



Private Brands

CORPORATE FOOD SAFETY & QUALITY ASSURANCE

**FOOD
CODE OF PRACTICE**

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SUPERVALU PRIVATE BRANDS

FOOD SAFETY & QUALITY ASSURANCE DEPARTMENT
EAST VIEW INNOVATION CENTER
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INTRODUCTION

SUPERVALU takes great pride and extensive steps to ensure a safe quality experience with every Private Brands product. We are committed to providing safe food in part by auditing suppliers' facilities and systems. These include but are not limited to: HACCP, GMPs, SSOPs, Food Sanitation, Microbiological Food-borne Hazards and Risk Analysis / Hazard Analysis in Food Safety. These audits are generally conducted on an annual basis by a contracted third party auditing firm and/or SUPERVALU technical staff. In addition, we evaluate and test more than 1,600 Private Brands products each year to verify that products are continually being manufactured to our quality standards.

The Code of Practice (COP) is based in part on 21 CFR 110 Good Manufacturing Practices (GMP's), HACCP, Public Health Security & Bioterrorism Preparedness & Response Act of 2002, Global Food Safety Initiative Standards (GFSI), and Industry Standards, and is a required part of being an Approved Supplier of SUPERVALU Own Branded product. In some case the COP may be more stringent than 21 CFR 110. The COP is a critical component in producing a safe, wholesome and regulatory compliant product. All suppliers of SUPERVALU Private Brands products are expected to adhere to the COP. The COP also constitutes in part the criteria used by SUPERVALU technical personnel, or authorized auditing agent, when inspecting and/or auditing suppliers' facilities.

**The COP is a
required part of
being an Approved
Supplier of
SUPERVALU
Private Branded
product.**

This COP pertains to all SUPERVALU banners. These include: Acme, Albertsons, Biggs, Bristol Farms, Cub Foods, Farm Fresh Food & Pharmacy, Hornbacher's, Jewel-Osco, Lucky, Osco Pharmacy, Save A Lot, Savon Pharmacy, Shaw's, Shop'n Save, Shopper's Food & Pharmacy, Star Market, SUPERVALU Pharmacies & W. Newell & Company.

This COP in no way supersedes or replaces any local, state or federal government requirements for sanitation, health or safety aspects in a food processing facility. The COP in some cases may be more stringent than regulations. Suppliers are expected to abide by all applicable federal, state and local laws, rules ordinances and mandates relative to good food handling and safe manufacturing practices.

The COP is not intended to quote any current government acts or regulations pertaining to any group of food products although reference to such acts, regulations or practices may be made for specific product groups.

All products furnished to and purchased by SUPERVALU are subject to inspection and approval as part of the receiving process. Products may be rejected in whole or in part if they are found to be inferior in quality. Rejection may also occur if the products are not in conformity with the terms, specifications or requirements of the purchase order, this program and/or other specifications provided by SUPERVALU.

Some portions of the Code of Practice may not apply to all types of processing facilities. Please contact one of the QA representatives listed on page 3 if you question the applicability to discuss the possibility of exemption for that section(s).

AMENDMENTS

SUPERVALU reserves the right to change or amend these policies, terms and conditions at any time. Updates and amendments to these policies will be provided to all suppliers. The COP was developed and is maintained by SUPERVALU Quality Assurance Department and will be reviewed annually.

CONFIDENTIALITY

All information obtained by SUPERVALU, and/or the agency acting on its behalf, during the audit will be treated as confidential. Except as required by law, SUPERVALU will not release any information or report of the audit to a third party without written authorization by the supplier.

QUALITY ASSURANCE TEAM

SUPERVALU Private Brands program identifies Quality Assurance as the Department with the responsibility of auditing Supplier facilities. These audits take the form of visits to the manufacturing sites designated by the Supplier as a Private Brands supplying unit(s).

SUPERVALU INC.

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AUDITS & INSPECTIONS

Management Commitment to Audits

SUPERVALU strongly believes that Food Safety and Quality Assurance is a culture that can only be developed from the top down. Food Safety and Quality Assurance is not a single department responsibility but the obligation of all departments and employees. It is expected that as much as possible the department managers be available during the audit while their areas are being inspected. At a minimum the facility's most senior production or operations manager onsite shall attend the opening and closing meetings of the audit.

New Supplier or Maintenance Audits

Before a product is branded with SUPERVALU Private Brands labels, the manufacturing site(s) shall be approved. Such approval will normally be based on an inspection by SUPERVALU technical staff or designated auditing body, covering all aspects of processing, from raw material receiving through warehouse/distribution, as well as an examination of all documentation associated with all aspects of production, environmental and facility maintenance, and storage of product. The normal schedule for Maintenance Audits is annually.

First Production

Audits and inspections are designed to assist Suppliers in complying with SUPERVALU specifications and guidelines.

The purpose of these visits is to ensure compliance with Private Brands Specifications and the Code of Practice and to ensure that Corrective Action Plans from prior audits have been implemented to the satisfaction of SUPERVALU Quality Assurance and Product Development groups.

After approval of the supplying unit(s), periodic visits may be made. These visits are normally, but not necessarily, scheduled to coincide with Private Brands product(s) production. The purpose of these visits is to ensure compliance with the SUPERVALU Code of Practice and Product Specifications. SUPERVALU reserves the right to review any other pertinent information which may be reasonably considered necessary for the purpose of verifying the safety of Private Brands product(s).

Unannounced Inspections

SUPERVALU reserves the right to conduct unannounced visits at any time to ensure that the Code of Practice, Specifications, etc. are being followed.

AUDIT SCOPE & CRITERIA

The scope of the audit includes **all** areas of the supplier's facilities. This includes all lines, all rooms, and all buildings regardless if SUPERVALU product is or is not to be produced on/in all lines, rooms, or buildings. The facility shall be in operation during the time of the audit. All components of the COP are subject to audit. A copy of the audit checklist will be provided to the facility prior to the audit by the auditing agency. You can also request a copy through the SUPERVALU Quality Assurance Department at any time. It will be the facility's responsibility to crosscheck the SUPERVALU provided checklist against the one provided by the Auditing Agency to determine if any changes have been made. The facility will be audited against the checklist provided by the auditor a few weeks prior to the audit. The audit checklist can also be found on iCiX.

AUDIT CONSIDERATIONS

Global Food Safety Initiative (GFSI) Recognized Schemes¹

GFSI is a benchmarking organization that recognizes existing food safety schemes. These standards meet internationally recognized minimum food safety requirements, developed by multi stakeholders, and they can be found in the GFSI Guidance Document Version 5. Once formal recognition has been given to a standard, the certificates gained from an audit to a GFSI recognized standard are accepted by many international and regional/national retailers or suppliers.

GFSI Recognized Schemes

The Global Food Safety Initiative currently fully recognizes five manufacturing schemes:

- [BRC](#) Global Standard Version 5
- [Dutch HACCP](#) (Option B)
- [FSSC 22000](#) (Conditional Recognition)
- [Global Red Meat Standard](#) Version 3
- [International Food Standard](#) Version 5
- [SQF](#) 2000 Level 2

There are also two recognized primary production (pre-farm gate) schemes:

- [GlobalGAP](#) (Fruit and Vegetable Scope Options 1 and 2 only)
- [SQF](#) 1000 Level 2 (against version 4 of the GFSI Guidance Document)

Benchmarking to GFSI ensures the core of these standards are equivalent.

The benchmarking process was not designed to create a single global standard, but rather to allow innovation and competitive development between standard owners whilst meeting a core set of requirements.

¹ <http://www.mygfsi.com>

SUPERVALU fully supports the Global Food Safety Initiative and will recognize and accept certification granted from one of the recognized schemes in lieu of the SUPERVALU audit conducted by SGS US Testing Company, after certain conditions have been met. The GFSI recognized schemes include Safe Quality Food (SQF), British Retail Consortium (BRC) Standard, Dutch HACCP, International Food Standard (IFS), GlobalGAP, Global Red Meat Standard (GRMS) and FSSC 22000 (when fully recognized).

The supplier must submit to the following conditions:

- The GFSI Scheme audit must take place within acceptable timelines as determined by SUPERVALU Quality Assurance.
- The GFSI Scheme facility audit, corrective actions and issued Certificate must be submitted in full to SUPERVALU for review prior to a SUPERVALU audit exemption being issued.
- The audit and subsequent corrective actions will be fully reviewed by SUPERVALU to ensure that they meet SUPERVALU expectations. Please note that approval of the corrective actions by the accrediting body of the utilized scheme does not automatically denote that SUPERVALU will accept said corrective actions.

DISPOSITION & USE OF SUPERVALU PRIVATE BRANDS

Without exception, absolutely no SUPERVALU Own Brand products, trademarks, titles or pre-packed labeled merchandise may be sold, salvaged, exported or used by the Supplier without the prior written consent of SUPERVALU.

If consent is given, the Supplier shall share with SUPERVALU the Supplier's salvage plan. The following criteria will be evaluated by SUPERVALU when accepting a Supplier's salvage plan:

SUPERVALU reserves the right at any time to expand the list for circumstances peculiar to the disposition of returned or rejected product.

- Such product shall not contain the original packaging which communicates SUPERVALU or any SUPERVALU branding
- Such product, if repackaged, shall not knowingly exceed the shelf life of the original package
- Such product shall not enter into rework for SUPERVALU product at levels or within timeframes not allowed within the product specification
- Such product shall not be reworked into a different standard of identity and be represented to SUPERVALU as such.
- Such product, if delivered to a sanitary or other landfill, shall have any packaging removed which communicates SUPERVALU or any SUPERVALU branding

Any Supplier who is granted permission to salvage SUPERVALU Private Brands labels shall provide written documentation to SUPERVALU as to the final disposition of the products sold for salvage. The aforementioned shall be documented and approved by SUPERVALU Quality Assurance Department prior to commencing the salvage.

iCiX Requirement

In an effort to forge a mutually beneficial and efficient relationship with our partners, SUPERVALU requires all Private Brands suppliers to register on the iCiX (International Compliance Information Exchange) system for document management and communications. Our long term goals with the iCiX system include:

- Building a platform that allows for easier document tracking resulting in a faster, more accurate communication vehicle on both broad and narrow scales
- Assembling a thorough product and supplier database that can be managed with minimal man power by both parties
- Lowering the cost per resolution associated with recalls and corrective actions
- Creating a centralized location for valuable information such as:
 - Complete and approve product specifications
 - Contact information including Crisis Management Numbers
 - Certifications
 - Plant protocol

www.icix.com

Broadcast Messages

iCiX has a function called Broadcast Messaging which allows users to send a message to multiple recipients all at once. SUPERVALU will utilize this function to contact its suppliers for various reasons including but not limited to the following:

- Notification of a change in SUPERVALU FSQA personnel
- Requests for information in regards to a recent recall (e.g., widely used sub-ingredients such as peanut butter that may have been utilized in the manufacture in a SUPERVALU Private Brands product)
- Change in Code of Practice or other SUPERVALU policy
- Dissemination of other information that is valuable to the supplier

For these reasons it is critical that the supplier ensure that the contacts listed in iCiX are correct and maintained, especially after an employee leaves the company. It is also recommended that you upload a list of emergency contacts, preferably from your crisis management plan, onto iCiX.

MANAGEMENT POLICY

The policy shall be displayed prominently and communicated (in appropriate language(s)) to all levels of the organization with documented training.

All suppliers shall have a written Quality & Food Safety Policy outlining the organization's commitment to supply safe, quality food. The owner or senior management shall define the policy. The policy shall be signed by the owner or senior manager. The policy shall be displayed prominently and communicated (in appropriate language(s)) to all levels of the organization with documented training. An annual review of the policy to determine effectiveness shall be completed. Refresher training of the policy shall be conducted annually. The facility shall act in accordance with the Quality and Food Safety Policy.

MANAGEMENT RESPONSIBILITY

The quality function should report outside of the production hierarchy.

Each facility shall maintain a current organizational chart. The chart shall indicate the reporting structure of all individuals responsible for quality and food safety to upper management and their relationship to each other. The quality function should report outside of the production hierarchy. Senior management shall ensure adequate resources are available to support the development, implementation, maintenance and ongoing improvement of the Quality and Food Safety Policy. The organization chart shall be readily available and shared with all employees. Management shall also have in place documented procedures to cover for the absence of key personnel.

FOOD SAFETY & QUALITY MANAGEMENT SYSTEMS

Policies & procedures shall be reviewed annually.

Each facility shall maintain a food safety and quality management manual. The manual shall summarize the facilities food safety and quality procedures. The manual shall include a policy statement and organization chart. Policies and procedures shall be formally reviewed annually or when any significant changes take place. These changes can be in personnel, raw material suppliers, facility design, products, etc. Records of all reviews and changes shall be maintained.

CUSTOMER COMPLAINT PROGRAM

All suppliers shall have a written & documented customer complaint program.

All suppliers shall have a written and documented program for evaluating customer complaints. The program shall include protocol for handling complaints including the identification of parties responsible for the investigation, appropriate time frame for resolution, follow-up notification to the customer and procedures for closing out the complaint. In addition, corrective actions shall be documented and trend analysis conducted. The complaints and trend analysis shall be shared with relevant staff.

FOOD LEGISLATION (REGULATION) & LICENSES

The facility shall ensure that the food supplied complies with the legislation that applies to the food and its production.

The facility shall ensure that the food supplied complies with the legislation that applies to the food and its production in the country of its origin and destination. Additionally the facility shall demonstrate compliance with legislation in regards to weight statements, packaging, product description, nutritional statements, additive and allergen labeling, and when applicable organic and religious certification requirements. Each facility shall maintain all required local, state and/or federal licenses. These licenses shall be current and available for review.

DOCUMENTATION

Documentation is an essential and integral part of a good Quality Assurance and Food Safety Program.

Effective documentation is an essential and integral part of a good Quality Assurance and Food Safety Program. The facility shall maintain appropriate documentation in regards to all aspects of Quality Assurance and Food Safety. These would include but are NOT limited to: instructions, procedures, methods, programs, records, reports, batch data, lot traceability, employee training, etc. Documents shall be legible, available in all appropriate languages, and provide enough detail to enable correct application by appropriate personnel. All documents shall be properly authorized and in the correct version and available to relevant staff at all times. The reasons for changes or amendments to critical documents shall be recorded. A procedure shall be put in place to ensure that obsolete documents are removed and where applicable replaced with a revised version.

CORRECTIVE ACTIONS (CA'S)

Corrective actions are an integral part to a good food safety and quality assurance program.

Corrective actions are an essential and integral part of a good Quality Assurance and Food Safety Program. A policy shall exist defining the methods and responsibilities for documenting, investigating, analyzing and resolving non-compliances against standards, specifications, procedures or findings of auditors. Non-compliance for the purpose of corrective actions can refer to food safety or quality limits and audit findings whether found internally, by third party or regulatory agencies. All corrective actions shall take place as soon as possible to limit further occurrence. This shall include a written policy detailing investigation (root cause analysis), corrective actions (resolutions) with timelines and responsible person(s). Once completed, corrective actions shall be monitored to ensure their completion and effectiveness. Records shall be maintained.

RECORDS MANAGEMENT

Each facility shall have a written records management policy. The policy shall address the identification, collection, filling, retention time and disposition of all quality and food safety records. The disposition of records shall be by a method that ensures permanent destruction, such as shredding or incineration. This is to protect the confidential information that may be contained on the records. The policy shall at a minimum, meet the regulatory requirements for the products made at the facility.

INTERNAL AUDITS

Each facility shall have an internal audit system in place which includes a policy statement. All policies, procedures, programs and systems shall be reviewed and audited at a frequency commensurate with associated risk but at a minimum annually. The audit shall only be conducted by appropriately trained personnel and shall verify compliances and non-compliances. The audit shall act as a method to verify and validate that all the Food Safety and Quality Assurance pieces are effective and shall result in the creation of appropriate corrective actions. The audit review shall be documented.

HACCP

HACCP Definition

Hazard Analysis Critical Control Point (HACCP) is an internationally recognized system of assuring the safe manufacture of foods. SUPERVALU requires all Private Brands food Suppliers to have a fully implemented HACCP system based on hazard analysis and/or risk assessment as part of the Supplier's product safety program.

Suppliers who are unfamiliar with HACCP Systems can find information, resources and guidance from a qualified industry trade association, consulting groups or academia.

HACCP consists of seven principles:

- Conduct hazard analysis
- Determine critical control points (CCP's)
- Establish critical limits (CL's)
- Establish a system to monitor control of the CCP
- Establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control
- Establish documentation concerning all procedures and records to these principles and their application
- Establish procedures for verification to confirm that the HACCP system is working effectively

HACCP Requirement

Each facility shall establish a HACCP Program which shall be supported by senior management. The HACCP program shall be specific to the application and practical to implement. All processes and process lines shall be covered by the HACCP Program.

HACCP Team

Each facility shall have a HACCP/Food Safety Team which is comprised of multidisciplinary key personnel with adequate training and experience. At least one member of the team (should be the team leader) shall be trained and able to demonstrate competence in HACCP principles. The facility shall be able to demonstrate this person's competence by retaining documentation of certified HACCP training.

Pre-Requisite Programs

Pre-requisite programs are the foundation of a HACCP plan and shall be in place.

Pre-requisite programs are the foundation of a HACCP plan and shall be in place. Pre-requisite programs are generally the environmental and operating programs that contribute to the production of a safe, wholesome food. Many of these programs are specified by federal, state and local regulations. It is important to remember that HACCP is a food safety program not a quality program. Quality programs are not considered in HACCP pre-requisite programs. A sampling (not an all inclusive list) of pre-requisite programs is listed below:

- Facility and Equipment Design
- Specifications
- Sanitation SOPs
- Traceability & Recall
- Labeling
- Training
- Glass Control
- Chemical Control

HACCP Plan Development

The HACCP plan shall be developed based on hazard analysis and correctly identify CCP's, CL's, monitoring procedures and corrective actions. The plan shall be scientifically validated and verified on a routine basis. The HACCP plan shall be reviewed whenever there is a change in procedures, product, equipment, etc or at minimum annually. All records pertaining shall be maintained a minimum of a year or as required by legislation.

Any deviation from HACCP system limits shall be addressed by appropriate corrective actions. Affected product(s) shall be placed on hold and quarantined until a course of action has been agreed by both parties.

FDA HACCP Information: <http://www.cfsan.fda.gov>

USDA HACCP Information: <http://www.fsis.usda.gov>

PRODUCT DEVELOPMENT & DESIGN

The facility shall have in place a product development and design program to ensure that their processes are capable of producing safe, legal and regulatory compliant products.

The facility shall have in place a product development and design program to ensure that their processes are capable of producing safe, legal and regulatory compliant products. The program shall be based on HACCP principles. Production trials and thorough testing of all new products, new formulations and new packaging shall be completed. Shelf life trials that are representative of conditions exhibited during storage and handling shall be completed and confirm compliance with set parameters for microbiological, chemical and organoleptic aspects. The program shall include measures to ensure that all ingredient, nutritional and label information meets stated claims. The program shall include strict control measures to ensure that no product reaches commerce until full validation has been achieved. No Private Brands Products produced under trial conditions can be released without the consent of SUPERVALU Food Safety & Quality Assurance or Product Development.

PRODUCT IDENTIFICATION

Food product freshness is a concern to a large segment of food shoppers and food product dating has received an increasing amount of public attention. It is SUPERVALU's intent to minimize consumer confusion relative to date coding so we have developed the following guidelines for SUPERVALU Private Brands labels.

The methods and responsibility for identifying product in all stages shall be documented and implemented. The procedure shall clearly identify product during all stages of receipt, production, storage and shipment. It shall ensure that the product is clearly identifiable in all steps. These records shall be maintained. All Private Brands products shall be marked with a lot or date code which identifies the Supplier and timing of production or packaging. The code shall be legible and shall be located on each retail unit and shipping case. All exceptions to these code dating requirements shall have prior approval by SUPERVALU Quality Assurance. Specific product coding is described in the product specification that has been agreed upon between the supplier and SUPERVALU. The coding system described in the specification shall be followed unless approved by SUPERVALU.

Code Location

Brands - The Best if Used By wording can be printed on the package or incorporated into the brands copy. Code dates shall not interfere with photos and shall avoid the front of the package.

Shipping Cases - The shipping case shall be Branded or printed with the same "Best if Used By" or "Sell By" date information as appears on the retail unit.

Closed Code

Food items with more than two years of shelf life can display a closed code. The closed code (a code not readily decipherable by a consumer) is for use by the manufacturer to track inventory or to rotate stock. These codes do not indicate freshness or quality of the product.

Open Date Code

An open date code (a code readily decipherable by the consumer) is required on all products with a shelf life of two years or less and on any other items as specified by SUPERVALU. To promote uniformity between our Suppliers, SUPERVALU recommends the following terminology:

- **"Best if Used By"** followed by month, day and year shall be used for food products with a shelf life of six (6) months or more. **"Best By"** can be substituted if package size or coding equipment restrictions apply. This terminology tells the consumer how long the product will retain its best flavor and quality and is not intended to be a purchase date.
- **"Sell By"** shall be used for refrigerated and other products with a six (6) month or less shelf life to maintain proper in-store stock rotation for maximum quality and safety to the consumer. This terminology tells the consumer that such products should not be purchased after this date.
- Alphabetic month abbreviations (JAN, FEB, etc.) and two numbers for day and year shall be used where space allows. (Ex. JAN 10 04).
- Military time of production shall follow code date where space and coding equipment allow.
- Plant designators shall be used if product is manufactured at multiple plant locations. USDA plants have either a meat or poultry# (i.e. EST-1254 & P-308). For others plants, it may be as simple as A, B, or C; Plant A, Plant B, Plant C.

CRISIS MANAGEMENT

SUPERVALU shall have a current file of the names & day, evening & weekend telephone numbers of the company officer(s) responsible for the category & the key technical contact.

SUPERVALU requires all Suppliers to have a documented Crisis Management Program designed to manage situations that may impact food safety, legality, regulatory compliance or quality. A Supplier's Crisis Management policy and procedures shall clearly establish lines of authority, specific responsibilities of team members and designate alternative members. The plan shall be reviewed on an annual basis.

SUPERVALU shall have a current file of the names and day, evening, and weekend telephone numbers of the company officer(s) responsible for the category and the key technical contact. SUPERVALU will provide the names and day, evening and weekend telephone numbers for the company officer responsible for procurement, technical contact and the category manager for the product.

PRODUCT RECALL

As a critical part of the Crisis Management Program the facility shall develop a Product Recall Plan. The recall plan shall detail how product and contact packaging will be identified, traced, retrieved, stored and disposed of in the event of a recall. It shall cover all products; include a list of key personnel with contact information and responsibilities, and the storage of recall records. The recall plan must be executable 24 hours a day, 7 days a week.

A recall can arise from any number of causes and will vary in intensity and scope. At one end of the scale is the release of finished product in violation of the Supplier's release system. The other end is a Class I Recall in which there is an imminent threat to the public health. Supplier's Crisis Management Program shall address both spectrums and shall include the following types of crisis:

Recall Descriptions

A product recall is the removal of product from distribution by manufacturers or distributors when there is sufficient evidence that the product is violative of regulations or the products represent a threat to the public safety or health. Recalls can be voluntary, requested by SUPERVALU, or mandated by the FDA or other governmental agency.

The level of risk classifies product recalls:

Class I: A situation in which there is a reasonable probability that the use of, or exposure to, a violative product will cause serious or adverse health consequences or death

Class II: A situation in which the use of, or exposure to, a violative product may cause temporary or medically reversible adverse health consequences or where the probability of serious adverse health consequence is remote

Class III: A situation in which the use of, or exposure to, violative product is not likely to cause health consequences

Market Withdrawals

The removal or correction of a distributed product that involves a minor violation that would not be subject to regulatory action or which involves no violation, e.g. removal of old stock.

Stock Recovery

The removal or correction of a product that has not been marketed or has not left the direct control of the Supplier.

Tampering

Tampering, real or threatened, can be divided into three general categories:

- Tampering complaints: actual product complaints by consumers who call directly or to retail outlets;
- Hoaxers: individuals who file false tampering reports or threaten to tamper with the product; and
- Threats for cause: individuals who make extortion attempts and other threats for nefarious purposes.

PRIVATE BRANDS product recalls & product withdrawals shall be directed to SUPERVALU QA Department.

IMPORTANT: PRIVATE BRANDS product recalls and product withdrawals from one or more or all market

Suppliers shall be able to trace 100% of their product within 4 hours in the event of a recall, and to provide SUPERVALU with a written description of their recall procedures and product coding system. Disposition of un-saleable product may be directed by a regulatory agency as the result of a recall or condemnation order or other official action. Disposition under such circumstances shall be in accordance with recommendations or requirements of the agency.

Recall Expectations

The Supplier initiating a product withdrawal or recall shall supply SUPERVALU with the name and item number of the product(s) involved, the reason for the withdrawal or recall, the code dates involved, the total quantity shipped to SUPERVALU by date code, the dates and bill of lading numbers of the shipments and where shipped. In addition, any special instructions for handling the product(s) shall be communicated.

All affected SUPERVALU inventory remaining at the place of manufacture of the implicated codes shall be quarantined immediately.

In the event that SUPERVALU Private Brands items are affected, all SUPERVALU inventory remaining at the place of manufacture of the implicated codes shall be quarantined immediately. A detailed explanation for the recall or withdrawal, including steps taken to resolve the issue and to prevent future recurrence, shall be provided to SUPERVALU.

In the event any product recall, withdrawal, disaster or tampering incident is from a facility that supplies SUPERVALU Private Brands products (whether it includes SUPERVALU products or not), SUPERVALU requires that we be notified 24 hours in advance of the decision to enact such an event whenever possible. If 24 hours advance notice is not feasible, then Supplier will notify SUPERVALU as soon as reasonably practical under the circumstances.

PRODUCT TRACE (MOCK RECALL)

The supplier's recall program shall be tested semi-annually.

SUPERVALU requires that a product trace (Mock Recall) program exists and is tested semi-annually. The program shall test the supplier's Recall Program. Traceability of all reworked product shall also be maintained. **The trace shall demonstrate the facility's ability to recall 100% of the product within 4 hours.** One trace shall be raw material (including packaging) driven and one shall be finished lot code driven. All records of product traces shall be maintained. Such testing shall confirm a facility's ability to recall product

already in the distribution chain in both the forward direction (finished goods through to SUPERVALU warehouse) and backwards direction (finished product to original ingredients). Facility or Corporate QA shall have primary ownership and decision-making within this system.

HOLD PROGRAM

There shall be a formal written hold program (for non-conforming product of materials detailing) methods and personnel responsible for the program. A hold can pertain to raw materials, ingredients and finished product. All employees involved with product or material handling and storage shall be trained on and follow the facility's Hold procedures. All hold material or product shall be properly labeled and shall not be moved or used without the proper authorization from the Quality Manager or designated individual responsible for program.

A log and or record of all holds shall be maintained and include:

- | | | |
|----------------------------|-----------------------------|---|
| ▪ Date of hold | ▪ Person placing it on hold | ▪ Date of disposition |
| ▪ Product description | ▪ Location of product | ▪ Person releasing it from hold |
| ▪ Product codes | ▪ Disposition of hold | ▪ Corrective actions |
| ▪ Quantity of held product | ▪ Testing results | ▪ Review with management, signatures |
| ▪ Reason for hold | ▪ Investigation results | ▪ Certificates of destruction (if applicable) |

When holds occur, it is imperative that the suspect materials are removed from use and quarantined. It is best practice to have a dedicated secured area for the storage of hold product. If a secured area is not feasible the product shall be placarded with signage indicating the product is not usable. **Daily inventories of the product shall take place to ensure product has not been removed.** If the product poses an imminent health risk it shall be placed in a secure area (even if it is a locked trailer).

TRAINING

A robust and all encompassing training program shall be developed for all personnel.

A robust and all encompassing training program shall be developed for all personnel including all full time, part-time, contract and temporary employees. Personnel or designated department(s) shall create specific, written procedures for all employee functions. The training shall be completed on an annual basis with records of all training being retained. All employees shall be trained on all relevant policies and procedures including job specific functions. Prior to beginning work, seasonal and temporary workers and contractors shall also be trained as appropriate and shall be supervised during the working period. Management shall recognize

that divergent populations within the workforce could require specific training programs based on cultural and educational differences.

STANDARD OPERATING PROCEDURES (SOPs)

Standard operating procedures (SOPs) can be defined as established methods to be followed routinely for the performance of designated operations or in designated situations. They are very concise and specific step-by-step instructions. Each facility shall have SOPs for every task or activity in the facility. SOPs are very useful in training employees and in maintaining consistent daily operations.

MICROBIOLOGICAL QUALITY

Product

SUPERVALU requires assurance that products have an established specification level for microbiological content appropriate for each product's category, and that no product tests positive for microorganisms of a public health concern. Assurance can be demonstrated through one or more of the following:

- Results of microbiological analyses of each lot packed and shipped to SUPERVALU
- Results of microbiological analyses of each production lot where SUPERVALU Private Brands product is represented as a sub-lot and where sufficient samples are taken throughout the production of the lot so that results are representative
- Results of regularly scheduled environmental samplings which demonstrate the absence of microorganisms of public health concern for the appropriate sample type and size, and the effectiveness of sanitation programs for these zones. Environmental sampling program shall outline corrective actions required in an event of a positive result.
- Records of HACCP program documents; including but not limited to:
 - Records of corrective actions taken in response to HACCP non-compliance Findings
 - Records of corrective action or appeal taken in response to regulatory action (FDA or USDA NR's)
 - Continuing Letters of Guarantee (CLOG) and Certificates of Analysis from Suppliers of microbiologically sensitive ingredients with minimum annual verification by outside lab

Microbial testing shall target organisms known to be associated with the product or processing condition, or based on industry guidelines. Suppliers who do not conduct microbiological analyses shall present documentation for not doing so from a food safety standpoint. Documentation can take the form of technical papers regarding the nature of the process and/or product, historical data including in-facility trials or written documents from regulatory agencies that verifies compliance to GMP's, etc. It shall be understood that after reviewing the process and other technical documents provided by the Supplier, SUPERVALU Quality Assurance Department may still require microbiological analyses of Private Brands products solely on the basis of Industry Best Practices as a condition of supplying unit(s) approval.

Sanitation

In order to determine if sanitation methods are adequate, microbial testing shall be completed appropriate to the process. This may be in the form of bioluminescence swabs or plating. The methods used shall be pertinent to the process and be taken in suspect areas. E.G. rinse waters from a CIP circuit, bioluminescent swabs of food contact areas, etc. A procedure detailing what actions shall be completed based on the result shall be in place.

Environmental

In order to assure a microbiologically safe and quality product, the environment it is processed in is essential. At a minimum, testing for yeast, mold and Total Plate Count Bacteria shall be conducted. Additional environmental testing shall be performed based on the risks provided by the product or processing conditions. Target organisms could include; Listeria, E. coli, or Salmonella. Please reference industry guidelines to determine which organisms shall be tested for. If uncertain please contact SUPERVALU QA for requirements.

All microbial testing shall be reviewed and tracked to determine trends.

FOOD SECURITY

Each facility shall develop a food security plan. The facility shall be compliant with the Public Health Security & Bioterrorism Preparedness Act of 2002. The plan shall be written based on a food security risk assessment. All employees shall be trained on the elements of food security.

Risk Assessment

A full risk assessment of the facility shall be completed prior to writing and implementing the plan. The risk assessment shall look at all aspects of the operation including: facility security, employee hiring and terminations practices, supplier programs, transportation (inbound and outbound), visitor policy, etc. Listed below are a few resources on creating a food security plan.

http://www.fsis.usda.gov/PDF/Self_Assessment_Checklist_Food_Security.pdf

http://www.ncfpd.umn.edu/docs/IFT_NCFPDfooddefenseassetool.pdf

<http://www.fda.gov/Food/FoodSafety/RetailFoodProtection/FoodDefenseandEmergencyResponse/default.htm>

Employee Hiring & Termination Practices

Screening checks shall be performed on all new/potential employees including part-time, temporary and seasonal employees to determine suitability for employment. There shall be a procedure in place for separation of employer and employee to ensure that all security access (keys, badges, etc.) is removed. Once separation takes place the former employee shall be considered a visitor and subject to the visitor's policy. In the case of a disgruntled employee every effort shall be made to keep the employee off the premises.

Facility Security

The facility shall have a clearly defined perimeter limiting access to the grounds. Fencing restricting access (creating an outer security ring) is best practice. The fencing shall have minimal access through points for vehicles and or pedestrians. The access points shall have electronic security locks or security guards. The building access doors shall have security controls in place to prohibit unauthorized entry (creating a middle security ring). The doors shall be enabled with alarms for open or unsecured doors. The alarm mechanism shall be periodically tested. All exterior bulk entry points shall also be locked. Interior building areas that pose high risk (ingredient storage, batching, laboratory, etc) shall have additional controls (inner ring) for restricting access. Authorized Personnel Only sign shall be posted. In the event that physical keyed locks are used a log shall be maintained detailing the number of keys and what they open and who has keys shall be maintained.

Supplier Program

The facility shall only accept materials from an approved supplier as detailed later in the COP.

Transportation

All incoming materials shall be inspected for signs of tampering. Tamper evident seals shall be in place and only removed by supplier personnel upon receipt. The seal number shall match what is recorded on the transportation paperwork or the materials shall be rejected. Outbound loads shall have tamper evident seals in place to only be removed by SUPERVALU personnel upon receipt. Locks may be acceptable with prior approval from SUPERVALU Quality Assurance.

Visitor Policy

The facility shall have in place a visitor's policy. Visitors including off-duty personnel, contractors, sales reps, company employees not based at the facility, employee family members, regulatory agencies, etc. The policy shall define that:

- All visitors shall provide proper identification and just reason for being at the facility.
- All visitors will review, sign off and comply with pertinent company policies including GMP's
- Shall be provided with identification denoting them as a visitor
- That they shall be accompanied at all times by facility personnel (long term contractors may be left unaccompanied if a trusted relationship has been developed and they are periodically checked upon and risk has been determined to be low)
- Employees should be trained and empowered to challenge unidentified visitors

EMERGENCY PREPAREDNESS

The facility shall have in place an emergency preparedness plan addressing the handling of raw materials, ingredients and products in the event of an emergency or natural disaster. Examples of an emergency or natural disaster would be power outages, sewage backups, lack of potable water, hurricanes, floods, tornadoes, etc. The plan shall define the methods of evaluation and disposition of materials at the facility after an occurrence and shall detail personnel and their responsibilities. Emergency contact information shall be conspicuously posted.

INTEGRATED PEST MANAGEMENT

The pest service shall be completed at a frequency determined by activity but at minimum monthly.

A formalized pest control program shall be maintained by the facility. The program can be administered by trained in-house personnel or by a reputable outside contractor. The responsibility for pest management shall be in the hands of a designated manager. It is the responsibility of management to respond promptly to findings and recommendations by the Pest Control Contractor. The pest service shall be completed at a frequency determined by activity but at minimum monthly. Findings from each service should have documented correct

Licenses, Insurance & Contract

Current copies of licenses and insurance shall be retained on site. In respect to a contracted agency a copy of the contract shall be retained onsite and fully describe the scope of work.

Material Safety Data Sheets (MSDSs)

Material safety data sheets shall be retained onsite for all pesticides, rodenticides, etc. used at the facility.

Location Map

A map or schematic shall be created depicting the location of all rodent control devices. Within each device a service record for the individual device shall be maintained.

Service Reports

A report shall be generated after the completion of each service and shall be reviewed with the quality manager or other designated employee. The report shall include:

A service report shall be reviewed with the quality manager or other designated employee.

- Findings from all stations
- Trend analysis for all stations
- GMP or other violations that could affect the pest management system (e.g. open doors, garbage, tall foliage)
- Recommendations for improvement
- In regards to pesticides are used the following shall be reported:
 - Materials applied
 - Target organism
 - Amount applied
 - Specific location of application
 - Application method
 - Dosage or rate of application
 - Date and time treated
 - Applicator's signature

Pesticide Usage & Storage

Pesticides shall be, applied ONLY by a licensed applicator.

All pesticides shall be approved for use in a food facility. The pesticides shall be used according to label and regulation, and applied ONLY by a licensed applicator. All pesticide containers and applicators shall be properly labeled and stored in a locked area. The area shall have containment materials in case of a leak or spill.

Infestation Prevention & Control Measures

Exterior Bait Stations

shall be in place for the control of rodents. They shall be tamper resistant, properly positioned, locked and anchored in place. The use of plastic ties or other easily cut materials shall not be used as a locking mechanism. The lids shall be locked with the devices recommended by the manufacturer. The bait used shall be an approved rodenticide or feeding block. The stations shall be serviced based on activity but no less than monthly. Each station shall be number and located on a facility map.

Exterior bait stations shall be tamper resistant, properly positioned, locked and anchored in place.

Internal Stations/Catchalls

– Unless prohibited by regulation all interior traps shall be of mechanical design. SUPERVALU discourages the use of glue boards. However, if used, they shall be inspected daily and replaced when necessary. Bait or any type of feeding block is strictly forbidden. The devices shall be placed every 20-40 feet along exterior walls and to each side of pedestrian and overhead doors where there is potential for rodent entry. Stations shall also be in place along interior walls where there is a potential risk of rodent activity (e.g. raw materials storage). The stations shall be serviced based on activity but no less than monthly. Each station shall be number and located on a facility map.

Interior stations shall be of mechanical design. Bait or any type of feeding block is strictly forbidden!

All types of domestic animals are unacceptable in any parts of a food facility. The use of cats as a form of rodent control or security dogs being allowed to roam in food premises overnight is not acceptable.

Exterior Grounds - The grounds bordering the facility shall be effectively controlled to prohibit the entrance of pests, from adjacent grounds or facilities which are not under the Supplier's control. The site boundaries shall be clearly defined. The grounds shall be adequately maintained including cutting or trimming grass, weeds or other foliage. A vegetation free strip of at least 36 inches (90cms) shall be maintained around the building foundation areas adjacent to production, product, raw materials and ingredients storage areas. Additionally the external areas shall be kept clear, minimally 18" unobstructed, of harborages such as debris, or equipment, etc.

A vegetation free strip of at least 36 inches (90cms) shall be maintained around the building foundation

Grounds shall drain adequately to prevent pooling water and/or contamination seepage. If retention ponds are located onsite they shall be aerated or circulated or properly treated to minimize mosquito breeding. All grounds areas shall be kept clean, neat and free of litter. Grounds shall be maintained in good repair.

Building - The building shall be maintained so that it does not provide access or harborage points for pests. All holes, cracks or crevices shall be repaired. All doors/entrances into the facility shall remain closed at all times. All pedestrian doors shall be self closing. Doorways requiring nighttime illumination shall be lit from a remote source to avoid drawing insects toward the opening. All exterior windows shall be screened with a suitable mesh to prevent entry of flying insects. Similarly, roof access at apexes and eaves as well as ventilators shall also be screened. Screen doors

The building shall not provide access or harborage points for pests.

to the exterior shall be tight fitting with an adequate seal. All screens, etc., shall be included on cleaning and PM schedules. If crevices, false paneling, holes in walls, roofs, floors, poor unsealed conduits, etc., are eliminated and correctly maintained, the risk of infestation is considerably reduced.

Insect Light Traps- These are the final line of defense against flying insects and are recommended. They shall be correctly located away from the production lines, properly maintained and be permanently operational. Catch trays shall be emptied and cleaned weekly. UV tubes shall be replaced at least annually and be documented. All units shall be included in cleaning and maintenance schedules. Flypapers are not acceptable.

Refuse & Refuse Containers - Dumpsters and other refuse containers shall be of a closed type. Where possible, refuse containers shall be in a separate room, effectively segregated from other processing, packaging or storage areas. Areas around dumpsters shall be routinely cleaned and treated against insects. Particular attention shall be given to removing any standing water and debris surrounding or beneath the containers.

Fogging & Fumigation - Internal fogging or spraying of factory production areas shall be done only when no product is present. Equipment shall be protected as much as possible and all food contact surfaces; containers or receptacles in the area treated shall be cleaned prior to production resuming. Fumigation of any sort shall be carried out by qualified staff or contractors only. All food shall be removed from the area to be fumigated prior to treatment. Fumigation is not regarded as a routine pest management measure.

External Control - Wasps and bees can be controlled by baiting the perimeter of the facility, but this should be left to a specialized contractor.

Residual Insecticidal Sprays - Residual sprays can be used when necessary but only in non-food areas (i.e. warehouses). Residual sprays shall never be used on food contact surfaces.

Control of Birds - Birds can become pests if an abundant source of food and nesting sites are available on or near the facility. Good grounds keeping i.e. picking up food spillages immediately can minimize flocks. Any entry into warehouses or production and packing areas shall be dealt with immediately. Access to the premises is usually through holes in walls, broken windows, eaves, and projections or ridges acting as perches. Timely repair of holes, broken windows and the use of anti-perching devices will reduce birds from roosting near the facility.

Raw Materials & Ingredient - Any raw material or ingredient known to have an inherent risk of infestation such as cocoa, spices, bagged flour, cereals, grains and meals, etc., shall be segregated and treated separately.

Infestation control is not restricted to the control of rodents, flies and birds. It includes all living creatures whether walking, crawling or flying. Unhygienic people are also pests within this context. The policy shall be one of prevention by the maintenance of good sanitation and housekeeping practices coupled with good sanitary design and maintenance of the building. All signs of infestation of whatever type shall be investigated and eradicated immediately.

CHEMICAL CONTROL PROGRAM

The facility shall have in place a program which manages the use, handling, storage and purchase of non-food chemicals. The program shall include:

- MSDS and specifications
- Properly labeled and identified containers
- Segregated & secured storage area(s) with restricted access
- Data confirming suitability for use in a food manufacturing facility
- Authorized use by trained personnel only
- Containment of potential spillage as appropriate

FOREIGN MATERIAL PREVENTION & CONTROL

Successful foreign material contamination prevention relies on the following elements:

- A comprehensive HACCP exercise per the principles outlined in the HACCP section of this Code
- Raw material selection and control
- Facility design, construction and maintenance
- Good working practices and clean-as-you-go
- Close attention to relevant customer complaint statistics
- Close attention to the hazards associated with rework
- Environmental conditions which may lead to the absorption of off-odors and flavors
- Corrective actions

Materials Covers

The protective measures shall be of clean design so that they themselves do not provide a source of contamination.

All open materials, whether raw, WIP, or finished product prior to packaging, shall be protected from contamination with tight fitting lids, covers or shields. The protective measures shall be of clean design so that they themselves do not provide a source of contamination (physical or microbial). These shall be kept in place at all times. All hoppers, silos, tanks, etc., shall have their contents identified. All exterior bulk receiving ports shall be sealed and locked when not in immediate use.

Screens & Filters

Screens shall be inspected & cleaned regularly & at a frequency that maintains its effectiveness.

All in-line screens shall be inspected and cleaned regularly and at a frequency that maintains its effectiveness. Any signs of wear to the grid or support sections shall be rectified immediately, before further use. Screens/sifters shall be made of metal or plastic. Wood is not acceptable. Vibrator screens shall be checked regularly for efficiency and cleanliness. Reduction of efficiency in separation shall be corrected immediately. Microbiological filters shall be checked for efficiency on a routine basis. Screens and filters used for foreign material control shall be regularly inspected with findings documented and investigated.

Wood & Wood Handled Implements

Wood in general is not acceptable in production areas.

A wood control policy shall be written and implemented. Wood in general is not acceptable in production areas where it may come into direct contact with exposed product or raw materials. While it is accepted that some equipment may necessarily be of wooden structure, alternatives shall be found where possible. In areas where wooden structure is still utilized it must be inspected on a routine basis to ensure it remains sound with no splinters or microbial presence. Any wet process in contact with wood is not acceptable, unless it constitutes a Best Practice according to industry guidelines. Wooden handled implements, i.e., brooms, knives, shovels, mops, etc., shall be eliminated.

Glass, Brittle or Hard Plastics and Ceramics

Glass, brittle or hard plastics and ceramics shall be eliminated except where absolutely necessary. A glass and brittle or hard plastics and ceramics policy shall be written and implemented. The policy shall state these items prohibited except where absolutely necessary. The policy shall also state that these items shall not be brought into the facility in the employees' personal effects. The policy shall include a log or map of their location(s), a documented log of incidents, and a procedure for handling breakage in an area that could jeopardize product. The log or map shall be audited monthly for breakage. Glass and brittle or hard plastics and ceramics are generally not acceptable in any form in open food production areas for measuring instruments, utensils, etc. The following common sources shall be eliminated:

The log or map shall be audited monthly for breakage.

- Glass ingredient containers, e.g., liquid essences, colors, acids, jars, etc.
- Laboratory sampling equipment, e.g., beakers, basins, pipettes, burettes, etc.
- Measuring cups, beakers, scoops, bowls, spoons, etc.
- Thermometers and gauges with glass fronts, mercury in glass (MIG) or alcohol in glass (except as protected fixed instrumentation on thermal processing equipment)
- Glass mirrors to view hopper contents, reflectors
- Scales coated in vitreous enamel

Notice Boards

Notice boards shall be outside production areas and designed to avoid any risk of contamination to the product.

Notice boards shall be outside of production areas and designed to avoid any risk of contamination to the product. Thumbtacks or pushpins to post notices are not acceptable. Permanent clips or frames shall be used. Bulletin boards shall be enclosed and locked to prevent possible unauthorized removal or addition of notices. Paper notices attached with tape to equipment are not acceptable. Pens, pencils, chalk, etc., shall not be allowed on, in or near processing or packaging equipment. Safety notices shall be of a permanent form properly posted on the appropriate equipment. Formulas and operating instructions shall be enclosed in a sealed washable plastic folder posted near, but not on the process equipment.

Materials Handling

The exterior of ingredients containers shall be cleaned prior to use.

All packaged materials, food and non-food, shall be stored in permanently labeled containers. Care shall be exercised to ensure that any packaging materials do not become a source of contamination. Multi-walled bagged ingredients shall be stripped of the outer layer prior to opening and dispensing. Alternatively, bags shall be vacuumed to remove any dust or debris. At the least, bags and container lids shall be brushed. The sacks can be opened by slitting with a sharp knife, ensuring no paper fragments exist. Knives shall be supplied by the company, ideally attached to equipment or carried on individuals using suitable sheaths. Knives shall be accounted for by supervisors, daily, or at the end of every shift. Knives shall not be of the snap off blade type.

The practice of dispensing raw materials directly from sacks should be discouraged. Ideally, they shall be emptied into suitably marked containers, preferably plastic and fitted with a lid; powders shall be sieved. The use of empty raw material sacks for the collection of waste and trash shall be prohibited.

In-line screens or filters shall be routinely cleaned, inspected with findings documented.

In-line screens or filters shall be fitted to bulk liquid systems. The filters shall be routinely cleaned, inspected and findings documented. All discharge points of bulk liquids (other than into vats) shall be fitted with a catch tray. All in-line filters shall be cleaned and inspected on a routine basis at scheduled frequencies. All dry powdered ingredients shall be sieved prior to use. Sieves shall be routinely cleaned, inspected and findings documented. Processing systems shall be enclosed where possible. Where this is not practical, appropriate line covers shall be fitted over exposed food products and food containers.

Small Quantity Ingredient Dispensing

A written document listing ingredient, ingredient supplier, lot number, vendor lot number, quantity by batch and batch numbers shall be maintained

All small ingredients shall be dispensed under strictly controlled conditions. These operations shall be assigned to designated personnel who measure or weigh out the ingredients into clearly marked, sealed plastic containers according to batch size. This ensures that proper ingredients and quantities are dispensed. A written document listing ingredient, ingredient supplier, lot number, vendor lot number, quantity by batch and batch numbers shall be maintained and reviewed by management to assure proper formula control. Under no circumstances shall finished product containers be used for dispensing ingredients.

Conveyors

Motor housings shall not be positioned directly over conveyors; but where this occurs; suitable drip trays shall be fitted.

Conveyors shall be kept clean and in good repair. Conveyors shall be constructed of a material that is easily cleaned and sanitized. Ideally, flexible webbing shall be seamless; however, if it is unavoidable, bonded seams are preferred to stitching and belt lacing. Metal vibrating conveyors shall be so constructed that seams are completely filled in and polished smooth. All conveyors shall be inspected regularly and repaired or replaced immediately when fraying, cracks or other damage is detected. Motor housings shall not be positioned directly over conveyors; but where this occurs; suitable drip trays shall be fitted. Empty jars, bottles, cans and cartons conveyed to the packing lines shall be made free of foreign material through the use of inversion blower/washer systems.

Level Indicators

All silos, vats or filling hoppers shall be fitted with level indicators. Where an automatic process is dependent on a continuous supply of material from a bulk container, a level indicator shall give audible/visual warning or automatic stopping of the process when a low level is reached. Filling hoppers shall be similarly equipped to avoid under-weights even where check weighing is carried out after filling.

Equipment & Machinery Finishes

All parts of equipment, which come into direct contact with food, shall be of a suitable non-toxic material that is easily cleaned & not likely to fragment, fracture, peel-off, oxidize or in any way be harmful to the product or consumer.

All parts of equipment, which come into direct contact with food, shall be of a suitable non-toxic material that is easily cleaned and not likely to fragment, fracture, peel-off, oxidize or in any way be harmful to the product or consumer of the product. Any paint or plastic coating of equipment shall have a clean, smooth, unbroken surface and withstand normal use and cleaning. It is sometimes better to leave metal surfaces that are in constant use uncoated. Any painting shall stop short of hopper mixers, etc.; similarly painting of moving parts immediately above production or raw material handling points shall be avoided.

Painted Surfaces

The use of lead paints is strictly forbidden.

All painted surfaces regardless of location shall be routinely inspected for loose and flaking paint. All loose and flaking paint shall be removed so as to not become a source of contamination. The use of lead paints is strictly forbidden. In areas where flaking paint is highly likely (e.g. steam, harsh chemical usage), alternate coatings shall be investigated.

Mobile Equipment

All mobile equipment shall be properly maintained and have means of locking it into place on site. The servicing areas for this type of equipment shall be properly constructed and maintained to avoid accidents.

Repairs & Maintenance

Maintenance personnel shall be made aware of the necessary personal hygiene and sanitation precautions to be observed while working on equipment and before allowing it back into production after overhaul or repair. Maintenance staff shall comply with the same sanitation standards as production staff.

The facility shall have in place a procedure for reconciling parts and tools following maintenance and repairs.

Parts & Tools Inventory – The facility shall have in place a procedure for reconciling parts and tools following maintenance and repairs. Maintenance personnel shall only take the parts and tools specifically needed for the task. The policy shall also address the corrective measures needed if at the completion of a repair parts and/or tools are missing

The following guidelines for maintenance personnel are recommended.

- All screws, nuts, bolts, washers, etc., shall be of a self-locking type or spot welded in place and ground to a smooth finish. Regular inspections of all equipment shall be carried out to ensure that all nuts, bolts, screws, etc., are secure.
- Protective screens or curtains shall be erected when work is necessary in a production area. Where possible equipment shall be removed from the production area for repair.
- After maintenance and repairs have been completed the area shall be eliminated of potential contaminants:
 - All excess oil, grease or dirt shall be cleaned off all equipment serviced prior to returning the equipment to operations or for storage
 - Any scraps, trimmings, pieces of wire or wire covering shall be collected and retained. Strict precautions shall be taken to ensure there is no risk of contamination to surrounding area or products.
 - After servicing, all food handling or food contact equipment shall be tagged to prevent their use without prior cleaning and sanitizing.

Prior to placing equipment back in service the equipment shall be inspected for the maintenance debris and for cleanliness.

Inoperable equipment shall be tagged or removed from area. Prior to placing equipment back in service after maintenance or repair, the equipment shall be inspected for the maintenance debris (parts, tools, lubricants, etc.) and for cleanliness and shall be sanitized. Necessary guards shall be replaced. The inspection shall be documented and records maintained.

Finished product containers or ingredient containers shall not be used to hold screws, wire, lubricants, solvents, etc. All repairs shall be of a permanent nature. The use of string, tape, clamps etc., to make temporary repairs is unacceptable.

Welds

Welds shall be of a clean sanitary design.

All welds on product contact surface shall be of a clean sanitary design. The welds shall be ground smooth to eliminate microbial harborage points. Spot or tack welds are prohibited.

Servicing

All lubricants, degreasers and release agents shall be established as suitable for use on food machinery. All lubricants shall be carefully controlled and those which may come into contact in any way with food shall be of a non-toxic edible oil base, specific for food processing or packing equipment. Non-food grade lubricants shall be segregated and labeled. Excess lubricants shall be removed after servicing is completed.

Forklifts

Forklifts used in areas where open food or ingredients are present shall be powered electricity.

All forklift trucks used in production areas, warehouses or any area where open food or ingredients are present, should be electric powered. A system to regularly inspect forklifts for oil and hydraulic leaks shall be carried out. Forklifts shall be routinely cleaned and inspected.

Metal Contamination

Preventive procedures backed by detection and removal systems plus documented corrective actions form the basis of an effective metal contamination control program.

Every precaution shall be taken to avoid contamination by any metal. Preventive procedures backed by detection and removal systems plus documented corrective actions form the basis of an effective metal contamination control program. The prevention program shall begin with an assessment of sources of metal contamination (HACCP). The scope of the hazard analysis shall include the vendor's supplier's programs to prevent metal contamination, inspection of ingredients and raw materials, processing operations, finished product packaging, storage and shipping. Depending upon the nature of the product, factors which require appropriate controls include:

Raw Materials

- Suitability of raw material packaging and delivery systems
- Field practices with respect to metal control e.g. prevention of game shooting, method of harvesting (hand picking or mechanical harvesting)
- Extra precautions for known sources of metal e.g. canned ingredients

Processing

- Metal-to-metal contact points where wear could occur
- Maintenance and repairs both during active production and during down time
- Metal fatigue leading to fragments of metal e.g. vibratory conveyors, sieves, sifters, and metal conveyors

Packaging

- Metal fragments embedded in final product packaging materials
- Small metal tools or equipment that could be incorporated in the final product
- Metal fragments or parts from packaging machinery
- Staples or metal ties

Storage & Warehousing

- Nails, staples and metal strapping

Elimination of Metal

There are several ways of reducing the risk of metal contamination that can be incorporated into the manufacturing system. These shall be employed where appropriate.

- Physical separation: air or water flotation systems and visual inspection
- Magnetic separation, especially just prior to final packaging
- Filtration of liquids
- Sieving of dry or powdered goods

Knives (Utility or Packaging)

- Shall not be of the snap off blade type

DETECTION OF METAL CONTAMINANTS

It is SUPERVALU policy that all products be screened for metal contaminants.

All production lines shall be fitted with active metal detecting devices (metal detectors or x-ray capable units) unless there is sound technical reason for not doing so, which shall be agreed upon by SUPERVALU Quality Assurance Department. Such devices shall be placed either immediately after the filling machines or as near to the end of the production line as practicable and shall be capable of detecting the most common forms of potential metal contaminants, including but not limited to, stainless steel, ferrous, and non-ferrous contamination. Such devices shall be sized for the items packed, kept clean, in good working order and shall be serviced and calibrated according to manufacturer's recommendations. Appropriate calibration and maintenance records shall be maintained.

Metal detecting devices shall be set for the optimum sensitivity for the product and shall be checked for effective operation at start up and at regular intervals (e.g. hourly, during each work period, etc.) by designated personnel. The test procedure shall follow the device's manufacturers' recommendations and include testing with products. The tests shall be recorded along with any malfunctions and corrective actions taken, and logs maintained at each unit's location in the processing environment. When a malfunction in the device is discovered, all goods produced since the previous valid check shall be detained and re-examined.

The rejection alarm and/or rejection equipment shall be tested at the same time and frequency as the device itself to ensure that the device and rejection equipment are synchronized. A positive capture bin shall be included to hold rejected goods for further inspection. Where no rejection system is fitted, the detection of metal shall be signaled by a light and/or clearly audible alarm and the flow of product stopped or diverted. All rejected products shall be examined by designated personnel to establish the source of the contamination. The results of the examination, including corrective actions taken based upon the findings, shall be recorded.

Other methods for detection or removal of metal contaminants, such as screens, filters or magnets, may be used if appropriate but must first have approval by SUPERVALU Quality Assurance.

MAINTENANCE PROGRAMS

Preventive Maintenance Program

All facilities shall have an active, documented Preventive Maintenance (PM) program. This program shall include the list of equipment, maintenance frequencies, documented training for personnel and accountability. Maintenance records shall also be maintained and emergency maintenance logged. The training program should include the importance of preventive maintenance and how it impacts food safety. It should include On-The-Job (OTJ) training for employees involved and how/where to access PM information.

Scheduling of Repairs

Wherever possible, maintenance of production equipment and processing areas shall take place during non-production hours. Following maintenance or repair work, all equipment shall be inspected, cleaned and sanitized before production restarts. Painting, gluing, etc., shall not be allowed in production areas while production is taking place. Sufficient time shall be allowed after painting to assure any and all fumes have dissipated before production resumes. Paints and chemicals shall never be allowed near food or raw materials and shall be stored in a locked segregated area. All food contact lubricants and non food lubricants shall be segregated.

Temporary Repair Policy

The facility shall have a policy addressing temporary repairs. It can be included within the main maintenance policy. The temporary repair policy shall address temporary repairs, which shall be eliminated or minimized, and when used shall not interfere with sanitation and not be used as a permanent solution. All temporary repairs shall be tagged with a date and the initials of who made the repair. A log of the repair shall be kept to ensure a timely permanent repair is made.

Parts and Tools Inventory Policy

Parts and tools shall be inventoried during repairs.

The facility shall have a policy addressing the inventory of parts & tools to ensure that they are all accounted for following repairs or maintenance. Maintenance personnel shall only take the parts and tools specifically needed for the task. The policy shall also address the corrective measures needed if at the completion of a repair, parts and/or tools are missing

Facility and Utility Maintenance

All alterations and repairs to the building or utilities shall be controlled particularly during production hours. The area shall be adequately screened off and extra precautions taken to prevent contamination by dust and debris. All contractors' personnel shall be informed of the requirements of a food facility and be instructed to comply. Contractors shall be required to wear protective clothing and comply with all facility GMP guidelines. If possible, they shall be segregated and prevented from entering the production areas.

ALLERGEN PROGRAM

A food allergen is defined as “a product or ingredient containing certain proteins that can potentially cause severe (occasionally fatal) reactions in a food allergic person. Allergen proteins are naturally occurring and generally cannot be eliminated by cooking or baking.” Food allergies cause immunologic responses that range from slight discomfort to life threatening reactions. The body mistakes the protein as harmful and reacts accordingly. Currently there are no medications to cure food allergies. Epinephrine, commonly called adrenaline, is a medication commonly used to control the allergic response. Avoiding the food is the only way to prevent reaction.

There are eight foods containing the proteins that cause 90% of the food allergic reactions according to the Food and Drug Administration (FDA) Guidance Document for Food Investigators. They are milk, eggs, peanuts, tree nuts, fish, shellfish, soy and wheat. The FDA focuses on these foods because they are the primary foods that cause anaphylaxis. Approximately 90% of the remaining reactions are attributed to cottonseed, poppy seed, sunflower seed, sesame seed, legumes, sulfites and celery root. It shall be noted there are approximately 220 different food materials that have been identified as causing an allergic response and the list will likely grow. There are some area specific issues, for example: Canada has expanded its list of major allergens to include sesame seeds and sulfites; Buckwheat in Japan; Celery root in Europe.

An Allergen Control plan shall be developed which will contain policies and procedures to prevent cross contamination with allergens and shall include appropriate documentation to support the activities. Listed are items that shall be considered when developing your Allergen Control Plan:

- | | | |
|---|---|--|
| ▪ Allergen changeover inspections | ▪ Protective equipment for employees | ▪ Dedicated lines |
| ▪ Employee Training | ▪ Preoperative inspections | ▪ Air flow |
| ▪ Color-coding or other designation of allergen devices | ▪ Barriers between allergen and non-allergen production | ▪ Allergen labeling (shall be conspicuously labeled) |
| ▪ Schedules (allergens should be last of day or week) | ▪ Enzyme Linked Immunosorbent Assay (ELISA) testing | ▪ Location of allergen addition and storage |
| ▪ Allergen changeover sanitation | | |

All suppliers shall develop an Allergen Control Program regardless if allergens are utilized in their facility or not. It is important that all employees be trained on the dangers of allergen contamination and how allergens can still enter the facility whether or not they are used as an ingredient in manufacture. This would include such things as the vending machines, employee lunches, truckers lounges, visitors, mis-shipments or mis-packed goods, etc., that have been received. Employees should be trained on how to properly handle these situations.

It is important to alert all visitors and contractors to the use of allergens in your facility as well as your policy against bringing allergens onsite. Basic allergen overview training shall be given to contractors as part of the GMP training.

All SUPERVALU suppliers shall require a stringent Allergen Program for all of their ingredient suppliers!

Notes:

Tree nuts would include walnuts, almonds, pecans, hazelnuts/filberts, pistachios, cashews, pine nuts, macadamia nuts, coconut and Brazil nuts.
Shellfish includes crab, crawfish, lobster, shrimp, mussels, and oysters.
Wheat will include barley, rye, oats, and spelt, either as grain or flour.

Sources of Information:

Food & Drug Administration (FDA) www.fda.gov
Food Allergy & Anaphylaxis Network (FAAN) www.foodallergy.org
Food Allergen Labeling and Consumer Protection Act of 2004 www.cfsan.fda.gov

FOOD SENSITIZING AGENTS

Certain food additives can cause intolerances in particular individuals and are known as sensitizing agents. They are often confused with food allergens. If known sensitizing agents are used in the process they shall also be segregated and labeled similarly to allergens. Examples of known sensitizers are: yellow #5, MSG and sulfites.

SCOPE

Technical specifications for the product shall be agreed upon between the Supplier and SUPERVALU.

Before any SUPERVALU Private Brands product is launched, a technical specification for the product shall be agreed upon between the Supplier and SUPERVALU. The specification format will be supplied by SUPERVALU and will include sufficient details to identify the product as well as any other information considered necessary by SUPERVALU. Updated copies of the SUPERVALU specification form may be obtained by contacting Quality Assurance or Product Development at SUPERVALU Private Brands. Technical and commercial representatives for both the Supplier and SUPERVALU will sign the specification. Any deviation or change from the agreed, signed specification will not be allowed without prior written agreement from SUPERVALU.

A copy of the completed current specification shall be available at each manufacturing site where the item is produced. The Supplier will provide SUPERVALU with the name of the department or person who retains possession of these specifications. All relevant documents shall be available for inspection by SUPERVALU Quality Managers during on-site inspections. In addition, documents pertaining to products manufactured for SUPERVALU may be requested by SUPERVALU for product quality verification.

SPECIFICATION CONTROL MANAGEMENT

The facility shall have in place a written procedure for managing changes in specifications.

The facility shall have in place a written procedure for managing changes in specifications. The procedure should cover both specification for materials the facility receives and for products it manufactures. The procedure should describe the personnel and methods utilized to make specification changes to ensure that there is formal agreement with all applicable parties prior to changes being implemented. For Private Brands products formal agreement shall be obtained from SUPERVALU.

RAW MATERIALS

Specifications shall be maintained for all raw materials.

The facility shall maintain product specification for all raw materials¹. Specifications may include physical, microbiological, chemical, organoleptic and shelf life parameters, etc. These specifications shall be readily available to all relevant personnel. All raw materials shall only be utilized for intended use. Packaging containers, empty ingredient containers, etc. shall not be used to store other items such as oils, greases, paint, tools, pens etc. Raw materials shall only be obtained from approved suppliers.

1. Raw materials include but are not limited to packaging, ingredients, chemicals and processing aids.

Inspection

Any raw material which is found to be in non-conformance to specifications shall be placed on QA HOLD.

All raw materials, which are purchased for a manufacturing process, shall be inspected and have such inspection documented against a written specification (preferably a Certificate of Analysis (COA) for product and/or a Continuing Letter of Guarantee, CLOG, for packaging material) before or upon arrival. Such inspection shall occur before off-loading from the vehicle. Inspection of the raw material, including packaging, palletizing, and trailer inspection shall be documented on a separate inspection form, and will depend upon the type of commodity. Visual checks may be supplemented by the appropriate detailed sampling and analysis. Dates of manufacture and/or lot numbers shall be recorded and checked against the invoice to ensure that they have been shipped correctly. Every raw material shall have its own sampling frequency and an agreed acceptance standard as a part of the raw material specification. Any raw material which is found to be in non-conformance to specifications shall be placed in a QA "HOLD" area prior to being returned to the vendor. Any raw materials accepted on site, but later found to be unsuitable for use e.g. infested, non-performing, contaminated with foreign material, etc., shall be isolated, destroyed or returned to the vendor.

Storage

Raw materials shall be stored in appropriate areas in the warehouse, clearly labeled as to date of receipt

Raw materials shall be stored in appropriate areas in the warehouse, clearly labeled as to date of receipt and not placed where they obscure current material in use. This practice will assist in correct stock rotation (FIFO²: first in first out). Food materials and packaging supplies shall be stored in separate areas. An area shall be allocated whether any suspect material can be guaranteed. All other materials such as cleaning materials, paint, boiler compounds, solvents, etc., shall be clearly identified and physically separated from food materials and packaging and under controlled access. Allergens shall be segregated and stored separately, appropriately, in a labeled area, preferably with limited, authorized access.

2. Caution shall be used when utilizing FIFO on raw materials to ensure that the supplier utilized FIFO prior to shipping to you. Manufacture & shelf life dates shall also be checked when receiving raw materials.

Silos & Bulk Storage Tanks

Caps and locks shall be provided and in place on external bulk inlet points

Bulk tanks shall be of a design and make-up suitable for the commodity. All connections to bulk silos whether for liquids or solids shall be kept clean and capped. A documented cleaning schedule and cleaning frequency shall be maintained on all bulk installations. The cleanliness and suitability of tanker hoses and hose connections shall be inspected prior to unloading. Instructions for connection and discharge of deliveries shall be displayed at the connecting point. All connecting points shall be clearly identified with the silo's contents. There shall be no direct piping or linkage between tanks containing different raw materials. Caps and locks shall

be provided and in place on external bulk inlet points. Only relevant personnel shall maintain keys to the locks in these areas and a listing of who is in possession of these keys shall be maintained. Keys shall be collected from personnel upon separation from the company.

Non-Bulk Items

Barrels, Drums, Sacks*, Cartons**, etc shall be inspected for leakage or damage before storing. They shall be intact, properly sealed and labeled. Any container found with minor damage shall be segregated, inspected for contamination or infestation and, if found satisfactory, receive special attention before going into stock i.e. re-bagged, taped or placed into production as soon as possible. Contaminated or severely damaged sacks shall be disposed or refused.

**Plastic-lined or multi-wall paper sacks (bags) are preferable to cloth or burlap.*

*** If cartons are to be stacked a number of pallets high, the rigidity of the boxes shall be checked to avoid collapse.*

Items in Glass

Glass shall be avoided as much as possible. If, however, this is impossible, then it shall be treated with care and segregated in the warehouse. Contents shall be repacked into unbreakable containers before going into a production or dispensing area. If the make-up of the item requires that it be in glass proper measures shall be in place for its use.

Pallets

A pallet management program shall be developed. The program shall detail pallet specifications along with inspection criteria. Pallets shall be inspected for damage, infestation or unusual odors on arrival and before going into the warehouse. Pallets shall be suitable for use in food manufacturing. This includes pallets that raw materials are shipped in on along with pallets for use with finish products.

Perishable and Frozen

Perishable and frozen materials shall meet their specific temperature requirements at point of receiving. If the temperatures are not met the materials shall be rejected. Perishable and frozen items shall immediately be placed in appropriate storage.

Agricultural Products

All fruit, vegetables or grains delivered directly from the fields shall receive a basic cleaning and inspection operation separate from the processing areas of the factory. The transfer from field to facility shall be in a controlled environment to prevent any form of contamination.

APPROVED SUPPLIER PROGRAM

The manufacturer shall have an approved supplier program in place. The program shall detail procedures for the evaluation, selection and maintenance of approved suppliers of goods and services. A list or register of all approved suppliers shall be maintained.

The manufacturer shall have an approved supplier program in place.

A list or register of all approved suppliers shall be maintained.

The Approved Supplier Program shall contain:

1. Specifications that have been agreed upon between supplier and manufacturer
2. Risk analysis of the supplied materials
3. Food safety plan and implemented controls by the approved supplier
4. Methods used for granting approved status
5. Frequency and methods used for monitoring approved supplier, audit as appropriate
6. A certificate of compliance format, to include COA's if required
7. An emergency contingency plan (how exceptions are handled, use of products when audit hasn't taken place, etc.)
8. Methods & frequency of reviewing supplier performance
9. Documents shall be maintained

All SUPERVALU suppliers shall maintain a stringent Approved Supplier Program for all of their suppliers!

FINISHED PRODUCT

All SUPERVALU specifications shall be held in confidence but made available to all relevant personnel.

Finished product specifications shall be documented, current and agreed upon with SUPERVALU. The specifications shall list all pertinent information in regards to but not limited to: microbiological limits, chemical limits, packaging & labeling requirements, quality attributes, etc. All SUPERVALU specifications shall be held in confidence but made available to all relevant personnel. Changes in any specification shall be authorized by SUPERVALU. A policy shall be written describing the procedures for changing specifications, and shall be shared with relevant personnel. A register or log of all specifications shall be maintained.

All product specifications shall be approved in advance of any launch & are strictly CONFIDENTIAL.

Before any SUPERVALU Private Brands product is launched; a technical specification for the product is agreed upon between the Supplier and SUPERVALU. The specification format will be supplied by SUPERVALU and will include sufficient details to identify the product as well as any other information considered necessary by SUPERVALU. Updated copies of the SUPERVALU specification form may be obtained by contacting Quality Assurance or Product Development at SUPERVALU Private Brands.

It is the Supplier's responsibility to ensure that the specifications for SUPERVALU Private Brands are up to date.

Technical and commercial representatives for both the Supplier and SUPERVALU will sign the specification. Any deviation or change from the agreed, signed specification will not be allowed without prior written agreement from SUPERVALU.

A copy of the completed current specification shall be available at each manufacturing site where the item is produced. The Supplier will provide SUPERVALU with the name of the department or person who retains possession of these specifications.

All relevant documents shall be available for inspection by SUPERVALU Technical Staff during on-site inspections or audits. In addition, documents pertaining to products manufactured for SUPERVALU may be requested by SUPERVALU for product quality verification.

CONTRACT SERVICES

Contract services include but are not limited to pest control, sanitation, storage, transport carriers, mechanics, electricians, etc.

Specifications for contract services shall be documented, current and agreed upon in regards to the facility's contracted services. The specifications shall include a full description of the services to be provided and the relevant training requirements of the contracted personnel. Contract services include but are not limited to pest control, sanitation, storage, transport carriers, mechanics, electricians, etc. It is the facilities responsibility to ensure that all the proper licenses, insurance certificates and training of the personnel are completed and available. All contracted service personnel shall have documented training on relevant policies and procedures maintained by the facility. A register or log of all contracted services and their scope of work shall be maintained. It is the supplier's responsibility to ensure that the contract services employees are aware of and adhere to the facilities' policies and procedures. A contract service employee working at the facility will be within the scope of the audit.

FACILITY LOCATION

Location of the building shall allow for the safe manufacture & handling of food products.

PERIMETER

A vegetation free strip of at least 36 inches (90cms) shall be maintained.

The grounds bordering the facility shall be effectively controlled to prohibit the entrance of pests, litter or dirt from adjacent grounds or facilities which are not under the Supplier's control. The site boundaries shall be clearly defined. The grounds shall be adequately maintained including cutting or trimming grass, weeds or other foliage.

A vegetation free strip of at least 36 inches (90cms) shall be maintained around the building foundation areas adjacent to production, product, raw materials and ingredients storage areas.

ACCESS WAYS & WATER DRAINAGE

All access ways to the plant shall be constructed of hard surfaces to minimize dust. Access ways includes all parking areas, loading docks, ramps, etc. Grounds shall drain adequately to prevent pooling water and/or contamination seepage. All grounds areas shall be kept clean, neat and free of litter. Grounds shall be maintained in good repair.

GARBAGE STORAGE

Garbage areas shall be strictly controlled and monitored. Dumpster areas shall be free of spills and litter. Doors and covers shall be kept closed. There shall be a physical separation or barrier between garbage/dumpster areas and the facility. It is recommended that self contained dumpster be used.

RECYCLABLE MATERIALS STORAGE

Recyclable materials storage areas shall be kept clean and organized. Materials shall be removed at a frequency to minimize pest harborage.

EQUIPMENT & MATERIALS STORAGE (BONE YARDS)

The exterior storage area shall facilitate inspection and control of pests.

Exterior storage of equipment and materials (Boneyards) shall be minimized. This would include idle equipment, contractor supplies or other miscellaneous items. If outside storage is required the areas shall be neatly organized and stored off the ground. The exterior storage area shall facilitate inspection and control of pests. Any items that will come back into the facility shall be inspected and cleaned prior to entering the facility to minimize introducing pests or other organisms into the facility.

RETENTION PONDS

If the facility has a retention pond on site it shall be aerated, circulated or treated to prevent mosquito breeding. The pond shall be located away from building entrance points. The pond shall be routinely inspected for infestation and rodent activity. Foliage in this area shall be kept to a minimum as much as possible.

FACILITY STRUCTURE & LOCATION

Local activities shall be considered as they could potentially impact the facility's ability to produce a safe legal product.

The facility shall be located and maintained so as to prevent contamination, constructed of suitable materials for use, be structurally sound and maintained in good repair. Local activities shall be considered as they could potentially impact the facility's ability to produce a safe legal product. Procedures shall be in place to protect the facility from potential contaminants and shall be reviewed for effectiveness.

PEST ENTRY PREVENTION

The structure shall be free of areas that would allow harborage or entry of pests.

The physical structure shall be maintained (free of cracks, holes, openings) to provide adequate barriers for protection against animals, vermin, birds and insects. All doors shall be tight fitting and self closing. Windows, ventilation, fans or other mechanical openings to the outside shall be adequately screened or sealed.

INTERIOR LAYOUT & TRAFFIC FLOW

The facility layout & traffic patterns shall prevent product contamination.

The facility layout, design or redesign shall ensure adequate separation of raw product and ingredient areas from work-in-process (WIP) areas and finished product areas. This becomes critically important in facilities where microbiologically sensitive products are manufactured or where allergens are used. Associated traffic patterns shall prevent product contamination from raw product or ingredient areas, microbiology labs, toilet facilities, waste areas and allergen storage or use. A full risk assessment of design & flow shall be completed. When necessary, vestibules or positive air pressure between areas shall be used to prevent contamination.

INTERIOR CONSTRUCTION & MATERIALS

Walls, ceilings, windows, doors and overhead structures shall be designed, constructed and maintained to prevent harborage or sources of foreign material contamination

Materials used for interior construction and/or repairs shall resist deterioration due to ingredients, products or cleaning chemicals used in those areas. Materials shall be impermeable to liquids and have a smooth easy to clean surface. Walls, ceilings, windows, doors and overhead structures shall be designed, constructed and maintained to prevent harborage (pest and/or microbial) or sources of foreign material contamination (e.g. flaking paint, condensate, fraying insulation, dust and dirt, etc.). Structural joints and cracks shall be adequately sealed. Where necessary openings for conduit, pipes, or ductwork shall be sleeved or sealed. Ledges along walls or windows shall be angled at 45° to prevent accumulation of dust or the storage of materials. As new facilities are built or redesign of existing facilities takes place, Clean Design Principles shall be followed.

ROOFS

Roofs shall be routinely inspected.

Roof surfaces shall not leak, shall drain freely (no pooling water) and shall be free of any product accumulation or debris. Any roof leaks shall be promptly repaired. Rooftops shall not be used for storage of idle or unused equipment, contractor supplies or other items. Roofs shall be routinely inspected for leaks or other damage and for pest activity as part of pest management program.

DOORS

General

Personnel doors shall ideally be separate from vehicle doors for safety purposes. The restrictions in use shall be clearly marked in both cases. There shall be no direct access from outside of the facility into a production area with exposed product.

Closure

All doors to production areas shall be self-closing. Warning indicators of opening or closing shall be used where a hazard to personnel or product exists. The doors shall be tight fitting on all sides including the floor.

Glass in Doors

No glass shall be in doors opening into production areas. Plexiglas or similar transparent plastics are acceptable alternatives.

Screening

All doors opening to the outside of the premises shall be mesh screened or equipped with hanging strip doors to prevent bird and insect entry. Air curtains may be used where their effectiveness has been demonstrated.

Lighting

Doorways requiring nighttime illumination shall be lit from a remote source to avoid drawing insects toward the opening.

FLOORS

Hazards

The condition of floors shall be inspected regularly to ensure no hazards are present. Each process may create different types of hazards on the floor. Manufacturing debris or untidiness, indications of floor break up, loose tiles, hoses and other items left on floors require immediate attention. Action shall be taken to prevent, eliminate or reduce these hazards to the absolute minimum.

Floor Surfaces

Floor surfaces shall be designed to withstand the rigors of the processes being carried out. Chemicals and other corrosive substances including cleaning materials shall be taken into consideration, and the surface shall be impervious and easily repairable. The junction of floor and wall shall be smooth, covered and sealed. Any cracks shall be repaired as soon as possible to prevent further damage and possible pest harborage.

Drainage

Floors shall have adequate drainage slopes to direct any water or effluent towards proper drains or drainage channels. Standing pools of water shall not occur. Drain channels shall be half round in section, with removable grids or covers and accessible for cleaning. The drainage capacity shall be considerably larger than the expected volume flow and be fitted with adequate solids traps. Curbs or channeling shall be provided around wet areas to prevent unnecessary extension of water from one area to another.

Consideration to the positioning of machinery and channeling shall be given so that any liquid discharge or overspill from processing goes directly into a drain rather than onto the floor. All drains shall be designed to prevent back flushing into the plant in the event of a blockage of the sewage system or be equipped with back flow preventers such as clapper valves. Floor drains shall have traps to prevent the emission of sewer gas.

Mezzanine Floors

Mezzanine floors shall be completely sealed and include sidewalls of adequate height to prevent contamination of machinery or products located or passing below. Drainage of these floors shall be completely sealed particularly if any wet processing is carried out on them.

Bridges

Any bridges to or from mezzanine floors or forming walkways over production lines shall also be sealed and include sidewalls at foot level to prevent product contamination.

Platforms

The use of platforms on any floors shall be kept to a minimum. If needed, metal or plastic platforms shall be used which are easily lifted for cleaning. Wooden pallets shall not be used for this purpose.

WALLS

Surfaces

All wall surfaces shall be impermeable to liquids and have a smooth easy to clean surface. Fixtures and attachments to walls shall be kept to a minimum to reduce debris traps and aid cleaning. Crevices shall be avoided, as they become harborage for debris and pest infestation.

Wall Joints

All junctions of walls with floors and other walls shall be smooth and impervious. A smooth rounded joint is preferred.

Finishes

Tiles shall be sound and in good repair. Loose or damaged tiles are unacceptable and shall be replaced. Painting is acceptable but painted surfaces shall not be allowed to deteriorate or flake. Paint used shall be approved for food manufacturing and packaging areas, be mold resistant and, in particular, free from noxious odors. Plastic, plastic fiber or other approved coatings are acceptable. All finishes shall be properly applied and maintained.

Ledges

Ledges, joining ridges, etc., shall be avoided, but where they are necessary, shall be adequately sloped to prevent build up of dust and debris.

Inner Partitions & Temporary Walls

Inner partitions if of a permanent nature shall meet the requirements listed previously. Wall placement and function within a facility are required to provide maximum protection of air-borne or other environmental contamination, and may be required to contain filtered, positive-pressure air flow to surrounding areas. Temporary walls shall be so constructed that they protect the production area from contamination and are not themselves a hazard to the process or product in any way. They shall only be permitted for a very limited period of time.

Protection Barriers

Barriers shall protect any wall surface that is likely to come into contact with or be scraped by any moving equipment. These shall be fixed to the floor.

WINDOWS

Glass & Frames

Ideally, glass windows shall be eliminated. Broken or cracked windows shall be replaced immediately and all debris cleaned up before production begins. Glass shall be properly installed and sealed. Window frames shall be sound, properly fitting and sealed to prevent insect entry. Any window in a food production area shall ideally be made of an unbreakable material, i.e., Plexiglas.

Screening or Sealing

All window frames not required for ventilation shall be permanently closed and sealed. Operable windows shall be adequately screened to prevent insect entry. This screening shall be of a permanent nature securely fixed to the inside or outside of the window frame, but in a manner that allows for adequate cleaning.

Sills

All windowsills inside and out shall be adequately sloped to prevent debris build up and facilitate cleaning.

CEILING

General

Ceilings shall be of a smooth cleanable surface and kept in good repair. They shall be regularly cleaned and carefully maintained, and all joints shall be sealed and impermeable. Where drop ceilings are used, access to the space above is essential for inspection and cleaning. Adequate walkways, etc., above shall be provided for this purpose and for any access to services.

Girders

Girders and overhead frameworks shall be kept clean and maintained regularly. These shall be kept to a minimum and where possible be rounded to facilitate cleaning.

Eaves & Ridges

These shall be sealed properly to prevent access to birds and insects and eliminate harborage. The gutters shall not leak or drain to the inside of the facility.

Skylights

Skylights shall be designed or modified so that they do not allow access to birds or insects and are not directly above any exposed raw material or finished product. Operable skylights shall be prohibited in the processing area, and where used elsewhere in plant, shall be suitably screened. Skylights shall be of safety type or adequately protected against breakage.

LIGHTING

All lighting within the facility shall be shatter resistant or protected.

Adequate lighting shall be provided in all areas. Levels and color of lighting shall be adequate and appropriate for the type of operation being carried out. All lighting within the facility shall be shatter resistant or protected by a clear or translucent plastic cover that will retain any breakages. These shall be kept clean at all times. Particular care shall be taken when cleaning or replacing light fittings to ensure the product is not contaminated in any way. This lighting requirement also applies to all warehouse areas in food production facilities. Exterior illumination of doorways and docks shall be lit from a remote source to avoid drawing insects toward the opening(s).

EQUIPMENT & MATERIALS PLACEMENT

Placement shall also allow ample space for inspection and cleaning.

Adequate spacing shall be provided when placing equipment to allow for proper operation, inspection, maintenance and cleaning. Equipment in processing areas shall be placed a minimum of 36" from walls. Materials storage/placement shall also allow ample space for inspection and cleaning, a minimum of 18" from the wall. If racking is used it may be placed flush with the wall only if there is a 12" clearance from the floor to allow for proper cleaning and inspection. Placement of equipment shall consider location of drains so that any discharge or spillage from the equipment goes directly to drain and not onto the floor. The equipment shall not be placed directly on top of drains or grates making cleaning of the drains impossible. The use of handrails and framework in, on, around or supporting equipment shall be in tubular sections with sealed ends.

HAND SINK DESIGN

All hands sinks in the manufacturing areas of the facility shall be of "hands free" design.

All hands sinks in the manufacturing areas of the facility shall be of "hands free" design. Hand sinks can be operable with a foot pedal, electronic sensor or knee pedal or some other method to allow for "hands free" operation. Office areas are exempted from the "hands free" requirement but the conversion to "hands free" design is highly recommended.

HEATING, VENTILATION & AIR CONDITIONING SYSTEMS (HVAC)

Air shall not be a source of product contamination.

Air and ventilation systems shall allow for the manufacture of a safe product. Air shall not be a source of product contamination. Ventilation systems shall adequately circulate clean, fresh air throughout the facility and remove fumes, dust, odors, gasses, vapors, steam and other contaminants. Air make-up units shall be fitted with clean filters and maintained free of mold and/or algae. Air shall be filtered based on the quality needs of the products. Air shall not originate from exterior areas with likely sources of contamination; e.g. a rooftop unit located next to a low spot with pooling water.

Natural Air Flow

Natural airflow shall not be relied upon where processing systems discharge large quantities of heat or steam. Airflows in production areas shall be vented directly to the outside and not toward non-production areas i.e. dry storage. The health and comfort of personnel shall be considered in the case of extremes of temperature or humidity.

Mechanical Air Flow

Air flow from fans, air conditioning, etc., shall be regulated to ensure:

Air flow from fans, air conditioning & ventilation systems shall not flow directly onto product.

- Air from ventilation systems does not exit directly onto product or equipment such as balances, etc., which might be affected.
- Where necessary, air shall be filtered to microbiological standards. Air from high-risk areas shall be vented to the outside to prevent it from entering low risk areas.
- Fans and baffles shall be regularly cleaned to remove dust and debris accumulations.
- All processes, which give off steam, high heat or other vapors, shall be effectively hooded and fitted with adequate exhaust equipment. This will help prevent mold growth on walls and reduce the level of corrosion in the facility.

Air Pressure

Positive air pressure shall be maintained in production areas.

Proper air pressure differentials shall be maintained to prevent product contamination. Positive air pressure shall be maintained in production areas that are defined as microbiologically sensitive. Negative air pressure shall be maintained in raw product and non-processing areas.

Heating

Radiators, air circulation or radiant heat shall provide heating. The use of direct heat from gas or oil is not acceptable in food production areas

COMPRESSED AIR

Compressed air used in any application shall be oil free and filtered (water and /or oil) to ensure clean air supply.

Compressed air used in any application shall be oil free and filtered (water and /or oil) to ensure clean air supply. Compressed air that comes into contact with product or product contact surfaces shall be further filtered, typically at 0.2 microns. Filters shall be located as close to the point of use as possible. Exception can be made if the filter is part of a loop system that can be steam sterilized. Air supply pipes shall be clearly identified and correctly installed. All equipment relying on a constant pressure shall be fitted with an audible low pressure warning system and excess pressure relief valve. The filters and traps shall be regularly serviced.

REFRIGERATED AREAS

All cold storage areas (coolers, freezers, etc.) shall have automatic control for regulating temperature, an automatic alarm system for indicating significant temperature change, a thermometer, and a temperature measuring or recording device.

ELECTRICITY

Electrical cables on equipment shall not have bare wires visible. All electrical conduits shall be enclosed but accessible for inspection and infestation treatment. Electric cables and fixtures shall be properly installed. All equipment shall have appropriate safety systems to cope with any emergency.

GAS

All gas lines shall be clearly identified with the type of gas flowing in them. The pressures in use for them shall be clearly identified on equipment. Necessary precautions shall be clearly displayed. Warning indicators shall be fitted where appropriate. Cylinder gas tanks in use for gas flushing operations shall be properly installed.

WATER

Process water shall be of acceptable potable standard meeting applicable regulatory requirements.

All water used in any food product or intermediary process shall be of acceptable potable standard meeting applicable regulatory requirements. At a minimum, annual bacteriological and chemical checks on the supply shall be carried out. If other sources, e.g., well, etc., are used, regular monitoring of quality is essential. Documentation of testing shall be maintained and available for review. Water treatment systems shall be carefully and regularly monitored during operation to ensure the water quality is constant.

Plumbing of water lines shall have no dead-legs and have no direct connection to non-potable water systems. Backflow preventers are required on all main and ancillary feed lines within a facility and locations shall be documented on a map or log. They shall be checked annually by a trained individual with inspections documented. If non-municipal water is used well-heads should be locked or in secured areas with controlled access. Alternative sources of potable water should be identified for use during emergency situations where systems have been compromised.

STEAM

Steam pipes shall be insulated with a suitable material which does not pose a hazard to food products or health of staff. The insulation material shall be encased in thin gauge aluminum or plastic as a protective outer layer. Joints shall be properly sealed. Any flexible steam hoses used for cleaning shall be well maintained.

Steam that is used for product processing shall be generated from potable source.

Steam for Processing

Steam that is used for product processing shall be generated from potable water and be produced with approved boiler chemicals.

Indirect Steam Use

Steam that is used indirectly in the process (jacketed equipment) shall be of process quality. Process quality steam may be used on product contact surfaces ONLY if it is followed by a potable water rinse.

Process quality steam: steam produced with boiler chemicals that are approved for use in food applications.

Direct Steam Injection

Steam that is injected directly into product shall be of culinary quality. Specifically the steam shall be:

Direct inject steam shall be of culinary quality.

- Produced using approved boiler chemicals
- Passed through a separator
- Filtered
- Delivered thorough Stainless Steel piping after the filter
- Tested – condensate checked for turbidity, off flavors and particulates

PERSONAL HYGIENE

Personnel shall be educated on personal hygiene.

Personnel employed as food handlers have a great responsibility for the health of others. It is imperative that all personnel are aware of the hazards involved and appreciate the necessity for clean habits and the rigid discipline of bathing and washing, etc. Personnel shall be educated on personal hygiene. Posters and constant reminders play a role in maintaining good hygiene standards. However, the most important factor in good hygiene standards is management example.

PERSONAL PRACTICES

In addition to presenting themselves in a clean and tidy manner and maintaining a high standard of personal hygiene, the following points shall be noted:

- Hairnets shall be worn by all personnel at food-producing facilities in all production and handling areas, irrespective of an individual's hair presence, type, or length. Hair shall be contained in a hairnet of tight mesh or a bouffant. All hair shall be contained within, including bangs and ponytails. No hair clips, curlers, bobby pins or similar restraints can be worn.
- Employees shall be clean shaven or cover the exposed facial hair with a beard snoot or other company issued restraint. Sideburns shall be trimmed and be no longer than the bottom of the ear otherwise a restraint shall be worn. A mustache is acceptable without restraint when:
 - It is no wider than the outer edge of the mouth
 - It is no longer than the bottom of the mouth
- Fingernails shall be trimmed short and kept clean. False nails and/or nail polish shall not be worn. Employees wearing nail polish or false fingernails shall wear protective gloves.
- Excessive use of perfumes or colognes shall not be allowed. This includes strongly scented lotions.
- No jewelry except plain wedding rings shall be worn in any area where there are any exposed food products. Wrist watches, bracelets, necklaces, cuff links or other similar jewelry shall not be worn in any area of the manufacturing or packaging operation. Medical Alert necklaces or bracelets shall be tucked in under shirts or contained within elbow-length gloves.

Personal items such as purses, coats, lunches shall not be allowed into any production or packaging area. Secure and accessible areas, e.g. locker rooms and refrigerators, should be provided for the storage of these items.

CLOTHING

The company should provide uniforms or protective clothing appropriate for the area or type of processing taking place. If uniforms are not provided personal (street) clothing shall be clean and appropriate. All personnel including outside contractors entering the production areas for any reason shall wear clean appropriate clothing for the room, area, or zone of production.

- All clothing and uniforms shall be clean at the beginning of the shift and kept reasonable clean during the work day. (Clothing shall not be worn to do agricultural or maintenance work or have contact with domestic or farm animals prior to coming to work.)
- No buttons or string shall be used to fasten garments. Snap closures, "Velcro" fasteners or zippers are preferred to buttons.
- Pockets shall be eliminated from garments above the waist.
- All uniforms/protective clothing shall be frequently and adequately laundered. Appropriate disposal of protective clothing is an acceptable alternative.
- All protective clothing or uniforms shall be retained on the premises and not worn when traveling to and from work.
- Soiled garments shall be stored away from clean garments in such a manner as to not come into contact with clean garments or become a harborage for pests.
- Protective clothing such as smocks or aprons shall be removed prior to entering restroom or lunchroom facilities. The company shall provide racks for the proper storage of protective equipment during break and lunch times. No outdoor clothing is to be worn over or protruding from, or in place of uniforms or protective clothing.

HIGH RISK AREAS

Special and more detailed GMP standards are necessary in certain high-risk areas i.e. allergen products, meat preparation, raw egg handling, cooked meats and other ready-to-eat food products. This would include total separation of all high and low risk processing i.e. separate personnel, locker rooms, entrances, cafeterias, etc.

FOOTWEAR

Footwear shall be suitable for the task and work environment. Where necessary, this includes rubber boots, steel toed work shoes, etc. Open toed (sandals), open heeled (mules), open weaved shoes or sandals are not acceptable. Shoes shall fully enclose the foot. Socks shall be worn. Excess soil/dirt shall be removed from shoes prior to entering the facility. Footwear policy should be appropriately chosen based on a risk based analysis. Risk assessment should determine if dedicated footwear, foot baths or other sanitation requirements are needed to maintain a sanitary environment and to decrease food safety risks.

HANDWASHING

Hand washing shall occur every time the hands become soiled.

Hand washing shall occur at a frequency that is appropriate and shall be done every time the hands become soiled. Separate sinks, easily accessible and appropriately placed (ideally at all entrances to processing areas) shall be provided for this purpose. They shall be supplied with an adequate and timely supply of warm water, non-perfumed liquid or powdered soap in a single serve dispenser, and either paper towels or a hot air dryer. Where paper towels are

provided they shall be correctly dispensed and a receptacle provided immediately adjacent to the point of use for the disposal of used towels. Instructions shall be clearly displayed stating that towels are not to be removed from this area under any circumstances. Reusable towels are not acceptable; nor are bar soap or soap provided by personnel.

All personnel and visitors shall wash their hands and exposed portions of their arms prior to:

Signs reinforcing hand washing shall be posted in all restrooms and at all hand sinks in the facility.

- Before starting work and upon returning to work from breaks or lunches
- After all visits to toilet facilities
- After touching or handling soiled equipment or utensils and after touching the floor
- After coughing, sneezing, using a handkerchief or disposable tissue
- After adjusting glasses, scratching head or other body parts
- After touching face, forehead, mouth nose or ears
- Immediately before engaging in food preparation and as often as necessary to remove soil or to prevent cross-contamination
- When switching tasks between raw foods and finished products, especially ready-to-eat foods, not only should sanitizing occur, but a uniform change as well

Note: This list is not meant to be all encompassing. Risk shall be evaluated at each facility.

Signs reinforcing hand washing shall be posted in all restrooms and at all hand sinks in the facility.

TOBACCO PRODUCTS

No use of tobacco products shall take place outside of the designated areas.

Smoking and smokeless tobacco shall be strictly forbidden except for specifically designated smoking areas. No use of tobacco products shall take place outside of the designated areas. Every possible precaution shall be taken to ensure that smoking debris is not transferred to the production areas. Suitable and adequate receptacles shall be provided at or immediately adjacent to the exit from the designated areas for the collection of smoking debris both for sanitary and safety reasons. Clearly legible signs shall be displayed at all entrances to production areas to the effect "No Smoking Beyond This Point."

FOOD AND DRINK

There shall be designated break areas for the consumption of food and drink.

There shall be designated break areas for the consumption of food and drink. All meals and refreshments including canned beverages, snacks and candies shall be consumed in the designated areas set aside for this purpose. These areas shall be located away from production areas and be kept clean and orderly, with trash receptacles emptied frequently. Chewing gum and glass beverage containers should be removed from vending machines, as these shall not be allowed in any production area.

DISEASE CONTROL**Disease Control Policy**

No person shall be admitted into processing facilities if he/she has been exposed to, is affected with, or is the carrier of any potential source of viral or microbial contamination.

Reporting of Infectious Diseases Contact

Any occurrence or outbreak of reportable diseases shall be reported to SUPERVALU immediately.

Before starting work, personnel suffering from gastric upsets, causing nausea, vomiting and/or diarrhea shall report this to their supervisor. If there is evidence to this effect, they shall not be allowed to return to work until they have been authorized by a physician to do so. Any occurrence or outbreak of reportable diseases in a food handling plant shall be reported to SUPERVALU immediately upon identification. This includes Infectious Hepatitis and all other reportable diseases.

Sickness & Injury

All personnel shall be made aware of their responsibilities with respect to sickness or injury.

All sickness and injury, however minor, shall be reported to the employee's immediate supervisor and recorded. All personnel shall be made aware of their responsibilities in this respect. A suitably colored waterproof dressing supplied by the company shall cover all sores, cuts, abrasions, infected areas and other wounds. Where possible, this shall be covered by a waterproof finger protector or rubber glove. Staff arriving at work with an unapproved wound dressing shall have it checked and if necessary replaced. Any dressing applied at the beginning of or during working hours shall be accounted for at the end of the shift. Instructions shall be given that any loss of such a dressing shall be reported immediately to the immediate supervisor or other management staff when the loss is noted.

Fitness for the Job

All persons employed shall be physically and intellectually capable of performing the jobs assigned to them. Examples are as follows:

- Strength for lifting tasks and adequate manual dexterity for task
- Eyesight capable of distinguishing colors, reading dials, scales, etc.
- Capable of being adequately trained to carry out responsibilities including calculations necessary for assigned tasks

Barrier Creams & Talc

The use of barrier creams and talc is discouraged unless it is considered to be an industry Best Standard at the point of use. If they are used, barrier creams shall be an approved type for use in food establishments. Barrier creams and talc for gloves shall be plain and unscented. No other creams, lotions, talc, etc., shall be permitted for use in areas where food is manufactured, handled or packed.

Bodily Fluid Exposure

For incidents where bodily fluids (e.g. blood) are released in a facility, proper clean-up procedures shall be followed (i.e. "universal precautions for blood borne pathogens". Appropriate sanitation procedures shall be applied. Any raw materials, ingredients, WIP or finished goods exposed to the fluids shall be destroyed.

Medical Facilities

These will be relative to the size of facility and the number of employees. A medical room staffed by a trained nurse is desirable but there shall be a minimum of one employee trained in first aid on site during all plant operating hours. Basic first aid facilities shall be available adjacent to all production areas for minor accidents. Instructions on how to obtain medical/first aid attention shall be clearly posted throughout the plant.

TEMPORARY, SEASONAL & CONTRACTED EMPLOYEES

All temporary and seasonal staff shall be fully GMP-trained.

All temporary and seasonal staff shall be fully GMP-trained within the process offered by the producing facility, and it is preferable that they are only employed in peripheral tasks rather than direct food handling. Care shall be taken that the work they are assigned does not put production at risk in any way through their inexperience. Outside contractors shall be similarly trained and strictly controlled and, where possible, prohibited from production areas. Truck drivers shall not be allowed access to a food manufacturing facility and shall be restricted to segregated delivery offices and space.

SANITARY DESIGN

Regulatory

Where applicable the facility shall obtain regulatory approval for equipment and/or process designs that pertain to regulated products. Products such as those governed by the USDA, local health authorities, etc.

Equipment & Processes

All equipment and processes shall be designed, constructed and maintained to ensure a safe quality product. Specifically design, construction and maintenance:

- Shall be constructed of materials approved for food contact
- Shall prevent areas of microbial or pest harborage
- Shall prevent introduction of foreign material into the process or product
- Shall allow easy accessibility for inspection, maintenance, cleaning & sanitation

Piping Systems

There shall be no dead-legs.

Piping systems shall be designed and constructed to ensure that there are no dead-legs (dead-ends) which could result in product contamination. A dead-leg is defined as an area that allows for the stagnation of product OR which cannot be sufficiently cleaned in place.

Tools

All tools shall be of sanitary design and cleanable.

All tools used in production areas shall be of sanitary design. They shall allow sufficient cleaning and not introduce foreign material into the process or product. Wooden handle tools shall not be used. Hollow handles shall only be used if its ends are properly sealed. Tools shall not be susceptible to breakage.

Hand Wash Stations

Hand washing stations shall be easily accessible and appropriately placed (ideally at all entrances to processing areas) equipped and maintained. Hand washing stations should be of hands-free design. As repairs or new installs are made the stations shall be upgraded to the hands-free design. The soap and towel dispensers shall also be of hands-free design. Hand wash stations shall not be used to wash utensils, parts or other items.

Hand wash stations shall not be used to wash utensils, parts or other items.

- Shall be conveniently located to optimize use in production areas
- Shall have hot and cold water available at all stations
- Shall have an adequate supply of soap (unscented and antibacterial) and hand towels
- Signs shall be posted at all hand wash stations reminding employees to wash hands
- A proper receptacle for trash, paper towels, etc., shall be available and emptied regularly
- Terry cloth toweling or individual re-usable hand towels shall not be used

Rest Rooms

Protective equipment (e.g. coats, smocks) shall be removed prior to entering the rest room.

The number of urinals, washbasins, etc., shall be adequate for the number of personnel employed. These shall function properly and be maintained in a clean sanitary condition. Doors shall be installed on stalls and when in use, shall be able to be adequately secured. Personnel shall not use toilet facilities while wearing protective clothing (e.g. coats, smocks). These shall be removed and hung on hangers prior to entering rest rooms. Female toilets shall be provided with containers for disposal of soiled sanitary wear. Field toilets and hand washing facilities shall be required where fresh produce is harvested.

Locker Rooms

Lockers and changing rooms are usually incorporated with or adjacent to the rest room facilities, and these shall also be adequate for the number of personnel employed. Some reserve space shall be available for temporary staff. No food items shall be stored in locker rooms. Items shall not be stored on the tops of lockers. The tops of lockers should be adequately sloped (typically 45⁰) to prevent the accumulation of dirt and to prevent the storage of items on the tops of lockers.

Break Rooms

Break rooms shall be separated from production areas.

Break rooms shall be separated from the production areas with proper trash receptacles for disposal of used containers, empty packages, etc. If non-disposable utensils are used, they shall be cleaned in suitable sinks or commercial dishwashers designed for this purpose. Under no circumstances are ceramic or glass containers to be taken into production areas. Chewing gum and glass containers shall be removed from all vending machines.

Cafeterias

If offered the facilities shall be relative to the size of plant, the type of operation and the demand of the work force for meals and refreshments, etc., at the various times of the day or night. The hygiene of the cafeteria personnel is of paramount importance as one bad habit or malpractice may put the whole work force out of action. Whether the cafeteria is under contract or directly controlled, hygiene standards of the highest level shall be strictly maintained, particularly in respect to food handling, food temperatures and times, utensil cleaning, sanitizing and storage.

Hygiene Notices

"Wash Your Hands Before Returning to Work" notices shall be clearly displayed in bold type on all exit doors from rest rooms and at all hand washing stations. This includes office areas.

"No Smoking Beyond This Point" shall be displayed on all doors leading from designated smoking areas.

"No Food Beyond This Point" shall be displayed at exit door of all break rooms.

Bilingual signs shall be used when non-English speaking personnel constitute a significant portion of the work force.

FOOD GRADE MATERIALS

Lubricants and all other materials that have direct or indirect product contact shall be an approved food grade type.

Lubricants and all other materials that have direct or indirect product contact shall be an approved food grade type. All lubricants shall be clearly marked (labeled, color coded) whether it is food grade or non-food grade. Non-food grade materials shall be restricted and have controlled access. If non-food materials are to be stored in processing areas it shall be in a locked storage cabinet. Excessive use of lubricants or other materials shall be avoided to prevent product contamination; any excess shall be wiped off. Training on the proper usage of lubricants shall be provided.

PREOPERATIVE & CHANGEOVER PROCEDURES

The facility shall develop preoperative and changeover procedures. The procedures may or may not be independent of each other depending upon the specific process. The procedures shall detail the checks put in place to assure that the conditions are appropriate prior to starting production or changing product during a work shift.

Below are listed some examples of what shall be considered (not all inclusive):

- Sanitation is of an acceptable level
- Equipment is in good shape, free of loose parts and excess lubricant, and operating correctly
- All raw materials are supplied and correct for the product being run
- Product has been checked and is of an acceptable Quality meeting specifications
- Operators are sufficiently qualified for the job and meet GMP standards
- Cross contamination risks have been eliminated when changing products on the same line

Each process will have specific requirements and shall be evaluated by the facility when creating the procedures.

SANITATION & GMP AUDITS

The supplier shall have in place a self-audit procedure to monitor facility sanitation and GMP compliance. Self-audits shall take place monthly and not solely driven by the Quality Manager. The best method of enforcement is to lead by example. The audits shall be documented with corrective actions (CA's) created for findings. The CA's shall be assigned to responsible person with associated timelines. Findings of the audit shall be shared with all employees through team meetings or postings. There are several acceptable methods of auditing, example;

1. Cross-functional team audit entire facility together
2. Cross-functional team audit separately (It is recommended that they do not audit their own department.)
3. Entire facility audited at one time
4. Sections audited each week with the entire facility being covered each month

Monthly audits are required but daily enforcement of sanitation and GMP practices is expected.

SANITARY PRACTICES

Sanitary Programs-Master Sanitation Schedule (MSS)

All areas of the facility grounds shall be included (e.g. boneyards, warehouses, cafeterias, etc.).

Facility shall be maintained in good repair and in a sanitary manner. Facility specific programs/procedures shall be defined and documented through a Master Sanitation Schedule (MSS). The MSS shall define the area, frequency, and responsibility of cleaning. All areas of the facility grounds shall be included (e.g. boneyards, warehouses, cafeterias, etc.). Detailed sanitation standard operating procedures (SSOP's) for each area shall be maintained. The responsible sanitation personnel shall be trained on the SSOP's at a minimum of annually. All of the activities shall be documented. The program itself shall be reviewed anytime there are major facility changes and at a minimum annually.

Pest Control

Any signs of pest activity in the facility shall be promptly reported to the Quality Manager (or other leader responsible for pest control). See Pest Control Section for further requirements.

Materials Handling Equipment

All equipment and parts used for handling materials shall be maintained and cleaned. These items shall be included on a MSS or other documented cleaning regimen. These items would include fork trucks, pallets, pallet jacks, etc.

Equipment & Parts Storage

Equipment and parts that are not in use shall be stored in a sanitary manner (e.g. on stands or carts) and protected from becoming soiled. They shall not be stored on the floor, on the tops of control panels, on the tops of tanks or other equipment, on catwalks or ladders, etc.

Idle Pipes & Hoses

Pipes and hoses that are not in use (connected to product systems) shall be capped or sealed to prevent substances from entering into them. Pipes and hoses shall be routinely cleaned and inspected for damage.

Condensate Control

Products and materials shall not be exposed to condensate.

Products and materials shall not be exposed to condensate. Whenever possible, condensate shall be eliminated by insulating the involved pipes. In areas where condensate cannot be prevented, it shall be controlled by using drip pans. The drip pans shall be routinely inspected and cleaned.

Utensil & Parts Washing

A suitable facility for the cleaning and sanitizing of food containers, scoops, implements, mixer blades, etc., Branded "Utensil Washing Only" shall be provided. Hand washing basins shall not be used for cleaning any food contact equipment. Separate cleaning facilities shall be provided for floor and wall cleaning equipment. Proper racking or storage areas shall be allocated for storage of cleaned utensil trays, containers, etc. Utensils shall not be stored on the floor or directly on wooden pallets.

Hoses

Hose nozzles shall not come into contact with the floor at anytime.

Hoses and hose reels shall be maintained in a hygienic condition. Hose reels shall be positioned such that hose nozzles shall not come into contact with the floor when the hoses are reeled. All hose stations shall be equipped so that hoses may be rolled up onto them and off of the floor. Additionally, all hose stations shall be equipped with vacuum breaks in order to prevent back flow. Product hoses shall not be on the floor while in use to prevent the possible contamination of product through small holes or cracks. Hard piping shall be installed where possible to reduce the use of hoses.

Facilities equipped with central system for dispensing detergents and sanitizing solutions shall clearly mark and/or color-code each chemical line so as to prevent misconnections.

Pressure hose use shall be strictly controlled in order to prevent spray debris and over spray from contaminating open products or clean food contact surfaces.

Cloths & Wipes

Cloths & wipes shall be of a suitable non-fraying material and strictly controlled in their use. The cloths shall be replaced before they become hazardous in any respect. They shall be collected and accounted for at the end of production. The frequency of cleaning and replacing of these cloths shall be determined based on their use.

Detergents, Cleaners & Sanitizers

Only chemicals approved for use in food manufacturing plants shall be permitted on the premises.

Detergents, cleaners and sanitizers shall be stored under lock and key and under the supervision of a designated person. All chemicals shall be in suitable containers (never glass or enamel), clearly labeled for their use and only used for their intended purpose. Everyone handling these agents shall be instructed in the proper dispensing operation, hazards and antidotes of all chemicals they use. Up-to-date Material Safety Data Sheets (MSDS) shall be available to all personnel. Under no circumstances are finished product containers to be used for storage of chemicals. Only chemicals approved for use in food manufacturing plants shall be permitted on the premises.

General Housekeeping Practices

- Avoid spillage & damage to product by careful handling
- Avoid product overhang on pallets
- Damaged bags or drums shall be immediately sealed to prevent product spillage or contamination
- Contaminated ingredients shall not be used
- All trash containers shall be labeled and covered
- Work areas shall be kept in a neat and orderly manner
- All containers shall be labeled as to contents

ORGANIC OPERATIONS

All facilities that produce Organic products shall maintain organic certification according to regulations. All regulatory requirements for Organic production and storage shall be maintained at all times. A copy of the certification shall be maintained onsite at all times and made available to SUPERVALU upon request. If the facility loses its Organic certification it shall immediately inform SUPERVALU.

PRODUCT IN GLASS

Policies and procedures shall be developed for facilities that produce in glass packaging. They shall address the proper storage and handling of containers, use of container, and specifically how to deal with breakage. There shall be detailed procedures on the handling of breakage during production. The policy should be posted at several locations in the manufacturing area(s) and in applicable languages. This policy is above and beyond the Glass and Brittle Plastics policy.

REWORK POLICY

Each facility shall have in place a policy describing its rework policy. It shall detail the procedures in place for handling rework and maintaining traceability throughout the process. The type of rework allowed, amount allowed along with the method of addition shall be detailed in work procedures. If a facility does not allow rework it shall state such and have procedures for handling the non-conforming product.

GLOVE POLICY

Each facility shall have in place a policy describing the use of gloves with-in the facility. It shall detail where they are to be used, what types of gloves are to be used, and the cleaning, sanitizing, changing and disposal of gloves. In Ready-to-Eat (RTE) processes clean appropriate gloves shall be worn

ANIMAL WELFARE

Supplier shall ensure that all slaughter facilities providing product to SUPERVALU conduct Animal Welfare Audits using a mutually agreed upon third-party audit service. The third party auditing service must use either the FMI, AMI or an industry approved audit process to complete the audit. Each slaughter facility that supplies product to SUPERVALU must be audited a minimum of once per year. Results of the audits will be requested by SUPERVALU on a random basis. Results of the audits shall be kept confidential. All costs associated with the audits shall be the responsibility of the Supplier.

MASTER SANITATION SCHEDULE

All cleaning shall be planned, organized, scheduled (Master Sanitation Schedule) and documented

All cleaning throughout the facility shall be planned, organized, scheduled (Master Sanitation Schedule) and documented, so that it is efficient and specific. The use of a cleaning staff as opposed to production personnel on overtime is usually more effective. In general, staff shall be encouraged to work neatly and "Clean as you go." All areas of the facility, including the outside grounds require some type of cleaning or sanitation and shall be included in the MSS. The effectiveness of the MSS shall be reviewed at minimum annually.

WATER SUPPLY

The water used for cleaning and sanitation practices shall be potable and sanitary quality. The cleaning stations shall be provided with both hot and cold water. Suitable temperatures and pressures shall be available.

WATER HANDLING

Water shall not be splashed from the floor or other unclean surface onto cleaned equipment or onto processes.

Whether during cleaning or sanitation or during production, water shall not be splashed from the floor or other unclean surface onto cleaned equipment or onto processes during operation. Water from cleaning in one area shall be prevented from flowing into an area where processing is taking place.

MACHINES & EQUIPMENT

Written procedures for the proper disassembly, cleaning and reassembly shall be available for all equipment.

All machinery and equipment shall be maintained in a clean serviceable condition. For every piece of equipment, written procedures for the proper disassembly, cleaning and reassembly shall be available. The procedures shall identify the proper cleaning compound(s), method of cleaning and sanitizing and injury avoidance. A written cleaning schedule and logbook shall be maintained as part of the procedures documented.

Note: Most equipment manufacturers can supply this for you.

FLOORS

Floors shall be kept clean, neat and in good repair at all times. Excessive debris shall not be allowed to build up as this becomes hazardous and cleaning becomes progressively more difficult to achieve. Floors shall be maintained to limit the number of cracks and crevices, as they are potential harborage points.

DRAINS

Tools for the cleaning of drains shall be clearly labeled and dedicated.

All drains require regular attention, as they can be a major source of off odors; off flavors; insects; mammals; and microbiological contamination. Drainage channels in production floors shall be cleaned daily. Drain covers and grids shall be removed and cleaned with the same frequency. Drainage channels shall be sanitized weekly. All drainage channels shall be maintained in a state of good repair at all times. Drain covers and grids shall be in place except when drains are being cleaned or sanitized. Tools for the cleaning of drains shall be clearly labeled and dedicated. Drain cleaning tools shall never be used on other surfaces.

VENTILATORS & OVERHEADS

Ventilators, fans and filters shall be cleared of debris and cleaned at specified and agreed frequencies. Overheads, girders, pipes, etc., shall be cleaned at frequencies that will keep the risk of contamination to the absolute minimum. False ceilings are only acceptable if there is adequate provision made for cleaning and inspection of overhead areas. If painted, ceilings shall be inspected at regular intervals to minimize the risk of contamination from peeling paint.

FACILITY PERIMETERS

Facility perimeters shall be kept clean and neat, free of debris and tall weeds. Old equipment, pallets, empty barrels, etc., shall not be allowed to accumulate, as this tends to provide harborage for pests and creates other hazards. Refuse areas may require additional attention.

SANITATION TOOLS

There shall be separate, distinct and dedicated cleaning tools for food-contact and non-food contact (structural) areas. The tools shall be color coded for identification. Posters shall be hung to provide a visual reminder of which tools can be used in what areas. They shall also be handled and stored separately.

- There shall be dedicated floor cleaning equipment
- There shall be dedicated production cleaning equipment
- There shall be dedicated allergen cleaning equipment
- There shall be dedicated drain cleaning equipment
- Floor mops and buckets shall be handled in a sanitary manner. Mops shall be rinsed, wrung-out, hang-dried and stored in a designated area. Mop buckets shall be emptied, rinsed and inverted after use.
- Pails and others containers shall be inverted after use

All cleaning utensils shall themselves be cleaned after use and then properly stored. Once a utensil becomes uncleanable or cracked and worn it shall be discarded.

SANITATION VERIFICATION

After sanitation the effectiveness of the program shall be verified through visual inspections and a microbial program.

After sanitation has been completed, the effectiveness of the program shall be verified through visual inspections and a microbial program (e.g. microbial results, swabs or plating). Records demonstrating inspection and sanitation effectiveness shall be established and maintained.

SANITATION RECORDS

Records pertaining to the MSS and all cleaning and sanitizing activities shall be maintained. These records shall be reviewed and corrective actions shall be effectively managed.

All handling procedures and practices shall protect the safety and quality of materials and product.

HOLD PRACTICES

All employees involved with product or material handling and storage shall be trained on and follow the facility's hold procedures. All hold material or product shall be properly labeled and shall not be moved or used without the proper authorization from the Quality Manager or designated individual responsible for program.

TRACEABILITY PRACTICES

Traceability records shall be maintained for all ingredients, raw materials, rework and finished products. Documentation of what lot(s) is used in which products shall be maintained in order to sustain full traceability of a finished product. The effectiveness of the traceability practices will be tested through traceability exercises (mock recalls) as described in the Recall section of this COP.

RAW MATERIAL & INGREDIENT CONTAINERS

Totes, buckets, bags or other containers used to transfer or measure raw materials or ingredients shall be handled to prevent contamination and stored off the floor. Container surfaces shall be clean prior to use in processing (e.g. strip outer bags from bagged ingredients immediately prior to use, brush external surfaces of boxes or pails). Designated containers for the storage or handling of raw materials or ingredients shall be clearly identified (e.g. color coding and labeling).

INTENDED USE ONLY CONTAINERS

Finished product containers and packaging materials shall only be used for their intended product use (i.e. not for purposes such as holding parts, to catch drippings or store chemicals). It is also suggested that ingredient containers not be reused for such activities. If ingredient containers are to be reused the containers shall be adequately cleaned and all original labeling shall be removed. Container shall be re-labeled for new contents.

DESIGNATED STORAGE PRACTICES

Finished product and ingredients shall not be stored immediately adjacent to containers used for waste or non-product use item. Non-product items such as cleaning compounds, solvents, inks, etc. shall be stored in a separate designated area. If pesticides are stored on site they shall be enclosed in a designated secured area (i.e. lockable storage cabinet, lockable fenced area).

INGREDIENT STORAGE PRACTICES

Ingredients shall be adequately protected and stored in a sanitary manner including:

- Shall be in their original, labeled container or
- In an authorized container that is clearly and permanently labeled for the specific ingredient; traceability shall be maintained

For open containers:

- Identification and traceability shall be maintained
- Containers shall be properly sealed
- Shall not be closed with anything that could contaminate the product (e.g. twist ties, metal closures)
- In an authorized container that is clearly and permanently labeled for the specific ingredient

PRINCIPLES

It is a prerequisite that before any SUPERVALU brand product is sold, a technical specification for the product is agreed upon between the vendor, SUPERVALU Product Development and Quality Assurance Departments. The aforementioned, Standard SUPERVALU Product Specification Format will be used and shall include details of quality checks, product analysis and microbiological standards together with agreed tolerances.

The level and frequency of checks to be carried out by the supplier shall also be agreed and included. Quality control results obtained on SUPERVALU products may be requested to be forwarded on a routine basis to SUPERVALU. Only products which meet the standards agreed upon in the specifications can be supplied to SUPERVALU.

In addition to routine AQL (Acceptable Quality Level) sampling, analysis, and documentation, each facility shall have an internal audit scheduled monthly by on-site or corporate staff knowledgeable in Quality and Process metrics. Such inspections shall have documented traceable corrective actions.

RAW MATERIALS

Specification

All raw materials shall be purchased to an agreed specification and be suitable for the process. Analytical standards and quality levels shall be set and agreed with the supplier for each commodity.

Sampling

All raw materials shall be sampled on arrival and inspected for damage and signs of infestation before off loading. Visual, analytical, physical or organoleptic tests shall be done where appropriate and recorded along with the date of delivery and any consignment references. In some instances, supplier certification may be appropriate. Lot numbers of raw materials shall be documented, and systems in place to allow them to be followed through the entire process to distribution.

Environmental Conditions

The raw materials shall be delivered and stored at the appropriate conditions of temperature and in suitable containers.

Positive Release

A system shall be set up to ensure that raw materials are not allowed into production until cleared against specification.

PACKAGING

All packing material shall conform to the agreed specification. All pre-formed food containers shall be inspected, inverted and air or water cleaned prior to entry to the product filling area/equipment.

Storage

All deliveries of packaging materials shall be checked upon arrival for damage and secure stacking before going into the warehouse. They shall be stored in a dry clean area away from direct heat and light, preferably under controlled conditions.

Sampling

Samples of delivered packaging shall be taken at random and checked for the following:

- Material type and standards
- Dimension and gauge standards
- Color and printing standards
- Accuracy of print with regards to ingredients, weight, UPC, nutritional facts, etc.
- Any closures or seals

All the above tests shall have established parameters and all findings shall be recorded.

FINISHED PRODUCT

Finished product shall be evaluated at sufficient frequency to ensure consistency and to ensure compliance to specification and maintain a quality product. At a minimum product shall be tested beginning of run, hourly, and at end of run. For short production runs product shall be tested at beginning, middle and end of run. Also the sampling rate shall be such as to ensure all batches are sampled. Examples are listed below.

- Finished product shall be inspected against specification(s) for all Key Product Attributes
 - Chemical properties (% salt, brix, pH, water activity, etc)
 - Physical properties (length, width, EVM, defects, weights, etc)
 - Organoleptic properties (color, flavor, texture, aroma, etc)
 - Product label and packaging shall be inspected (label application, code legibility and correctness, correct package size, etc,)
- Shelf life sample testing and evaluation program (including weight delivery)

All results shall be recorded and any necessary rejection or quarantine actions shall isolate any suspect product.

PROCESS CONTROL**Calibration**

It is expected that vendors can show systems are in place for the calibration of all equipment and procedures used in the manufacture and control of SUPERVALU products. This system applies to microbiological and chemical analytical procedures, as well as physical process measurements, e.g., thermometers, scales, pressure gauges, metering devices, etc. All calibrations shall be documented and retained. If an item can no longer be calibrated it shall be placed out of service.

Weight Control

An appropriate number of weight checks depending on the product being produced, shall be carried out throughout the manufacturing process. These shall be recorded, retained and checked to ensure compliance with the specification. All weight control systems and operations shall be controlled by a designated production or quality control employee. Any scales used for weight control shall be frequently calibrated. Loose weights used for this purpose shall be suitably stored. Weight control systems shall be capable of monitoring all filling heads and be of adequate frequency. All weighing results shall be recorded giving both actual and ranges of weights. Production, which does not go through 100 percent check weighing, shall be checked at a frequency agreed with SUPERVALU technical personnel. Any system of weight control, together with tolerances shall be specifically agreed upon with SUPERVALU technical personnel. In all instances, weight control is to conform to all Federal and State Regulations.

Finishes Product Packaging & Coding

The finished packages shall be securely sealed and the correct number packed into the outer master casing. Any damaged or distorted packs shall be rejected and care taken that the correct facing or configuration in any display cases is maintained. Outer cases and intermediate packaging shall be checked to ensure they are correct for the product concerned. Any agreed printing shall be correct and clearly legible on all outer cases.

Date Coding

The production date code on the primary (retail) container and the outer shipping container shall be in agreement. Open dating (sell by or best if used by) information shall also be in agreement between the primary containers and outer shippers (cases or trays).

Finished Product Control

It is expected that effective systems will be in place for the handling of finished product and their guarantee of acceptability against spec. Systems shall be in place to control the following aspects of a finished product:

- Stock rotation
- Distribution practices
- Packaging quality and presentation
- Usage instructions
- Nutritional information
- Temperature requirements during storage and distribution.

Temperature Control

Where temperature control of product and/or environment is essential during production, this information shall be monitored and recorded at agreed frequencies. Time restrictions shall be placed on products removed from controlled temperature storage for processing or packaging, and shall be strictly adhered to at all times.

AUTOMATED CONTROL SYSTEMS

- Where automated control systems are introduced or replace any manual or other system of in-line-process control, there shall be no subsequent increase in the risk of producing defective or hazardous product.
- All key personnel in Production and Quality Control shall have appropriate training for all the responsibilities assigned to them, including those necessary for the management of systems within their field of responsibility which utilize computers.
- A general description of a system shall be available. It shall describe principles and main features of the way in which the computer is used and how it interacts with all other systems.
- Any computer system shall be thoroughly tested and formally commissioned. This would include parallel operation with any other system it is designed to replace.
- Back-up systems shall be available.
- Checks and alterations to the system shall be made only by the responsible person and shall be formally recorded.
- Data entry and retrieval shall be adequately protected from unauthorized access.
- All electronically-stored data shall be able to be produced on hard copy.
- Breakdown procedures and error analysis procedures shall be established.
- When outside contractors are employed to provide a support service to the computer, there shall be a formal agreement including a clear definition of responsibilities for the system, the data and the appropriate confidentiality.

LABORATORY CONTROLS

Laboratory Facilities

Adequate facilities and staff shall be available to measure, record, control and adjust any parameters necessary to produce the correct finished product. If corporate facilities are not available to carry out finished product analysis, the use of consultant analysts for this work is acceptable. Where products have a legally enforceable standard, the supplier has responsibility to meet this standard.

Specification & Quality Control Records

A current SUPERVALU specification for all products shall be held at the producing factory for reference by authorized personnel. All records relating to microbiological, physical, chemical performance and organoleptic testing shall be available for inspection. These shall be in a format that can easily be examined for auditing and monitoring of trends. They shall be kept for a time period consistent with product shelf life and any relevant legislation.

Reference Samples

The system of storing reference samples for an agreed period will be specified where required by SUPERVALU QA Department. For perishable and semi-perishable products, we recommend a period in excess of its normal shelf life. For non-perishable commodities, sufficient samples to study the product quality during its normal life shall be stored.

Chemicals & Test Kits

Chemicals, reagents and other materials with expiration dates shall be inventoried and rotated. All materials used for testing shall be within the noted expiration date. Any materials that have expired shall be immediately disposed of according to regulatory requirements. Use of expired materials is strictly prohibited.

Employee Procedure Verification

A procedure shall be put in place to verify the confidence levels for critical testing. Each employee shall be verified against a standard or results from an outside laboratory. Results shall be evaluated and there shall be a procedure for handling results that don't meet the expected confidence levels.

QUARTERLY MONITORING

Participation in SUPERVALU Quarterly Monitoring (QM) program is required for all Private Brands products. Effective method(s) to ensure timely sampling and sample delivery to SUPERVALU Private Brands Quality Assurance is necessary to ensure a facility's participation in this program.

RECEIVING**Visual Inspection Of Carriers And Materials**

Prior to and during unloading carriers shall be inspected for cleanliness, including objectionable odors that may indicate unsanitary conditions or potential contamination.

- Carefully inspect items for damage, infestation, or off odors prior to transferring to storage
- If inspection reveals evidence of unsanitary conditions or infestation, the extent of the issue shall be determined prior to further unloading. Appropriate actions shall be taken based on the extent. If an infestation is evident the materials shall be rejected.
- Inspection results shall be documented.
- Receipt dates shall be placed on incoming materials

Receiving Documents & Seals

Documents received with incoming materials shall be checked for accuracy. Security seals shall be intact and verified against listed on the receiving documents.

Proper Labeling

All materials, specifically ingredients, shall be clearly labeled. For bulk ingredients the Bill of Lading (BOL) is considered to be the label. Materials missing labels shall be rejected.

Specification Compliance

All raw materials shall be sampled on arrival and inspected for damage and signs of infestation before off loading. Visual, analytical, physical or organoleptic tests shall be done where appropriate and recorded along with the date of delivery and any consignment references. In some instances supplier certification may be appropriate. Lot numbers of raw materials shall be documented, and systems in place to allow them to be followed through the entire process to distribution.

Temperature Compliance

Perishable and frozen materials shall meet their specific temperature requirements at point of receiving. If the temperatures are not met the materials shall be rejected. Perishable and frozen items shall be immediately placed in appropriate storage so that proper temperatures are maintained.

Bulk Materials

Prior to unloading the receiving and unloading ports shall be inspected to ensure sanitary conditions. Any gaskets, screens, clamps, etc shall be cleaned and sanitized prior to connecting to the bulk carrier. Screens appropriate for the product shall be in place at the discharge or receiving port for reduction of possible contaminants. During unloading the dome openings shall be adequately screened to protect the materials from contamination. The dome screens shall allow adequate air flow to permit normal unloading. The hauler shall provide documentation of the last 3 commodities hauled or letter of guarantee stating it is dedicated to hauling only that commodity. Products shall not be received if the tanker:

- Has been used to haul waste materials
- Any of whose previous 3 loads were for a non-food item (even after cleaning)

STORAGE & HANDLING

Good Warehouse Practices

- All items shall be stored off the floor, on pallets or racks
- Standing or sitting on shipping cases (raw or finished product) shall not be allowed
- Over-stacking of product shall be avoided to prevent damaging goods
- Segregated storage areas shall be established to prevent the contamination or cross contamination of goods (i.e. hold product, allergens, glass, non-food grade materials, chemicals, battery chargers, etc.)

Warehouse Conditions

Warehouse facilities shall be in a neat and sanitary, and proper conditions shall be maintained, including:

- Sanitation through the use of a MSS including walls, ceilings, racking, etc.
- Pest control by adequate spacing from walls and ceilings, doors kept closed, etc.
- Temperature and humidity monitoring (shall meet storage specifications to prevent adverse effects to material)
- Forklift trucks used in the warehouse shall be powered by bottled gas or electricity.

Warehouse Stacking

All product in the warehouse shall be stacked neatly and at least 18" from walls. The height of stacks shall be restricted so that no crushing or distortion of lower layers occurs. The warehouse layout shall be such that it allows:

- Inspection and cleaning
- Access for rodent control operations
- A buffer zone to keep loads off walls
- Protect walls from forklift, pallet or other damage

Inventory Practices

Inventory shall be dispatched in manufactured date order unless written instructions to the contrary are received. Any product damaged prior to dispatch shall be removed and replaced with sound stock. Inventory practices shall be established for all materials to control requirements for:

- Product identification and traceability
- First In/First Out rotation (FIFO)
- Quarantine
- Hold and release

Monitoring & Recordkeeping

Warehousing conditions shall be monitored and documented to assure specifications are met and controls are effective. Records shall be reviewed and maintained.

Materials Handling

All finished products delivered to SUPERVALU shall be on standard pallets or other bulk systems as currently approved by SUPERVALU. The quantity per pallet will be as agreed with the SUPERVALU buyer. The configuration will be such that they will be self-supporting and interlocking and where necessary banded, strapped, stretch or shrink wrapped. All products shall be handled in a manner that prevents damage, contamination and deterioration.

- Forklifts, hand trucks, etc., shall be properly used, well maintained and kept clean
- Broken or dirty pallets shall not be used
- Pallets shall be stored in clean areas which are free of rodent, insect or bird contamination. They shall not be stored outside.

SHIPPING

Hold or Non-Conforming Product

Held or non-conforming product shall not be shipped. All product shipped to SUPERVALU shall meet the agreed upon specifications.

Finished Product Release

Positive Release - Wherever possible (i.e. for non-perishable/long shelf-life products) systems shall be in place to audit documentation for all relevant process, quality control, and microbiological data, prior to product release.

Negative Release - A negative release system can be used where positive release is not an available option (i.e. where shelf life is too short). In this situation it is essential that an effective product recall system will allow any out-of-specification product released, to be effectively recalled.

Finished Product Inspection

Finished product shall be inspected prior to loading for:

- Proper product being loaded
- Damage to product
- Proper coding for traceability

Mixed loads of food and non-food commodities are not acceptable to SUPERVALU unless previously authorized.

Carrier Inspection

Product shall only be loaded into vehicles with acceptable conditions. Prior to loading the vehicle shall be inspected for cleanliness and sanitary conditions. Inspection criteria shall include checking for:

- The absence of offensive odors
- The absence of infestation
- The absence moisture or condensation
- The absence of dirt, litter and debris
- The absence of damage to floor, walls or ceilings

All inspection results shall be documented and maintained.

Shipping Temperature

Perishable and frozen products shall be shipped at the specified temperature. The operation of the refrigeration or freezer unit shall be verified prior to loading. Product temperatures shall be monitored and recorded prior to dispatch. All vehicles shall be capable of maintaining appropriate storage conditions, e.g. temperature and humidity throughout distribution. It is preferable for all vehicles to be fitted with permanent temperature recording devices.

Shipping Docks (Bays)

Whenever possible, all vehicles shall be loaded and unloaded in covered docks protected from the weather and separate from production areas. The docks shall be kept clean and sanitary. Dock doors shall remain closed when not in use and be tight fitting.

APPENDIX A: ACRONYMS & DEFINITIONS

BOL	A bill of lading or BOL is a document issued by a carrier to a shipper, acknowledging that specified goods have been received on board as cargo for conveyance to a named place for delivery to the consignee who is usually identified.
BRC Global Standard	The British Retail Consortium is the lead trade association for the UK retail industry. The BRC Global Standards are a leading global product safety and quality certification program used by certificated suppliers in over 100 countries. It is a recognized GFSI scheme. http://www.brcglobalstandards.com/
CLOG	A Continuing Letter of Guarantee or "CLOG" typically states that the products provided to the customer(s) meet all governmental requirements as mandated by applicable Federal regulations. Customers may also require specific language to cover labeling, food safety, general wholesomeness and the sanitary conditions under which the products were produced.
COA	Certificate of Analysis of COA is a document that reports and certifies the analytical test results of a product.
Dead Leg	A dead leg is any area in a piping system where water can become stagnant and where water is not exchanged during flushing. Bacteria in dead-end pipe lengths and crevices are protected from flushing and sanitization procedures and can re-contaminate the piping system.
FIFO	FIFO is an acronym for First In, First Out, used to describe stock rotation procedures of using older products first, typically those that have been received first.
Food Safety	Food safety is a scientific discipline describing handling, preparation, and storage of food in ways that prevent foodborne illness. This includes a number of routines that should be followed to avoid potentially severe health hazards.
Food Security (Defense)	Food Security or Food Defense is putting measures in place that reduce the chances of the food supply from becoming <i>intentionally</i> contaminated using a variety of chemicals, biological agents or other harmful substances. Food Security or Defense is not the same as Food Safety. Food Safety addresses the accidental contamination of food.
FSSC 22000	Food Safety System Certification (FSSC) 22000 is the scheme based on the integration of the ISO 22000:2005 food safety standard and Publicly Available Specification (PAS) 220. Developed by the Netherlands-based Foundation for Food Safety Certification and supported by the Confederation of Food and Drink Industries of the European Union (CIAA). It is a conditional recognized GFSI scheme.
GFSI	The Global Food Safety Initiative (GFSI) is a non-profit making foundation, created under Belgian law in May 2000. The daily management of GFSI is undertaken by The Consumer Goods Forum. GFSI benchmarks existing food standards against food safety criteria, and also looks to develop mechanisms to exchange information in the supply chain, to raise consumer awareness and to review existing good retail practices. Within GFSI, benchmarking is a "procedure by which a food safety-related scheme is compared to the GFSI Guidance Document," a copy of which can be found on http://www.globalfoodsafetyinitiative.com . The process is intended to be executed in an independent, unbiased, technically proficient and transparent manner. The GFSI Board Benchmarking a scheme successfully means that all recognized schemes have a common foundation of requirements which should provide consistent results, in regard to the common requirements applied during the audit, but the benchmarked schemes cannot be considered as equal.
GLOBAL GAP	GLOBAL GAP (formerly known as EUREPGAP) has established itself as a key reference for Good Agricultural Practices (G.A.P.) in the global market place, by translating consumer requirements into agricultural production in a rapidly growing list of countries – currently more than 80 on every continent. GLOBALGAP is a private sector body that sets voluntary standards for the certification of agricultural products around the globe. The aim is to establish ONE standard for Good Agricultural Practice (G.A.P.) with different product applications capable of fitting to the whole of global agriculture.
GMP	Good manufacturing practice or GMP is a term that is recognized worldwide for the control and management of manufacturing and quality control of foods, pharmaceutical products, and medical devices. GMPs are guidelines that outline the aspects of production that would affect the quality of a product.
GRMS	The Global Red Meat Standard (GRMS) is the standard for the slaughtering, cutting, boning and sales of red meat and meat products. It has recently been recognized and approved as a GFSI scheme.
HACCP	Hazard Analysis and Critical Control Point (HACCP) is a systematic preventive approach to food safety and pharmaceutical safety that addresses physical, chemical, and biological hazards as a means of prevention rather than finished product inspection. HACCP is used in the food industry to identify potential food safety hazards, so that key actions, known as Critical Control Points (CCPs) can be taken to reduce or eliminate the risk of the hazards being realized. The system is used at all stages of food production and preparation processes including packaging, distribution, etc. The Food and Drug Administration (FDA) and the United States Department of Agriculture (USDA) say that their mandatory HACCP programs for juice and meat are an effective approach to food safety and protecting public health. Meat HACCP systems are regulated by the USDA, while seafood and juice are regulated by the FDA. The use of HACCP is currently voluntary in other food industries but required by SUPERVALU.
iCiX	International Compliance Information Exchange or iCiX is an online Industry Network that harmonizes the way in which companies can store, share and manage documentation, information and communications with other companies that they do business with; easily accurately and constantly. http://www.icix.com/
IFS	The International Food Standard (IFS) is a GFSI (Global Food Safety Initiative) endorsed standard, like SQF, Dutch HACCP and BRC Standard.

MSDS	Material Data Safety Sheet or MSDS is a form containing data regarding the properties of a particular substance. An important component of product stewardship and workplace safety, it is intended to provide workers and emergency personnel with procedures for handling or working with that substance in a safe manner, and includes information such as physical data (melting point, boiling point, flash point, etc.), toxicity, health effects, first aid, reactivity, storage, disposal, protective equipment, and spill handling procedures. The exact format of an MSDS can vary from source to source within a country depending on how specific is the national requirement.
MSS	The Master Sanitation Schedule (MSS) defines the cleaning frequencies for the entire facility that do not occur on a routine basis (typically daily or more frequently). All areas of the facility grounds shall be included (e.g. boneyards, warehouses, cafeterias, etc.). The MSS should have applicable SSOP's and documentation supporting the completion of the cleaning activities.
PM Program	A Preventive Maintenance (PM) Program is the care and servicing by personnel for the purpose of maintaining equipment and facilities in satisfactory operating condition by providing for systematic inspection, detection, and correction of incipient failures either before they occur or before they develop into major defects.
Policy	A policy is typically described as a deliberate plan of action to guide decisions and achieve rational outcome(s).
Procedure	A procedure is a specified series of actions or operations which have to be executed in the same manner in order to always obtain the same result.
Rework	Rework is an unincorporated food product kept for subsequent use or reprocessing.
SOP	Standard operating procedures (SOPs) can be defined as established methods to be followed routinely for the performance of designated operations or in designated situations. They are very concise and specific step-by-step instructions.
SQF	<p>The SQF (Safe Quality Food) Program is a leading, global food safety and quality certification program and management system, designed to meet the needs of buyers and suppliers worldwide. The Program provides independent certification that a supplier's food safety and quality management system complies with international and domestic food safety regulations. This enables suppliers to assure their customers that food has been produced, processed, prepared and handled according to the highest possible standards, at all levels of the supply chain. SQF is designed as a food safety program, but it also covers product quality, a feature that is unique to a certification program of this type. Assuring consistent quality and meeting buyer specifications are important aspects of the buyer-supplier relationship.</p> <p>The Program was launched in 1994 in Australia and since 2004 has been administered by the SQF Institute (SQFI), a division of the Food Marketing Institute (FMI). SQF certifications have been issued to thousands of companies operating in Asia-Pacific, Europe, Middle East and North and South America.</p> <p>SQF certification is supported by an increasing number of U.S. and international retailers and foodservice providers who express a preference for suppliers who implement HACCP-based (Hazard Analysis Critical Control Point) food safety and quality management systems.</p> <p>http://www.sqfi.com</p>
SSOP	<p>Sanitation Standard Operating Procedures is the common name give to the sanitation procedures in production plants. SSOP's are generally documented steps that must be followed to ensure adequate cleaning of product contact and non-product surfaces. These cleaning procedures must be detailed enough to make certain that adulteration of product will not occur.</p> <p>SSOP's can be very simple to extremely intricate depending on the focus. An individual SSOP should include:</p> <ul style="list-style-type: none"> • The equipment or affected area to be cleaned, identified by common name, • The tools necessary to prepare the equipment or area to be cleaned • How to disassemble the area or equipment • The method of cleaning and sanitizing <p>SSOP's can be stand alone documents but they should also serve as work instruction as this will help ensure they are accurate.</p>

Resources

www.fsa.usda.gov	United States Department of Agriculture
www.dhs.gov	Department of Homeland Security
www.fda.gov	Food and Drug Administration
www.cfsan.fda.gov	FDA Dept. Health and Human Services
http://www.wikipedia.org/	Wikipedia online Encyclopedia
http://www.mygfsi.com	Global Food Safety Initiative

