SQF Quality Audit Edition 9
Beston Pure Dairies - Beston Pure Dairies

Summary

AUDIT DECISION
CERTIFIED

CERTIFICATION NUMBER
FSM43898 | 137400

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

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:** Recommend Quality Certification proceeds

Section Responses

2.1.1 Management Responsibility

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 the site's commitment to quality and includes at a minimum: i. Establishment and maintenance of a quality management system; ii. Compliance with customer, regulatory, and company quality requirements; iii. Identification of quality objectives and the methods used to measure them; and iv. Continuous improvement of its quality performance.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.1.1.3 Senior site management shall implement, maintain, and continuously improve the quality culture within the site that ensures at a minimum: i. Quality objectives and key performance indicators are communicated to all staff; ii. Provision of adequate resources to meet the objectives and key performance indicators; iii. Awareness by all staff of their quality responsibilities and their accountability in meeting the requirements of the SQF Quality Code; iv. Responsibility to notify management of actual or pending quality issues and empowerment to resolve quality issues within their scope of work; and v. Education of all staff to understand the importance of quality controls and deviation consequences.

RESPONSE: COMPLIANT

2.1.1.4 Senior site management shall ensure the personnel performing key process steps and responsible for achieving quality objectives and meeting customer, regulatory, and company quality requirements are identified in the reporting structure and have the required competencies to carry out these functions.

RESPONSE: COMPLIANT

2.1.1.5 Job descriptions for personnel performing key process steps and responsible for achieving quality requirements shall be documented and include provisions for coverage in the absence of key personnel.

RESPONSE: COMPLIANT

2.1.1.6 Senior site management shall designate an SQF quality practitioner for each site with responsibility and authority to: i. Oversee the development, implementation, review, and maintenance of the SQF Quality System, including quality fundamentals outlined in 2.4.2 and the quality plan outlined in 2.4.3; ii. Take appropriate action to ensure the integrity of the quality system; and iii. Communicate to relevant personnel all information essential to ensure the effective implementation and maintenance of the quality system.

RESPONSE: COMPLIANT

2.1.1.7 The SQF quality practitioner shall: i. Be competent to implement and maintain food quality plans using a risk-based methodology such as HACCP; ii. Understand the Quality Code and the requirements to implement and maintain a quality management system; and iii. Be competent, through training or experience, in process control and/or other quality tools to reduce process variation impacting quality and achieve customer requirements.

RESPONSE: COMPLIANT

2.1.1.8 Senior site management shall develop and implement a quality communication program to ensure all staff: i. Know the site's quality statement, quality objectives, and the process by which quality performance is measured; and ii. Understand the methods by which customer, regulatory, and company quality requirements, where applicable, are met.

RESPONSE: COMPLIANT

2.1.1.9 Senior site management shall establish a process to trend progress in quality performance against agreed measures. Benchmarking shall be part of this process, and the performance data shall be reported at least annually, and communicated to all staff, to demonstrate effectiveness of the quality management system.

RESPONSE: COMPLIANT

2.1.1.10 Sites that are certified to the SQF Quality Code may use the SQF Quality Shield. The use of the quality shield shall follow the requirements outlined in Appendix 4: SQF Quality Shield Rules of Use.

RESPONSE: COMPLIANT

2.1.2 Management Review

Management Review Procedure FSP 1.5.1-7. The Quality Manager is responsible for reviewing the SQF system with the site management team, this has been performed on a 6 monthly basis. 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 Senior site management shall be responsible for reviewing the performance of the SQF Quality System. Reviews shall include actions required to: i. Monitor compliance to specifications; ii. Measure and reduce process and product variation; iii. Meet customer requirements; iv. Take appropriate corrective action where applicable; and v. Ensure sufficient resources are allocated to maintain and improve the performance of the quality system.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.1.3 Complaint Management

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 responsibilities for the complaint management process shall be documented and implemented. They shall include: i. A mechanism to collect and record all quality complaints resulting from activities at the site; and ii. Communication processes for reporting and follow-up with senior management and customers.

RESPONSE: COMPLIANT

2.1.3.2 Trends from quality complaints shall be included in the performance measures established for the quality system.

RESPONSE: COMPLIANT

2.1.3.3 Corrective and preventative action shall be implemented based on the seriousness of the incident and identified trends and shall be completed as outlined in 2.5.3.

RESPONSE: COMPLIANT

2.1.3.4 Records of quality complaints, their investigation and resolution, if applicable, shall be maintained.

RESPONSE: COMPLIANT

2.2.1 Quality Management System

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

RESPONSE: COMPLIANT

2.2.2 Document Control

Document Control is detailed in the Control of site Management Procedures FSP 1.7.2 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 maintenance, storage, and distribution of quality documents shall be documented and implemented.

RESPONSE: COMPLIANT

2.2.2.2 A register of current SQF Quality System documents and amendments to documents shall be maintained. Documents shall be safely stored and readily accessible.

RESPONSE: COMPLIANT

2.2.3 Records

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 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. Records shall be retained in accordance with periods specified by customers or regulations or, at a minimum, no less than the product shelf- life.

RESPONSE: COMPLIANT

2.3.1 Product 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 for designing, developing, and converting product concepts to commercial realization shall include a comparison of process controls with specification limits (i.e., process capability analysis) to ensure that processes can consistently supply products that meet customer specifications.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.1.3 Shelf life trials shall be conducted for new products, or when there are changes in materials, ingredients, or equipment, to establish and validate a product's packaging, handling, storage, and customer-use requirements through the end of its commercial life and consumer use.

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

RESPONSE: COMPLIANT

2.3.2.2 Raw and packaging quality parameters shall be verified upon receipt to ensure they meet specifications.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.2.5 Finished product specifications shall be documented, current, approved by the site and its customers when required, and accessible to relevant staff. The specifications shall include product quality attributes, service delivery requirements, and labeling and packaging requirements.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

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 quality, site/customer product requirements, their realization, and delivery shall be specified, documented, agreed upon, and implemented.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.4 Approved Supplier Program

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 Raw materials, ingredients, packaging materials, processing aids, and services, including co-manufactured products, that impact finished product quality shall be supplied by an approved supplier.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.4.3 Materials supplied shall only be accepted by the site based on either a certificate of analysis for each lot received, or inspection of the lot at receipt, to ensure materials comply with specifications. All receipts shall be visually inspected for damage and product integrity.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.3.4.5 Any supplier audits performed shall be conducted by individuals knowledgeable of applicable regulatory and food quality requirements and trained in auditing techniques.

RESPONSE: COMPLIANT

2.4.1 Customer Requirements

Is included in Customer Specifications and BCP plan. Quality attributes are included in customer specifications reviewed in conjunction with customers. C of A is provided to customer requesting C of A' as demonstration of compliance to specification, customer is notified if non compliance to specification, there is positive release on microbiological specification for all products.

2.4.1.1 The methods and responsibilities for managing customer requirements and/or consumer expectations shall be documented and implemented. They shall include at a minimum: i. A review and approval process for all new or updated customer requirements, as they occur; ii. A process for collection and analysis of data for product quality attributes to ensure specifications continue to meet consumer expectations; and iii. A communication process to notify identified customers when the ability to supply compliant products is temporarily halted.

RESPONSE: COMPLIANT

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

RESPONSE: NOT APPLICABLE

EVIDENCE: No Customer supplied product or equipment

2.4.2 Quality Fundamentals

The buildings and equipment is constructed, designed and maintained to facilitate the manufacture, handling, storage and delivery of finished product that meets customer specifications and corporate quality requirements. 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. Floors are constructed of concrete and sealed and are sloped towards the floor drainage system, Floor drainage is designed for ease of cleaning, well maintained and functional. Walls, partitions, ceilings and doors are constructed of suitable manufacturing materials (Fridge panels) 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. 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. The site maintains a register of all 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 which and 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 generally been maintained as per scheduled requirements. Product packaging is stored in the warehouse and protected from contamination and deterioration. The racks are stainless 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. 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. 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 both transports are use refrigerated trucks

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.2.3 Storage and transport of raw materials, work-in-progress, and finished product shall be suitable to maintain the integrity of the product without loss, waste, or damage and to meet customer requirements for inventory management and transportation, where applicable.

RESPONSE: COMPLIANT

2.4.3 Food Quality Plan

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 quality plan shall be developed, effectively implemented, and maintained in accordance with a risk-based method such as HACCP. The food quality plan may be combined with or independent from the food safety plan, but either way it must identify quality threats and critical quality points and their controls.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.3.5 Product descriptions shall be developed and documented for all products included in the scope of the food quality plan. This shall include information in the finished product specifications (refer to 2.3.2.1) plus any additional quality or service attributes established by agreement with the customers.

RESPONSE: COMPLIANT

2.4.3.6 The intended use of each product shall be determined and documented. This shall include, as appropriate, target consumer groups, ease of use by consumers, consumer instructions, evidence of tampering , and other applicable information affecting product quality.

RESPONSE: COMPLIANT

2.4.3.7 The food quality team shall review the flow diagrams developed as part of the food safety plan and confirm and ensure process steps, process delays, and inputs and outputs that impact product quality are included.

RESPONSE: COMPLIANT

2.4.3.8 The food quality team shall identify and document all quality threats that can reasonably be expected to occur at each step in the processes, including raw materials and other inputs.

RESPONSE: COMPLIANT

2.4.3.9 The food quality team shall conduct a quality threat analysis for every identified quality threat to identify which threats are significant, i.e., their elimination or reduction to an acceptable level is necessary to ensure or maintain product quality. The methodology for determining threat significance shall be documented and used consistently to assess all potential quality threats.

RESPONSE: COMPLIANT

2.4.3.10 The food quality team shall determine and document the control measures that must be applied to all significant quality threats. More than one control measure may be required to control an identified threat, and more than one significant threat may be controlled by a specific control measure.

RESPONSE: COMPLIANT

2.4.3.11 Based on the results of the threat analysis (refer to 2.4.3.9), the food quality team shall identify the steps in the processes where control must be applied to eliminate a significant threat or reduce it to an acceptable level. These steps shall be identified as Critical Quality Points or CQPs.

RESPONSE: COMPLIANT

2.4.3.12 For each identified CQP, the food quality team shall identify and document the quality limits that separate acceptable from unacceptable product. The food quality team shall validate the critical quality limits to ensure the designated level of control of the identified quality threat (s), and that all critical quality limits and control measures individually or in combination effectively provide the level of control required.

RESPONSE: COMPLIANT

2.4.3.13 The food quality team shall develop and document procedures to monitor CQPs to ensure they remain within the established limits (refer to 2.4.3.12). Monitoring procedures shall identify the personnel assigned to conduct testing, the sampling and test methods, and the test frequency.

RESPONSE: COMPLIANT

2.4.3.14 The food quality team shall develop and document deviation procedures that identify the disposition of affected product when monitoring indicates a loss of control at a CQP. The procedures shall also prescribe actions to correct the process step to prevent recurrence of the quality failure.

RESPONSE: COMPLIANT

2.4.3.15 The documented and approved food quality plan shall be fully implemented. The effective implementation shall be monitored by the food quality team, and a full review of the documented and implemented plans shall be conducted at least annually, or when changes to the process, equipment, specifications or inputs occur which may affect product quality.

RESPONSE: COMPLIANT

2.4.3.16 Implemented food quality plans shall be verified as part of SQF Quality System verification (refer to 2.5).

RESPONSE: COMPLIANT

2.4.4 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

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

RESPONSE: COMPLIANT

2.4.4.2 On-site laboratories and inspection stations shall be equipped and resourced to enable testing of in-process and finished products to meet customer, regulatory, and/ or company requirements and meet quality objectives. 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 2.3.2.7).

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.4.5 Non-conforming Product or Equipment

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 Non-conforming product shall include products that fail to meet in-process or product requirements for quality. Non-conforming product shall be suitably identified, segregated, and appropriately dispositioned with records maintained.

RESPONSE: COMPLIANT

2.4.5.2 Non-conforming equipment shall include equipment that is not suitable for use and/ or is not capable of producing products that meet in-process or product requirements for quality. Non-conforming equipment shall be identified and segregated from production areas, if possible, with appropriate documentation maintained.

RESPONSE: COMPLIANT

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

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 Procedures shall be documented and implemented to ensure product quality or formulation is not compromised by the rework process. Material to be reworked shall be identified and traceable. Rework operations shall be overseen by qualified personnel.

RESPONSE: COMPLIANT

2.4.7 Product Release

Product Hold and Release Procedure FSP 4.15.1-2 detail requirements and management of releasing non-conforming raw materials, work in progress & finished products. The procedure details labelling requirements, inspections, communication channels and authorized personnel. Product release is based on finished product micro being within specification. Records are maintained via a spreadsheet. Product cannot be picked for dispatch until unlocked in the SAP system. 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 site shall document and implement a positive product release procedure to ensure that, at the time of delivery to its customer, the food supplied complies with all agreed customer, regulatory, and/or company requirements, including but not limited to product specifications, sensory attributes, packaging and package integrity, labeling, delivery, and service requirements.

RESPONSE: COMPLIANT

2.4.7.2 Records of all product release or disposition shall be maintained

RESPONSE: COMPLIANT

2.5.1 Validation and Effectiveness

Validation and Effectiveness include monitoring and measuring, validation of control measures, food safety plan updates, and food quality plan updates. The responsibilities of this process are managed by Quality Manager. The frequency of HACCP review is documented as annually with the last review dated June 2020 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 Validation activities shall include those necessary to authenticate critical quality limits, process controls, and other quality tests established to meet customer requirements.

RESPONSE: COMPLIANT

2.5.1.2 Records of validation of quality criteria shall be maintained.

RESPONSE: COMPLIANT

2.5.2 Verification Activities

Verification activities are documented in the individual Verification and Validation Table under each specific product and stated in the Internal Audit schedule FSP 6.26.3 Records sighted demonstrate CCP's have been monitored and compliance with critical limits observed or corrective action demonstrated to be undertaken. Monitoring records are verified by an internal auditing system and 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 verification schedule shall include activities designed to ensure the effectiveness of process controls and quality tests.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.5.3 Corrective and Preventative Action

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

RESPONSE: COMPLIANT

2.5.4 Internal Audits

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

RESPONSE: COMPLIANT

2.5.4.2 Staff conducting the quality internal audits shall be trained and competent in internal audit procedures and have knowledge and experience in quality processes and process control methods as they relate to the scope of certification. Where practical, staff conducting internal audits shall be independent of the function being audited.

RESPONSE: COMPLIANT

2.6.1 Product Identification and Traceability

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.

2.6.1.1 Finished product shall be labeled to the agreed customer, regulatory, and/or company requirements.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.1.3 Finished product shall be traceable forward to the customer, such as the retailer, distributor, or manufacturer (one forward).

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.6.2 Product Withdrawal and Recall

Product Recall and Withdrawal Procedure FSP 4.14 details the business process and procedures around the event of a product recall or withdrawal. The elements stated are comprehensive and meet the requirements of the SQF Ed 8 standard. SQF & CB, 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.

2.6.2.1 The site's recall and withdrawal procedures shall apply to product recalled or withdrawn due to failure to meet customer specifications or corporate quality requirements. Records shall be maintained and meet customer, regulatory, and company requirements, as applicable.

RESPONSE: COMPLIANT

2.6.3 Crisis Management

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.

2.6.3.1 The crisis management plan prepared by senior site management shall include the methods by which the site shall, in the event of a crisis, maintain continuity of supply that meets customer, regulatory, and/or company product and service quality requirements.

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.7.1 Food Fraud

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.

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

RESPONSE: COMPLIANT

2.7.1.2 A food fraud mitigation plan shall be developed and implemented that specifies the methods to be used for controlling identified food fraud vulnerability that could adversely impact food quality.

RESPONSE: COMPLIANT

2.8.1 General Requirements for Identity Preserved Foods

Detailed in in procedure Product Traceability FSP 4.12-8, includes Halal, Kosher, and the process is review via the NPD process, specific ingredients are documented via the finished product spec. Control measures and segregated is maintained for the storage of RM's and ingredients throughout production. Halal Certificate 2019979/AHAA/BPD valid 8/11/21. Kosher Certificate 50771749 exp 21/03/2022 cream cheese and cheese products.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.8.1.8 Additional customer-specific requirements for identity preserved foods shall be included in the finished product specification, as described in 2.3.2.5, or the label register and implemented by the site.

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

RESPONSE: COMPLIANT

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

RESPONSE: COMPLIANT

2.9.2 Training Program

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

RESPONSE: COMPLIANT

2.9.2.2 The employee training program shall include: i. Applicable process control and quality tools training for those responsible for operating, inspecting, and overseeing key manufacturing processes; ii. Training, calibration, and proficiency testing of internal laboratory personnel; iii. Training of personnel responsible for sensory evaluations; iv. Training in the application of risk-based principles, such as HACCP, used for the identification and control of quality threats for staff involved in developing and maintaining the food quality plan; and v. Provision for identifying and implementing the refresher training needs of site personnel.

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