials, packaging, service inputs (e.g., water, steam, gasses as applicable), scheduled process delays, and all process outputs including waste and rework. Each flow diagram shall be confirmed by the food safety team to cover all stages and hours of operation. **RESPONSE:** COMPLIANT
2.4.3.7	The food safety team shall identify and document all food safety hazards that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs. **RESPONSE:** COMPLIANT
2.4.3.8	The food safety team shall conduct a hazard analysis for every identified hazard to determine which hazards are significant, i.e., their elimination or reduction to an acceptable level is necessary to control food safety. The methodology for determining hazard significance shall be documented and used consistently to assess all potential hazards. **RESPONSE:** COMPLIANT
2.4.3.9	The food safety team shall determine and document the control measures that must be applied to all significant hazards. More than one control measure may be required to control an identified hazard, and more than one significant hazard may be controlled by a specific control measure. **RESPONSE:** COMPLIANT
2.4.3.10	Based on the results of the hazard analysis (refer to 2.4.3.8), the food safety team shall identify the steps in the process where control must be applied to eliminate a significant hazard or reduce it to an acceptable level (i.e., a critical control point or CCP). In instances where a significant hazard has been identified at a step in the process, but no control measure exists, the food safety team shall modify the process to include an appropriate control measure. **RESPONSE:** COMPLIANT
2.4.3.11	For each identified CCP, the food safety team shall identify and document the limits that separate safe from unsafe product (critical limits). The food safety team shall validate all of the critical limits to ensure the level of control of the identified food safety hazard(s) and that all critical limits and control measures individually or in combination effectively provide the level of control required (refer to 2.5.2.1). **RESPONSE:** COMPLIANT
2.4.3.12	The food safety team shall develop and document procedures to monitor CCPs to ensure they remain within the established limits (refer to 2.4.3.11). Monitoring procedures shall identify the personnel assigned to conduct monitoring, the sampling and test methods, and the test frequency. **RESPONSE:** COMPLIANT
2.4.3.13	The food safety team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CCP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the safety failure. **RESPONSE:** COMPLIANT
2.4.3.14	The documented and approved food safety plan(s) shall be implemented in full. The effective implementation shall be monitored by the food safety team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, inputs, or other changes affecting product safety occur. **RESPONSE:** COMPLIANT
2.4.3.15	Procedures shall be in place to verify that critical control points are effectively monitored and appropriate corrective actions are applied. Implemented food safety plans shall be verified as part of SQF System verification (refer to 2.5). **RESPONSE:** COMPLIANT
2.4.3.16	Critical control point monitoring, corrective action, and verification records shall be maintained and appropriately used. **RESPONSE:** COMPLIANT
2.4.3.17	Where food safety regulations in the country of production and destination (if known) prescribe a food safety control methodology other than the Codex Alimentarius Commission HACCP guidelines, the food safety team shall implement food safety plans that meet both Codex and food regulatory requirements. **RESPONSE:** COMPLIANT

2.4.4 Product Sampling, Inspection and Analysis

Testing guidelines Cheese Parameters SOP 5.2.1, Includes parameters for (Mill times, pH, acidity guidelines, recipes, calculations, cultures & whey off pH standards, salt settings, cut duration, pump out,) with Raw and Pasteurized milk, Cream Cheese and Le Rice testing parameters also stipulated via testing program specification and test frequency, with results reviewed January to June 2021 demonstrating good compliance to in process and finished product specification. Finished product release is also based on micro testing compliance ie Cream Cheese : Listeria, Coliform, E Coli, Yeast and Mould, per batch Salmonella, Staph Aureus, per 5 batches, were compliant for test results reviewed 6/01/21 to 11/06/21 compliant. Le Rice: Fresh samples -Bacillus Cereous, SPC, PH, Abuse samples 24 hours at 30C, Gas Forming, Bacillus as well as monthly Listeria, Staph Aureus, E Coli, results 4/01/21 to 11/06/21 compliant. Cheddar: Listeria, Coliform, E Coli, Yeast and Mould, Salmonella, Staph Aureus, 9/11/20 to 5/03/20 (no cheddar as yet in 2021) compliant. Pepato and Romano: Listeria, Coliform, E Coli, Yeast and Mould, Salmonella, Staph Aureus 7/01/21 to 25/03/21 complaint. The onsite laboratory is located away and separate from the processing area and access limited to laboratory staff. Waste receptacles are identified for laboratory waste. Signage on the access door indicates that the area is laboratory. There is micro testing conducted on site and by ALS NATA Lab 1240 acc 1247 to ISO 17025 requirements, and waste material autoclaved.

2.4.4.1 The methods, responsibility, and criteria for sampling, inspecting, and/or analyzing raw materials, work-in-progress, and finished product shall be documented and implemented. The methods applied shall ensure that inspections and analyses are completed at regular intervals as required and to agreed specifications and legal requirements. Sampling and testing shall be representative of the process batch and ensure that process controls are maintained to meet specification and formulation.

RESPONSE: COMPLIANT

2.4.4.2 Product analyses shall be conducted to nationally recognized methods or company requirements, or alternative methods that are validated as equivalent to the nationally recognized methods. Where internal laboratories are used to conduct input, environmental, or product analyses, sampling and testing methods shall be in accordance with the applicable requirements of ISO/IEC 17025, including annual proficiency testing for staff conducting analyses. External laboratories shall be accredited to ISO/IEC 17025, or an equivalent international standard, and included on the site's contract service specifications list (refer to 2.3.2.11).

RESPONSE: COMPLIANT

2.4.4.3 On-site laboratories conducting chemical and microbiological analyses that may pose a risk to product safety shall be located separate from any food processing or handling activity and designed to limit access only to authorized personnel. Signage shall be displayed identifying the laboratory area as a restricted area, accessible only by authorized personnel.

RESPONSE: COMPLIANT

2.4.4.4 Provisions shall be made to isolate and contain all hazardous laboratory waste held on the premises and manage it separately from food waste. Laboratory waste outlets shall at a minimum be downstream of drains that service food processing and handling areas.

RESPONSE: COMPLIANT

2.4.4.5 Retention samples, if required by customers or regulations, shall be stored according to the typical storage conditions for the product and maintained for the stated shelflife of the product.

RESPONSE: COMPLIANT

2.4.4.6 Records of all inspections and analyses shall be maintained.

RESPONSE: COMPLIANT

2.4.5 Non-conforming Materials and Product

Included in the Non- Conformance Program FSP 4.2.10 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.

2.4.5.1 The responsibility and methods outlining how to handle non-conforming product, raw material, ingredient, work-in-progress, or packaging, which is detected during receipt, storage, processing, handling, or delivery, shall be documented and implemented. The methods applied shall ensure: i. Non-conforming product is quarantined, identified, handled, and/or disposed of in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product; and ii. All relevant personnel are aware of the organization's quarantine and release requirements applicable to product placed under quarantine status.

RESPONSE: COMPLIANT

2.4.5.2 Quarantine records and records of the handling, corrective action, or disposal of nonconforming materials or product shall be maintained.

RESPONSE: COMPLIANT

2.4.6 Product Rework

Rework Procedure 4.21.4, only rework is underweight cream cheese, reworked back into same batch ie added from excess cut logs.

2.4.6.1 The responsibility and methods outlining how ingredients, packaging, or products are reworked shall be documented and implemented. The methods applied shall ensure: i. Reworking operations are overseen by qualified personnel; ii. Reworked product is clearly identified and traceable; iii. Reworked product is processed in accordance with the site's food safety plan; iv. Each batch of reworked product is inspected or analyzed as required before release; v. Inspections and analyses conform to the requirements outlined in element 2.4.4.1; vi. Release of reworked product conforms to element 2.4.7; and vii. Reworked product does not affect the safety or integrity of the finished product. Records of all reworking operations shall be maintained.

RESPONSE: COMPLIANT

2.4.7 Product Release (Mandatory)

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. Micro Testing and clearance release results were verified during audit: Cream Cheese : Listeria, Coliform, E Coli, Yeast and Mould, per batch Salmonella, Staph Aureus, per 5 batches, were compliant for test results reviewed 6/01/21 to 11/06/21 compliant. Le Rice: Fresh samples -Bacillus Cereous, SPC, PH, Abuse samples 24 hours at 30C, Gas Forming, Bacillus as well as monthly Listeria, Staph Aureus, E Coli, results 4/01/21 to 11/06/21 compliant. Cheddar: Listeria, Coliform, E Coli, Yeast and Mould, Salmonella, Staph Aureus, 9/11/20 to 5/03/20 (no cheddar as yet in 2021) compliant. Pepato and Romano: Listeria, Coliform, E Coli, Yeast and Mould, Salmonella, Staph Aureus 7/01/21 to 25/03/21 complaint.

2.4.7.1 The responsibility and methods for releasing products shall be documented and implemented. The methods applied shall ensure the product is released by authorized personnel, and only after all inspections and analyses are successfully completed and documented to verify legislative and other established food safety controls have been met. Records of all product releases shall be maintained.

RESPONSE: COMPLIANT

2.4.7.2 Product release shall include a procedure to confirm that product labels comply with the food legislation that applies in the country of manufacture and the country(ies) of use or sale if known (refer to 2.4.1.1). If product is packaged and distributed in bulk or unlabeled, product information shall be made available to inform customers and/or consumers of the requirements for its safe use.

RESPONSE: COMPLIANT

2.4.7.3 In the event that the site uses positive release based on product pathogen or chemical testing, a procedure shall be in place to ensure that product is not released until acceptable results have been received. In the event that off-site or contract warehouses are used, these requirements shall be effectively communicated and verified as being followed.

RESPONSE: COMPLIANT

2.4.8 Environmental Monitoring

Environmental monitoring requirements are managed through the Environmental Monitoring Procedure and program. The procedure details the requirements of the SQF standard. The program is based on a risk assessment. Highlighted issues are addressed via a re-swabbing process and documented as a corrective action with a root cause investigation. Cream Cheese – monthly listeria swabs, min 12 swabs taken from random areas within the HC area, contact, non contact, floor, drains, equipment etc. Sighted records monthly results January to May 2021 Listeria Negative. Hard Cheese - monthly Listeria swabs (5) Sighted records monthly results January to May 2021 Listeria Negative. Le Rice - monthly Listeria swabs (8) Sighted records monthly results January to May 2021 Listeria Negative. Cheddar monthly Listeria swabs (8) Sighted records monthly results January to May 2021. 18/02/21 +ve Listeria Species detection, under cross over bridge, however there was no evidence of retest/corrective action. General all areas: Le Rice, Processing areas, Tanker Bay etc Sighted records monthly January to May 2021 Listeria Negative. Aerial plates are also used to monitor potential aerial contamination in cream cheese high care area, yeast and mould, as well as Enterobacteriaceae, for equipment, utensil, boots, floors, trays, crates, door handles etc, as were test results January to June 2021, with majority of results demonstrating high quality conditions being maintained and reclean of areas and review of results next round if results are out of specification.

2.4.8.1 A risk-based environmental monitoring program shall be in place for all food manufacturing processes and immediate surrounding areas, which impact manufacturing processes. The responsibility and methods for the environmental monitoring program shall be documented and implemented.

RESPONSE: COMPLIANT

2.4.8.2 An environmental sampling and testing schedule shall be prepared. It shall at a minimum: i. Detail the applicable pathogens or indicator organisms to test for in that industry; ii. List the number of samples to be taken and the frequency of sampling; iii. Outline the locations in which samples are to be taken and the rotation of locations as needed; and iv. Describe the methods to handle elevated or undesirable results.

RESPONSE: COMPLIANT

2.4.8.3 Environmental testing results shall be monitored, tracked, and trended, and preventative actions (refer to 2.5.3.1) shall be implemented where unsatisfactory results or trends are observed.

RESPONSE: MINOR

EVIDENCE: Cheddar monthly Listeria swabs (8) Sighted records monthly results January to May 2021. 18/02/21 +ve Listeria Species detection, under cross over bridge, however there was no evidence of retest/corrective action.

ROOT CAUSE: RC Inadequate supervision, training & resources. CA : FSP 4.15.3 updated to include specific requirements on positive swabs. One Point lesson conducted with all quality staff

CORRECTIVE ACTION: FSP 4.15.3 updated to include specific requirements on positive swabs and OPL conducted

VERIFICATION OF CLOSEOUT: Sighted updated Environmental Hygiene Monitoring Standard 4.15.3-2, updated 6/07/2021, inclusive of updated section for action on +ve swabs including immediate notification of Quality Manager and Production Manager, raising of NCR by Quality Manager, full clean of area, reswab and retest, detailing of any actions and changes to cleaning procedure on NCR form, maintain records of results electronically. Sighted training completed for personnel involved 7-19/07/21.

COMPLETION DATE: 07/19/2021 **CLOSEOUT DATE:** 07/27/2021

2.5.1 Validation and Effectiveness (Mandatory)

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 to May 2021 Validation references include FSC 1.4.2 schedule 1, ANZDAC Pasteuriser validation and verification guideline 2007, Ch4 pg 7. AS 3993-2003, Lion Compliance Manufacturing Specification, Thermal and X ray calibration schedules, Export control Orders 2008 pg 107,109, SA Health Food Act 2 hour/4hour rule. Cream cheese micro testing criteria DASA 2015.

2.5.1.1 The methods, responsibility, and criteria for ensuring the effectiveness of all applicable elements of the SQF Program shall be documented and implemented. The methods applied shall validate that: i. Good Manufacturing Practices are confirmed to ensure they achieve the required results; ii. Critical food safety limits are reviewed annually and re-validated or justified by regulatory standards when changes occur; and iii. Changes to the processes or procedures are assessed to ensure the controls are still effective. Records of all validation activities shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities (Mandatory)

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 records sited 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 to May 2021, GMP Audits –as sighted audits undertaken 2/02/21 all areas included pest control, CCP's, Foreign matter, basic GMP, jewellery compliance etc, 4/05/21 different format with separate audits conducted for foreign matter, Hand washing, door audits and other focus areas, with scoring system used, corrective actions are clearly documented. Pre-Operational Checks: daily – 28/06/21 to 3/11/21. Glass Audits via preoperational checks and GMP audits. Metal Detection and X ray Calibration – 1/03/21, Internal audits conducted as per 2020/21 schedule.

2.5.2.1 The methods, responsibility, and criteria for verifying monitoring of Good Manufacturing Practices, critical control points, and other food safety controls, and the legality of certified products shall be documented and implemented. The methods applied shall ensure that personnel with responsibility for verifying monitoring activities authorize each verified record.

RESPONSE: COMPLIANT

2.5.2.2 A verification schedule outlining the verification activities, their frequency of completion, and the person responsible for each activity shall be prepared and implemented. Records of verification of activities shall be maintained.

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action (Mandatory)

Included in the Non- Conformance Program FSP 4.2.10 dated details requirements and management of non-conforming raw materials, work in progress, finished products and equipment, complaints. The procedure details quarantine requirements, labelling requirements, communication channels and release and/or disposal procedures. Internal and external (including supplier) non-conformances are managed via a dedicated electronic register. Actions are allocated to the most appropriate area manager and closed by the original issuer of the Corrective Action Register. The Corrective action register maintained was sighted January to June 2021 raised for identified internal or external issues, eg CAR 21/019 17/02/21, Supplier milk temperature consistently higher than 5C 1-16/02/21, reviewed with supplier, a number of actions undertaken, no further high milk temperatures post 24/02/21, long term solution to replace milk vat by 15/04/21, which has now occurred, car closed.

2.5.3.1 The responsibility and methods outlining how corrective and preventative actions are determined, implemented, and verified, including the identification of the root cause and resolution of non-compliance of critical food safety limits and deviations from food safety requirements, shall be documented and implemented. Deviations from food safety requirements may include customer complaints, nonconformances raised at internal or external audits and inspections, non-conforming product and equipment, withdrawals and recalls, as appropriate.

RESPONSE: COMPLIANT

2.5.3.2 Records of all investigation, root cause analysis, and resolution of non-conformities, their corrections, and the implementation of preventative actions shall be maintained.

RESPONSE: COMPLIANT

2.5.4 Internal Audits and Inspections (Mandatory)

Internal Audits procedure FSP 4.1-4 cover all aspects of the SQF standard including scheduling and conducting of internal auditors, audit reports and non conformances and management review. All aspects of the food safety system are subject to an Internal audit on an annual basis including mock recalls, Crisis testing with audits shared by the Murray Bridge and Jervois Quality Managers. 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: Maintenance Procedure 10/12/20, Food Legislation 8/12/20, reviewed DASA compliance and FSANZ label verification, Food Security 14/09/20, Food Safety Plan 2.5 Cheddar, 2/10/20, Calibration 25/05/21, Allergens 23/09/20, with audits inclusive of photos and advisory findings, reference to procedures, previous NCR's closed and NCR's raised. GMP audits sighted audit 2/02/21 all areas included pest control, CCP's, Foreign matter, basic GMP, jewellery compliance etc, 4/05/21 different format with separate audits conducted for foreign matter, Hand washing, door audits and other focus areas, with scoring system used, corrective actions are clearly documented.

2.5.4.1 The methods and responsibility for scheduling and conducting internal audits to verify the effectiveness of the SQF System shall be documented and implemented. Internal audits shall be conducted in full and at least annually. The methods applied shall ensure: i. All applicable requirements of the SQF Food Safety Code: Food Manufacturing are audited per the SQF audit checklist or a similar tool; ii. Objective evidence is recorded to verify compliance and/or non-compliance; iii. Corrective and preventative actions of deficiencies identified during the internal audits are undertaken; and iv. Audit results are communicated to relevant management personnel and staff responsible for implementing and verifying corrective and preventative actions.

RESPONSE: COMPLIANT

2.5.4.2 Staff conducting internal audits shall be trained and competent in internal audit procedures. Where practical, staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

2.5.4.3 Regular inspections of the site and equipment shall be planned and carried out to verify Good Manufacturing Practices and facility and equipment maintenance are compliant to the SQF Food Safety Code: Food Manufacturing. The site shall: i. Take corrections or corrective and preventative action; and ii. Maintain records of inspections and any corrective actions taken.

RESPONSE: COMPLIANT

2.5.4.4 Records of internal audits and inspections and any corrective and preventative actions taken as a result of internal audits shall be recorded as per 2.5.3. Changes implemented from internal audits that have an impact on the site's ability to deliver safe food shall require a review of applicable aspects of the SQF System (refer to 2.3.1.3).

RESPONSE: COMPLIANT

2.6.1 Product Identification (Mandatory)

These requirements are managed through a Product & Identification Procedure FSP 4.12 23/09/20. 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 The methods and responsibility for identifying raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products during all stages of production and storage shall be documented and implemented to ensure: i. Raw materials, ingredients, packaging, work-in-progress, process inputs, and finished products are clearly identified during all stages of receipt, production, storage, and dispatch; and ii. Finished product is labeled to the customer specification and/or regulatory requirements.

RESPONSE: COMPLIANT

2.6.1.2 Product start-up, product changeover, and packaging changeover (including label changes) procedures shall be documented and implemented to ensure that the correct product is in the correct package and with the correct label and that the changeover is inspected and approved by an authorized person. Procedures shall be implemented to ensure that label use is reconciled and any inconsistencies investigated and resolved. Product changeover and label reconciliation records shall be maintained.

RESPONSE: COMPLIANT

2.6.2 Product Trace (Mandatory)

These requirements are managed through a Product & Identification Procedure FSP 4.12 23/09/20. 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 #. The last documented mock recall and trace exercises were conducted 24/06/21 Costco Flavoured Cream Cheese UB 6/01/22, cut and packed 10/06/21 trace excersize conducted back to raw materials and packaging batch codes, cooked fruit, code and label verification, allergen cleaning log, cold room temperature logs, Pre operational checks and ATP swabbing, supplier certifications, C of A's and dates of receipt , mixing logs, cut and pack logs. Completed in less than 2 hours Traceability exercise (Mass Balance) was conducted 26/10/20 Costco Cream Cheese UB 5/05/21 trace excersize and mass balance conducted back to raw materials and batch codes, supplier certifications, C of A's and dates of receipt as well as 100% mass balance to distribution. Completed in less than 2 hours. Raw Material Forward Traceability exercise was conducted (Mass Balance), during audit traced from Spring Onion Batch 19047 received 384 kg, usage in production 29/07/19 to 25/06/21 362.4 kg, 19 kg in stock =381.4 kg accounted for (99.32% acceptable variance) Completed in less than 2 hours. Minor NCR 2 Mock recall and mass balance excersizes undertaken for finished product trace to raw materials and packaging as well as to distribution however forward traces form raw materials and packaging not completed.

2.6.2.1 The responsibility and methods used to trace product shall be documented and implemented to ensure: i. Finished product is traceable at least one step forward to the customer and at least one step back from the process to the manufacturing supplier; ii. The receipt dates of raw materials, ingredients, food contact packaging and materials, and other inputs are recorded (refer to 2.8.1.8 for traceback of allergen containing food products.); iii. Traceability is maintained where product is reworked (refer to 2.4.6); and iv. The effectiveness of the product trace system is reviewed at least annually, as part of the product recall and withdrawal review (refer to 2.6.3.2). Records of raw and packaging material receipt and use and finished product dispatch and destination shall be maintained.

RESPONSE: COMPLIANT

2.6.3 Product Withdrawal and Recall (Mandatory)

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, FSANZ and retailer contact details were observed to be current and correct. The procedure documents the requirement to test, review and verify the system annually. The last documented mock recall and trace exercises were conducted 24/06/21 Costco Flavoured Cream Cheese UB 6/01/22, cut and packed 10/06/21 trace excersize conducted back to raw materials and packaging batch codes, cooked fruit, code and label verification, allergen cleaning log, cold room temperature logs, Pre operational checks and ATP swabbing, supplier certifications, C of A's and dates of receipt , mixing logs, cut and pack logs. Completed in less than 2 hours There has been no recall or withdrawal since the last audit.

2.6.3.1 The responsibility and methods used to withdraw or recall product shall be documented and implemented. The procedure shall: i. Identify those responsible for initiating, managing, and investigating a product withdrawal or recall; ii. Describe the management procedures to be implemented, including sources of legal, regulatory, and expert advice, and essential traceability information; iii. Outline a communication plan to inform site personnel, customers, consumers, authorities, and other essential bodies in a timely manner appropriate about the nature of the incident; and iv. Ensure that SQFI, the certification body, and the appropriate regulatory authority are listed as essential organizations and notified in instances of a food safety incident of a public nature or product recall for any reason.

RESPONSE: COMPLIANT

2.6.3.2 The product withdrawal and recall system shall be reviewed, tested, and verified as effective at least annually. Testing shall include incoming materials (minimum traceability one step back) and finished product (minimum traceability one step forward). Testing shall be carried out on products from different shifts and for materials (including bulk materials) that are used across a range of products and/or products that are shipped to a wide range of customers.

RESPONSE: COMPLIANT

2.6.3.3 Records shall be maintained of withdrawal and recall tests, root cause investigations into actual withdrawals and recalls, and corrective and preventative actions applied.

RESPONSE: COMPLIANT

2.6.3.4 SQFI and the certification body shall be notified in writing within twenty-four (24) hours upon identification of a food safety event that requires public notification. SQFI shall be notified at foodsafetycrisis@sqfi.com.

RESPONSE: COMPLIANT

2.6.4 Crisis Management Planning

Business Continuity Plan FSP 4.21 MB 10/05/21, was updated to include pandemic risk (now rated as medium risk), details the business process and procedures around continuation of supply as well as update of new internal staff. The elements required by the SQF Edition 9 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 25/02/21 relating to rice shortage for the dairy desert rice product, team reviewed alternative sources, and supply via 10, 20, 25kg bags rather than bulk supply, responses and control measures documented and implemented, management of change process followed.

2.6.4.1 A crisis management plan based on the understanding of known potential dangers (e.g., flood, drought, fire, tsunami, or other severe weather events, warfare or civil unrest, computer outage, pandemic, loss of electricity or refrigeration, ammonia leak, labor strike) that can impact the site's ability to deliver safe food shall be documented by senior management, outlining the methods and responsibility the site shall implement to cope with such a business crisis. The crisis management plan shall include at a minimum: i. A senior manager responsible for decision making, oversight, and initiating actions arising from a crisis management incident; ii. The nomination and training of a crisis management team; iii. The controls implemented to ensure any responses do not compromise product safety; iv. The measures to isolate and identify product affected by a response to a crisis; v. The measures taken to verify the acceptability of food prior to release; vi. The preparation and maintenance of a current crisis alert contact list, including supply chain customers; vii. Sources of legal and expert advice; and viii. The responsibility for internal communications and communicating with authorities, external organizations, and media.

RESPONSE: COMPLIANT

2.6.4.2 The crisis management plan shall be reviewed, tested, and verified at least annually with gaps and appropriate corrective actions documented. Records of reviews of the crisis management plan shall be maintained.

RESPONSE: COMPLIANT

2.7.1 Food Defense Plan (Mandatory)

These requirements are managed through the Food Security Plan FSP 4.20-4. This includes how raw materials, finished product, operations of water, security strategy, data systems, are managed to prevent adulteration caused by a deliberate act of sabotage or terrorist-like incident during all stages of receipt, production, storage and dispatch. The responsibilities of this process are managed by Quality Manager. The site was observed to be secured by a perimeter fence and gates are locked outside of working hours with CCTV cameras is strategic locations. A Food Security assessment was last conducted 15/06/21, additional controls implemented, still working on locked and sealed outbound vehicles . All employees have annual Security training as part of their GMP training completed March 2021 .

2.7.1.1 A food defense threat assessment shall be conducted to identify potential threats that can be caused by a deliberate act of sabotage or terrorist-like incident.

RESPONSE: COMPLIANT

2.7.1.2 A food defense plan shall be documented, implemented, and maintained based on the threat assessment (refer to 2.7.1.1). The food defense plan shall meet legislative requirements as applicable and shall include at a minimum: i. The methods, responsibility, and criteria for preventing food adulteration caused by a deliberate act of sabotage or terrorist-like incident; ii. The name of the senior site management person responsible for food defense; iii. The methods implemented to ensure only authorized personnel have access to production equipment and vehicles, manufacturing, and storage areas through designated access points; iv. The methods implemented to protect sensitive processing points from intentional adulteration; v. The measures taken to ensure the secure receipt and storage of raw materials, ingredients, packaging, equipment, and hazardous chemicals to protect them from deliberate acts of sabotage or terrorist-like incidents; vi. The measures implemented to ensure raw materials, ingredients, packaging (including labels), work-in-progress, process inputs, and finished products are held under secure storage and transportation conditions; and vii. The methods implemented to record and control access to the premises by site personnel, contractors, and visitors.

RESPONSE: COMPLIANT

2.7.1.3 Instruction shall be provided to all relevant staff on the effective implementation of the food defense plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

2.7.1.4 The food defense threat assessment and prevention plan shall be reviewed and tested at least annually or when the threat level, as defined in the threat assessment, changes. Records of reviews and tests of the food defense plan shall be maintained.

RESPONSE: COMPLIANT

2.7.2 Food Fraud (Mandatory)

Food Fraud/VACCP procedure outlines methodology and steps for food fraud risk assessment process These requirements are managed through the Food Fraud Risk Assessment Procedure FP 4.20.3-4 which was reviewed 15/06/21 added new products , ingredients. This includes how raw materials, work in progress and finished product are managed to prevent concealment, counterfeiting, dilution, mislabeling, grey market, diversion, substitution, historical events & emerging concerns, economic factors/price fluctuations, geographic region, length and complexity of supply chain, all products assessed low probability. Previously had tested Chives by DTS Laboratory, result was chives.

2.7.2.1 The methods, responsibility, and criteria for identifying the site's vulnerability to food fraud, including susceptibility to raw material or ingredient substitution, finished product mislabeling, dilution, or counterfeiting, shall be documented, implemented, and maintained.

RESPONSE: COMPLIANT

2.7.2.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods by which the identified food fraud vulnerabilities shall be controlled, including identified food safety vulnerabilities of ingredients and materials.

RESPONSE: COMPLIANT

2.7.2.3 Instruction shall be provided to all relevant staff on the effective implementation of the food fraud mitigation plan (refer to 2.9.2.1).

RESPONSE: COMPLIANT

2.7.2.4 The food fraud vulnerability assessment and mitigation plan shall be reviewed and verified at least annually with gaps and corrective actions documented. Records of reviews shall be maintained.

RESPONSE: COMPLIANT

2.8.1 Allergen Management (Mandatory)

These requirements are managed through the Allergen Management Procedure FSP 4.22.1. This covers all requirements of the SQF standard which includes responsibilities, assessment and labelling training requirements, allergen listing and matrix. Risk assessment FSP 4.22.5 dated 21/02/20 for all ingredients and products and controls included, cleaning procedures and segregation procedures. There are currently four (4) allergens identified on site: milk, tree nuts, dried fruit (Sulphur dioxide) and Lysozyme (egg). Control measures were observed to be well managed. There is allergen cleen sign off log for each change of cream cheese mixing and cutting and packing operations as per records sighted 28/06/21, 31/03/21, 7/01/21, 3/11/20. The responsibilities of this process are managed by Site team. Allergen controls begin at product development process where raw material specifications (PIFs) are obtained and assessed and incorporated in to the control procedures as required. Allergen training is provided at induction. GMP Refresher training (Allergens, FO Matter control, tools, maintenance handover, housekeeping) March 2021

2.8.1.1	The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include: i. A risk analysis of those raw materials, ingredients, and processing aids, including food grade lubricants, that contain food allergens; ii. An assessment of workplace-related food allergens that may originate from locker rooms, vending machines, lunchrooms, and visitors; iii. A list of allergens that is applicable in the country of manufacture and the country(ies) of destination, if known; iv. A list of allergens that is accessible to relevant staff; v. The control of hazards associated with allergens and incorporated into the food safety plan, and vi. Management plans for control of the identified allergens. **RESPONSE:** COMPLIANT
2.8.1.2	Instructions shall be provided to all relevant staff involved in the receipt or handling of raw materials, work-in-progress, rework, or finished product on how to identify, handle, store, and segregate raw materials and products containing allergens. **RESPONSE:** COMPLIANT
2.8.1.3	Provisions shall be made to clearly identify and segregate foods that contain allergens. Segregation procedures shall be implemented and continually monitored. **RESPONSE:** COMPLIANT
2.8.1.4	Where allergenic material may be intentionally or unintentionally present cleaning and sanitation of product contact surfaces between line changeovers shall be effective, appropriate to the risk and legal requirements, and sufficient to remove all potential target allergens from product contact surfaces, including aerosols as appropriate, to prevent cross-contact. Separate handling and production equipment shall be provided, where satisfactory line hygiene and clean-up or segregation are not possible. **RESPONSE:** COMPLIANT
2.8.1.5	Based on risk assessment, procedures for validation and verification of the effectiveness of the cleaning and sanitation of areas and equipment in which allergens are used shall be documented and effectively implemented. **RESPONSE:** COMPLIANT
2.8.1.6	Where allergenic material may be present, product changeover procedures shall be documented and implemented to eliminate the risk of cross-contact. **RESPONSE:** COMPLIANT
2.8.1.7	The product identification system (refer to 2.6.1.1) shall make provision for clear identification and labeling, in accordance with the regulatory requirements of those products produced on production lines and equipment on which foods containing allergens are manufactured. **RESPONSE:** COMPLIANT
2.8.1.8	The product trace system (refer to 2.6.2) shall take into consideration the conditions under which allergen-containing foods are manufactured and ensure full traceback of all ingredients and processing aids used. **RESPONSE:** COMPLIANT
2.8.1.9	The site shall document and implement methods to control the accuracy of finished product labels (or consumer information where applicable) and assure work-in progress and finished product are true to label with regard to allergens. Measures may include label approvals at receipt, label reconciliations during production, destruction of obsolete labels, verification of labels on finished product as appropriate, and product change over procedures. **RESPONSE:** COMPLIANT
2.8.1.10	Re-working of product (refer to 2.4.6) containing food allergens shall be conducted under conditions that ensure product safety and integrity are maintained. Re-worked product containing allergens shall be clearly identified and traceable. **RESPONSE:** COMPLIANT
2.8.1.11	Sites that do not handle allergenic materials or produce allergenic products shall document, implement and maintain an allergen management program addressing at a minimum the mitigation of introduced or unintended allergens through supplier, contract manufacturer, site personnel, and visitor activities. **RESPONSE:** COMPLIANT

2.9.1 Training Requirements

These requirements are managed through the Training Procedure FSP 4.4-4. 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 training matrix. The responsibilities of this process are managed by the Site Management Team.

2.9.1.1 The responsibility for establishing and implementing the training needs of the organization's personnel to ensure they have the required competencies to carry out those functions affecting products, legality, and safety shall be defined and documented (refer to 2.1.1.6).

RESPONSE: COMPLIANT

2.9.1.2 Appropriate training shall be provided for personnel carrying out the tasks essential to the effective implementation of the SQF System and the maintenance of food safety and regulatory requirements.

RESPONSE: COMPLIANT

2.9.2 Training Program (Mandatory)

These requirements are managed through the Training Procedure FSP 4.4-4 . This covers all requirements of the SQF standard. Responsibilities lay with the Managers/Team Leaders and other Managers. The procedure includes highlighting of critical tasks, induction training, specific training requirements (export requirements), effective implementation of the food management system, the provision for refresher training & records in the form of a training matrix. The responsibilities of this process are managed by the Site Management Team. Internal auditors have been trained internally by the SQF Practitioner L. Haebich who is a full-time employee and formally HACCP trained on 27/03/2014 and Principles and Application of HACCP with SAI Global in 2019. Training records were also verified for personnel observed during audit including: Cheesemaker FC- training Cheese Parameters completed 20/10/20, FS/GMP/HACCP Refresher 7/03/20, Cream Cheese room Operator AC X Ray 15/05/20, Equipment breakage and loss 31/03/20, FS/GMP/HACCP Refresher 2/03/21, Cream Cheese room packer LV FS/GMP/HACCP Refresher 5/03/21, Le Rice Pack room operator BH X Ray 15/05/20, Equipment breakage and loss 31/03/20, FS/GMP/HACCP Refresher 5/03/21, Le rice Filler Operator BM (in training) FS/GMP/HACCP Refresher 2/03/21, Maintenance Fitter NC FS/GMP/HACCP 17/08/20, Maintenance program (incl handover) FSP 4.6 -7 1/09/20. Milk Tanker drivers - Antibiotic testing MB 21/05/19, MA 20/05/19. Training skill matrix is a 'live' document covering all staff by departments and by skills/training sessions and completion date. Instructions are in English & Training is conducted in English and observed to be understood by all on site.

2.9.2.1 A training program shall be documented and implemented that at a minimum outlines the necessary competencies for specific duties and the training methods to be applied to personnel carrying out tasks associated with: i. Implementing HACCP for staff involved in developing and maintaining food safety plans; ii. Monitoring and corrective action procedures for all staff engaged in monitoring critical control points (CCPs); iii. Personal hygiene for all staff involved in the handling of food products and food contact surfaces; iv. Good Manufacturing Practices and work instructions for all staff engaged in food handling, food processing, and equipment; v. Sampling and test methods for all staff involved in sampling and testing of raw materials, packaging, work-in-progress, and finished products; vi. Environmental monitoring for relevant staff; vii. Allergen management, food defense, and food fraud for all relevant staff; and viii. Tasks identified as critical to meeting the effective implementation and maintenance of the SQF code. The training program shall include provisions for identifying and implementing the refresher training needs of the organization.

RESPONSE: COMPLIANT

2.9.2.2 Training materials, the delivery of training, and procedures on all tasks critical to meeting regulatory compliance and the maintenance of food safety shall be provided in language(s) understood by staff.

RESPONSE: COMPLIANT

2.9.2.3 Training records shall be maintained and include: i. Participant name; ii. Skills description; iii. Description of the training provided; iv. Date training completed; v. Trainer or training provider; and vi. Verification that the trainee is competent to complete the required tasks.

RESPONSE: COMPLIANT

11.1.1 Premises Location and Approval

The site is located and operates in Murray Bridge in an established industrial area, none of which impact the current operations at the facility. The external environment is maintained by the site staff and surrounds were observed well maintained with no accumulation of debris at the site. The external environment is assessed as part of the GMP Audits to ensure the external environment is maintained to not pose a risk to the manufacturing operations. The site is registered with the Dairy Safe Accreditation No 1356 expiry dated 30/06/2022. The site is also registered for export Reg 815 3/01/19.

11.1.1.1 The site shall assess local activities and the site environment to identify any risks that may have an adverse impact on product safety and implement controls for any identified risks. The assessment shall be reviewed in response to any changes in the local environment or activities. The construction and ongoing operation of the premises on the site shall be approved by the relevant authority.

RESPONSE: COMPLIANT

11.1.2 Building Materials

Floors are constructed of acid resistant tiles and epoxy flooring sealed and are sloped towards the floor drainage system, Floor drainage is designed for ease of cleaning, well maintained and functional. Waste traps are located externally and they were observed to be well managed. Walls, partitions, ceilings and doors are constructed of suitable manufacturing materials (cold room paneling) and or materials which are smooth and impervious with a light in coloured finish and observed to be clean and satisfactorily maintained. Wall to wall and wall to floor junctions appropriately designed and maintained. Conduit and pipes that convey services in the main appropriately concealed designed for ease of cleaning. Product and handling areas have suitably designed ceilings. Floors were observed to be in good condition. There Stairs, Catwalks and Platforms throughout the facility and are designed / constructed not to pose a risk product, areas obtaining stairs, catwalks and platforms were free from waste and were deemed acceptable.

11.1.2.1 Floors shall be constructed of smooth, dense, impact-resistant material that can be effectively graded, drained, impervious to liquid, and easily cleaned. Floors shall be sloped to floor drains at gradients suitable to allow the effective removal of all overflow or wastewater under normal working conditions. Where floor drainage is not available, plumbed options to handle overflow or wastewater shall be in place.

RESPONSE: MINOR

EVIDENCE: Floors cracked in a number of areas within the Le Rice processing room hence floors not fully impervious in these areas.

ROOT CAUSE: Lack of Resources. Additional maintenance staff have been employed across both sites (previously 4 fitter and 3 electricians), now 6 fitters and 5 electricians and a administrator to help with PM scheduling.

CORRECTIVE ACTION: Holes filled, GMP audits to follow up

VERIFICATION OF CLOSEOUT: Sighted Photos of completed floor repairs. GMP audits include review of floors in all areas, actions now captured by Maintenance Up Keep program, Maintenance personnel trained 20/07/21, and now have additional resources.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.1.2.2 Drains shall be constructed and located so they can be easily cleaned and not present a hazard.

RESPONSE: COMPLIANT

11.1.2.3 Waste trap system shall be located away from any food handling areas or entrances to the premises.

RESPONSE: COMPLIANT

11.1.2.4 Walls, partitions, ceilings, and doors shall be of durable construction. Internal surfaces shall have an even and regular surface and be impervious with a light-colored finish and shall be kept clean (refer to 11.2.5). Wall-to-wall and wall-to-floor junctions shall be designed to be easily cleaned and sealed to prevent the accumulation of food debris.

RESPONSE: COMPLIANT

11.1.2.5 Ducting, conduit, and pipes that convey ingredients, products, or services, such as steam or water, shall be designed and constructed to prevent the contamination of food, ingredients, and food contact surfaces and allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

11.1.2.6 Pipes carrying sanitary waste or wastewater that are located directly over product lines or storage areas shall be designed and constructed to prevent the contamination of food, materials, ingredients, and food contact surfaces and shall allow ease of cleaning. A risk analysis shall be conducted to ensure food contamination risks are mitigated.

RESPONSE: COMPLIANT

11.1.2.7 Doors, hatches, and windows and their frames in food processing, handling, or storage areas shall be of a material and construction that meets the same functional requirements as for internal walls and partitions. Doors and hatches shall be of solid construction, and windows shall be made of shatterproof glass or similar material.

RESPONSE: COMPLIANT

11.1.2.8 Product shall be processed and handled in areas that are fitted with a ceiling or other acceptable structure that is constructed and maintained to prevent the contamination of products. Drop ceilings, where present, shall be constructed to enable monitoring for pest activity, facilitate cleaning, and provide access to utilities.

RESPONSE: COMPLIANT

11.1.2.9 Stairs, catwalks, and platforms in food processing and handling areas shall be designed and constructed so they do not present a product-contamination risk and with no open grates directly above exposed food product surfaces. They shall be kept clean (refer to 11.2.5).

RESPONSE: COMPLIANT

11.1.3 Lightings and Light Fittings

Lighting intensity is appropriate for the tasks performed. Light fittings in all areas where production and storage areas are shatterproof and or manufactured with a shatterproof covering. Lighting was observed to be intact in all areas of the factory.

11.1.3.1 Lighting in food processing and handling areas and at inspection stations shall be of appropriate intensity to enable the staff to carry out their tasks efficiently and effectively and shall comply with local light-intensity regulations or industry standards.

RESPONSE: COMPLIANT

11.1.3.2 Light fixtures in processing areas, inspection stations, ingredient and packaging storage areas, and all areas where the product is exposed shall be shatterproof, manufactured with a shatterproof covering or fitted with protective covers, and recessed into or fitted flush with the ceiling. Where fixtures cannot be recessed, structures must be protected from accidental breakage, manufactured from cleanable materials, and addressed in the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.1.3.3 Light fixtures in the warehouse or other areas where product is covered or otherwise protected shall be designed to prevent breakage and product contamination.

RESPONSE: COMPLIANT

11.1.4 Inspection/ Quality Control Area

Inspection areas are well maintained with appropriate lighting and hand wash facilities. There is a designated areas for the inspection and assessment of products online to ensure specifications and regulatory requirements are met and provided with sufficient lighting intensity.

11.1.4.1 If online inspection is required, a suitable area close to the processing line shall be provided for the inspection of product (refer to 2.4.4). The inspection/quality control area shall be provided with facilities that are suitable for examination and testing of the type of product being handled/processed. The inspection area shall: i. Have easy access to handwashing facilities; ii. Have appropriate waste handling and removal; and iii. Be kept clean to prevent product contamination.

RESPONSE: COMPLIANT

11.1.5 Dust, Insect, and Pest Proofing

External walls and doors were effectively sealed when closed commensurate with the risk of products manufactured. Ventilation fans are screen, personnel access doors are available for use with self-closing devices fitted. The HR/HC area has positive air pressure. The pest control program is maintained by the approved service provider and bait traps were located to not pose a risk to the products.

11.1.5.1 All external windows, ventilation openings, doors, and other openings shall be effectively sealed when closed, and proofed against dust, vermin, and other pests. External personnel access doors shall be effectively insect-proofed and fitted with a self-closing device and proper seals to protect against entry of dust, vermin, and other pests.

RESPONSE: COMPLIANT

11.1.5.2 External doors, including overhead dock doors in food handling areas used for product, pedestrian, or truck access, shall be designed and maintained to prevent pest ingress by at least one or a combination of the following methods: i. A self-closing device; ii. An effective air curtain; iii. A pest-proof screen; iv. A pest-proof annex; and v. Adequate sealing around trucks in docking areas.

RESPONSE: COMPLIANT

11.1.5.3 Electric insect control devices, pheromone, or other traps and baits shall be located and operated so they do not present a contamination risk to the product, packaging, containers, or processing equipment. Poison rodenticide bait shall not be used inside ingredients or product storage areas or processing areas where ingredients, packaging, and products are handled, processed, or exposed.

RESPONSE: COMPLIANT

11.1.6 Ventilation

Adequate ventilation has been provided in enclosed processing and product storage and handling areas. All areas of the processing facility were observed to have adequate ventilation. The HR/HC area - cream cheese room does have hepa filtered positive air pressure.

11.1.6.1 Adequate ventilation shall be provided in enclosed processing and food handling areas. Where appropriate, positive air-pressure systems shall be installed to prevent airborne contamination.

RESPONSE: COMPLIANT

11.1.6.2 All ventilation equipment and devices in product storage and handling areas shall be adequately cleaned as per 11.2.5 to prevent unsanitary conditions.

RESPONSE: COMPLIANT

11.1.6.3 Extractor fans and canopies shall be provided in areas where open cooking operations are carried out or a large amount of steam is generated. Capture velocities shall be sufficient to prevent condensation build-up and to evacuate all heat, fumes, and other aerosols to the exterior via an exhaust hood positioned over the cooker(s).

RESPONSE: COMPLIANT

11.1.6.4 Fans and exhaust vents shall be insect-proofed and located so they do not pose a contamination risk and shall be kept clean.

RESPONSE: COMPLIANT

11.1.7 Equipment and Utensils

These requirements are managed through the Good Manufacturing Procedure, this covers all requirements of the SQF standard. Equipment and utensils have been designed, constructed, installed, operated and maintained so as not to pose a contamination threat to product. Food containers are made from food grade plastics & bins used for waste bins are easily identified. Protective clothing is made from cotton materials easily laundered; PPE consists of disposable hair net, beard snood and overall and boots. Product contact surfaces have been designed, constructed and maintained appropriately with the risk of the process and product supplied. Contact surfaces are made from stainless steel and other metals and food grade plastics and rubbers where required. Standard dairy Industry equipment is used.

11.1.7.1 Specifications for equipment and utensils and procedures for purchasing equipment shall be documented and implemented.

RESPONSE: COMPLIANT

11.1.7.2 Equipment and utensils shall be designed, constructed, installed, operated, and maintained to meet any applicable regulatory requirements and to not pose a contamination threat to products.

RESPONSE: COMPLIANT

11.1.7.3 Equipment storage rooms shall be designed and constructed to allow for the hygienic and efficient storage of equipment and containers. Where possible, food contact equipment shall be segregated from non-food contact equipment.

RESPONSE: COMPLIANT

11.1.7.4 Product contact surfaces and those surfaces not in direct contact with food in food handling areas, raw material storage, packaging storage, and cold storage areas shall be constructed of materials that will not contribute to a food safety risk.

RESPONSE: COMPLIANT

11.1.7.5 Benches, tables, conveyors, mixers, mincers, graders, and other mechanical processing equipment shall be hygienically designed and located for appropriate cleaning. Equipment surfaces shall be smooth, impervious, and free from cracks or crevices.

RESPONSE: COMPLIANT

11.1.7.6 Product containers, tubs, and bins used for edible and inedible material shall be constructed of materials that are non-toxic, smooth, impervious, and readily cleaned as per 11.2.5.1. Bins used for inedible material shall be clearly identified.

RESPONSE: COMPLIANT

11.1.7.7 All equipment and utensils shall be cleaned after use (refer to 11.2.5.1) or at a set and validated frequency to control contamination and be stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

11.1.7.8 Vehicles used in food contact, handling, or processing zones or cold storage rooms shall be designed and operated so as not to present a food safety hazard.

RESPONSE: COMPLIANT

11.1.7.9 Non-conforming equipment shall be identified, tagged, and/or segregated for repair or disposal in a manner that minimizes the risk of inadvertent use, improper use, or risk to the integrity of finished product. Records of the handling, corrective action, and/or disposal of non-conforming equipment shall be maintained.

RESPONSE: COMPLIANT

11.1.8 Grounds and Roadways

Grounds and surrounding areas are satisfactorily maintained. No pest harborages observed. Paths, roadways and loading and unloading areas are satisfactorily maintained, clean and tidy. Paths from amenities leading to facility entrances are all hard surfaced. Work was observed to be well managed and there is no risk to product safety or quality.

11.1.8.1 A suitable external environment shall be established, and the effectiveness of the measures shall be monitored and periodically reviewed. The premises, its surrounding areas, storage facilities, machinery, and equipment shall be kept free of waste or accumulated debris, and vegetation shall be controlled so as not to attract pests and vermin or present a food safety hazard to the sanitary operation of the site.

RESPONSE: COMPLIANT

11.1.8.2 Paths, roadways, and loading and unloading areas shall be maintained so as not to present a hazard to the food safety operations of the premises. They shall be adequately drained to prevent the pooling of water. Drains shall be separate from the site drainage system and regularly cleared of debris.

RESPONSE: COMPLIANT

11.1.8.3 Paths from amenities leading to site entrances shall be effectively sealed.

RESPONSE: COMPLIANT

11.2.1 Repairs and Maintenance

Maintenance responsibilities are managed by the Maintenance Manager. The preventative and reactive maintenance program is managed via an electronic database Up Keep with a detailed list of assets now incorporated on the system and repairs/PM's logged via I Pad. It was sighted repairs and preventative maintenance task recorded eg Refrigeration Bi Monthly Service conducted by Cold Logic 1-2/06/21, Cream Cheese Air Conditioner serve and sanitation and Hepa Filter checks completed 14/05/21. Post Engineering Clearance is via the maintenance handover production form includes tools accounted for, no breakages, food contact surfaces cleaned and sanitised, completed via I Pad, signed by the Production Supervisor as was sighted after light replacement on the Le Rice Filler 4/06/21. The food processing equipment at the site is specified and designed to not present risk to product. Prior to purchase the equipment is specified to ensure its suitability in a food manufacturing environment and information is maintained in the maintenance department. The engineering /maintenance workshop was observed clean and tidy during the audit, and FG lubricants appropriately stored and segregated and labelled in the dedicated cabinet. Food Grade lubricants in use included Silicone Acetate FG NSF ANSI-61G and Lube Central Grease LE 4024, NSF H1 reg 125745. The workshops are located away from the processing areas and are subject to housekeeping audits as sampled and reviewed, swarf matts are also located at each work bench area.

11.2.1.1 The methods and responsibility for the maintenance and repair of plant, equipment, and buildings shall be documented, planned, and implemented in a manner that minimizes the risk of product, packaging, or equipment contamination.

RESPONSE: MINOR

EVIDENCE: Whilst new maintenance program Up Keep, has now been updated with all site assets, there were not PM's recorded for some assets on the new system eg Le Rice Osgood Filler, Cream Cheese Ulmer Slicing and Pack machine.

ROOT CAUSE: New system implementation, lack of training

CORRECTIVE ACTION: Pm's put in, examples attached. Training of maintenance staff in Upkeep procedures carried out, training from attached

VERIFICATION OF CLOSEOUT: Up Keep Maintenance program now implemented, sighted work orders generated eg WO 1326 Osgood 2 monthly service, WO 1325 Osgood Hopper Inspection, WO 1327 Osgood Filler Hose replacements, WO 1328 Involvo glue unit service, WO 1329 Involvo 2 monthly service, WO 1330 Mead Sleever 2 monthly service, WO 1331 Osgood O Ring replacements. Maintenance personnel trained Up Keep program 20/07/21.

COMPLETION DATE: 07/20/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.1.2 Routine maintenance of plant and equipment in any food processing, handling, or storage areas shall be performed according to a maintenance control schedule and recorded. The maintenance schedule shall be prepared to include buildings, equipment, and other areas of the premises critical to the maintenance of product safety.

RESPONSE: COMPLIANT

11.2.1.3 Failures of plant and equipment in any food processing, handling, or storage areas shall be documented and reviewed, and their repair(s) incorporated into the maintenance control schedule.

RESPONSE: COMPLIANT

11.2.1.4 Site supervisors shall be notified when maintenance or repairs are to be undertaken in any processing, handling, or storage areas.

RESPONSE: COMPLIANT

11.2.1.5 The maintenance supervisor and the site supervisor shall be informed if any repairs or maintenance activities pose a potential threat to product safety (e.g., pieces of electrical wire, damaged light fittings, and loose overhead fittings). When possible, maintenance is to be conducted outside operating times.

RESPONSE: COMPLIANT

11.2.1.6 Temporary repairs, where required, shall not pose a food safety risk and shall be included in routine inspections (refer to 2.5.4.3) and the cleaning program. There shall be a plan in place to address the completion of temporary repairs to ensure they do not become permanent solutions.

RESPONSE: COMPLIANT

11.2.1.7 Food contact equipment and equipment located over food contact equipment shall be lubricated with food-grade lubricant, and its use shall be controlled to minimize the contamination of the product.

RESPONSE: COMPLIANT

11.2.1.8 Paint used in a food handling or processing area shall be suitable for use, in good condition, and not be used on any product contact surfaces.

RESPONSE: COMPLIANT

11.2.2 Maintenance Staff and Contractors

Maintenance responsibilities are managed by the Maintenance Manager. Contractors are required to read the Visitors Contractors Handbook sign in log and have conducted the induction process including Hygiene and Covid 19 requirements.

11.2.2.1 Maintenance staff and contractors shall comply with the site's personnel and process hygiene requirements (refer to 11.3).

RESPONSE: COMPLIANT

11.2.2.2 All maintenance and other engineering contractors required to work on-site shall be trained in the site's food safety and hygiene procedures or shall be escorted at all times until their work is completed.

RESPONSE: COMPLIANT

11.2.2.3 Maintenance staff and contractors shall remove all tools and debris from any maintenance activity once it has been completed, and inform the area supervisor and maintenance supervisor, so appropriate hygiene and sanitation can be conducted and a pre-operational inspection completed prior to the restarting of site operations.

RESPONSE: COMPLIANT

11.2.3 Calibration

The site maintains a register of measuring and monitoring devices at the site to ensure the delivery of safe and quality products compliant with regulatory and legislation requirements. Monitoring and measuring equipment are logged on the Calibration Register 2020/21 includes department, model number, serial number, calibration frequency, date of last calibration, date of next calibration and calibration tolerances. The calibration procedure documents protocols to be taken when equipment is out of calibration and the identification of the equipment and any non-conforming products that may have been produced during that time and its isolation and review. Approved calibration contractors are used for the calibration of the instruments and equipment around the site as well as trained internal staff. Records reviewed demonstrate that measuring and monitoring equipment have been maintained as per scheduled requirements. Sighted records: Holding Tubes (5 yearly) by Matrix Process Solutions 15 March 2021 Milk Pastueriser maximum flow rate 350000L/H, 20.9 seconds, LeRice Cooker Holding Tubes 4/01/2016 maximum flow rate 350000L/H, 783 seconds, (now due for reverification), LeRice Cooker Integrity test 21/12/20 passed at 600kpa, Holding Tubes Milk Pasteuriser Temperature probes ex holding tube TT1151 and TT152 25/06/21 by Active Instruments and Controls, Pasteuriser Gas Integrity pressure check at 600kpa pass, no internal or external leaks, LeRice Cooker Hold Tubes out TT 7023, 25/06/21, Cooker pressure guages 23/10/20, L e Rice Hold Tank TT 7042 25/06/21, X ray 1.2 SS, 3.0 glass, 1.2 Ferrous calibrated by Mettler Toledo 1/03/21. Incubators internal calibration with reference probe 23/11/20 Anti Biotic Water Bath internal calibration with reference probe 23/11/20 Cool rooms dated 27/09/20 by Active Instruments and Controls.

11.2.3.1 The methods and responsibility for calibration and re-calibration of measuring, testing, and inspection equipment used for monitoring activities outlined in prerequisite programs, food safety 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

11.2.3.2 Equipment shall be calibrated against national or international reference standards and methods or to an accuracy appropriate to its use. In cases where standards are not available, the site shall provide evidence to support the calibration reference method applied.

RESPONSE: COMPLIANT

11.2.3.3 Calibration shall be performed according to regulatory requirements and/or to the equipment manufacturers' recommended schedule.

RESPONSE: MINOR

EVIDENCE: Internal calibration of a number of temperature probes eg LeRice pack room, Cream Cheese pack room not calibrated 6 monthly according to schedule ie last recorded calibration 21/05/2020. Also 5 yearly holding tube verification on the Rice Cooker has not been completed since 4/01/16 now due. Calibration of milk Pastueriser pressure gages was also not evident during the audit.

ROOT CAUSE: Inadequate Supervision and verification processes. Corrective Action 1. Added additional documents to check on Internal audit register. Ensured Holding Tube and pressure transducer planned calibration are in the Preventative Maintenance software

CORRECTIVE ACTION: Internal - CA - added additional documents to check on Internal Audit Schedule Hold time verification of Rice cooker, pressure test calibration of BHX1 26/07/21 Thermometers completed 05/07/21 Matrix onsite tomorrow 20/07/21 to do hold tube. Ensured calibrations in UpKeep _PM

VERIFICATION OF CLOSEOUT: Sighted calibrations completed 5/07/21 cream cheese temperature probe 905-T1 against reference probe, 20/07/21 LeRice Cooker Holding Tube verification by Matrix Process Solutions, 9 minutes 13 seconds hold time, Pastueriser Pressure Gauge BHX1 calibrated by Active Instruments 26/07/21. Internal audit schedule 2021 also now includes audit of calibration schedule and associated records. Calibrations also included in PM maintenance Up Keep schedule.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.3.4 Procedures shall be documented and implemented to address the resolution of potentially affected products when measuring, testing, or inspection equipment is found to be out of calibration.

RESPONSE: COMPLIANT

11.2.3.5 Calibrated measuring, testing, and inspection equipment shall be protected from damage and unauthorized adjustment or use.

RESPONSE: COMPLIANT

11.2.3.6 A directory of measuring, testing, and inspection equipment that require calibration and records of the calibration tests shall be maintained.

RESPONSE: COMPLIANT

11.2.4 Pest Prevention

These requirements are managed through the Pest Control Procedure FSP 4.8.4. This covers all requirements of the SQF standard, Responsibility lies with the QA Manager. Adams Pest Control is the service provider on a monthly service schedule. This has been in place for several years. The schedule details frequency of service, targeted pests and the notification in the event of pest activity or infestation. Reports outlines the date of treatment, licensed operator chemicals used, quantity, batch numbers and recommendations. Service reports sighted 4/06/21 10/05/21, 9/04/21, 5/03/21, 5/02/21, (feb to June 2021) high fence line and external activity, minimal internal activity in tin traps)11/01/21 . Corrective actions are clearly documented and there is no history of pest issues internally. Chemicals used, and dosages are clearly documented on service reports, and SDS's for chemicals eg Talon XT November 2016. There are comprehensive bait maps dated 15/01/21. Trending reports are evident within the database. Internal Pest Control audits are also planned with template developed, conducted with review of pest proofing, bait stations, internal findings etc. Licensed Technicians were noted to perform the services on site, local government credentials were observed to be up to date (eg Ross Noga License 54521, exp 19/04/22)

11.2.4.1 A documented pest prevention program shall be effectively implemented. It shall: i. Describe the methods and responsibility for the development, implementation, and maintenance of the pest prevention program; ii. Record pest sightings and trend the frequency of pest activity to target pesticide applications; iii. Outline the methods used to prevent pest problems; iv. Outline the pest elimination methods and the appropriate documentation for each inspection; v. Outline the frequency with which pest status is to be checked; vi. Include the identification, location, number, and type of applied pest control/monitoring devices on a site map; vii. List the chemicals used. The chemicals are required to be approved by the relevant authority and their Safety Data Sheets (SDS) made available; viii. Outline the methods used to make staff aware of the bait control program and the measures to take when they come into contact with a bait station; ix. Outline the requirements for staff awareness and training in the use of pest and vermin control chemicals and baits; and x. Measure the effectiveness of the program to verify the elimination of applicable pests and to identify trends.

RESPONSE: COMPLIANT

11.2.4.2 Pest contractors and/or internal pest controllers shall: i. Be licensed and approved by the local relevant authority; ii. Use only trained and qualified operators, who comply with regulatory requirements; iii. Use only approved chemicals; iv. Provide a pest prevention plan (refer to 2.3.2.8), which includes a site map, indicating the location of bait stations traps and other applicable pest control/monitoring devices; v. Report to a responsible authorized person on entering the premises and after the completion of inspections or treatments; vi. Provide regular inspections for pest activity with appropriate action taken if pests are present, and vii. Provide a written report of their findings and the inspections and treatments applied.

RESPONSE: COMPLIANT

11.2.4.3 Pest activity risks shall be analyzed and recorded. Inspections for pest activity shall be conducted on a regular basis by trained site personnel and the appropriate action taken if pests are present. Identified pest activity shall not present a risk of contamination to food products, raw materials, or packaging. Records of all pest control inspections and applications shall be maintained.

RESPONSE: COMPLIANT

11.2.4.4 Food products, raw materials, or packaging that are found to be contaminated by pest activity shall be effectively disposed of, and the source of pest infestation shall be investigated and resolved. Records shall be kept of the disposal, investigation, and resolution.

RESPONSE: COMPLIANT

11.2.4.5 Pesticides shall be clearly labeled and stored per 11.6.4 if kept on-site.

RESPONSE: COMPLIANT

11.2.4.6 No animals shall be permitted on-site in food handling and storage areas.

RESPONSE: COMPLIANT

11.2.5 Cleaning and Sanitation

These requirements are managed through the Cleaning and Sanitising Procedures FSP 4.5.2-3. This covers requirements of the SQF standard. Procedures include what and how to clean each machine and area as well as methods used to verify the effectiveness of cleaning (Cleaning procedures, cleaning schedules, Cleaning WI's, Monitoring & Verification) eg FSP 5.4.7 V 4.0 Cleaning Cream Cheese includes cleaning and sanitation chemicals, cleaning chemical guidelines, cleaning and sanitation procedures, cleaning materials, as well as ATP Hygiene Testing for Cream cheeses Production includes preoperational swabbing program for equipment and utensils (Pass<2.5, warning 2.5-3.0, Fail >3.0 (reclean, sanitise and retest). The responsibilities of this process are managed by the Departmental Managers & Quality Team. SDS register is also maintained for cleaning chemicals stored in secured compounds. Cleaning records are in the form of a Pre-Operational checks as cleaning is performed by the production team after production hours. Records sighted from November 2020 to June 2021. Corrective actions are clearly documented. Chemical usage including batch numbers, location used, and quantity are documented. CIP Procedure FSP 4.5.3-2 includes CIP parameter register, plant/process, caustic cycle, acid cycle, sanitiser, validations, flow rates temp and conductivity. CIP Validation references relate to: DFSV note 5 CIP and AS/NZS 2541.1998 Guide to CIP for dairy processing. Sighted CIP records for the areas – Pasteurizers, Cheddar Master 1 & 2 Areas, Cheddar Tower Hoppers, & Vat Room, Le Rice Processing - records November 2020 to June 2021. Verification of cleaning is performed via the use of environmental swabbing (ATP swabs), highlighted issues are addressed via a re-swabbing process and documented as a corrective action with a root cause investigation. Environmental Listeria (Monthly) & Rapid ATP swabbing (Daily) is undertaken as sighted records November 2020 to June 2021. CIP validation is conducted by Chemical Supplier Integra.

11.2.5.1 The methods and responsibility for the effective cleaning of the food handling and processing equipment and environment and storage areas shall be documented and implemented. Consideration shall be given to: i. What is to be cleaned; ii. How it is to be cleaned; iii. When it is to be cleaned; iv. Who is responsible for the cleaning; v. Validation of the cleaning procedures for food contact surfaces (including CIP); vi. Methods used to confirm the correct concentrations of detergents and sanitizers; and vii. The responsibility and methods used to verify the effectiveness of the cleaning and sanitation program.

RESPONSE: COMPLIANT

11.2.5.2 Detergents and sanitizers shall be suitable for use in a food manufacturing environment, labeled according to regulatory requirements, and purchased in accordance with applicable legislation. The organization shall ensure: i. The site maintains a list of chemicals approved for use; ii. An inventory of all purchased and used chemicals is maintained; iii. Detergents and sanitizers are stored as outlined in element 11.6.4; iv. Safety Data Sheets (SDS) are provided for all detergents and sanitizers purchased; and v. Only trained staff handle sanitizers and detergents.

RESPONSE: COMPLIANT

11.2.5.3 Detergents and sanitizers that have been mixed for use shall be correctly mixed according to the manufacturers' instructions, stored in containers that are suitable for use, and clearly identified. Mix concentrations shall be verified and records maintained.

RESPONSE: COMPLIANT

11.2.5.4 Cleaning-in-place (CIP) systems, where used, shall not pose a chemical contamination risk to raw materials, ingredients, or product. CIP parameters critical to assuring effective cleaning shall be defined, monitored, and recorded (e.g., chemical and concentration used, contact time, and temperature). CIP equipment, including spray balls, shall be maintained, and any modifications to CIP equipment shall be validated. Personnel engaged in CIP activities shall be effectively trained.

RESPONSE: COMPLIANT

11.2.5.5 Cleaning equipment, tools, racks, and other items used in support of the cleaning and sanitizing program shall be clearly identified, stored, and maintained in a manner that prevents contamination of processing areas, product handling equipment, and storage areas as well as the tools themselves.

RESPONSE: COMPLIANT

11.2.5.6 Suitably equipped areas shall be designated for cleaning product containers, knives, cutting boards, and other utensils used by staff. The areas for these cleaning operations shall be controlled so they do not interfere with manufacturing operations, equipment, or product. Racks and containers for storing cleaned utensils shall be provided as required.

RESPONSE: MINOR

EVIDENCE: It was observed during audit water spray from wash down of equipment/floors in the cream cheese processing and packing room went onto moulded plastic wrapped product being staged ready for cutting and sealing operations, hence potential for cross contamination

ROOT CAUSE: Inadequate supervision & training, lack of following procedures

CORRECTIVE ACTION: Has been tool boxed with the team to ensure the understanding of the team. We will also be covering the pallets of logs with a plastic liner like we do for finished mozz. Tool box to be imbedded ND

VERIFICATION OF CLOSEOUT: WIP Procedure amended and implemented to include covering of all WIP with Plastic liners to prevent any risk of contamination during changeovers, all personnel trained 26/07/2021.

COMPLETION DATE: 07/26/2021 **CLOSEOUT DATE:** 07/27/2021

11.2.5.7 Pre-operational inspections shall be conducted following cleaning and sanitation operations to ensure food processing areas, product contact surfaces, equipment, staff amenities, sanitary facilities, and other essential areas are clean before the start of production. Pre-operational inspections shall be conducted by qualified personnel.

RESPONSE: COMPLIANT

11.2.5.8 Staff amenities, sanitary facilities, and other essential areas shall be inspected by qualified personnel at a defined frequency to ensure the areas are clean.

RESPONSE: COMPLIANT

11.2.5.9 The responsibility and methods used to verify the effectiveness of the cleaning procedures shall be documented and implemented. A verification schedule shall be prepared. A record of pre-operational hygiene inspections, cleaning and sanitation activities, and verification activities shall be maintained.

RESPONSE: COMPLIANT

11.3.1 Personnel Welfare

These requirements are managed through the Good Manufacturing Requirements FSP 4.3.1.1-9. This covers all requirements of the SQF standard. There were no breaches of Hygiene & GMP policies observed during the audit.

11.3.1.1 Personnel who are known to be carriers of infectious diseases that present a health risk to others through the packing or storage processes shall not engage in the processing or packing of food or enter storage areas where food is exposed.

RESPONSE: COMPLIANT

11.3.1.2 The site shall have measures in place to prevent contact of materials, ingredients, food packaging, food, or food contact surfaces from any bodily fluids, open wounds, coughing, sneezing, spitting, or any other means. In the event of an injury that causes the spillage of bodily fluid, a properly trained staff member shall ensure that all affected areas, including handling and processing areas, have been adequately cleaned, and that all materials and products have been quarantined and/or disposed of.

RESPONSE: COMPLIANT

11.3.1.3 Personnel with exposed cuts, sores, or lesions shall not engage in handling or processing exposed products or handling primary (food contact) packaging or touching food contact surfaces. Minor cuts or abrasions on exposed parts of the body shall be covered with a colored, metal-detectable bandage or an alternative suitable waterproof and colored dressing.

RESPONSE: COMPLIANT

11.3.2 Handwashing

These requirements are managed through the Good Manufacturing Procedure FSP FSP 4.3.1.1-9. The hand washing stations have been installed in the amenities, lunchroom and entrance to the processing areas and accessible to all staff. The hand wash sinks have been made of stainless steel and have been equipped with disposable hand towels, water and soap and sanitizer. Appropriate signage is in place. Blue Disposable gloves are used in the high care cream cheese area.

11.3.2.1 All personnel shall have clean hands, and hands shall be washed by all staff, contractors, and visitors: i. On entering food handling or processing areas; ii. After each visit to a toilet; iii. After using a handkerchief; iv. After smoking, eating, or drinking; and v. After handling wash down hoses, cleaning materials, dropped product, or contaminated material.

RESPONSE: COMPLIANT

11.3.2.2 Handwashing stations shall be provided adjacent to all personnel access points and in accessible locations throughout food handling and processing areas as required.

RESPONSE: COMPLIANT

11.3.2.3 Handwashing stations shall be constructed of stainless steel or similar non-corrosive material and at a minimum supplied with: i. A potable water supply at an appropriate temperature; ii. Liquid soap contained within a fixed dispenser; iii. Paper towels in a hands-free cleanable dispenser; and iv. A means of containing used paper towels.

RESPONSE: COMPLIANT

11.3.2.4 The following additional facilities shall be provided in high-risk areas: i. Hands-free operated taps; and ii. Hand sanitizers.

RESPONSE: COMPLIANT

11.3.2.5 Signage in appropriate languages instructing people to wash their hands before entering the food processing areas shall be provided in a prominent position in break rooms, at break room exits, toilet rooms, and in outside eating areas, as applicable.

RESPONSE: COMPLIANT

11.3.2.6 When gloves are used, personnel shall maintain the handwashing practices outlined above.

RESPONSE: COMPLIANT

11.3.3 Clothing and Personal Effects

These requirements are managed through the Good Manufacturing Requirements FSP FSP 4.3.1.1-9. This covers all requirements of the SQF standard. Cotton uniforms are laundered by Alsco on a weekly basis. Disposable blue gloves used in high care cream cheese area, changed after each use. Uniforms are available in ample supply in the event that it becomes heavily soiled and can be changed and disposed in the allocated used laundry receptacle. Jewellery and other loose objects protocols have been documented and staff observed in compliance with the policies during the audit.

11.3.3.1 The site shall undertake a risk analysis to ensure that the clothing and hair policy protects materials, food, and food contact surfaces from unintentional microbiological or physical contamination.

RESPONSE: COMPLIANT

11.3.3.2 Clothing worn by staff engaged in handling food shall be maintained, stored, laundered, and worn so it does not present a contamination risk to products.

RESPONSE: COMPLIANT

11.3.3.3 Clothing, including shoes, shall be clean at the start of each shift and maintained in a serviceable condition.

RESPONSE: COMPLIANT

11.3.3.4 Excessively soiled uniforms shall be changed or replaced when they present a product contamination risk.

RESPONSE: COMPLIANT

11.3.3.5 Disposable gloves and aprons shall be changed after each break, upon re-entry into the processing area, and when damaged. Non-disposable aprons and gloves shall be cleaned and sanitized as required and when not in use stored on racks provided in the processing area or in designated sealed containers in personnel lockers. They should not be placed or stored on packaging, ingredients, product, or equipment.

RESPONSE: COMPLIANT

11.3.3.6 Protective clothing shall be manufactured from material that will not pose a food safety threat and is easily cleaned. All protective clothing shall be cleaned after use, or at a frequency to control contamination, and stored in a clean and serviceable condition to prevent microbiological or cross-contact allergen contamination.

RESPONSE: COMPLIANT

11.3.3.7 Racks shall be provided for the temporary storage of protective clothing when staff leave the processing area and shall be provided nearby or adjacent to the personnel access doorways and handwashing facilities.

RESPONSE: COMPLIANT

11.3.3.8 Jewelry and other loose objects shall not be worn or taken into a food handling or processing operation or into any area where food is exposed. Wearing plain bands with no stones, prescribed medical alert bracelets, or jewelry accepted for religious or cultural reasons can be permitted, provided these items are properly covered and do not pose a food safety risk. All exceptions shall meet regulatory and customer requirements and shall be subject to a risk assessment and evidence of ongoing risk management.

RESPONSE: COMPLIANT

11.3.4 Visitors

These requirements are managed through the Good Manufacturing Requirements FSP FSP 4.3.1.1-9 and the Induction process. This covers all requirements of the SQF standard. Visitors and Contractors are required to sign in / out and complete induction process and are accompanied while on site. Site rules requires the wearing of supplied clothing, footwear, PPE, removal of jewellery and follow all hygiene requirements and only allowable items enter processing. No breaches observed during the audit.

11.3.4.1 All visitors shall be trained in the site's food safety and hygiene procedures before entering any food processing and handling areas or shall be escorted at all times in food processing, handling, and storage areas.

RESPONSE: COMPLIANT

11.3.4.2 All visitors, including management staff, shall be required to remove jewelry and other loose objects in accordance with the facilities Good Manufacturing Practices and 11.3.3.8. All visitors shall wear suitable clothing and footwear when entering any food processing and handling area.

RESPONSE: COMPLIANT

11.3.4.3 Visitors exhibiting visible signs of illness shall be prevented from entering areas in which food is handled and processed.

RESPONSE: COMPLIANT

11.3.4.4 Visitors shall enter and exit food handling areas through the proper staff entrance points and comply with all handwashing and personnel practice requirements.

RESPONSE: COMPLIANT

11.3.5 Staff Amenities (change rooms, toilet, break rooms)

Staff amenities have adequate lighting and ventilation with adequate supplies of soap, water (Hot & Cold) air dryers and paper towel. Covid -19 has incorporated additional cleaning and sanitation and hand sanitation stations. Change rooms provided for staff were observed clean during the audit, with locker facilities available for staff to store personal belongings. Dedicated boot change and cross over bench for the High Care Cream Cheese operations. The lunchroom is located away from the processing facility, well-lit and ventilated and supplied with heating and refrigeration facilities, beverage making facilities and equipped with seating for the number of staff at the site. The area was observed clean and tidy during the audit. The area also provides a outdoor eating areas as well which is undercover. Covid -19 includes additional cleaning and sanitation and hand sanitation stations.

11.3.5.1 Staff amenities shall have documented cleaning procedures, be supplied with appropriate lighting and ventilation, and shall be made available for use by all persons engaged in the handling and processing of product.

RESPONSE: COMPLIANT

11.3.5.2 Change rooms shall be provided to enable staff and visitors to change into and out of protective clothing as required. Change rooms shall be kept clean.

RESPONSE: COMPLIANT

11.3.5.3 High-risk change areas shall be provided for staff engaged in the processing of high-risk foods or processing operations in which clothing can be soiled.

RESPONSE: COMPLIANT

11.3.5.4 Provision shall be made for staff to store their street clothing and personal items separate from clean uniforms, food contact zones, food, and packaging storage areas.

RESPONSE: COMPLIANT

11.3.5.5 Where required, a sufficient number of showers shall be provided for use by staff.

RESPONSE: COMPLIANT

11.3.5.6 Toilet rooms shall be: i. Designed and constructed so that they are accessible to staff and separate from any processing and food handling operations; ii. Accessed from the processing area via an airlock vented to the exterior or through an adjoining room; iii. Sufficient in number for the maximum number of staff; iv. Constructed so that they can be easily cleaned and maintained; v. Located inside or nearby areas for storing protective clothing, outer garments, and other items while using the facilities; and vi. Kept clean and tidy. Tools/equipment used for cleaning toilet rooms shall not be used to clean processing areas.

RESPONSE: COMPLIANT

11.3.5.7 Sanitary drainage shall not be connected to any other drains within the premises and shall be directed to a septic tank or a sewerage system in accordance with regulations.

RESPONSE: COMPLIANT

11.3.5.8 Handwashing basins shall be provided immediately outside or inside the toilet room and designed as outlined in 11.3.2.3.

RESPONSE: COMPLIANT

11.3.5.9 Separate break rooms shall be provided away from food contact/handling zones. Break rooms shall be: i. Ventilated and well lit; ii. Provided with adequate tables and seating to cater for the maximum number of staff at one sitting; iii. Equipped with a sink serviced with hot and cold potable water for washing utensils; iv. Equipped with refrigeration and heating facilities, enabling staff to store or heat food and to prepare non-alcoholic beverages if required; and v. Kept clean and free from waste materials and pests.

RESPONSE: COMPLIANT

11.3.5.10 Where outside eating areas are provided, they should be kept clean and free from waste materials and maintained in a manner that minimizes the potential for the introduction of contamination, including pests to the site.

RESPONSE: COMPLIANT

11.4.1 Staff Engaged in Food Handling and Processing Operations

These requirements are managed through the Good Manufacturing Requirements FSP FSP 4.3.1.1-9. Operations personnel were observed complying with the GMP requirements at the site, inclusive of washing hands when entering the processing facility, all doors were observed kept closed, compliance to personal hygiene requirements, all finished product and raw materials observed stored on pallets or crates and off the floor, identified waste receptacles and no accumulation of debris.

11.4.1.1 All personnel engaged in any food handling, preparation, or processing operations shall ensure that products and materials are handled and stored in such a way as to prevent damage or product contamination. They shall comply with the following processing practices: i. Personnel entry to processing areas shall be through the personnel access doors only; ii. All doors are to be kept closed. Doors shall not be open for extended periods when access is required for waste removal or receiving of product/ingredient/packaging; iii. Packaging, product, and ingredients shall be kept in appropriate containers as required and off the floor; iv. Waste shall be contained in the bins identified for this purpose and removed from the processing area on a regular basis and not left to accumulate; and v. All wash down and compressed air hoses shall be stored on hose racks after use and not left on the floor.

RESPONSE: COMPLIANT

11.4.1.2 Personnel working in or visiting food handling or processing operations shall ensure that: i. Staff shall not eat or taste any product being processed in the food handling/contact zones, except as noted in element 11.4.1.4; ii. The wearing of false fingernails, false eyelashes, eyelash extensions, long nails, or fingernail polish is not permitted when handling exposed food; iii. Hair restraints and beard covers, where applicable, shall be used in areas where product is exposed. iv. Smoking, chewing, eating, or spitting is not permitted in areas where product is produced, stored, or otherwise exposed. v. Drinking water is permissible only under conditions that prevent contamination or other food safety risks from occurring. Drinking water containers in production and storage areas shall be stored in clear, covered containers, and in designated areas away from raw materials, packaging, tools, or equipment storage.

RESPONSE: COMPLIANT

11.4.1.3 The flow of personnel in food processing and handling areas shall be managed such that the potential for contamination is minimized.

RESPONSE: COMPLIANT

11.4.1.4 In circumstances where it is necessary to undertake sensory evaluations in a food handling/contact zone, the site shall implement controls and procedures to ensure: i. Food safety is not compromised; ii. Sensory evaluations are conducted by authorized personnel only; iii. A high standard of personal hygiene is practiced by personnel conducting sensory evaluations; iv. Sensory evaluations are conducted in areas equipped for the purpose; and v. Equipment used for sensory evaluations is sanitized, maintained, and stored separately from processing equipment.

RESPONSE: COMPLIANT

11.5.1 Water Supply

These requirements are managed through the Potable Water Testing Procedure FSP 4.16-3. Water supply is sourced from municipal water supply (SA Mains Water) and used for processing and cleaning with supplies of hot and cold water readily available. Water at the site complies with water drinking guidelines. The delivery of water within the premises is protected and identified to ensure that the water systems are not contaminated.

11.5.1.1 Adequate supplies of potable water drawn from a known clean source shall be provided for water used as an ingredient during processing operations and for cleaning the premises and equipment. The source of potable water shall be identified as well as on-site storage (if applicable) and reticulation within the facility.

RESPONSE: COMPLIANT

11.5.1.2 Contingency plans shall be in place for instances when the potable water supply is deemed to be contaminated or otherwise inappropriate for use.

RESPONSE: COMPLIANT

11.5.1.3 Supplies of hot and cold water shall be provided, as required, to enable the effective cleaning of the premises and equipment.

RESPONSE: COMPLIANT

11.5.1.4 The delivery of water within the premises shall ensure potable water is not contaminated. Testing of the backflow system, where possible, shall be conducted at least annually and records shall be maintained.

RESPONSE: COMPLIANT

11.5.1.5 The use of non-potable water shall be controlled such that: i. There is no cross-contamination between potable and non-potable water lines; ii. Non-potable water piping and outlets are clearly identified; and iii. Hoses, taps, and other similar sources of possible contamination are designed to prevent backflow or back-siphonage.

RESPONSE: COMPLIANT

11.5.1.6 Where water is stored on-site, storage facilities shall be adequately designed, constructed, and routinely cleaned to prevent contamination.

RESPONSE: COMPLIANT

11.5.2 Water Treatment

Ro water used for rennet additions and boiler water, testing program in place, all other water is potable mains water. These requirements are managed through the Potable Water Testing Procedure FSP 4.16-3. This covers all requirements of the SQF standard (water sampling plan NBLAMM.013) which covers hand washing stations, RO plant, Reverse Omisisi, condensate, Mains all areas 5 samples per month. Water testing is conducted monthly by a NATA lab 1247 - ALS (Coliforms & E. coli) Records sighted 21/05/21, 29/04/21, 31/03/21, 25/02/21,28/01/21(29/04/21, 31/03/21 several low level coliform results, rechecks ND) all other results ND /100ml.

11.5.2.1 Water treatment methods, equipment, and materials, if required, shall be designed, installed, and operated to ensure water receives effective treatment. Water treatment equipment shall be monitored regularly to ensure it remains serviceable.

RESPONSE: COMPLIANT

11.5.2.2 Water used as an ingredient in processing or for cleaning and sanitizing equipment shall be tested and, if required, treated to maintain potability (refer to 11.5.2.1).

RESPONSE: COMPLIANT

11.5.2.3 Treated water shall be regularly monitored to ensure it meets the specified indicators. Water treatment chemicals usage shall be monitored to ensure chemical residues are within acceptable limits. Records of testing results shall be kept.

RESPONSE: COMPLIANT

11.5.3 Water Quality

These requirements are managed through the Potable Water Testing Procedure FSP 4.16-3. This covers all requirements of the SQF standard (water sampling plan NBLAMM.013) which covers hand washing stations, RO plant, Reverse Omisisi, condensate, Mains all areas 5 samples per month. Water testing is conducted monthly by a NATA lab 1247 - ALS (Coliforms & E. coli) Records sighted 21/05/21, 29/04/21, 31/03/21, 25/02/21,28/01/21(29/04/21, 31/03/21 several low level coliform results, rechecks ND) all other results ND /100ml. Water supply are sourced from municipal water supply and used for processing and cleaning with supplies of hot and cold water readily available. Water at the site complies with water drinking guidelines. The delivery of water within the premises is protected and identified to ensure that the water systems are not contaminated.

11.5.3.1 Water shall comply with local, national, or internationally recognized potable water microbiological and quality standards, as required when used for: i. Washing, thawing, and treating food; ii. Handwashing; iii. Conveying food; iv. An ingredient or food processing aid; v. Cleaning food contact surfaces and equipment; vi. The manufacture of ice; or vii. The manufacture of steam that will come into contact with food or be used to heat water that will come into contact with food.

RESPONSE: MINOR

EVIDENCE: Brine water in Brine tank used for hard cheese manufacture, observed mould on surface of tank. There had been no hard cheese manufacture for a long period.

ROOT CAUSE: Inadequate supervision, lack of procedure. Corrective Cation: Brine tank cleanliness added to FSP 5.8 Form 2 Brine Tanks

CORRECTIVE ACTION: Mould removed, amended FSP 5.8 Form 4-2 to capture and remined on cleaning & condition

VERIFICATION OF CLOSEOUT: Sighted amended FSP 5.8 Form 4- 3 has been updated 2607/21 to review brine tank cleanliness and condition, no visible mould or dust, weekly verification when not running and before use. Also sighted photo of clean brine solution.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.5.3.2 Microbiological analysis of the water and ice supply shall be conducted to verify the cleanliness of the supply, the monitoring activities, and the effectiveness of the treatment measures implemented. Samples for analysis shall be taken at sources supplying water for the process or cleaning or from within the site. The frequency of analysis shall be risk-based and at a minimum annually.

RESPONSE: COMPLIANT

11.5.3.3 Water and ice shall be analyzed using reference standards and methods.

RESPONSE: COMPLIANT

11.5.4 Ice Supply

NA - No ice processing conducted onsite

11.5.4.1 Ice provided for use during processing operations, as a processing aid, or an ingredient shall comply with 11.5.3.1.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No ice processing conducted onsite

11.5.4.2 Ice that is purchased shall be from an approved supplier and included in the site's food safety risk assessment. Ice shall be supplied in containers that are appropriate for use, cleanable if reused, and tested as appropriate.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No ice processing conducted onsite

11.5.4.3 Ice rooms and receptacles shall be constructed of materials as outlined in element 11.1.2 and designed to minimize contamination of the ice during storage, retrieval, and distribution.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No ice processing conducted onsite

11.5.5 Air and Other Gasses

NA - No compressed air or Nitrogen comes into contact with Food or Food surfaces Compressed air, not used in direct contact with the food, is monitored and maintained at the site.

11.5.5.1 Compressed air or other gases (e.g., nitrogen or carbon dioxide) that contact food or food contact surfaces shall be clean and present no risk to food safety.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No compressed air or Nitrogen comes into contact with Food or Food surfaces

11.5.5.2 Compressed air systems and systems used to store or dispense other gases that come into contact with food or food contact surfaces shall be maintained and regularly monitored for quality and applicable food safety hazards. The frequency of analysis shall be risk-based and at a minimum annually.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No compressed air or Nitrogen comes into contact with Food or Food surfaces

11.6.1 Receipt, Storage and Handling of Goods

These requirements are managed through the Good Manufacturing Requirements FSP 4.3.1.1.6. This covers all requirements of the SQF standard. Dry ambient product well maintained, packaging is stored on racking and or pallets and wrapped until used. No pests noted during the audit. Chilled goods are kept in refrigerated areas. Unused equip is also stored on pallets were possible and the area is tidy,

11.6.1.1 The site shall document and implement an effective storage plan that allows for the safe, hygienic receipt and storage of raw materials (i.e., frozen, chilled, and ambient), ingredients, packaging, equipment, and chemicals.

RESPONSE: COMPLIANT

11.6.1.2 Controls shall be in place to ensure all ingredients, raw materials, processing aids, and packaging are received and stored properly to prevent cross-contamination risks. Unprocessed raw materials shall be received and stored separately from processed raw materials to avoid cross-contamination risk.

RESPONSE: COMPLIANT

11.6.1.3 The responsibility and methods for ensuring effective stock rotation principles shall be documented and implemented.

RESPONSE: COMPLIANT

11.6.1.4 Procedures shall be in place to ensure that all ingredients, materials, work- in-progress, rework, and finished product are utilized within their designated shelf-life.

RESPONSE: COMPLIANT

11.6.1.5 Where raw materials, ingredients, packaging, equipment, and chemicals are held under temporary or overflow conditions that are not designed for the safe storage of goods, a risk analysis shall be undertaken to ensure there are no risks to the integrity of those goods, no potential for contamination or adverse effect on food safety.

RESPONSE: COMPLIANT

11.6.1.6 Records shall be available to verify the effectiveness of alternate or temporary control measures for the storage of raw materials, ingredients, packaging, equipment, chemicals, or finished products.

RESPONSE: COMPLIANT

11.6.2 Cold Storage, Freezing and Chilling of Foods

Temperature controlled storage facilities are effective in maintaining product quality and safety and observed well maintained and clean. There are several temperature-controlled storage facilities available to store the maximum capacity of product and to allow for cleaning of cold stores. Chillers and freezers have been designed and constructed for the safe handling of food. Discharge from defrost and condensate lines are discharged directly to the drainage system. The refrigeration is calibrated annually (18/09/20) and monitored daily. Data Logging records sighted for cold rooms 1a and 1B 1/01/21 to 28/06/21 compliant in the main 25 to 3.5C. Also maintenance record all Cool rooms and freezer temperature readouts sighted 29/06/21 to 12/05/21 compliant and are also alarmed.

11.6.2.1 The site shall provide confirmation of the effective operational performance of freezing, chilling, and cold storage facilities. Chillers, blast freezers, and cold storage rooms shall be designed and constructed to allow for the hygienic and efficient refrigeration of food and be easily accessible for inspection and cleaning.

RESPONSE: COMPLIANT

11.6.2.2 Sufficient refrigeration capacity shall be available to chill, freeze, store chilled, or store frozen the maximum anticipated throughput of product with allowance for periodic cleaning of refrigerated areas.

RESPONSE: COMPLIANT

11.6.2.3 The site shall have a written procedure for monitoring temperatures, including the frequency of checks, and corrective actions, if the temperature is out of specification. Freezing, chilling, and cold storage rooms shall be fitted with temperature monitoring equipment that is located to monitor the warmest part of the room and be fitted with a temperature measurement device that is easily readable and accessible. Records shall be kept of frozen, cold, and chilled storage room temperatures.

RESPONSE: MINOR

EVIDENCE: The room used tray packing of cream cheese products and storage of small amounts of work in progress cream cheese sealed packs is not currently on the temperature monitoring program to ensure temperatures do not exceed limits for these products.

ROOT CAUSE: Management oversight, CA, One point Lesson conducted on need to remove all product into cool room at end of packing shift

CORRECTIVE ACTION: Removed product out of room, end of pack shift all product will be moved to cold room, One Point Lesson conducted that all product to be moved to coolroom at end of production

VERIFICATION OF CLOSEOUT: Procedure now to move product to Main cold room, no storage in tray pack room, main cold room is monitored via data logger and manual temperature log as sighted during audit. Sighted training record for all relative employees 26/07/21.

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11.6.2.4 Discharge from defrost and condensate lines shall be controlled and discharged into the drainage system.

RESPONSE: COMPLIANT

11.6.3 Storage of Dry Ingredients, Packaging, and Shelf Stable Packaged Goods

Product packaging is stored in the warehouse and protected from contamination and deterioration. The racks are steel racking and packaging were observed in racking and /or on pallets and does not present as a harborage point for pest. The forklifts used are in an open environment and do not present a risk.

11.6.3.1 Rooms used for the storage of product ingredients, packaging, and other dry goods shall be located away from wet areas and constructed to protect the product from contamination and deterioration and prevent packaging from becoming a harborage for pests or vermin.

RESPONSE: COMPLIANT

11.6.3.2 Racks provided for the storage of packaging shall be constructed of impervious materials and designed to enable cleaning and inspection of the floors and behind the racks. Storage areas shall be cleaned at a pre-determined frequency.

RESPONSE: COMPLIANT

11.6.4 Storage of Hazardous Chemicals and Toxic Substances

Cleaning equipment and cleaning chemicals were observed stored in the designated and secured cleaning chemical storage facility. There was no packaging or utensils observed stored in the cleaning chemical storage facility. The pest control chemicals are only administered by the approved contracted service provider. Cleaning chemicals were observed stored in their original containers. Signage was observed on the door of the cleaning chemical storage facility indicating that it is a hazardous storage area, with SDS's available. Note: Spill kits were evident around the facility.

11.6.4.1 Hazardous chemicals and toxic substances with the potential for food contamination shall be: i. Clearly labeled, identifying and matching the contents of their containers; ii. Included in a current register of all hazardous chemicals and toxic substances that are stored on-site; and iii. Supplemented with current Safety Data Sheets (SDS) made available to all staff.

RESPONSE: COMPLIANT

11.6.4.2 Storage of hazardous chemicals and toxic substances shall be: i. Located in an area with appropriate signage indicating that the area is for hazardous storage; ii. Controlled, lockable, and accessible only by personnel trained in the storage and use of chemicals; iii. Adequately ventilated; iv. Stored where intended and not comingled (e.g., food versus non-food grade); v. Designed such that pesticides, rodenticides, fumigants, and insecticides are stored separately from sanitizers and detergents; and vi. Stored in a manner that prevents a hazard to finished product or product contact surfaces. Processing utensils and packaging shall not be stored in areas used to store hazardous chemicals and toxic substances.

RESPONSE: COMPLIANT

11.6.4.3 Hazardous chemicals and toxic substances shall be correctly labeled and: i. Used only according to manufacturers' instructions; ii. Controlled to prevent contamination or a hazard to raw and packaging material, work-inprogress, finished product, or product contact surfaces; iii. Returned to the appropriate storage areas after use; and iv. Be compliant with national and local legislation.

RESPONSE: COMPLIANT

11.6.4.4 Daily supplies of chemicals used for continuous sanitizing of water, as a processing aid, or for emergency cleaning of food processing equipment and surfaces in food contact zones may be stored within or in close proximity to a processing area, provided that access to the chemical storage facility is restricted to only authorized personnel.

RESPONSE: COMPLIANT

11.6.4.5 Personnel who handle hazardous chemicals and toxic substances, including pesticides and cleaning chemicals,: i. Shall be fully trained in the purpose of the hazardous chemicals and toxic substances, their storage, handling, and use; ii. Be provided first aid equipment and personnel protective equipment (PPE); and iii. Ensure compliance with the proper identification, storage, usage, disposal, and clean-up requirements.

RESPONSE: COMPLIANT

11.6.4.6 The site shall dispose of empty, obsolete, and unused chemicals, pesticides, toxic substances, and containers in accordance with requirements and ensure that primary containers are: i. Not reused; ii. Segregated and securely stored prior to collection; and iii. Disposed through an approved vendor.

RESPONSE: COMPLIANT

11.6.4.7 In the event of a hazardous spill, the site shall: i. Have spillage clean-up instructions to ensure that the spill is properly contained; and ii. Be equipped with PPE, spillage kits, and cleaning equipment.

RESPONSE: COMPLIANT

11.6.5 Loading, Transport, and Unloading Practices

Well established protocols in place for the loading, transport and unloading of raw materials and finished products at the site and implemented to ensure that food safety and integrity is maintained. Distribution of finished products is contracted to an approved service provider, Eades Transport and the delivery of raw milk is contracted to McColls Transport. Transport vehicles are checked for security and hygiene (acknowledge condition of floor, walls, rails, doors, door seals, no doors) and temperature prior to loading, as well as temperature check of set point and actual temperature prior to loading as per records sighted for in and out loads 28/06/21, 7/06/21, 26/02/21, 31/07/21 demonstrated compliance.

11.6.5.1 The practices applied during loading, transport, and unloading of food shall be documented, implemented, and designed to maintain appropriate storage conditions and product integrity. Foods shall be loaded, transported, and unloaded under conditions suitable to prevent cross-contamination.

RESPONSE: COMPLIANT

11.6.5.2 Vehicles (e.g., trucks/vans/containers) used for transporting food within the site and from the site shall be inspected prior to loading to ensure they are clean, in good repair, suitable for the purpose, and free from odors or other conditions that may impact negatively on the product.

RESPONSE: COMPLIANT

11.6.5.3 Vehicles (e.g., trucks/vans/containers) shall be secured from tampering using seals or other agreed-upon and acceptable devices or systems.

RESPONSE: COMPLIANT

11.6.5.4 Loading and unloading docks shall be designed to protect the product during loading and unloading. Loading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity during loading and transport.

RESPONSE: COMPLIANT

11.6.5.5 Refrigerated units shall maintain the product at the required temperature. The unit's temperature settings shall be set, checked, and recorded before loading, and the product temperature shall be recorded at regular intervals during loading, as applicable.

RESPONSE: COMPLIANT

11.6.5.6 The refrigeration unit shall be operational at all times and checks completed of the unit's operation, the door seals, and the storage temperature at regular intervals during transit.

RESPONSE: COMPLIANT

11.6.5.7 On arrival, prior to opening the doors, the food transport vehicle's refrigeration unit's storage temperature settings and operating temperature shall be checked and recorded. Unloading shall be completed efficiently, and product temperatures shall be recorded at the start of unloading and regular intervals during unloading.

RESPONSE: COMPLIANT

11.6.5.8 Unloading practices shall be designed to minimize unnecessary exposure of the product to conditions detrimental to maintaining product and package integrity.

RESPONSE: COMPLIANT

11.7.1 High-Risk Processes

The cream cheese area is a High Care area, the requirements are managed through the Good Manufacturing Procedure FSP 4.3.1.1-6 , Transfer of packaging and raw materials is suitably controlled into the packing facility. Changing procedures are clearly documented including cross over bench, appropriate signage is in place at all entrances to the facility, waste chute for removal of waste. Microbiological records demonstrate that the cleaning program is effectively implemented, Cream Cheese – monthly listeria swabs, min 12 swabs taken from random areas within the HC area, sighted records January to June 2021 compliant. Pre-operational checks (Pre-Operational Checks June to Jan 2021 have been completed daily to ensure that hygiene standards prior to start up are satisfactory. Personnel were observed to follow the high care and low risk principles as documented for the site. There is clear demarcation of high care and low risk areas.

11.7.1.1 The processing of high-risk food shall be conducted under controlled conditions, such that sensitive areas, in which the high-risk food has undergone a "kill" step, a "food safety intervention" or is subject to post-process handling, are protected/segregated from other processes, raw materials, or staff who handle raw materials, to ensure cross-contamination is minimized.

RESPONSE: COMPLIANT

11.7.1.2 Ambient air in high-risk areas shall be tested at least annually to confirm that it does not pose a risk to food safety.

RESPONSE: COMPLIANT

11.7.1.3 Areas in which high-risk processes are conducted shall only be serviced by staff dedicated to that function.

RESPONSE: COMPLIANT

11.7.1.4 Staff engaged in high-risk areas shall change into clean clothing and footwear or temporary protective outerwear when entering high-risk areas. Staff access points shall be located, designed, and equipped to enable staff to change into the distinctive protective clothing and practice a high standard of personal hygiene to prevent product contamination.

RESPONSE: MINOR

EVIDENCE: Whilst staff change into clean boots after cross over bench in high risk cream cheese room entry, temporary protective outer wear or clean clothing is not donned when entering the high risk area (laundered clothing is donned in non high risk change room).

ROOT CAUSE: Different interpretation of High Care compared to previous, Management oversight. One Point Lesson conducted to explain need to wear over coat/jacket to reduce risk

CORRECTIVE ACTION: Disposable coats ordered, and a toolbox held to ensure understanding of what is required.

VERIFICATION OF CLOSEOUT: Procedure amended to include use of disposable coats at high care cross over change area at entry to high care room to ensure no exposed pre donned clothing when entering the room. Employees trained in new procedure 26/07/21. Sighted photo of employee in clean outer garment (disposable coat), hair net, clean boots and disposable gloves, covid mask.

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11.7.1.5 Product transfer points shall be located and designed, so they do not compromise high-risk segregation and minimize the risk of cross-contamination.

RESPONSE: COMPLIANT

11.7.2 Thawing of Food

NA - No thawing of raw materials or product on site.

11.7.2.1 Thawing of food shall be undertaken in equipment and rooms appropriate for the purpose. Equipment for water thawing shall be continuous flow to ensure the water exchange rate and temperature do not contribute to product deterioration or contamination. Water overflow shall be directed into the floor drainage system and not onto the floor or shall be appropriately plumbed.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No thawing of raw materials or product on site.

11.7.2.2 Air thawing facilities shall be designed to thaw food under controlled conditions at a rate and temperature that does not contribute to product deterioration or contamination.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No thawing of raw materials or product on site.

11.7.2.3 Provision is to be made for the containment and regular disposal of used cartons and packaging from thawed product so that there is no risk to the product.

RESPONSE: NOT APPLICABLE

EVIDENCE: NA - No thawing of raw materials or product on site.

11.7.3 Control of Foreign Matter Contamination

Foreign matter controls are documented in the HACCP plans and appropriate control measures and monitoring documentation have been maintained. Controls are also detailed in the Foreign Matter Prevention Procedure FSP 4.3.1.5 dated 27/04/20. Policies for metal, glass and brittle materials, wood and chemical controls are implemented throughout the facility with operators aware of the requirements and initiatives. Cleaning chemicals and equipment lubricants and greases are stored in a secured area and current SDS's available. Pre-operational checks include an assessment for hygiene, labels, functionality of equipment is completed by the trained operatives and clearance for packing processes to commence. Records sighted Pre-Operational Checks 28/06/21, 1/06/21, 19/04/21, 31/03/21, 7/01/21, 3/11/20. The site performs GMP Audits sighted audit 2/02/21 all areas included pest control, CCP's, Foreign matter, basic GMP, jewellery compliance etc, 4/05/21 different format with separate audits conducted for foreign matter, Hand washing, door audits and other focus areas, with scoring system used, corrective actions are clearly documented. Issues requiring action are logged in the maintenance system. Glass and Brittle plastics are controlled on site and managed via preoperational checks and GMP audits. Glass and Hard Plastics registers maintained per area, as sighted Le Rice wash area and packing 30/03/20 Processing and fill room 2/03/20, Cheddar production areas and vat room 12/05/20 , cream cheese 12/05/20, Le Rice 11/05/20 investigation and corrective action noted. Glass Breakage Procedure documents the requirements for glass breakage kits as observed at key locations around the facility. Register of permissible items allows registered items at the site. All products are subject to being metal detected. This process was observed to be well managed during the audit.

11.7.3.1 The responsibility and methods used to prevent foreign matter contamination of the product shall be documented, implemented, and communicated to all staff. Inspections shall be performed (refer to 2.5.4.3) to ensure plant and equipment remain in good condition and equipment has not become detached or deteriorated and is free from potential contaminants.

RESPONSE: MINOR

EVIDENCE: Glass and hard plastic register condition inspection has not occurred annually as required by schedule eg Le Rice Room last completed in March 2020. High Risk items are inspected during preoperational inspections and GMP audits.

ROOT CAUSE: Inadequate training and handover to new QM

CORRECTIVE ACTION: Lists updated and added in Internal Audit schedule to ensure completion

VERIFICATION OF CLOSEOUT: Sighted glass and hard plastics register audit 6-12/07/21, all areas, all items, condition of each item checked, if condition deteriorating or unsatisfactory, reported and Up Keep maintenance request completed. Has now been included in Internal Audit schedule dated 26/07/21.

COMPLETION DATE: 07/24/2021 **CLOSEOUT DATE:** 07/27/2021

11.7.3.2 Containers, equipment, and other utensils made of glass, porcelain, ceramics, laboratory glassware, or other similar materials shall not be permitted in food processing /contact zones (except where the product is contained in packaging made from these materials, or measurement instruments with glass dial covers are used, or MIG thermometers are required under regulation). Where glass objects or similar material are required in food handling/contact zones, they shall be listed in a glass inventory, including details of their location and condition.

RESPONSE: COMPLIANT

11.7.3.3 Regular inspections of food handling/contact zones shall be conducted (refer to 2.5.4.3) to ensure they are free of glass or other like material and to establish changes to the condition of the objects listed in the glass inventory.

RESPONSE: COMPLIANT

11.7.3.4 Glass instrument dial covers on processing equipment and MIG thermometers shall be inspected at the start of each shift to confirm they have not been damaged.

RESPONSE: COMPLIANT

11.7.3.5 In circumstances where glass or similar material breakage occurs, the affected area shall be isolated, cleaned, thoroughly inspected (including cleaning equipment and footwear), and cleared by a suitably responsible person prior to the start of operations.

RESPONSE: COMPLIANT

11.7.3.6 Wooden pallets and other wooden utensils used in food processing and handling areas shall be dedicated for that purpose, clean, and maintained in good order. Their condition shall be subject to regular inspection.

RESPONSE: COMPLIANT

11.7.3.7 Loose metal objects on equipment, equipment covers, and overhead structures shall be removed or tightly fixed so as not to present a hazard.

RESPONSE: COMPLIANT

11.7.3.8 Knives and cutting instruments used in processing and packaging operations shall be controlled, kept clean, and well maintained. Snap-off blades shall not be used in manufacturing or storage areas.

RESPONSE: COMPLIANT

11.7.3.9 Gaskets, rubber impellers, and other equipment made of materials that can wear or deteriorate over time shall be inspected on a regular frequency (refer to 2.5.4.3).

RESPONSE: COMPLIANT

11.7.4 Detection of Foreign Objects

Documented protocols in place which includes inspection and disposition of affected product. All products are subject to being metal detected or X Rayed. This process was observed to be well managed during the audit and is a CCP requirement. Sighted Records 28/06/21, 1/06/21, 19/04/21, 31/03/21, 7/01/21, 3/11/20 were compliant. Team members using the X Ray and MD machines were noted to be suitably trained. Procedures are clearly documented in the Good Manufacturing Procedure.

11.7.4.1 The responsibility, methods, and frequency for monitoring, maintaining, calibrating, and using screens, sieves, filters, or other technologies to remove or detect foreign matter shall be documented and implemented.

RESPONSE: COMPLIANT

11.7.4.2 Where detection and/or removal systems are used, the site shall establish limits for detection, based on a risk assessment of the product and its packaging, and identify the location(s) of the detector(s) in the process.

RESPONSE: COMPLIANT

11.7.4.3 Metal detectors or other physical contaminant detection technologies shall be routinely monitored, validated, and verified for operational effectiveness. The equipment shall be designed to isolate defective product and indicate when it is rejected.

RESPONSE: MINOR

EVIDENCE: The cream cheese line metal detector has swing reject arm into stainless steel cage, however cage is not secured/locked to ensure isolation of product.

ROOT CAUSE: Different interpretation of the SQF requirement, management oversight. Corrective Action: Locked box in place, verified that FSP 5.4.20 Cream Cheese Metal detector correctly describes procedure

CORRECTIVE ACTION: Locked box completed 16/07/21, verified that FSP 5.4.20 correctly describes use of Locked Box

VERIFICATION OF CLOSEOUT: Sighted Photo of locked Metal detector cage for when test pieces are tested and securing of packs with potential metal. Metal Detector use and Calibration procedure FSP 5.4.20 updated 26/07/21 to include rejections into locked box, authorised release by Production Supervisor.

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11.7.4.4 Records shall be maintained of the inspection of foreign object detection devices, of any products rejected or removed by them, and of corrective and preventative actions resulting from the inspections.

RESPONSE: COMPLIANT

11.7.4.5 In all cases of foreign matter contamination, the affected batch or item shall be isolated, inspected, reworked, or disposed of. Records shall be maintained of the disposition.

RESPONSE: COMPLIANT

11.8.1 Waste Disposal

Stated in the Waste & environment Procedure FSP 4.18.5, responsibilities lies with the Operations manager and the day to day management lies with maintenance and the quality departments. Waste bins and waste skips for the disposal of general waste material are located away from processing areas. The site practices clean as you go, and no overflowing waste observed during the audit in the processing and packing areas and outside waste skips which are removed by the approved service providers. Waste management services are provided by Veolia for general waste and cardboard is collected and recycled. Waste water is disposed directly into the town system with a pH monitoring system in place to control acidity. No historical issues noted with waste water disposable of this nature. Should milk/dairy liquid require disposable, this is done under controlled conditions via a dedicated contractor. Note the company has a service agreement with the SA water relating trade waste.

11.8.1.1 The responsibility and methods used to collect and handle dry, wet, and liquid waste and how to store it prior to removal from the premises shall be documented and implemented.

RESPONSE: COMPLIANT

11.8.1.2 Waste shall be removed on a regular basis and not allowed to build up in food handling or processing areas. Designated waste accumulation areas shall be maintained in a clean and tidy condition until external waste collection is undertaken.

RESPONSE: COMPLIANT

11.8.1.3 Waste and overflow water from tubs, tanks, and other equipment shall be discharged directly to the floor drainage system or by an alternative method that meets local regulatory requirements.

RESPONSE: COMPLIANT

11.8.1.4 Trolleys, vehicle waste disposal equipment, collection bins, and storage areas shall be maintained in a serviceable condition, cleaned, and sanitized regularly to prevent the attraction of pests and other vermin.

RESPONSE: COMPLIANT

11.8.1.5	Adequate provision shall be made for the disposal of all solid processing waste, including trimmings, inedible material, and used packaging. **RESPONSE:** COMPLIANT
11.8.1.6	Where applicable, a documented procedure shall be in place for the controlled disposal of trademarked materials waste considered high-risk for handling or other reasons. Where a contracted disposal service is used, the disposal process shall be reviewed regularly to confirm compliance. **RESPONSE:** COMPLIANT
11.8.1.7	Inedible waste designated for animal feed shall be stored and handled so that it will not cause a risk to the animal or further processing. If denaturant is used to identify inedible waste, it shall be demonstrated that it does not pose a risk to animal health. **RESPONSE:** COMPLIANT
11.8.1.8	Waste held on-site prior to disposal shall be stored in a separate storage facility that is suitably insect proofed and located where it does not present any hazards. **RESPONSE:** COMPLIANT
11.8.1.9	Adequate provision shall be made for the disposal of all liquid waste from processing and food handling areas. Liquid waste shall either be removed from the processing environment continuously or held in a designated storage area in lidded containers prior to disposal where it does not present any hazards. **RESPONSE:** COMPLIANT
11.8.1.10	Reviews of the effectiveness of waste management shall form part of regular site inspections (refer to 2.5.4.3), and the results of these inspections shall be included in the relevant inspection reports. **RESPONSE:** COMPLIANT