UNITED SAFETY AGENTS

FSVP

COMPLIANCE PLAN

ZIBA NUT CORPORATION

Name of FSVP Importer

L.I.R.A. S.A.

Name of Foreign Supplier

ORGANIC RAISINS

Name of Product

AUGUST 13, 2021

Date of Initial Verification / Reverification

AUGUST 14, 2022

Date of FSVP Plan Expiration

VERIFICAITON COMPLETE | APPROVED FOR IMPORT

Status of Review

NUMBER 01

Version

– Confidential –

TABLE *of* CONTENTS

NOTICE *of* REDACTION

This FSVP Plan has been partially redacted and is intended for review purposes only. All food safety documents are subject to change without notice, may contain non-binding recommendations, and should be considered uncontrolled.

Any documents provided by a foreign supplier are considered to be the property of that foreign supplier and may contain information which is privileged, confidential, and protected. Any reproduction, distribution or other use of these documents without the consent of the foreign supplier is prohibited.

Please contact United Safety Agents with any questions or concerns.

OVERVIEW *of* FSVP PLAN

Title 21 of the Code of Federal Regulations requires that *"... for each food you import; you must develop, maintain, and follow an FSVP [Foreign Supplier Verification Program] that provides adequate assurances that your foreign supplier is producing the food in compliance with processes and procedures that provide at least the same level of public health protection as those required under section 418 (regarding hazard analysis and risk-based preventive controls for certain foods) or 419 (regarding standards for produce safety), if either is applicable, and the implementing regulations, and is producing the food in compliance with sections 402 (regarding adulteration) and 403(w) (if applicable) (regarding misbranding with respect to labeling for the presence of major food allergens) of the Federal Food, Drug, and Cosmetic Act. ..."* for each product *(and each foreign supplier of each product)* that our client imports, United Safety Agents (USA) has been engaged to undertake and successfully complete all requisite actions on our client's behalf; to analyze, verify, build and maintain this FSVP plan, that our client will now use to keep in compliance with FSVP regulations.

INSTRUCTIONS

Please review this FSVP plan in its entirety and sign where indicated. 21 C.F.R., §1.510 requires that this FSVP plan be kept on file for a minimum of two years after its use is discontinued. All records must be legible and stored to prevent deterioration or loss. If requested in writing by FDA, you must send records to the Agency electronically, or through another means that delivers the records promptly. Off-site storage of records, including records maintained by other entities in accordance with §1.504, §1.505, or §1.506, is permitted if such records can be retrieved and provided on-site within 24 hours of FDA's request for review. Electronic records are considered to be on-site if they are accessible from an on-site location. Records obtained by FDA in accordance with this subpart are subject to the disclosure requirements under part 20 of this chapter. **Please contact United Safety Agents immediately to report a change in a foreign supplier's process or status**, in the case of an FDA inspection, or with any questions that you may have by email: info@unitedsafetyagents.com, by fax: +1 (888) 557-2649, or by telephone: +1 (888) 551-7403.

TERMS & DEFINITIONS

FSVP Importer *(Importer)*: The importer, is the U.S. owner or consignee of an article of food that is being offered for import into the United States. **U.S. owner or consignee** means the person in the United States who, at the time of U.S. entry, either owns the food, has purchased the food, or has agreed in writing to purchase the food.

Foreign Supplier *(Supplier)*: The foreign supplier or supplier is the establishment that manufactures/processes the food, raises the animal, or grows the food that is exported to the United States.

Qualified Individual *(QI)*: Qualified individual means a person who has the education, training, or experience (or a combination thereof) necessary to perform an activity required under this subpart.

Verified &/or **Approved**: Verified & approved means only that actions were taken to fulfill regulatory obligations. It does NOT mean that the subject product of this FSVP plan is ready for consumption in its current state.

RULES *of* USE

FOREIGN SUPPLIER VERIFICATION PROCEDURES

21 C.F.R., §1.506 (a), (a)(2), (b), and (c) require that written procedures are established and followed to ensure that food is imported from approved suppliers only and that these procedures provide adequate assurance that the hazards requiring a control in the imported food have been significantly minimized or prevented. 21 C.F.R., §1.506 (d) requires that *"... Except as provided in paragraphs (d)(2) and (3) of this section, before importing a food from a foreign supplier, [an FSVP Importer] must determine and document which verification activity or activities listed in paragraphs (d)(1)(ii)(A) through (D) of this section, as well as the frequency with which the activity or activities must be conducted, are needed to provide adequate assurances that the food [an FSVP Importer] obtain[s] from the foreign supplier is produced in accordance with paragraph (c) of this section. Verification activities must address the entity or entities that are significantly minimizing or preventing the hazards or verifying that the hazards have been significantly minimized or prevented (e.g., when an entity other than the grower of produce subject to part 112 of this chapter harvests or packs the produce and significantly minimizes or prevents the hazard or verifies that the hazard has been significantly minimized or prevented, or when the foreign supplier's raw material supplier significantly minimizes or prevents a hazard). The determination of appropriate supplier verification activities must be based on the evaluation of the food and foreign supplier conducted under §1.505."* As an FSVP Agent or Qualified Individual, USA's FDA-mandated goal is to verify that a product's innate physical, chemical and biological hazards are being controlled in a manner that is at least equivalent to the FDA's domestic standards. in order to accomplish this goal, documentation of a foreign supplier's processes, procedures and control methods will be required. Understanding that all foods may not share identical hazards - their control*(s)* also not being identical - USA utilizes a variety of foreign supplier verification activities to verify that a food's hazards have been significantly minimized or prevented. USA's determination of appropriate supplier verification activities is based on an evaluation of a specific food, its relevant hazards, and its corresponding foreign supplier. The following activities may be used to satisfy the requirements of 21 C.F.R., §1.506 (a), (a)(2), (b), (c), and (d):

A foreign supplier's Hazard Analysis and Critical Control Point *(HACCP)* plan may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the foreign supplier's HACCP plan will be included within this FSVP plan.

An onsite audit of a foreign supplier's facility may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the foreign supplier's onsite audit report will be included within this FSVP plan.

Sampling and testing of a food may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the foreign supplier's reviewed sampling and testing results will be included within this FSVP plan.

A foreign supplier's relevant food safety record(s) may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the foreign supplier's relevant food safety record(s) will be included within this FSVP plan.

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FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

Certifying documents for a foreign supplier's Qualified Individual(s) may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the certifying documents for a foreign supplier's Qualified Individual(s) will be included within this FSVP plan.

A food's nutritional label(ing) may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the food's nutritional label(ing) will be included within this FSVP plan.

Completion of the FSVP Importer's Supplier Assessment Questionnaire and/or the FSVP Importer's Allergen and Intolerance Questionnaire may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the completed Questionnaire(s) will be included within this FSVP plan.

Documentation that a foreign supplier is in, and under the regulatory oversight of, a country whose food safety system FDA has officially recognized as comparable or determined to be equivalent to that of the United States, and that the food is within the scope of that official recognition or equivalency determination, and that the foreign supplier of the food is in good compliance standing with the food safety authority of the country in which the foreign supplier is located may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of all substantiating documents will be included within this FSVP plan.

Documentation that a foreign supplier meets the definition of a qualified facility *(as defined by §117.3 or §507.3)* may be required. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of all substantiating documents will be included within this FSVP plan.

The FSVP Importer may rely upon performance of activities by other entities. If the FSVP Importer relies upon supplier verification activities conducted by another entity, the FSVP Importer will review and assess the results of these activities. Notation and documentation of the FSVP Importer's review and assessment will be recorded in this FSVP plan, including documenting that the determination of appropriate verification activities was made by a Qualified Individual.

When the FSVP Importer determines that a hazard in a food will be controlled by the foreign supplier and is one for which there is a reasonable probability that exposure to the hazard will result in serious adverse health consequences or death to humans or animals, the FSVP Importer will require a copy of the foreign supplier's annual on-site audit results. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the foreign supplier's annual on-site audit results will be included within this FSVP plan. After initial verification, the FSVP Importer will require that the foreign supplier provide copies of their annual on-site results at least annually thereafter.

Continued onto next page.

FOREIGN SUPPLIER VERIFICATION PROCEDURES

Continued from previous page.

It may be required that the FSVP Importer conduct or obtain documentation of other (not previously mentioned) appropriate supplier verification activity(s) based on the foreign supplier's performance and the risk associated with the food. If required, notation will be recorded on the enclosed FSVP Document Checklist and a reviewed and approved copy of the supplier verification activity(s) will be included within this FSVP plan.

FREQUENCY *of* VERIFICATION PROCEDURES

All above noted foreign supplier verification procedures and activities will be conducted and/or re-conducted at a frequency appropriate to the relevant procedure/activity and the corresponding hazard profile for the relevant food. Please refer to document-specific notes found on pg. 11, Ongoing Document Requirements found on pg. 12, Additional Recommendations found on pg. 21, and Verification Timeline found on pg. 23 for information about the frequency of verification procedures.

USE *of* APPROVED SUPPLIERS ONLY

Food and/or food-related products should only be imported from foreign suppliers that have been verified to the standards of FSVP. Prior to importation, all steps necessary to successful verify that a foreign supplier's food safety processes and procedures meet the requirements of FSVP *(and other applicable regulations)*, must be undertaken. Once complete, the product specific FSVP plan - created by United Safety Agents – will denote a supplier's status on the Title Page of each plan. Importation may occur if the following three parameters are met: 1) the FSVP plan's status does not read "Denied" or other wording denoting that product is not currently approved for import; 2) the date of importation will fall within one calendar year *(365 days)* from the plan's noted "Review End" date, and 3) there are no outstanding issues or changes in the supplier's processes and/or procedures since the noted "Review End" date.

CORRECTIVE ACTIONS

The FSVP Importer will take prompt corrective actions if it determines that a foreign supplier does not produce food consistent with the written assurance, and in compliance with applicable processes and procedures that provide same level of protection as FDA requirements. If the FSVP Importer determines by means other than verification activities that a foreign supplier does not produce food in compliance with applicable processes and procedures that provide the same level of protection as FDA requirements, it will conduct an investigation to determine whether the FSVP should be modified accordingly. Such corrective actions are dependent upon the specific circumstances of the deviation but could include: the complete discontinued use of the foreign supplier, or the discontinued use of the foreign supplier until the cause or causes of noncompliance, adulteration, or misbranding have been adequately addressed.

IDENTIFICATION *of* FSVP IMPORTER

The FSVP Importer will ensure that, for each line entry, the following information is provided to U.S. Customs and Border Protection: 01) FSVP Importer's Business Name; 02) FSVP Importer's Electronic Mail Address; and 03) The FSVP Importer's FDA acceptable UFI *(Unique Facility Identifier)* such as a DUNS number.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

UNITED STATES CODE *of* FEDERAL REGULATIONS

The following are or may be applicable to this product/supplier, FSVP Importer should confirm & comply independently.

- ☑ **101.** §101.1–101.108. Food Labeling.
- ☐ **106.** §106.1–106.160. Infant Formula Requirements Pertaining to Current Good Manufacturing Practice, Quality Control Procedures, Quality Factors, Records and Reports, & Notifications.
- ☐ **110.** §110.3–110.110. Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food.
- ☐ **111.** §111.1–111.610. Current Good Manufacturing Practice in Manufacturing, Packaging, Labeling, or Holding Operations for Dietary Supplements.
- ☐ **112.** §112.1–112.213. Standards for the Growing, Harvesting, Packing, and Holding of Produce for Human Consumption.
- ☐ **113.** §113.3–113.100. Thermally Processed Low-Acid Foods Pkged in Hermetically Sealed Containers.
- ☐ **114.** §114.3–114.100. Acidified Foods.
- ☑ **117.** §117.1–117.475. Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food.
- ☐ **120.** §120.1–120.25. Hazard Analysis and Critical Control Point (HACCP) Systems.
- ☐ **121.** §121.1–121.401. Mitigation Strategies to Protect Food Against Intentional Adulteration.
- ☐ **123.** §123.3–123.28. Fish and Fishery Products.
- ☐ **129.** §129.1–129.80. Processing/Bottle Drinking Water.
- ☐ **131.** §131.3–131.206. Milk and Cream.
- ☐ **133.** §133.3–133.196. Cheeses & Related Products.
- ☐ **135.** §135.3–135.160. Frozen Desserts.
- ☐ **136.** §136.3–136.180. Bakery Products.
- ☐ **137.** §137.105–137.350. Cereal Flours.
- ☐ **139.** §139.110–139.180. Macaroni & Noodle Products.
- ☐ **145.** §145.3–145.190. Canned Fruits.
- ☐ **146.** §146.3–146.187. Canned Fruit Juices.
- ☐ **150.** §150.110–150.160. Fruit Butters, Jellies, Preserves, and Related Products.
- ☐ **152.** §152.126. Fruit Pies.
- ☐ **155.** §155.3–155.201. Canned Vegetables.
- ☐ **156.** §156.3–156.145. Vegetable Juices.
- ☐ **158.** §158.3–158.170. Frozen Vegetables.
- ☐ **160.** §160.100–160.190. Eggs and Egg Products.
- ☐ **161.** §161.30–161.190. Fish and Shellfish.
- ☐ **163.** §163.5–163.155. Cacao Products.
- ☐ **164.** §164.110–164.150. Tree Nut and Peanut Products.
- ☐ **165.** §165.3–165.110. Beverages.
- ☐ **166.** §166.40–166.110. Margarine.
- ☐ **168.** §168.110–168.180. Sweeteners and Table Sirups.
- ☐ **169.** §169.3–169.182. Food Dressings and Flavorings.
- ☐ **170.** §170.3–170.285. Food Additives.
- ☑ **179.** §179.21–179.45. Irradiation in the Production, Processing and Handling of Food.
- ☐ **190.** §190.6. Dietary Supplements.
- ☐ **501.** §501.1–501.110. Animal Food Labeling.
- ☐ **507.** §507.1–507.215. Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals.
- ☐ **570.** §570.3–570.280. Food Additives.
- ☐ **579.** §579.12–579.40. Irradiation in the Production, Processing, & Handling of Animal & Pet Food.

Note: List is not exhaustive. Other regulations may be applicable.

Supplier: L.I.R.A. S.A.

Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC)

Review Start: March 03, 2021 Review End: Aug. 15 2021

21 C.F.R. §1.500–§1.514

The following section(s) of the FSVP regulation is/are or may be particularly relevant to this product/supplier.

- ☒ **§1.500.** What Definitions Apply to This Subpart?
- ☒ **§1.501.** To What Foods Do the Requirements in This Subpart Apply?
- ☒ **§1.502.** What Foreign Supplier Verification Program *(FSVP)* Must I Have?
- ☒ **§1.503.** Who Must Develop My FSVP and Perform FSVP Activities?
- ☒ **§1.504.** What Hazard Analysis Must I Conduct?
- ☒ **§1.505.** What Evaluation for F. Supplier Approval & Verification Must I Conduct?
- ☒ **§1.506.** What Foreign Supplier Verification and Related Activities Must I Conduct?
- ☐ **§1.507.** What Requirements Apply When I Import Food That Cannot Be Consumed Without the Hazards Being Controlled or for Which the Hazards Are Controlled After Importation?
- ☒ **§1.508.** What Corrective Actions Must I Take Under My Foreign Supplier Verification Program?
- ☒ **§1.509.** How Must the Importer Be Identified at Entry?
- ☒ **§1.510.** How Must I Maintain Records of My FSVP?
- ☐ **§1.511.** What FSVP Must I Have If I Am Importing A Food Subject to Certain Requirements in the Dietary Supplement Current Good Manufac turing Practice Regulation?
- ☐ **§1.512.** What FSVP May I Have If I Am A Very Small Importer or I Am Importing Certain Food from Certain Small Foreign Suppliers?
- ☐ **§1.513.** What FSVP May I Have If I'm Importing Certain Food from A Country with An Officially Recognized Food Safety System?
- ☒ **§1.514.** What Are Some Consequences of Failing to Comply with the Requirements of FSVP?

NOTES & COMMENTS

FSVP 21 CFR §1.500–§1.514

This product falls – at least in part – under the jurisdiction of the United States Food and Drug Administration (FDA), and does not qualify for an exemption in Title 21, Code of Federal Regulations, Chapter I, Sub-chapter A, Part 1, Subpart L, §1.501. As the FSVP Importer's Qualified Individual (as the term is defined in §1.503) United Safety Agents – through the actions of this FSVP Plan's identified "Agent(s)" – has performed all actions required by FSVP and has presented this FSVP Plan for the review of this product's FSVP Importer. Please refer to pages 27 through 35 for substantiation of the FSVP QI's / PCQI's qualifications and certifications.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

DESIGNATION *of* ROLES & SUMMARY *of* REVIEW

FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: Ziba Nut Corporation FDA FEI: 3016047992

Physical Address: 600 West Broadway, Suite 700 DUNS No.: 12-18-82726

City: San Diego State: California, 92101 Country: United States

Mailing Address: 600 West Broadway, Suite 700

City: San Diego State: California, 92101 Country: United States

Phone Number: +1 (619) 209-6001 Email Address: mmorshed@zibanut.com

Name *of* Representative*(s)*: Mr. Massoud Morshed Title: Commercial Rep.

FOREIGN SUPPLIER &/OR MANUFACTURER *as defined by §1.500*

Company Name: L.I.R.A. S.A. FDA FFR: 19801307310

Manufacturing Address: Parcela 22, Colonia Anguinán FDA FEI: 3004340039

City: Chilecito Province/Territory: La Rioja, F5360DFD Country: Argentina

Office Address: Calle La Plata 554

City: Cordoba Province/Territory: Cordoba, X5004AJF Country: Argentina

Phone Number: +54 351 7266818 Email Address: lira@familiafrezzi.com

Name *of* Representative*(s)*: Diego Frezzi Title: QA /QC

QUALIFIED INDIVIDUAL*(s)* & AGENT*(s)*

Agent/QI Name: Claudio Innocenti Signature: Claudio Innocenti

Title: Partner & Preventive Controls Qualified Individual. Date: Aug. 15 2021

Agent/QI Name: William J. Barber Signature: W. J. Barber

Title: Preventive Controls Qualified Individual. Date: Aug. 15 2021

SUMMARY *of* REVIEW

Details *of* Product(s)	*Is foreign supplier expected to implement controls for*			**Comments**
	Biological Hazards	**Chemical Hazards**	**Physical Hazards**	
Raisins. Bulk. For Industrial Use	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	Verified & Approved. — See Addendum.
	☐ FSVP Importer	☑ FSVP Importer	☐ FSVP Importer	
	☐ Disclosure	☐ Disclosure	☐ Disclosure	
	☐ Customer	☐ Customer	☐ Customer	

Preventive Control or Disclosure Rqd.: Per §117, §507, §111 and/or §1.507, Notice is required when FSVP Importer or FSVP Importer's customer will be responsible for controlling hazards. *See "Hazard Analysis & Determination" section(s) and "Addendum" section for additional information.* ■ *Required* ■ *Recommended* ■ *Confirm efficacy of previously applied control(s)*

Supplier: L.I.R.A. S.A.

Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC)

Review Start: March 03, 2021 Review End: Aug. 15 2021

REGISTER *of* SUBSTANTIATING DOCUMENTS

HAZARD ANALYSIS

☐ *Requested* ☐ *Required* ☐ *Received* ☐ *Reviewed*

NOTES L.I.R.A. S.A.'s HACCP Plan received.
Dated: January 31, 2021.
Version: No. Cód. PL 8.5.4 01
Prepared By: Diego Frezzi
Note: We respectfully request that an unabridged copy of the supplier's HACCP/HARPC Plan be provided for evaluation.

ON-SITE AUDIT

☐ *Requested* ☐ *Required* ☐ *Received* ☐ *Reviewed*

NOTES L.I.R.A. S.A.'s ISO 22000 :2018 Audit Report received.
Dated: December 15, 2020.
Audit Grade: Certified.
Note: On-site audit report was not relied upon to approve this foreign supplier.

SAMPLING OR TESTING RESULTS

☐ *Requested* ☐ *Required* ☐ *Received* ☐ *Reviewed*

NOTES Six (6) Certificates of Analysis received from supplier.
Dated: Range, but are within 2020 - 2021.
Tested for: Pesticides, Biological Hazards, Mycotoxins, Heavy Metals, Etc.
Laboratory: JLA Argentina. Results: Acceptable.
Note: We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory).

OTHER FOOD SAFETY RECORDS

☐ *Requested* ☐ *Required* ☐ *Received* ☐ *Reviewed*

NOTES Completed Foreign Supplier FSVP Questionnaire received.
Dated: March 10, 2021
Completed by: Diego Frezzi and Hector Oscar Frezzi.

Note: No substantiating information provided by the supplier.

PRODUCT LABELING

☐ *Requested* ☐ *Required* ☐ *Received* ☐ *Reviewed*

NOTES Product Label received. Label clearly identifies all present allergens. Labeling is in compliance with Part 403(w) of the Federal Food, Drug, and Cosmetic Act in so far as it is not misbranded with respect to the presence of food allergens. See Analysis & Determination of Allergenic Hazard(s) for details.

Note: USA's assessment of product(s) labeling is restricted to a label(s)' allergen disclosure statement and should not be interpreted to meant that the label(s) meets all requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act), the Food Allergen Labeling and Consumer Protection Act (FALCPA), or any other applicable section of 21 CFR Part 101.. USA recommends that FSVP Importer independently confirm that product label(s) is in compliance with all regulations prior to import.

Supplier: L.I.R.A. S.A.

Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC)

Review Start: March 03, 2021 Review End: Aug. 15 2021

VERIFICATION FREQUENCY *for* UPDATED DOCUMENTS

21 C.F.R., §1.505, §1.506, and §1.510 require that all FSVP records be updated and maintained. Depending on USA's review and determination of the supplier's compliance history and food safety program, receipt of the following food safety documents are recomended accord to their individually-marked time interval.

FACILITY FOOD SAFETY PLAN

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

HACCP PLAN / HARPC PLAN

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

ON-SITE AUDIT RESULTS

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

LABORATORY TESTING RESULTS

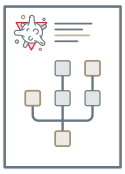
- [x] if positive results are returned
- [x] if recall or import refusal occurs
- [x] if inspection occurs
- [x] on an annual basis
- [ ] on a per-batch/shipment basis
- [x] Chemical [x] Biological
- [ ] *other:*

FDA REGISTRATION

- [x] if a change or update occurs
- [x] bi-annual basis *(regardless of change)*

FACILITY LICENSE

- [ ] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [x] *not applicable*



RECALL PLAN

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

PRODUCT LABEL

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

QUALIFICATIONS

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

IMPLEMENTATION RECORDS

- [x] if recall or import refusal occurs
- [x] if inspection occurs
- [ ] on an annual basis
- [ ] on a per-batch/shipment basis
- [ ] *other:*

FSVP QUESTIONNAIRE

- [x] if a change or update occurs
- [ ] annual basis *(regardless of change)*
- [ ] *other:*

NOTES

All documents used for FSVP verification and approval must be re-acquired at least one every three years or sooner, per above.

unitedsafetyagents.com/documents

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

FDA COMPLIANCE ACTIONS & REGULATORY HISTORY

21 CFR part 1, subpart L, §1.505(a)(1)(iii)(A)(C), and elsewhere requires that a foreign supplier's compliance history be evaluated, including whether the foreign supplier is the subject of an FDA Warning Letter*(s)*, Import Alert*(s)*, or other FDA compliance action(s) related to food safety. The following constitutes the results of this evaluation.

RESULTS *of* EVALUATION

Date *of* Action	Description *of* Action
N/A	FDA Data Dashboard search results indicate that supplier's compliance history does not include FDA Warning Letters, Import Alerts, or other applicable compliance actions.

Covers: L.I.R.A. S.A. FEI: 3004340039 Date: Aug. 15 2021

***Note**: Results may not be exhaustive. FSVP Importer should conduct independent inquiry.*

Supplier: L.I.R.A. S.A.

Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC)

Review Start: March 03, 2021 Review End: Aug. 15 2021

REVISION LOG *for* FSVP PLAN

Version No.	Date *of* Change	Description *of* Revision
No. 01	Aug. 15 2021	Product and supplier underwent initial FSVP verification.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

ADDENDUM

NOTE

Labeling Requirements

The Food Allergen Labeling and Consumer Protection Act (FALCPA) of 2004 requires food manufacturers to label food products that contain an ingredient that is or contains protein from a major food allergen in one of two ways.

The first option for food manufacturers is to include the name of the food source in parenthesis following the common or usual name of the major food allergen in the list of ingredients in instances when the name of the food source of the major allergen does not appear elsewhere in the ingredient statement. For example: Vanilla Waffers Ingredients: Enriched flour (wheat flour, malted barley, niacin, reduced iron, thiamin mononitrate, riboflavin, folic acid), sugar, partially hydrogenated soybean oil, and/or cottonseed oil, high fructose corn syrup, whey (milk), eggs, vanilla, natural and artificial flavoring) salt, leavening (sodium acid pyrophosphate, monocalcium phosphate), lecithin (soy), mono-and diglycerides (emulsifier)

The second option is to place the word "Contains" followed by the name of the food source from which the major food allergen is derived, immediately after or adjacent to the list of ingredients, in type size that is no smaller than the type size used for the list of ingredients. For example: Contains Wheat, Milk, Egg, and Soy

Food Allergen Labeling and Consumer Protection Act

- Nutritional information (not appliance to bulk).
- Name and place of business of the manufacturer, packer, or distributor (21 CFR 101.5).
- Quantity of contents (21 CFR 101.7).
- Statement of identity (21 CFR 101.3).
- Presence of artificial flavoring, artificial coloring, or chemical preservative (21 CFR 101.22).
- Ingredient statement if the product has two or more ingredients (21 CFR 101.4).
- Presence of major food allergens (21 U.S.C. 343(w)).
- Percent juice (21 CFR 101.30), when applicable.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

ADDENDUM

---------- NOTE ----------
---------- Review Notes ----------

The company bases its Prerequisite Program on the Good Manufacturing Practices (BPM) according to the Argentine Food Code (CAA), as well as in point 7.2 of ISO 22000 Standard , Prerequiste Program. The team leader of safety is Diego Frezzi. Given the production is made in stages, making the operations of Preselection, destemming and selection for all the requested volumen (maybe delaying several days) , and then the remaining operations are carried out (Washing, Manual and Automatic Selection, Glazing, Fractioning, Packing); at the moment of the audit it could only be evaluated the second part of the production line (Washing, Manual and Automatic Selection, Glazing, Fractioning, Packing, Shipping) ; the remaining was checked through records.

Compliance with Legal Requirement
- Enabled establishment (RNE): 1200007.
- Enabled products (RNPAs) for convencional and organic raisins.
- Productive workers have health cards in force, during the audit updated health cards were checked.

Outsourced processes: Raw material analysis and analysis of waters by external laboratories. Standard weight calibration and maintenance services of Laser scan and metal detector

Revision carried out on 30/10/2017 by the Management. Internal Auditing of the healthy management system 1/9/2017

The company has established and put into practice the following programs of prerequisites: PPR –Good Manufacturing Practice (P 7.2 01)
- Cleaning of the plant (POES programs).
- Integrated pest management.
- Equipment Maintenance.
- Follow-up monitoring and equipment measuring.
- Supplier management.
- Plant security.
- Waste management, among others.

HACCP Methodology used: Hazard analysis. Evaluation according to 4 level matrix for severity and likelihood of occurrence. Evaluation of significant hazards according to decision tree for determination of PPRo and PPC.

The company has defined and documented the following PPROs (PL 7.5 02 and 01):
- Analysis of some raw material parameters not included in the PCC, like microbiology (for those customers who ask for them) in the reception stage.
- Water analysis (microbiological and F-Q).
- Magnet Control in Feeding chute and smusher of bunches.
- Process control of washing in cascade form and rinse.
- Passage through SCAN laser to remove foreign bodies.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

ADDENDUM

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Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

Claudio Innocenti

in recognition for having successfully completed
the Food Safety Preventive Controls Alliance course:

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on
05/13/2021

Robert Brackett, VP and Director
Institute for Food Safety and Health

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti

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Certificate # 31d8ad94

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delivered by Lead Instructor

Charles Nolan

completed on
07/09/2020

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Institute for Food Safety and Health

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Susan M. Hays, Executive Director
Association of American Feed Control Officials

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Association of American Feed Control Officials

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Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

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delivered by Lead Instructor

Bob Bauer

completed on

09/14/2018

Robert Brackett, VP and Director
Institute for Food Safety and Health

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AFDO

Certificate # d2e9c287

Produce Safety
ALLIANCE

AFDO
ASSOCIATION OF FOOD & DRUG OFFICIALS
SINCE 1896

Certificate of Training

is awarded to

Claudio Innocent

in recognition for having successfully completed
the Produce Safety Alliance course:

PSA Grower Training Course

Delivered by PSA Lead Trainers and/or PSA Trainers
Cara Fraver, Laura McDermott, Yolanda Gonzalez, Lindsey Pashow

Class Number
NY-180712-GR
Grower ID Number
50447
Training Date and Location
7/12/2018–7/12/2018
Voorheesville, NY

Joseph Corby
Executive Director, AFDO

Elizabeth A. Bihn, Ph.D.
Produce Safety Alliance Director

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

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Institute for Food Safety and Health

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International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

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Joseph Corby, Executive Director
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Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

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FSPCA PREVENTIVE CONTROLS FOR HUMAN FOOD

delivered by Lead Instructor

Amanda Evans

completed on

07/25/2017

Robert Brackett, VP and Director
Institute for Food Safety and Health

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

Gerald Wojtala, Executive Director
International Food Protection Training Institute

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Joseph Corby, Executive Director
Association of Food and Drug Officials

AFDO

Certificate # 2d697331

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

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WILLIAM BARBER

in recognition for having successfully completed
the Food Safety Preventive Controls Alliance course:

FSPCA Preventive Controls for Human Food

delivered by Lead Instructor

Mirasol Mohal

completed on
06/05/2019

Robert Brackett, VP and Director
Institute for Food Safety and Health

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

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tina coil

completed on
06/13/2017

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Institute for Food Safety and Health

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International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

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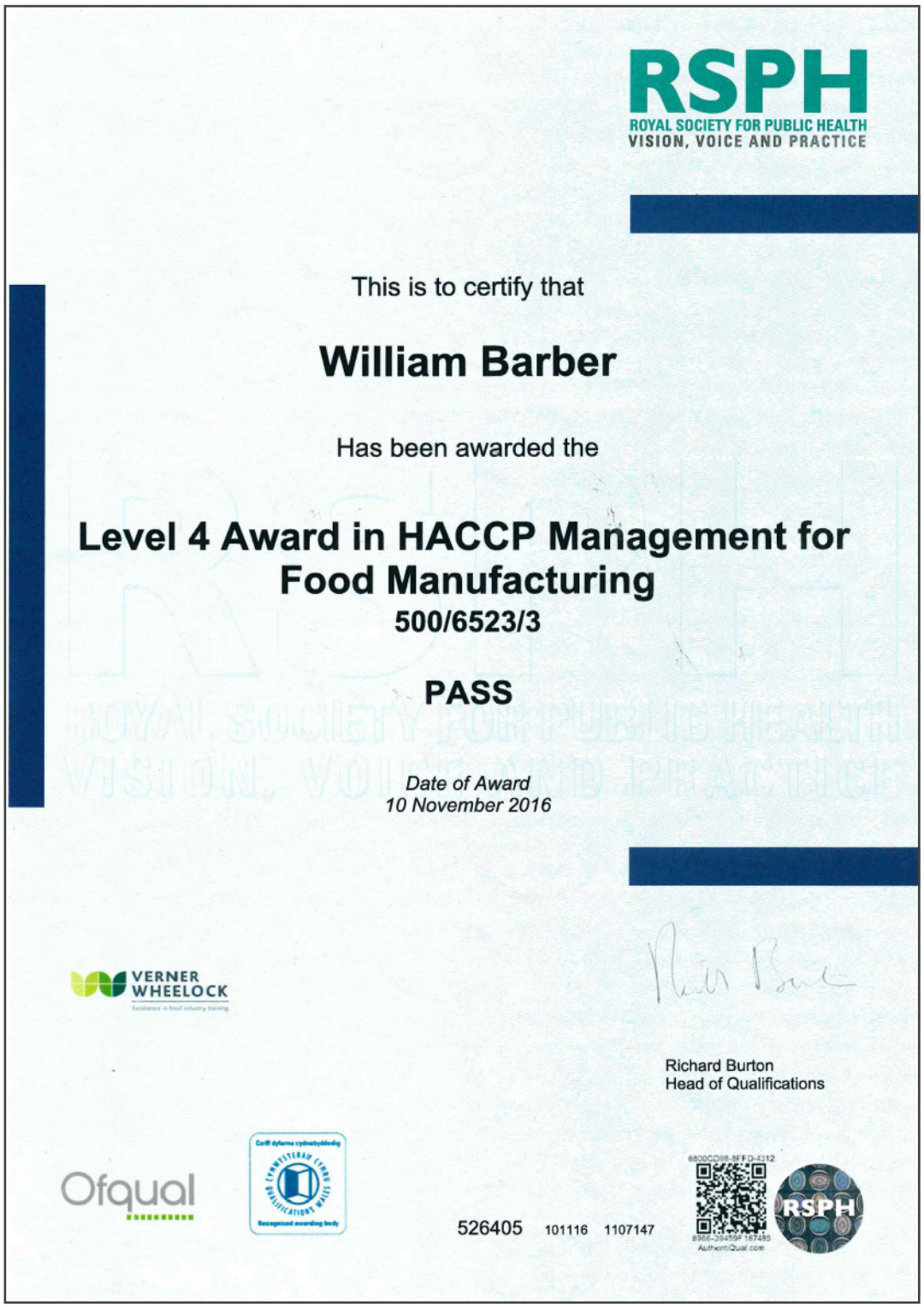

RSPH
ROYAL SOCIETY FOR PUBLIC HEALTH
VISION, VOICE AND PRACTICE

This is to certify that

William Barber

Has been awarded the

Level 4 Award in HACCP Management for Food Manufacturing

500/6523/3

PASS

Date of Award
10 November 2016

VERNER WHEELOCK

Richard Burton
Head of Qualifications

Ofqual

526405 101116 1107147

RSPH

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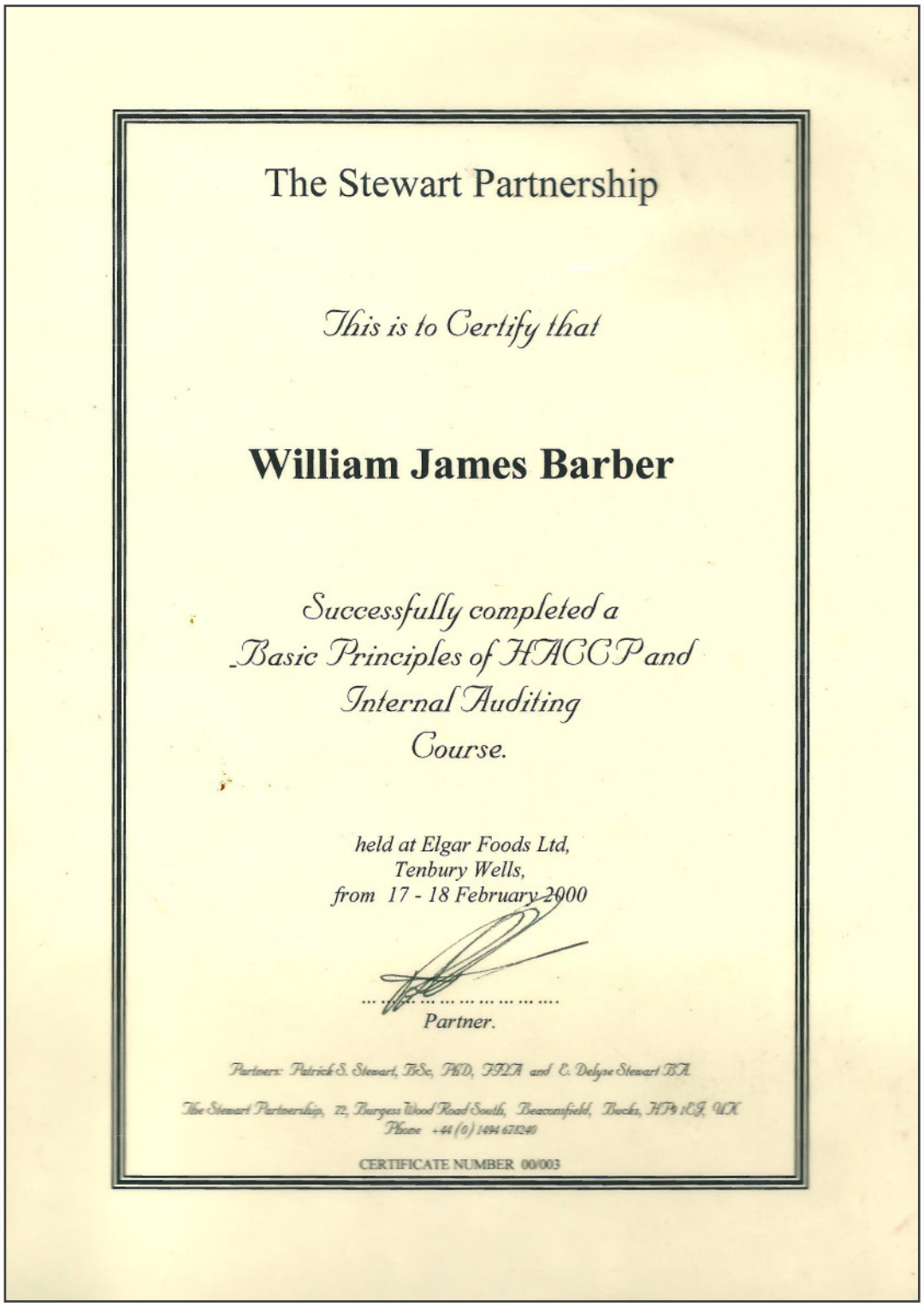

The Stewart Partnership

This is to Certify that

William James Barber

Successfully completed a Basic Principles of HACCP and Internal Auditing Course.

held at Elgar Foods Ltd, Tenbury Wells, from 17 - 18 February 2000

..... *Partner.*

Partners: Patrick S. Stewart, BSc, PhD, FIFST and E. Delyse Stewart BA

The Stewart Partnership, 72, Burgess Wood Road South, Beaconsfield, Bucks, HP9 1EJ, UK
Phone +44 (0) 1494 678240

CERTIFICATE NUMBER 00/003

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

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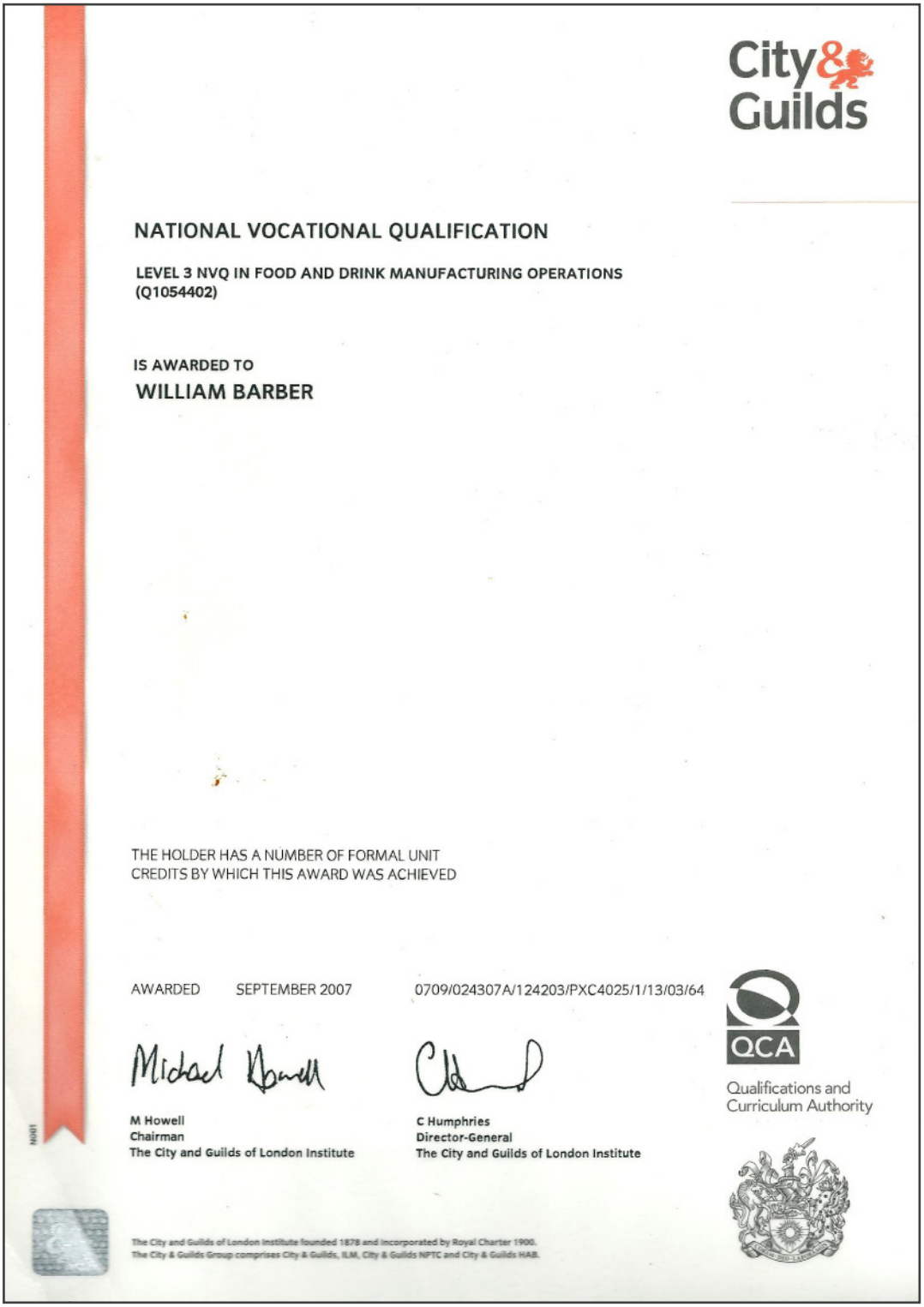

City & Guilds

NATIONAL VOCATIONAL QUALIFICATION

LEVEL 3 NVQ IN FOOD AND DRINK MANUFACTURING OPERATIONS
(Q1054402)

IS AWARDED TO

WILLIAM BARBER

THE HOLDER HAS A NUMBER OF FORMAL UNIT
CREDITS BY WHICH THIS AWARD WAS ACHIEVED

AWARDED SEPTEMBER 2007 0709/024307A/124203/PXC4025/1/13/03/64

M Howell
Chairman
The City and Guilds of London Institute

C Humphries
Director-General
The City and Guilds of London Institute

QCA
Qualifications and Curriculum Authority

The City and Guilds of London Institute founded 1878 and incorporated by Royal Charter 1900.
The City & Guilds Group comprises City & Guilds, ILM, City & Guilds NPTC and City & Guilds HAB.

Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

City & Guilds

CERTIFICATE OF UNIT CREDIT TOWARDS
NATIONAL VOCATIONAL QUALIFICATION
LEVEL 3 NVQ IN FOOD AND DRINK MANUFACTURING OPERATIONS

IS AWARDED TO
WILLIAM BARBER

WHO ATTENDED PERSHORE GROUP OF COLLEGES

AND WAS SUCCESSFUL IN THE
FOLLOWING TEN UNITS

CONTROL AND MAINTAIN QUALITY WITHIN MULTI-STAGE MANUFACTURING OPERATIONS	U1024734
RESOLVE PROBLEMS IN MULTI-STAGE MANUFACTURING OPERATIONS	U1024735
MAINTAIN AND IMPROVE HEALTH AND SAFETY WITHIN THE WORKPLACE	U1024736
MAINTAIN AND IMPROVE HYGIENE AND PRODUCT SAFETY WITHIN THE WORKPLACE	U1024737
CONTRIBUTE TO THE ACHIEVEMENT OF ORGANISATIONAL AND PERSONAL GOALS	U1028661
PROVIDE INFORMATION TO SUPPORT DECISION MAKING	U1026144
MONITOR AND MAINTAIN THE HANDLING AND STORAGE OF MATERIALS	U1024742
IMPLEMENT QUALITY ASSURANCE SYSTEMS	U1027820
DEVELOP A FOOD AND DRINK PRODUCT	U1050274

CONTINUED

AWARDED SEPTEMBER 2007 0709/024307A/124203/PXC4025/1/13/03/64

M Howell
Chairman
The City and Guilds of London Institute

C Humphries
Director-General
The City and Guilds of London Institute

R01

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Supplier: L.I.R.A. S.A. Product: Raisins | For Industrial Use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: March 03, 2021 Review End: Aug. 15 2021

SUBSTANTIATING DOCUMENTS

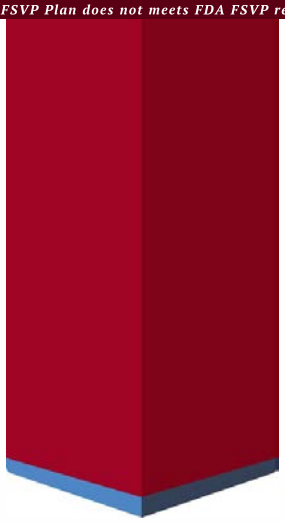
This FSVP plan is based – at least in part – on the following foreign supplier-provided food safety documents. All substantiating documents have been reviewed and assessed by United Safety Agents LLC.

Note All foreign supplier-provided documents are considered to be the property of that foreign supplier and may contain information which is privileged, confidential, and protected. Any reproduction, distribution or other use of these documents without the express written consent of the foreign supplier is prohibited. Enclosed documents are meant for review purposes only and are subject to change without notice. Documents may contain non-binding recommendations and are uncontrolled.

	FOOD SAFETY MANAGEMENT SYSTEMS	Plan
Pusafre® L.I.R.A. S.A.		Cód. PL 8.5.4 01
	HACCP PLAN - ORGANIC AND CONVENTIONAL RAISINS	

CCP N°	Stage Nº	Stage / Raw Material / Ingredient	Type of danger	Hazard	Control measures	Critical limits	Monitoring	Sample size	Frequency	Responsible person	Corrective actions		Resp. Verificati on	Associated record
											Process	Product		
1	1	Reception of Raw Material	Biological	Soil Mould proliferation : Rhizoctonia spp y Fusarium spp Of the fruit: Aspergillus flavus y ochraensis	Moisture content of the raw material	>12,5 %	Moisture Meter Method AOAC 972.20	The reception manager must take a sample of three random bags from each delivered pallet, then with the samples make up a delivery pool (500 grams) to perform moisture and mold analyzes before authorizing the discharge of the raw material sub-lot / lot. harvest.	Each delivery of raw material.	Quality Analist	N.A.	Moisture content greater than 12,5 %: item is rejected to continue drying.	Coordinator of Plant	"Quality control sheet passes from raisins to the factory" R PL CAL 01 02
2	30 (Organic) / 30 (Conventional)	Final inspection tape	Physical	Raisins with stone (sand) embedded > to 2mm < 4mm	Operational work instruction "Manual selection" + Training for operators + technical specification	1 unit or according to technical specification	Visual inspection test and quantity of units with embedded sand	100 grams	Every 30 minutes	Quality Analyst	Content greater than the critical limit notify the person in charge of the laser scan to increase sensitivity / assign more selectors on inspection tape / Regular entry of raisins in feeder hopper 2.	Identify product made from the last compliant control, segregate and reprocess at the end of the work shift from the lifting belt to the laser scan.	Coordinator of Plant	"Quality control register passes from processed raisins" R PL CAL 01 01 / "Monitoring operation Scan laser sorter" R P L 7.5 01 02 05
			Physical	Raisins with stone (sand) embedded > 4 mm	Operational work instruction "Manual selection" + Training for operators + technical specification	Absence								
2	30 (Organic) / 30 (Conventional)	Final inspection tape	Physical	Raisins with stone (sand) embedded > to 2mm < 4mm	Operational work instruction "Manual selection" + Training for operators + technical specification	2 unit or according to customer's specification	Visual inspection - Sampling in tray	10 Kg or 30 Pounds	1 box every 10, 20 or 30 produced based on the results of the commercial analysis.	Quality Analyst	Content greater than the critical limit notify the person in charge of the laser scan to increase sensitivity /assign more selectors on inspection tape / Increase control frecuency	Identify product made from the last compliant control, segregate and reprocess at the end of the work shift from the lifting belt to the laser scan.	Coordinator of Plant	"Quality control register passes from processed raisins" R PL CAL 01 01 / "Monitoring operation Scan laser sorter" R P L 7.5 01 02 05
			Physical	Raisins with stone (sand) embedded > 4 mm	Operational work instruction "Manual selection" + Training for operators + technical specification	Absence								
3	37 (Organic) / 35 (Conventional)	Detection of metals in finished product	Physical	Foreign materials metals (screws, pieces of wire, clamps, rivets, nails) less than 3 mm Fe (Ferrous), 4.0 mm stainless steel and 4.5 mm non-ferrous.	Operational / calibrated metal detector	Detection of test pieces for ferrous metals = > to 3 mm, non-ferrous = > 4.5 mm and stainless steel = > 4.0 mm (sound alarm activation and conveyor belt stop)	Alternately passing a box of finished product with a test pieces inside it through the metal detector.	1 box of finished product with each test pieces .	Start of production, change of product, every 2 hours during the work shift and at the end of production	Packaging worker	1) During the passage of the standard specimens, if the audible alarm does not sound or the conveyor belt stops, notify Plant Coordination. 2) During the normal operation of the equipment after the passage of test tubes: if there are 3 consecutive activations of the audible alarm, the program must be reviewed and adjusted and the witness passage repeated before passing rejected boxes.	Segregate rejected product by metal detector into container / bag / box identified with the label "non-conforming product". Notify the Plant Coordinator for its disposal. Reprocess all bags / boxes produced during the time elapsed since the last compliant control. In case of observing more than 5 metal detections in a shift, issue a Non-conformity report in order to investigate the causes	Plant Coordinator	"Monitoring and verification of the metal detector" (R PL 7.6.1 01/02 07) "Metal Contamination Record detected" R PL 7.6.1 01 / 02 07

Prepared: Juan Padilla Quality management	Validated: Food Safety Team	Approved: Diego Frezzi Leader Food Safety Team	Date Issued: October 24, 2004 Review date: January 27º, 2021 Review Nº: 31

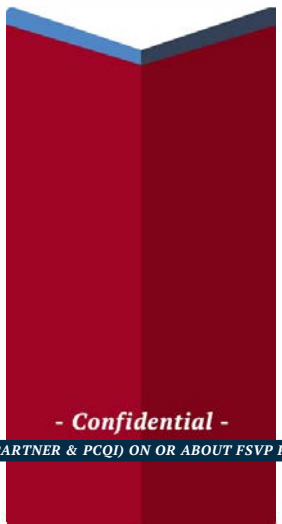


SUPPLIER QUESTIONNAIRE

for

U.S. IMPORT ENTRY

UNDER FSVP



OVERVIEW *of* REGULATIONS

The Foreign Supplier Verification Program (FSVP) was published by the FDA on November 27, 2015. FSVP is fundamentally concerned with food safety. As a validly designated and qualified United States *(U.S.)* representative, United Safety Agents LLC's *(USA)* FDA-mandated goal is to verify that a product's innate physical, chemical and biological hazards are being controlled prior to public consumption, and in a manner that provides at least the same level of public health protection as the FDA's domestic standards *(Preventive Controls Rule, Produce Safety Rule, etc.)*.
To accomplish this goal, insight into each product's production process and control methods will be required.

INSTRUCTIONS

We respectfully request that every entity/facility that controls any food safety hazard complete this Questionnaire. All sections are required, unless explicitly noted otherwise. **Complete via computer, do not print.**

Upon completion: Please return this questionnaire and accompanying documents via:

Method One: e-mail completed questionnaire to **info@unitedsafetyagents.com**

Method Two: upload completed questionnaire to USA's **ShareFile**

CONFIDENTIALITY

All information shared will remain strictly privileged & confidential and will ONLY be used during FSVP certification activities. An accurate and truthful response is required to successfully complete your company's FSVP certification. This document contains information which is privileged, confidential, and protected. Any disclosure, copying, distribution, or use of the contents of this message is prohibited. Document may contain Non-binding recommendations. United Safety Agents provides FSVP compliance services to businesses and has no direct affiliation with the FDA.

CONTACT

If you have any questions or require additional information, please contact United Safety Agents LLC directly via Email: info@unitedsafetyagents.com; Phone: +1 (888) 551-7403; Fax: +1 (888) 557-2649; UnitedSafetyAgents.com, or by Mail: 715 West Park Avenue, No. 222, Oakhurst, New Jersey 07755, United States of America.

GENERAL INFORMATION

Company Name: L.I.R.A. S.A. Today's Date: March 10, 2021

Factory Address: Parcela Nº 22 Colonia Anguinan

City: Chilecito Province: La Rioja Country: Argentina

Office Address: La Plata Nº 554

City: Córdoba Province: Córdoba Country: Argentina

FDA Registration No.: 19801307310 DUNS No.: 97-805-8618

FDA Establishment Id.: 978058618 (UFI) Phone No.: 0054 351 7266818

QC/QA's Name: Diego Frezzi E-mail: lira@familiafrezzi.com

SUPPLIER CLASS

Please select all actions/roles that apply to your facility/operation.

☒ Manufacturer *(Raw Material)*	☐ Processor	☐ Packer	☐ Re-Packer
☒ Manufacturer *(Finished Product)*	☐ Distributor	☐ Shipper	☐ Warehouse
☐ Importer *(US-based)*	☐ Exporter *(Non US-based)*	☐ Broker	☐ *Other*

RESPONSIBILIE *for* HAZARD CONTROLS

Please select the appropriate response for each hazard type that your facility/operation controls.

Is your factory/facility responsible for controlling Biological Hazards?	☒ Yes	☐ No
Is your factory/facility responsible for controlling Chemical Hazards?	☒ Yes	☐ No
Is your factory/facility responsible for controlling Physical Hazards?	☒ Yes	☐ No
Is/Are product(s) in Ready-to-Eat form when exiting your factory/facility?	☒ Yes	☐ No

PRODUCTS SUPPLIED

Please list the name (and variation) of each product that your facility/operation supplies.

No. 01, Product Name: Raisins - Flame seedless Product No.: 20 A G H 09

No. 02, Product Name: Raisins - Thompson seedless Product No.: 20 A G H 09

No. 03, Product Name: Product No.:

No. 04, Product Name: Product No.:

No. 05, Product Name: Product No.:

No. 06, Product Name: Product No.:

Resources FDA Product Codes and Product Code Builder

FDA–IDENTIFIED BIOLOGICAL HAZARDS

FDA-identified Biological Hazards associated with the product(s) that your company supplies.

☒ Bacillus cereus	☐ Clostridium botulinum	☐ C. perfringens	☐ Brucella spp.
☐ Campylobacter spp.	☒ Pathogenic E. coli	☒ Salmonella spp.	☒ S. aureus
☒ L. monocytogenes	☐ Trichinella spiralis	☐ Giardia lamblia	☐ Shigella spp.

Resources | Appendix 1 | Description *of* Hazard | Bad Bug Book

CRITICAL CONTROLS *for* BIOLOGICAL HAZARDS

Please select and describe the method by which Biological Hazard(s) are controlled. *Please be as detailed as possible. Include time/temperature, chemical names, or any other information.*

☐ **Heat**

☐ **Chemical**

☒ **CGMPs**

☒ **Testing**

☒ **Other**

DESCRIPTION *of* CRITICAL CONTROLS

Maximum percentage of moisture in raw material (12,5%) and finished product (19%) Moisture Meter Method AOAC 972.20 / Dried Fruit Moisture Tester Method.

Note: process control - dehydratation, conservation by drying / natural dehydration in the sun (The elimination of moisture prevents the growth and reproduction of microorganisms that cause decomposition and minimizes many of the moisture-mediated deterioration reactions)

UNITED STATES FOOD & DRUG ADMINISTRATION'S PRODUCT HAZARD PROFILE

Note: Please fill the following

Category: Fruits

Category No.:

FREQUENCY *of* CONTROL VALIDATION

Moisture control frequency: each delivery of raw material or start of production and every 2 hours in finished product. Use of Water activity (aw) as a Formulation Process Control .

To determine the moisture content, a parameter that is monitored both in raw material and in finished product and its relation to water activity, the "sorption isotherms for dried fruits at 25 ° C" were used where moisture values for raisins were obtained of grape and its corresponding water activity p. ex. at 12% humidity corresponds a water activity (aw) of 0.30, while with a 19%, an aw of 0.65 is correlated.

There are intrinsic factors inherent in foods that encourage, prevent or limit the growth of microorganisms in food; the most important are the activity of water (aw), pH and and controlled atmosphere packaging that prevent the development of pathogens associated with the product, including natural toxins by inhibiting the proliferation of fungi associated with them.

FDA–IDENTIFIED CHEMICAL HAZARDS

FDA-identified Chemical Hazards associated with the product(s) that your company supplies.

☐ Drug residues	☒ Heavy metals	☐ Industrial chemicals	☒ Pesticides
☒ Mycotoxins/Toxins	☐ Radiological	☐ Unapproved colors & additives	☐ Other

Resources  Appendix 1  Description *of* Hazard  Bad Bug Book

CRITICAL CONTROLS *for* CHEMICAL HAZARDS

Select and describe the method(s) by which Chemical Hazard(s) are controlled. *Please be as detailed as possible.*

☒ CGMPs

☒ Testing

☒ Other

DESCRIPTION *of* CRITICAL CONTROLS

Certificate of Organic Operation according USDA organic regulations, 7 CFR Part 205 - Category of certification: NOP "100% organic" product or equivalent (205.301a) for raisins. Frecuency: each harvest. Natural toxins: moisture control frequency: each delivery of raw material or start of production and every 2 hours in finished product.

Use of Water activity (aw) as a Formulation Process Control. Supply chain preventive controls (GMP in cultivation, harvest, transport, storage and drying).

UNITED STATES FOOD & DRUG ADMINISTRATION'S PRODUCT HAZARD PROFILE

Note: Please fill the following

FREQUENCY *of* CONTROL VALIDATION

Certificate of Organic Operation Issued according USDA organic acording regulations, 7 CFR Part 205 - Category of certification: NOP "100% organic" product or equivalente (205.301a) for raisins valid. Frecuency Process Control - Moisture content of the raw material (Each delivery of raw material) and finished product (Minimum 3 times per work shift.

Verification by multi-residue trials of annual / harvest random pesticides y test semestral heavy metals (Note: not mandatory, it is understood that the organic product does not contain pesticides not allowed and this is endorsed by the Certification Body).

Verification effectiveness Water activity (aw) as a Formulation Process Control by tests of natural toxins (Aflatoxins, Ocratoxin A) randomized 1 semiannual analysis by supplier / harvest / weather conditions and / or specifications of customers or countries of destination.

FDA–IDENTIFIED ENVIROMENTAL/PROCESS HAZARDS

FDA-identified Environmental Hazards associated with the product(s) that your company supplies.

- ☐ Recontamination with environmental pathogens.
- ☐ Bacterial growth and/or toxin formation due to lack of time / temperature control.
- ☒ Bacterial growth and/or toxin formation due to reduced oxygen packaging.
- ☐ Bacterial pathogen survival of a lethal treatment.
- ☐ Recontamination due to lack of container integrity.
- ☐ Bacterial growth and/or toxin formation due to poor formulation control.

Resources  Appendix 1  Description *of* Hazard  Bad Bug Book

CRITICAL CONTROLS *for* ENVIROMENTAL HAZARDS

Select and describe the method(s) by which Environmental Hazard(s) are controlled. *Be as detailed as possible.*

- ☐ **Heat**
- ☐ **Chemical**
- ☒ **CGMPs**
- ☒ **Testing**
- ☒ **Other**

DESCRIPTION *of* CRITICAL CONTROLS

Dry cleaning sector pre cleaning. Microbiological monitoring of process and environmental equipment surfaces.

UNITED STATES FOOD & DRUG ADMINISTRATION'S PRODUCT HAZARD PROFILE

Note: Please fill the following

Category: Fruits
Category No.:
Subcategory: Dried fruits
Storage:

FREQUENCY *of* CONTROL VALIDATION

According to hygiene plan PL 7.2 01 01. Semiannual surface swabs.

FDA–IDENTIFIED PHYSICAL HAZARDS

FDA-identified Physical Hazards associated with the product(s) that your company supplies.

- ☒ Metal
- ☐ Glass
- ☒ Extraneous Matter
- ☒ Plastics
- ☒ Stones
- ☐ Wood
- ☒ Natural Component of Food
- ☒ Other

Resources — Appendix 1 — Description *of* Hazard — Bad Bug Book

CRITICAL CONTROLS *for* PHYSICAL HAZARDS

Select and describe the method(s) by which Physical Hazard(s) are controlled. *Please be as detailed as possible.*

- ☒ CGMPs
- ☐ Testing
- ☒ Raw Material Inspection
- ☒ Filter
- ☐ Screen
- ☒ Metal Detector *see below*
- ☒ Magnet
- ☐ X-Ray
- ☐ Radar
- ☒ Other

DESCRIPTION *of* CRITICAL CONTROLS

Final inspection tape - Control de proceso (raisins with stone (sand) embedded > 4 mm) manual seleccion.

Detection of metals in finished product / Foreign materials metals (screws, pieces of wire, clamps, rivets, nails) greater than 3 mm Fe (Ferrous), 4.0 mm stainless steel and 4.5 mm non-ferrous./ Operational / calibrated metal detector.

In adittional (Operational prerequisite programme)
Double cascade wash - Control de proceso (Loose stones diameter thickness> to 6 mm and <to 13 mm) por cascade.

Scan Laser - Control de proceso (Pass with embedded stone> 4 mm) por air pressure of the laser scan ejectors or Impurity expulsion program, including mycotoxins according to type of hazard. /

UNITED STATES FOOD & DRUG ADMINISTRATION'S PRODUCT HAZARD PROFILE ✚

FREQUENCY *of* CONTROL VALIDATION

Final inspection tape - process control (raisins with stone (sand) embedded > 4 mm) / Absence / Visual inspection test and quantity of units with embedded sand / 10 Kg or 30 Pounds/ 1 box every 10, 20 or 30 produced based on the results of the commercial analysis.

Detection of metals in finished product / Detection of test pieces for ferrous metals = > to 3 mm, non-ferrous = > 4.5 mm and stainless steel = > 4.0 mm (sound alarm activation and conveyor belt stop) / Alternately passing a box of finished product with a test pieces inside it through the metal detector./ 1 box of finished product with each test pieces. / Start of production, change of product, every 2 hours during the work shift and at the end of production.

In adittional (Operational prerequisite programme):

Metal detection standards

Ferrous: 3 mm

Non-Ferrous: 4,5 mm

Stainless Steel: 4 mm

ALLERGEN & CROSS-CONTAMINATION CONTROLS

Component *or* Ingredient	Present in *product?*	Present on *same equipment?*	Present in *same facility?*
Peanuts	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Tree Nuts	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Milk *or* Milk Derivatives	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Egg *or* Egg Products	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Fish	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Shellfish	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Soy	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Gluten	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Wheat	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Celery	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Sesame	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Mustard	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Sulfates	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Monosodium Glutamate	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Colorings	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Aflatoxins	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
ALL ALLERGENS	☒ **Absent**	☒ **Absent**	☒ **Absent**

DESCRIPTION *of* ALLERGENIC CONTROLS

The product does not have by design nor allergens are incorporated. Aflatoxins are not considered allergens but natural toxins produced by some types of fungi. ALLERGEN - Letters of guarantee are requested from suppliers.

ONSITE AUDITING INFORMATION

Does the manufacturing/processing site have a recognized GFSI certification (BRC, SQF, Etc.)? ☐ Yes ☒ No

If Yes; Please provide a copy of the **full audit report** (written in English).

What standard is the GFSI certification? _____

If No;
1. Does the site have a documented quality manual? ☒ Yes ☐ No
2. Does the site undergo internal hygiene audits? ☒ Yes ☐ No
3. Does the site undergo quality system audits? ☒ Yes ☐ No
4. Does the site undergo process audits? ☒ Yes ☐ No

CLEANING INFORMATION

Does the site have documented hygiene procedures in place? ☒ Yes ☐ No

Does the site have a designated hygiene team? ☒ Yes ☐ No

Are all cleaning staff formally trained? ☒ Yes ☐ No

Do the cleaning schedules include:
- Chemicals used? ☒ Yes ☐ No
- Concentration levels? ☒ Yes ☐ No
- Dilution method? ☒ Yes ☐ No

Please list the chemical type(s) used on all food contact lines and surfaces:

BIO LAV Lavandina water Certificate C-1832 issued by the Health Authority (National Service of Quality and Agrifood Health - SENASA).

STAFF HYGIENE INFORMATION

Have all staff undergone formal food hygiene training? ☒ Yes ☐ No
- In-house hygiene training? ☒ Yes ☐ No
- Accredited hygiene training? ☐ Yes ☒ No

Training level certification obtained:

Are staff issued protective clothing? ☒ Yes ☐ No

Are operatives required to cover head/facial hair within the processing/manufacturing area? ☒ Yes ☐ No

Are adequate toilet and hand washing facilities provided? ☒ Yes ☐ No

Are hand washing/swabbing validation checks carried out? ☒ Yes ☐ No

What is the total number of staff employed on site? 9

PEST CONTROL

Is a pest control contractor employed? ☐ Yes ☒ No

If yes, please provide: Name of contractor used: _____

Number of yearly visits: _____

If no, by what means is pest prevention carried out? Documented procedure "Integrated Pest Management (IPM

HACCP & TACCP & VACCP

Does a fully documented and audited HACCP system exist for the site? ☒ Yes ☐ No

Has a hazard analysis study been completed for each site operation? ☒ Yes ☐ No

Does the business have a trained & certified in-house HACCP team? ☒ Yes ☐ No

If yes, please provide copies of current & relevant HACCP training certificates.

Does the business outsource the HACCP management to a certificated consultant? ☒ Yes ☐ No

If yes, please provide copies of current & relevant HACCP training certificates.

Are records maintained for all CCPs? ☒ Yes ☐ No

Does the HACCP system include the following:

- Sieving of ingredients? ☒ Yes ☐ No
- Sieving of finished products? ☒ Yes ☐ No
- Glass & hard plastic breakage procedure? ☒ Yes ☐ No
- Metal detection of final product? ☒ Yes ☐ No
- Magnets within the mixing & filling stages? ☒ Yes ☐ No

Do you use blue metal detectable plasters in the manufacturing/processing areas? ☐ Yes ☒ No

Please detail any other prevention systems used on-site: _____

Has a full threat assessment of your supply chain been conducted & tested? ☐ Yes ☐ No

Please provide details: Documented procedure "Preparation and answer to the emergencies" Code 5.7 01.

Has a full product vulnerability assessment within the supply chain been conducted & tested? ☐ Yes ☐ No

Please provide details: Documented procedure "Preparation and answer to the emergencies" Code 5.7 01. Regist

TRACEABILITY

Does full traceability exist for all products supplied to your customer base? ☒ Yes ☐ No

If yes, please give details of traceability codes on the final packaging: In box code: 05-985 (05: variety organi

RAW MATERIAL

Are materials used by your company sourced from approved suppliers? ☒ Yes ☐ No

Are certificates of conformance/analysis received for all raw ingredients? ☒ Yes ☐ No

Are raw materials positively released before use? ☒ Yes ☐ No

Please describe your supplier approval system:

Supplier approval system documented "Supplier selection and management" Code P 7.2.3. 01 includes registration documentation for new suppliers, presentation of guarantee letters, possibility of on-site GPA audits, classification of the raw material, analysis results and a risk assessment. There is a methodology to consider an approved provider.

FINISHED / PACKED PRODUCT

Are finished / packed products positively released? ☒ Yes ☐ No

Are reference samples from finished / packed products retained? ☒ Yes ☐ No

Are finished products submitted to an **17025:2005** accredited laboratory for validation purposes? ☒ Yes ☐ No

If yes, please give details of the testing routines conducted:

Routine tests performed in the internal laboratory: moisture content and defects according to USDA standard for raisins. In external laboratories: the analyzes are performed 1) on request or according to the client's specification, 2) according to the legislation in force in the country of destination or 3) verification of the HACCP plan (Preventive process control) In the case of customers or depending on the destination, the tests may include one or more of the

CUSTOMER COMPLAINTS

Does a formal customer complaint procedure exist? ☒ Yes ☐ No

Please describe your customer complaint procedure.

The company has a documented "claims complaint" procedure Code P 9.0 01. Claims can be received by telephone or mail, customer and product data are documented, including the reason for the same. They are classified according to their severity and in all cases the quality and safety team performs an analysis of causes, corrective actions to correspond and prepares a written response that is sent to the client. If necessary, act according to recall plan.

RECALL / IMPORT ALERT /FOOD SAFETY ISSUE

Has your company ever experienced a recall or other food safety related issue of any kind? ☐ Yes ☒ No

If yes, please describe fully.

CERTIFICATION

I certify that the information I provided on and in connection with this form is true, accurate and complete. I also understand that any false statements or deliberate omissions on this document or any other document I file with United Safety Agents, LLC may be grounds for disqualification from successful Foreign Supplier Verification Program (FSVP) approval or, if discovered after FSVP approval takes place, could result in my company's FSVP approval status being revoked or terminated, and may result in my shipments being rejected from entry into the United States. I confirm that all products that my company trades are in compliance with the Food Safety Modernization Act and all other U.S. & FDA Food Safety legislation.

CONFIRM CERTIFICATION - Required

Representative's Name: Héctor Oscar Frezzi

Title: Agricultural Engineer

Today's Date: 3/10/21

Hector Frezzi
Presidente
L.I.R.A. SA

TÜVRheinland®
Precisely Right.

CN 01 154 1829860

Audit Report as per

ISO 22000 :2018

for

L.I.R.A. S.A.
Parcela 22,
Colonia Anguinán, Chilecito,
La Rioja, Argentina

Audit Report

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Client	Standard(s)	Certification Number(s)	Audit Type
L.I.R.A. S.A.	ISO 22000	01 154 1829860	FU2

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Audit Leader : Virginia Agriello

Audit Team :

Management System Representative : Diego Frezzi

Audit Date : 15.12.2020 [08 :00 – 12 :30hs ; 13 :30 – 17 :00hs]
16.12.2020 [08 :00 – 12 :00hs]

1 Scope

1.1 Description of the organization

L.I.R.A. S.A. is a family business located in Chilecito, Province of La Rioja, in the northwest of Argentina, dedicated to the processing and commercialization of certified Conventional and Organic Raisins.

It has Certification for Organic production as ARGENCERT for the EEC and Organic Certification NOP for USA. In recent years, more than 99.9% of production was destined for the export market (Germany, Holland, USA, New Zealand, Japan and Brazil among others) and the rest in the local market being the main suppliers of raisins Arcor.

The main processes include: Reception of raw material (the main raw material is dry grapes), Storage, Preselection, Destemming, Washing, Selection (Manual and Automatic), Polishing, Fractionation, Packaging, Dispatch, Transportation, Distribution. Among the support activities, are identified, human resources and training activities, purchases, sales and activities related to the safety management system. Raw material is collected in January and February, and processing takes place mainly from March to November. The same business group with organic certification produces approximately one third of the raw material that enters the plant; the rest comes mainly from three suppliers with whom the organization relates in the different campaigns.

The following registrations of the establishment and its products were verified:

-RNE 12000007 for establishment L.I.R.A S.A located in street Parcela 22 Colonia Anguinán Chilecito La Rioja for dried grapes authorised for processing of vegetable food and fractionation of vegetable food, with an expiry date 16.04.2021.

-RNPA Nº 12003791 for raisins without organic seed Pasafre brand elaborated and fractionated by L.I.R.A date 22.03.2018 expiration 30.04.2022

-RNPA 12000083 for raisins without seed Pasafre brand elaborated and fractionated by L.I.R.A date 30.04.2019 expiration 30.04.2022

Usually, visits are received from the health authority in order to renew RNE. During the past year, there have been no visits from the health authority due to the pandemic.

1.2 Scope of certification

Scope of certification: (per standard):	Raw material receiving, storage, processing and packaging of raisins in plastic bags.
ISO 22000:2018 standard requirements to be excluded from the scope:	NA
Reasons for exclusions:	NA

The following sites and their scopes are included in the scope of certification:

Audit Report

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Site No. (CN ext.)	Sites included in cert. Name/address of site	No. of emp.	Scope and processes	Standard(s)	Audited
01	L.I.R.A. S.A. Parcela 22, Colonia Anguinán, Chilecito, La Rioja, Argentina	9	Raw material receiving, storage, processing and packaging of raisins in plastic bags. Reception of raw material, Storage, Preselection, Destemming, Washing, Selection (Manual and Automatic), Polishing, Fractionation, Packaging, Dispatch.	ISO 22000	X

2 Audit result – Stage 2

X	The last audit revealed nonconformities which have been demonstrably corrected. The corrections and corrective actions taken in this respect have been verified.
	A stage 1 audit was performed and the organization found ready for certification. Identified weaknesses, if any, have been eliminated and the corrective action associated therewith verified.
X	The current audit revealed 1 minor nonconformity.
	The major nonconformities (No. x) with individual standard elements require a re-audit to verify the effectiveness of the corrections and corrective actions (probable date: ddmmyyyy)
	The organization has established and maintains an effective system to ensure compliance with its policy and objectives. The audit team confirms in line with the audit targets that the organization's management system complies with, adequately maintains and implements the requirements of the
X	The organization uses the logo and the certificate (e.g. on business cards, company brochures, websites etc.) in compliance with the requirements.
	Repeat audit: Based on the reviewed reports of the entire certification cycle, the auditor confirms the effectiveness of the system with regard to the last certification cycle.

The auditor therefore recommends (provided the effectiveness of corrections and/or corrective actions addressing the identified nonconformities has been verified):

	Award of the new certificates.
X	Maintenance of the existing certification.
	Inclusion of the changes (see Section 3) in the scope of application of existing certifications
	Maintenance or issue of the certificates only after successful completion of a re-audit.

3 Changes in the management system / Contract review

No major changes have been made to the management system and the management system documentation since the last audit. The order details which form the basis of the audit (including number of employees, scope and sites) reflect the actual situation in the organization. The FSMS was updated to comply with all requirements of ISO 22000:2018

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4 Audit findings and opportunities for improvement

Review of management system documentation and verification of management system implementation revealed the following results:

No.	Unit/Department/Site	Positive Findings
1	Management	the Safety Management System is highlighted, for example from active participation in the audit process
2	Objectives	It highlights the development of specific objectives and monitoring board for the results of laboratory analyses performed
3	Infraestructure	The improvements observed with respect to the quality of the camera system installed, which facilitates the monitoring of activities at a distance, are highlighted

No.	Unit/Department/Site	Opportunities for Improvement
1	Politicy	It would be wise to consider publishing the policy on the organization's website
2	PPR	It would be advisable to consider using ISO 22002-1 as a basis for the PPR program
3	Planning of Changes	It would be advisable to establish the steps to be followed for the analysis of the possible impact of the changes in GIS, as a basis for planning.
4	Emergency Preparedness and Response	It might be useful to review the possibility of testing some of the scenarios defined in the Emergency Response Plan.
5	FS Manual	It would be convenient to review in the manual, the references regarding all the requirements of the standard
6	Flow Chart	It would be convenient to clarify in the flow chart of conventional raisins, the alternatives, after the fumigation process.
7	Documented Information	It would be convenient to improve the availability of some documents, such as audit reports, validation reports
8	Verification System	It would be appropriate to include the verification schedule in the document control system
9	Measurement monitoring	It is recommended to continue monitoring the pending calibration routines, as soon as access to the area is possible.
10	Internal Audit	It is recommended to review that the audit documents, evidence of the review of all requirements according to the established criteria.

In view of the fact that audits are always based on sampling, weaknesses may still exist which were not revealed and identified during the audit.

The auditor and the certification body will treat all information gained during the audit with strict confidentiality.

16.12.2020	Virginia Agriello
Date	Audit Leader / Auditor(s)

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5 Annex: ISO 22000

		No. of the pro-duction site	Evaluation
4	**Context of the organization**	1	1

The organization LIRA SA implemented and maintains a functioning and effective food safety management system. The scope of application is recorded in this report.

The organization has identified external and internal issues related to the following areas: technology, infrastructure, employees, economic context, among others. The analysis was documented in M 4.1 01 - Context Analysis of the FSMS Organization, identifying Strengths, Opportunities, Weaknesses and Threats in each of the above-mentioned areas. One of the weaknesses identified is due to the context of the pandemic and the impossibility of accessing the village, e.g., for calibration services. For example, the need for immediate progress with the Laser Scan equipment calibration service has been identified.

The following interested parties were determined: (Code M 4.2 01 Understanding the needs and expectations of the interested parties

- Customers (Companies - Distributors) and consumers
- Control organisms of destination countries FDA, USDA (United States Department of Agriculture).

The following processes have been outsourced. They are documented in the food safety management system:

- Calibrations
- Laboratory analysis
- Maintenance (for some specific tasks)
- Technical advice regarding the safety management system

5	**Leadership**	1	1

With the following points the top management demonstrates among others its commitment regarding the development and realization of the food safety management system:

- determination of the company's objectives and food safety policy
- Conducting the management review and providing the necessary resources

Top management has documented the food safety policy and announced it within the company (5.2.1 01 Food Safety Policy dated 27.10.2020 signed by Héctor Oscar Frezzi). This happens on the basis of

- newsletters
- employee meetings
- Exhibition on plant boards

Top management made sure that the responsibilities and authorities for relevant roles are assigned, communicated and understood. This happens on the basis of

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	• Job descriptions, for example, for Quality Control and Safety Assistant DP 03 Quality Control and Safety, among his functions is the release of the lot to start packaging, is responsible for the control of PCC 2, performs control of raisins. The communication responsibilities are described • Org Chart No. 001 Revision date 09.03.2020 The food safety team leader has been verifiably announced. The food safety team consists of the following members/functions: • Diego Frezzi (food safety team leader) • Virginia Moya (Plant Coordinator) • Mariana Palacios (FSMS Management) • Juan Padilla • Possible members: Plant operators, as responsible for laboratory controls		
6	**Planning**	1	1
	The document P 6.1 01 - Planning - actions to address risks and opportunities Rev .A, which describes the methodology for analyzing the need to act on risks or opportunities identified during the context analysis or the analysis of stakeholders' needs, is verified. The importance of the risks and the organization's influence on them is analyzed, prioritizing the treatment of those of high importance and high influence. Once the risk has been identified, RP 6.1 0101 Context risk action plan is prepared. The possibility of a plant inspection by FDA is identified, for example. Actions of SGIA adaptation to the requirements of the law are evaluated, estimated date 02/28/2021. The organization has, amongst others, establish the following objectives for the FSMS at relevant functions and levels: (documented in OBJ 6.2 01 Safety Management System Objectives rev 13 28.10.2020) • Maintain certification of safety management system • Less than 1 innocuous claim. Result in 2017 and 2018 and 2019: 0 safety claims. This year the claim received for sand as a foreign body (less than 4mm) was considered, counting it in the indicator • PCC 1: 100% compliance with humidity parameter at the entrance. • Grape pebble with major stone 4mm incrusted, target <1, 0 findings: Fulfilled • Fulfilment of customer specifications for mycotoxins, aflatoxins, ochratoxin A and mychrobiologicals Fulfilled • Pesticide residues (herbicides, insecticides and fungicides, including organophosphates and organochlorines) Goal: absence in case of organics and according to resolution 934/2010 of Senasa in case of conventional raisins. 100% compliance was observed		
7	**Support**	1	1

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The organization has Selection and management of suppliers P 7.2.3 01 01.10.18 Rev.B, differentiating the management for the suppliers of raisins from that of other inputs or services. For example, in the case of raisin raw material suppliers, one of the components of the evaluation is the GAP audit (carried out by an engineer who advises the primary production part), the quality of the grape, classified during the entry, results on analysis of pesticides, mycotoxins, among others.

The evaluation is carried out, once the harvest is finished, between the months of March and April of each year. PR 7.2.3 01 01 evaluation of raw material suppliers is verified, evaluation date of 03/24/2020, considering for example the evaluation of suppliers: Iriarte: result 76%, Bellia 77%. This result corresponds to the conforming classification.

The company's employees are competent and do have an appropriated education, training, skills and experiences. Within the audit the competences were retraced with the following documents:

- Job descriptions, for example, for Quality Control and Safety Assistant DP 03 Quality Control and Safety, among his functions is the release of the lot to start packaging, is responsible for the control of PCC 2, performs control of raisins. The communication responsibilities are described
- MPL 6.2.2 01 01 Polyvalences and polycompetences, indicating the level of training of all employees in different subjects.

External experts were employed to carry out the maintenance of the Innocuousness Management System, within the company. The records of agreement were available.

The follow-up of PL 6.2.2 01 Training year 2020 was verified, including Prerequisites training for all the work team, ISO 22000:2018 requirements for the safety team, among others.

Within the audit the following trainings were retraced by records:

- IRCA FSMS - ISO 22000 Lead Auditor Course, date 11.01.2013, given by TUV Rheinland to Juan Padilla, external consultant
- Training on ISO 22000:2018 update given by Juan Padilla for the Innocuousness team, in June 2020 and 08.07.2020.
- Training on Prerequisites dictated by Juan Padilla for the production team, on 06.24.2020.

The company uses the following externally provided processes, products or services:

- Calibrations
- Laboratory analysis
- Maintenance (for some specific tasks)
- Technical advice regarding the safety management system

With the following measures, the company ensures that sufficient information is provided externally and available to interested parties in the food chain:

- P5.6.1 01 Management of orders external communication date 01.08.2020 ind de mod H, considering mainly communication with customers and health authorities. It is considered the revision of the need for adaptation of labels and identification of legal requirements of destination countries.

Client	Standard(s)	Certification Number(s)	Audit Type
L.I.R.A. S.A.	ISO 22000	01 154 1829860	FU2

- It was verified the claim treatment for sandstone (foreign material less than 2 mm) - customer Sweet Dried Fruit Inc in lots 05-981- L, 05-981-O, 05981-D, notified on 10.01.2020. Traceability is done on the claim, the production shifts involved are identified (of the whole lot, for not having received identification of the box). No signs of possible contamination with stone or sand were identified. A report is prepared for the client two days after receiving the claim, explaining the stages that segregate this type of danger. Once the analysis is finished, it is concluded that there are no elements that indicate that the contamination could be related to the plant.

The food safety team is notified of changes in a timely manner (e.g. new products / raw materials / production systems / cleaning).

The requirements of food safety inspection authorities and customers are available. No visits were received from the health authority in the last year.

The documents are verifiably controlled. This includes among others review and approval procedures, the identification of document changes, to ensure that relevant versions of applicable documents are available and the prevention of unintended use of obsolete documents.

The procedure P4.2 01 Document and Record Control revision date 06.08.2019 modification index k, is installed for record control. The organization also has a Master List of Documents and Records RP4.2 01 01 01

8	**Operation**	1	2

The organization has established and implemented, besides others, the following prerequisite programs:

- Supplier selection and evaluation
- Standardized cleaning programs
- Integrated Pest Management

Regarding emergency preparedness and response, a program has been established to manage possible emergency situations and accidents that may impact food safety.

P5.7 01 Emergency Preparedness and Response rev K, Revision Date 07/30/2020; considering possibilities of sabotage, submersible pump failure, zonda wind (in this case it is expected that plant closures will be secured), power outages, establishing maximum times in case of power outages, regarding product handling, among others.

Within the audit the traceability system was positively checked on the basis of the retain sample Lot 05 - 1082 Organic raisins produced for Ceres Clients, on 05.11.2020, 06.11.2020 and 09.11.2020. For this purpose, the following documents have been checked, among others:

- Trial Order No. 1082 , issued on 30.10.2020
- Remittance 1982 Hellman AAXseal S0641 date of dispatch 25/11 patent DWP 383., semi-trailer HLQ 328.
- Certificate of analysis made by Quality Control, reporting 16.3% humidity, absence of pesticides, physical parameters such as damaged raisins, presence of foreign matter between 2 and 4mm, and greater than 4mm, among others

Client	Standard(s)	Certification Number(s)	Audit Type
L.I.R.A. S.A.	ISO 22000	01 154 1829860	FU2

- Batches of materials used: (R PL 7.2 01 04 Control of inputs by order), considering the use of:

  -Bags: lot 244390 from supplier Plastics DISE

  -Sunflower oil lot 10.05.2022 supplier Successors of Harald Tomi SRL, is verified analysis protocol and organic certificate

- RP 07.10 01 02 Precleaning, indicating all the lots of raw material used per supplier, stowage, the date of entry, and the number of bags per supplier: Iriarte (entry date 03.03.20), Bonifanti (27.01.2020 and 30 bags from 27.02.2020), Capese (entry date 05.06.20), Bellia (entry date 23.01.2020 and 07.03.2020) preliminary date: 02.11.2020
- R PL CAL 01 02 Quality control in reception of raw material, e.g. entry date 03/03/2020 from supplier Iriarte. Damage control, humidity control (PCC 1)
- Production sheet format is verified where production performance per order is tracked and reconciliation of the amount of raw material used against the amount of final product can be evidenced

The final products are described in specifications. Within the audit the following examples were seen:

- Description of the product Organic Raisins E PTO N° 2 T for Thompson variety, revision R dated 03.02.2020 taking into account the ingredients (raisins, vegetable oil; physicochemical characteristics such as pH between 4 and 5; maximum humidity. 19%; shelf life 12 months; microbiological and chemical parameters such as aflatoxins, ochratoxin A and heavy metals, pesticides according to Senasa Resolution, among others.

The company has prepared a risk analysis. The methodology used is documented in M 8.5.2 01 01 "Hazard analysis and determination of PPRO / PCC in the organic raisin production process" and M 8.5.2 02 01 "Hazard analysis and determination of PPRO / PCC in the raisin production process" (Rev O date 20.10.2020). Hazard analysis with 4x4 matrix, according to Chilean Standard 2861, and classification of control measures, according to Guidance FSSC 22000 (according to questions defined in the standard).

The company has demonstrated and documented the following operational prerequisite programs (OPRPs) in the hazard control plan:

- Control of herbicides, insecticide fungicides: Through control of certificates of organic raw material in each reception for organic raw material / Receipt of letters of guarantee in case of suppliers of conventional raisins.
- Magnet Nº 2 located in a feeding hopper and a raisin regulator in an intermediate area. Visual inspection of the sieve at the beginning and end of the shift is defined. (For organic and conventional products)
- Washer peak condition and water pressure in Pressurized water rinse (Rotary Drain) every 2 hours. (For organic and conventional products)
- Passage through laser scan for removal of foreign bodies, check programming and operation adjusted according to results of inspection table (PCC). (For organic and conventional products)
- PPRO related to Phosphine curing practice for conventional product

Within the audit it was proved that the specified monitoring and measuring methods and equipment are adequate to ensure the performance of the monitoring and measuring procedures. The list of measuring and testing equipment RP 8.3 01 01 01 revision date 23.09.2020 is verified, considering metal detectors, pressure gauges, among others. Due to the context of the pandemic, it was not possible for all suppliers to enter the plant. The latest calibration reports were checked:

Client	Standard(s)	Certification Number(s)	Audit Type
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	• Metal detector calibration certificate No. 23897 issued by Penta dated 26.08.2019 on equipment No. 20782 series using the organization's standards, verifying the two production programs. Calibration certificates of splints used are verified. • It was also verified the support for the technical service request for the Laser Scanner, which includes the calibration of the pressure gauge in charge of the product ejection in PPRO 4: offer 321 13/2020 dated 20.01.20, proposal confirmed 03/02/2020 for the beginning of March (money transferred). Requesting the assistance of a Belgian technician, from the head office. • MHU 0001 moisture meter, series A 1475, internal verification every six months (with standards granted by the manufacturer), inter-laboratory controls with annual frequency As part of the audit, the control of non-compliant products and processes was checked based on the document P 8.9 01 date 01/08/2020 Non-conforming product. The follow up of the reprocessing actions of non-conforming product was verified by means of an indicator panel. The complaints on food safety are documented and archived by the company. The following example has been checked: • It was verified the claim treatment for sandstone (foreign material less than 2 mm) - customer Sweet Dried Fruit Inc in lots 05-981- L, 05-981-O, 05981-D, notified on 10.01.2020. Traceability is done on the claim, the production shifts involved are identified (of the whole lot, for not having received identification of the box). No signs of possible contamination with stone or sand were identified. A report is prepared for the client two days after receiving the claim, explaining the stages that segregate this type of danger. Once the analysis is finished, it is concluded that there are no elements that indicate that the contamination could be related to the plant. There were no recall situations in the last year. We verified that the next recalculation exercise was carried out: • Performed on lot 03-1076 of 1500 boxes subdivided into three lots, customer Sweet Dreid fruit, due to a labeling error. Product received by the client on 29.10.2020; the client reports 1430 boxes in stock, 70 sold. Start date of the fiscal year 04.12.2020 09:21hs, date of response from the client 10/12/2020 18:07. Contacts with the client confirmed; opportunities to reduce communication times with the client identified. The following Non-Conformity is documented: NCm No. 1 (ISO 22000 8.5.4.5): It was not possible to confirm in all cases, that corrective actions are documented, as defined in PL 8.5.4 01 Rev 30 HACCP Plan Organic and conventional Raisins E.g. Date 05.11.2020 during control of metal detector equipment. Note: It was verified that the personnel knows the defined corrective actions and considers them in practice.		
9	**Performance evaluation**	1	1
	At least once a year or if required the organization conducts internal audits. For this the following internal audits were retraced in terms of records: • P 9.2 01 Internal audits rev J date 20.9.2020, the possibility of remote audits is considered within the procedure, and the security considerations to be taken into account, for example, regarding technological tools. • Annual audit plan of the SGI, RP 9.2 01 01 considering the importance of the processes, in addition to any action to update results and previous audits		

Client	Standard(s)	Certification Number(s)	Audit Type
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	• Audit report dated 16.09.2020: Findings regarding the frequency of microbiological water testing were detected, due to the closure of the laboratory commonly used by the context of the pandemic • Audit report made on 05.11.2020, identifying the need to formalize the needs of stakeholders The results of the verification procedures, including the results of the internal and external audits were analyzed by the food safety team. For this the analysis result and the resulting procedures could be retraced. The following analysis results, for example, were verified as part of the system check: • Report Nº 369831 JLA Laboratory for raisins lot 15-1063 date of analysis 02/07/2020 with non detectable results on aflatoxins G2, G1, B2, B1 and total aflatoxins • Report Nº371355 JLA Laboratory for raisins lot 15-1063 date of analysis 14/07/2020 with results of Ochratoxin A • Report Pesticides laboratory AGQ Sample Code AL-20/032177 sampling date 03/02/2020 on raisins (MP) "SAMPLE N°1: LAR/Fi_05/02" with not detectable results • Report Pesticides laboratory AGQ Sample Code AL-20/032182 sampling date 03/11/2020 on raisins (MP) "SAMPLE N°2: BEL/FL_08/02" with not detectable results Top management has evaluated the food safety management system within the management review from 02.12.2020. The following improvements / actions have been defined in written form: • Meetings with local raisin producers, to keep up with last year's raisin conditions, which were very good. Top management ensures that the organization is constantly improving the effectiveness of the food safety management system. This requirement was presented by showing the following example: • Improvement of the definition of the cameras installed for monitoring operations and improvement of the capacity of the internet networks to facilitate communication, e.g. with commercial offices in Cordoba.		
10	**Improvement**	1	1
	As part of the audit, the following nonconformity was audited on the basis of the corrections, the evaluation of the causes and the verification of the effectiveness: • NC Report RP 8.9 01 01 on deviation 1. The analysis of causes, corrections and corrective actions are verified. Analysis of causes: Laboratories available in the area and capable of shipment were restricted by pandemic conditions. The UN Chilecito laboratory was not serving the public. Water analysis is being performed at the laboratory in Cordoba. In order to secure the food safety the management system is updated constantly. Therefore, the food safety team evaluates the food safety management system in regular time periods.		

Audit Report

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Client	Standard(s)	Certification Number(s)	Audit Type
L.I.R.A. S.A.	ISO 22000	01 154 1829860	FU2

The following CCPs were identified and are controlled.

CCP No.	Process step	Hazard	Monitoring procedure	Critical limits	Evaluation
1	Receipt of raw materials (For all products)	Proliferation of fungi: from soil Rhizoctonia spp and Fusarium spp; from fruit: Aspergilius flavus and Ochraensis	Moisture measurement at each dry grape inlet	12,5%	1
2	Manual Selection (For all products)	Sandstone or sandstone > 4 mm embedded in raisins	Visual inspection on inspection table Vlisual inspection on boxes. Frequency depending on the presentation	Ausencia / 100gr processed per 30' Ausencia / box	1
3	Metal detection in finished product (For all products)	Metallic bodies (screws, pieces of wire, nails, etc.) less than 3 mm Fe (Ferrous), 4.0 mm stainless steel and 4.5 mm non-ferrous.	Each activated audible and visual alarm. Tape stop.	Operative and calibrated metal detector: Fe: 3 mm, non-fel 4.5 mm and stainless steel 4.0 mm	1

***Rating:**

1 = conforming
2 = failed/nonconformity (see nonconformity report)
3 = not applicable
4 = not audited in this audit

1. OBJETIVE

Establish the methodology to be followed to allow the recovery of the product in the distribution channels that represents a potential danger for food safety:

- Immobilize the food involved to prevent it from reaching the consumer.

- Recover from the market effectively and efficiently as much of the market risk product as possible, including those held by consumers if deemed necessary.

Consequently, the start and end of the recall should be carried out in the shortest possible time to minimize consumer exposure to products that may pose a risk to their health.

2. SCOPE

Complaints or incidents of quality and safety received from L.I.R.A. Clients. S.A.

3. DEFINITIONS

Recall: procedure carried out by a company, which consists of withdrawing a product from the market, when there is a suspicion or certainty that it violates current food laws or that the quality standards established by the company for said market are violated.

Withdrawal or recovery of product or market: (in English it is called “Withdrawal”): it deals with the removal of the product once it is being distributed when it violates a law at a lower technical level (does not pose a risk to health) , or if it does not meet the technical specifications or quality standards of the producer. Does not include products that have been contaminated or adulterated.

Stock recovery. Removal of product from potential distribution before it leaves direct control of L.I.R..A. S.A., that is, even when it is in deposit or in the distributor's, but has not been released for sale to the consumer.

Incident:

- An event that has potentially harmful consequences to the population as a result of consuming a certain food.

- Identification of contaminated, counterfeit, adulterated, altered, or food products that are in violation of current regulations.

- The identification of human disease that can be related to food consumption.

- Identifying bad practices in the food establishment

Crisis committee: multidisciplinary team from which they can participate

Bioterrorism: intentional act generally motivated by political issues, which results in damage to humans, animals or agriculture in general. It includes pathogens and other agents that could be intentionally introduced into food, water and other consumer products.

Product recall / recall depth: The level of distribution that must be used to recall a product:

Consumer or User Level: means reaching people who may have already bought the product for domestic use, who must allow the product to be withdrawn, collected or destroyed.

Recall: withdrawal by a company of the distribution and sale of a marketed product because it is not innocuous, because it is adulterated, contaminated, or mislabeled, or that the health authority considers to be a violator of the law. The recall does not include Market Recovery (Withdrawal) or Stock Recovery.

Recall spokesperson: member of the "Recovery Team / Crisis Committee" responsible for all communications with the media, health authority and affected customers. The function is fulfilled by the "Recall Coordinator" or the Commercial Direction of the company.

Class I: When the food incident involves situations in which there is a reasonable probability that the consumption of a product will cause serious adverse health consequences or death. In this case the product should not be consumed anywhere, even the units that are in the possession of consumers must be recovered. Source: Article 1415 of the Argentine Food Code.

Class II: in the case of those incidents in which there is a reasonable probability of temporary and / or reversible adverse consequences on the health of people who consume the food. Source: Article 1415 of the Argentine Food Code.

Class III: the reason for the withdrawal has a low probability of adverse consequences for the health of consumers but constitutes an infraction. Source: Article 1415 of the Argentine Food Code

4. RESPONSABILITY

1. **Direct:** Commercial, Plant Management and Document Management SGI are responsible for the effective application of this procedure. The responsibilities of the members of the Crisis Committee - Recall are described in job descriptions.

2. **Participants**: Food Safety Team.

5. DEVELOPMENT

Item	Activities	Responsable	Document
5.1	**Causes that can origin a Recall:** 1) Information generated by company controls: quality and / or safety failures. 2) Customer complaints: a potential or real food safety problem. Determine the relevance of the claim in relation to the origin of the product according to the procedure "Treatment of claims" P 9.0 01. 3) Information generated by the Health Authority: results of inspections or surveillance by the health authority, investigations by scientific centers. a) Complaints from different sectors of the community (consumers, governmental and non-governmental organizations, health agents, food companies, etc.). b) Actions initiated by the National Health Authority, the Jurisdictional or Municipal Health Authority (eg Provincial or Municipal Directorate of Food Science of La Rioja - Argentina, etc.) c) Information about an incident at an international level where some country / ies that export food to Argentina are involved. d) An adverse result of an official sample (National	Plant Coordinator Commercial INAL, SENASA, ANMAT, Argentine Food Code, etc. Supplier	Mail Complaint Health Authority Notification

	Health Authority, communication from the Jurisdiction or Municipality, other official institutions) collected in routine inspection. 4) Supplier information: supplier of inputs or raw materials can report safety failures in some item incorporated into the manufacturing process.		
5.2	Document the need for withdrawal: • Complete and send as an attached report "Preliminary Incident Questionnaire" (R P 7.10.4 01 01) • Identify the Distributor / Trader • Anticipate problem, incident by phone to Coordinator "Recovery Team / Crisis Committee". • Generate mail to factory c.c. to members of the "Crisis Committee" In case that problem - incident is presented by an Export client, the mail must be received at the factory translated into Spanish.	Administrative staff Córdoba (Argentine) office	Report "Preliminary Incident Questionnaire" R P 7.10.4 01 01
5.3	• Assemble the "Recovery Team / Crisis Committee" and inform them of the situation. • Retain the suspect product (s) that are in the L.I.R.A S..A warehouse. • Stop shipments of the suspect product (s). • Immediately begin gathering all records to investigate the cause or source of the problem. Perform traceability of the product and batch involved as indicated in the procedure "Prerequisite Program - BPM" (P 7.2 01). Collect necessary information: **EXTERNAL SOURCES**: • Brokers and distributors • Regulatory Agencies (actual reports or alert notices). • Newspapers, radio, television and reports. • Suppliers (of their ingredients and / or packaging materials). • Contact the client's Trader / Quality Management.	SGI document management / Plant Coordinator / Food quality and safety	List of members of the Recovery Team / Crisis Committee "(RP 7.10.4 01 02) Documented Procedure "Prerequisite Program - BPM" (P 7.2 01) Mail
5.4	Evaluate consequences for health and profile and size of population at risk.	Plant Management / Management / "Recovery Team / Crisis Committee"	"Risk assessment" "(R P 7.10.4 01 03)
5.5	**Withdrawal decision:** **1.** ¿ Should a recall be done as a first step? In case		"Risk assessment" "(R P 7.10.4 01 03)

	there is verifiable evidence that the food has caused any disease, due to an alleged contamination, or some other unsafe condition. **2.** ¿ What should be removed ? a) it is decided to withdraw the product: • Define "product recall strategy" and depth levels of the recall: • **Wholesale level:** the level of distribution between the manufacturer and the retailer or user level. • **Retail level**: (includes retailers and all intermediate wholesale levels to reach retailers) or • **Consumer level:** (includes consumers in households and all previous levels of distribution). b) If the withdrawal is not decided, justify / document the decision in the report "Preliminary Incident Questionnaire" R P 7.10.4 01 01 (File) Note: in the case of outgoing shipments of products subject to recall, they must be stopped immediately.	Recovery Team / Crisis Committee Commercial	Report "Preliminary Incident Questionnaire" R P 7.10.4 01 01
5.6	**Classification of the type of Recall or product recall / Recall:** • Classify type of product recall (Type I, II or III). • Prepare a Withdrawal or Recall plan as appropriate.	Recovery Team / Crisis Committee	"Risk assessment" "(R P 7.10.4 01 03)
5.7	In case of withdrawal of Class I and II products, you must: • Contact Health Authority, present Plan: send Notification. • Approve recall plan • In the event that it is decided to review or suspend, modify the Plan.	Management Sanitary Authority.	"Form / Letter Notification Annex I"
5.8	Implement Withdrawal Plan or Recall as appropriate - Send Release Progress control: 7 days after the start of the Recall, a "preliminary report" will be issued that will include: • Stock recovered to date.	Plant Coordinator / Food Quality and Safety / Commercial	"Communication of Food Withdrawal from the Market to the Health Authority" (R.P 7.10.4.01. 04) Preliminary report
5.9	Notify customers.	Plant Coordinator / Quality and Food Safety / External Asesor	
5.10	Evaluate effectiveness of the Product Recall Plan. • Control and record recovered products	"Coordinator - Recovery Team / Crisis Committee" Commercial	

	• Evaluate effectiveness.		
5.11	**Disposal of the recovered products according to the withdrawal / Recall:** Dispose (identify, segregate) and determine the destination of the recovered products. • Re tagged • Donation • Destruction	Recovery Team / Crisis Committee Commercial	
5.12	**End of Withdrawal or Recovery / Recall:** 1) Completar registro "Cuestionario preliminar de incidentes" R P 7.10.4 01 01 (Archivar). 2) Evaluate the result of the withdrawal or Remember: i) Review the procedures and analyze if the plan worked correctly. ii) Prepare a report detailing the recall in its entirety. iii) Issue recommendations regarding how to prevent the problem that caused the recall from recurring in the future. Then follow up to see that they are met. iv) Decide whether follow-up is appropriate (for consumers, retailers, authority officials, employees, and members of the media). v) Analyze the real costs associated with the recall and present the background that corresponds to the insurance company, together with the documents that accredit the costs and losses.	"Coordinator - Recovery Team / Crisis Committee" Administration	"Preliminary Incident Questionnaire" R P 7.10.4 01 01 (Archive). Product recall effectiveness report
5.13	**Withdrawal / Recall Test:** Carry out a system operation test at least once a year to verify its effectiveness.	"Coordinator - Recovery Team / Crisis Committee"	

ANALYTICAL REPORT

Sample Code:	**AL-20/032182**	Received at:	AGQ Argentina	Client:	L.I.R.A. S.A.
Analysis Type:	MG+ML	Analysis Center:	AGQ España	Address:	La Plata 554-Bº Junior Chilecito
Sample Type:	RAISIN	Reception Date:	03/06/2020	Contract:	AR20-0163
Start Date:	03/11/2020	Finalized Date:	03/16/2020	Third party:	----
Description:	MUESTRA N°2: BEL/FL_08/02				

Sampling Date/Hour: 03/02/2020 Sampled By: Cliente (*)

No positive results have been found in the analyzed sample.

As per AGQ Quality Assurance policies, samples are conserved under controlled conditions only for the required predetermined period of time before being discarded. For further information, please do not hesitate to contact us.

Victoria Fernandez Boton

DATE ISSUED: 03/16/2020

OBSERVATIONS:

ANALYTICAL REPORT

ACCREDITED Testing Laboratory TL- 475

Sample Code: AL-20/032182
Description: MUESTRA N°2: BEL/FL_08/02
Sample Type: RAISIN
Finalized Date: 03/16/2020

ANALYTICAL RESULTS

SOP: PE-674 **Technique: GC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
2,4,6-Trichloroanisole	<0.010	0.010	Diphenylamine	<0.010	0.010	Naled (SP)	<0.010	0.010
2,4,6-Trichlorophenole	<0.010	0.010	Disulfoton	<0.010	0.010	Napropamide	<0.010	0.010
Acetochlor	<0.010	0.010	Disulfoton (Sum)	<0.010	0.010	Nitralin	<0.010	0.010
* Aclonifen	<0.010	0.010	Disulfoton-sulfone	<0.010	0.010	Nitrofen	<0.010	0.010
Acrinathrin	<0.010	0.010	Disulfoton-sulfoxide	<0.010	0.010	Nitrothal Isopropyl	<0.010	0.010
Alachlor	<0.010	0.010	Ditalimfos	<0.010	0.010	Nuarimol	<0.010	0.010
Aldrin (SP)	<0.010	0.010	Endosulfan (A+B+Sulf)	<0.010	0.010	Ofurace	<0.010	0.010
Alpha-HCH	<0.010	0.010	Endosulfan Alpha	<0.010	0.010	Oxadixyl	<0.010	0.010
Ametryn	<0.010	0.010	Endosulfan Beta	<0.010	0.010	Oxychlordan	<0.010	0.010
Anthraquinone	<0.010	0.010	Endosulfan Sulfate	<0.010	0.010	Oxyfluorfen	<0.010	0.010
Atrazine	<0.010	0.010	Endrin	<0.010	0.010	Paraoxon-ethyl	<0.010	0.010
Beflubutamid	<0.010	0.010	EPN	<0.010	0.010	Paraoxon-methyl	<0.010	0.010
Benalaxyl (SP)	<0.010	0.010	Epsilon-HCH	<0.010	0.010	Parathion-ethyl	<0.010	0.010
Benfluralin	<0.010	0.010	EPTC	<0.010	0.010	Parathion-methyl (SP)	<0.010	0.010
Beta-HCH	<0.010	0.010	* Ethalfluralin	<0.010	0.010	Parathion-methyl (Sum)	<0.010	0.010
Bifenazate	<0.010	0.010	Ethion	<0.010	0.010	Penconazole	<0.010	0.010
Bifenox	<0.010	0.010	Ethofumesate (SP)	<0.010	0.010	Pendimethalin	<0.010	0.010
Bifenthrin	<0.010	0.010	Ethofumesate (Sum)	<0.010	0.010	Pentachloroaniline	<0.010	0.010
Biphenyl	<0.010	0.010	Ethofumesate-2-keto	<0.010	0.010	Pentachloroanisole	<0.010	0.010
Bitertanol	<0.010	0.010	Ethoprophos	<0.010	0.010	Pentachlorobenzene	<0.010	0.010
Bromocyclen	<0.010	0.010	Etridiazole	<0.010	0.010	Pentachlorobenzonitrile	<0.010	0.010
Bromophos-methyl	<0.010	0.010	Etrimfos	<0.010	0.010	Pentachlorophenol	<0.010	0.010
Bromopropylate	<0.010	0.010	Fenarimol	<0.010	0.010	Permethrin	<0.010	0.010
Bromphosethyl	<0.010	0.010	Fenazaquin	<0.010	0.010	Phenthoate	<0.010	0.010
Bupirimate (SP)	<0.010	0.010	Fenchlorphos	<0.010	0.010	Phorate	<0.010	0.010
* Captan	<0.010	0.010	Fenchlorphos (Sum)	<0.010	0.010	Phosalone	<0.010	0.010
* Captan (Sum)	<0.010	0.010	Fenchlorphos Oxon	<0.010	0.010	Phthalimide (Folpet)	<0.010	0.010
Carbophenothion	<0.010	0.010	Fenitrothion	<0.010	0.010	Piperonyl butoxide	<0.010	0.010
Chinomethionat	<0.010	0.010	Fenpropathrin	<0.010	0.010	Pirimiphos-ethyl	<0.010	0.010
Chlordane (Sum)	<0.010	0.010	Fenson	<0.010	0.010	Pirimiphos-methyl	<0.010	0.010
Chlordane Cis	<0.010	0.010	Fenthion (SP)	<0.010	0.010	Prochloraz (Sum)	<0.010	0.010
Chlordane Trans	<0.010	0.010	* Fenthion Oxon	<0.010	0.010	Procymidone	<0.010	0.010
Chlorfenapyr	<0.010	0.010	Fenvalerate+Esfenvalerate	<0.010	0.010	Profenofos	<0.010	0.010
Chlorfenson	<0.010	0.010	Flucythrinate	<0.010	0.010	Profluralin	<0.010	0.010
Chlorfenvinphos	<0.010	0.010	Flumetralin	<0.010	0.010	Prometryn	<0.010	0.010
Chlormephos	<0.010	0.010	Fluopicolide	<0.010	0.010	Propazine	<0.010	0.010
* Chlorobenzilate+Chloropropylate	<0.01	0.01	Fluopyram	<0.010	0.010	Propetamphos	<0.010	0.010
Chlorothalonil	<0.010	0.010	Fluotrimazole	<0.010	0.010	Propyzamide	<0.010	0.010
Chlorotoluron	<0.010	0.010	Flurtamone	<0.010	0.010	Prothiofos	<0.010	0.010
Chlorpropham (SP)	<0.010	0.010	* Folpet	<0.010	0.010	Pyrazophos	<0.010	0.010
Chlorpyrifos	<0.010	0.010	Folpet (Sum)	<0.010	0.010	Pyridaben	<0.010	0.010
Chlorpyrifos-methyl	<0.010	0.010	Fonofos	<0.010	0.010	Pyridaphenthion	<0.010	0.010

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ANALYTICAL REPORT

TL- 475

Sample Code:	AL-20/032182	Sample Type:	RAISIN
Description:	MUESTRA N°2: BEL/FL_08/02	Finalized Date:	03/16/2020

ANALYTICAL RESULTS

SOP: PE-674 **Technique: GC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
Chlorthal-dimethyl	<0.010	0.010	Furalaxyl	<0.010	0.010	Pyrifenox	<0.010	0.010
Chlorthion	<0.010	0.010	Heptachlor (SP)	<0.010	0.010	Pyrimethanil	<0.010	0.010
Chlozolinate	<0.010	0.010	Heptachlor (Sum)	<0.010	0.010	Pyriproxyfen	<0.010	0.010
Cinidon-ethyl	<0.010	0.010	Heptachlor Epoxide A	<0.010	0.010	Quinalphos	<0.010	0.010
Cyfluthrin	<0.010	0.010	Heptachlor Epoxide B	<0.010	0.010	Quintozene	<0.010	0.010
Cypermethrin	<0.010	0.010	Heptenophos	<0.010	0.010	Quintozene (Sum)	<0.010	0.010
Cyproconazole	<0.010	0.010	Hexachlorobenzene	<0.010	0.010	Silthiofam	<0.010	0.010
Cyprodinil	<0.010	0.010	Hexaclorobutadiene	<0.010	0.010	Simazine	<0.010	0.010
DDD-o,p	<0.010	0.010	Hexaconazole	<0.010	0.010	Sulprofos	<0.010	0.010
DDD-pp+DDT-op	<0.010	0.010	Hydroxyquinoleine-8	<0.010	0.010	Tau-Fluvalinate	<0.010	0.010
DDE-o,p	<0.010	0.010	Iodofenphos	<0.010	0.010	Tebuconazole	<0.010	0.010
DDE-p,p	<0.010	0.010	Iprobenfos	<0.010	0.010	Tebufenpyrad	<0.010	0.010
DDT (Sum)	<0.010	0.010	Iprodione	<0.010	0.010	Tecnazene	<0.010	0.010
DDT-p,p	<0.010	0.010	Iprovalicarb	<0.010	0.010	Tefluthrin	<0.010	0.010
DEET	<0.010	0.010	Isazofos	<0.010	0.010	Terbacil	<0.010	0.010
delta-HCH	<0.010	0.010	Isofenphos	<0.010	0.010	Terbumeton	<0.010	0.010
Deltamethrin	<0.010	0.010	Isophenfos-methyl	<0.010	0.010	Terbuthylazine	<0.010	0.010
Desethyl atrazine	<0.010	0.010	Isoprothiolane	<0.010	0.010	Terbuthylazine Desethyl	<0.010	0.010
Diafenthiuron	<0.010	0.010	Kresoxim-methyl	<0.01	0.01	Terbutryn	<0.010	0.010
Diazinon	<0.010	0.010	Lambda-Cyhalothrin	<0.010	0.010	Tetrachlorvinphos	<0.010	0.010
Dichlobenil	<0.010	0.010	Lindane	<0.010	0.010	Tetraconazole	<0.010	0.010
Dichlofenthion	<0.010	0.010	Malaoxon	<0.010	0.010	Tetradifon	<0.010	0.010
Diclobutrazol	<0.010	0.010	Malathion (SP)	<0.010	0.010	Tetrahydrophthalimide (THPI)	<0.010	0.010
Dicloran	<0.010	0.010	Malathion (Sum)	<0.010	0.010	Tetramethrin	<0.010	0.010
Dicofol (Sum)	<0.010	0.010	Mefenpyr Diethyl	<0.010	0.010	Tetrasul	<0.010	0.010
Dicofol o,p	<0.010	0.010	Mepronil	<0.010	0.010	Thiometon	<0.010	0.010
Dicofol p,p´	<0.010	0.010	Metalaxyl (SP)	<0.010	0.010	Tolclofos Methyl	<0.010	0.010
Dicrotophos	<0.010	0.010	Methacrifos	<0.010	0.010	Transfluthrin	<0.010	0.010
Dieldrin (SP)	<0.010	0.010	Methidathion	<0.010	0.010	Triadimefon (SP)	<0.010	0.010
Dieldrin (Sum)	<0.010	0.010	Methoxychlor	<0.010	0.010	Triadimenol (SP)	<0.010	0.010
Difenoconazole	<0.010	0.010	Metribuzin	<0.010	0.010	* Tri-Allate	<0.010	0.010
Diflufenican	<0.010	0.010	Mevinphos	<0.010	0.010	Triamiphos	<0.010	0.010
Dimefox	<0.010	0.010	Mirex	<0.010	0.010	Trifluralin	<0.010	0.010
Dimoxystrobin	<0.010	0.010	Molinate	<0.010	0.010	Uniconazole	<0.010	0.010
Diniconazole	<0.010	0.010	Myclobutanil	<0.010	0.010	Vinclozolin (SP)	<0.010	0.010
Dinobuton	<0.010	0.010						

SOP: PE-674 **Technique: LC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
2,4-D	<0.010	0.010	Fenbutatin-oxide	<0.010	0.010	Oryzalin	<0.010	0.010
Abamectin	<0.010	0.010	Fenhexamide	<0.010	0.010	Oxadiargyl	<0.010	0.010
Acephate	<0.010	0.010	Fenobucarb	<0.010	0.010	Oxadiazon	<0.010	0.010
Acequinocyl	<0.010	0.010	Fenoxycarb	<0.010	0.010	Oxamyl	<0.010	0.010
Acetamiprid (SP)	<0.010	0.010	Fenpiclonil	<0.010	0.010	Oxasulfuron	<0.01	0.01

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ANALYTICAL REPORT

ACCREDITED Testing Laboratory TL- 475

Sample Code:	AL-20/032182	Sample Type:	RAISIN
Description:	MUESTRA N°2: BEL/FL_08/02	Finalized Date:	03/16/2020

ANALYTICAL RESULTS

SOP: PE-674 **Technique: LC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
* Acibenzolar-S-methyl	<0.010	0.010	Fenpropidin	<0.010	0.010	Oxathiapiprolin	<0.010	0.010
Aldicarb (SP)	<0.010	0.010	Fenpropimorph	<0.010	0.010	Oxycarboxin	<0.010	0.010
Aldicarb (Sum)	<0.010	0.010	Fenpyrazamine	<0.010	0.010	Oxydemeton-methyl (SP)	<0.010	0.010
Aldicarb-sulfone	<0.010	0.010	Fenpyroximate	<0.010	0.010	Oxydemeton-methyl (Sum)	<0.010	0.010
Aldicarb-sulfoxide	<0.010	0.010	Fensulfothion	<0.010	0.010	Oxymatrine	<0.010	0.010
* Ametoctradin	<0.010	0.010	Fensulfothion Oxon	<0.010	0.010	Paclobutrazol	<0.010	0.010
Aminocarb	<0.010	0.010	Fensulfothion Oxon Sulfone	<0.010	0.010	Pencycuron	<0.010	0.010
Atrazine Desisopropyl	<0.010	0.010	Fensulfothion Sulfone	<0.010	0.010	Penthiopyrad	<0.010	0.010
Azaconazole	<0.010	0.010	Fenthion (Sum)	<0.010	0.010	Phenmediphan	<0.010	0.010
Azadirachtin	<0.010	0.010	Fenthion Oxon Sulfone	<0.010	0.010	Phorate (Sum)	<0.010	0.010
Azamethiphos	<0.010	0.010	Fenthion Oxon Sulfoxide	<0.010	0.010	Phorate Oxon	<0.010	0.010
Azimsulfuron	<0.010	0.010	Fenthion-sulfone	<0.010	0.010	Phorate Oxon Sulfone	<0.010	0.010
Azinphos-ethyl	<0.010	0.010	Fenthion-sulfoxide	<0.010	0.010	Phorate Oxon Sulfoxide	<0.010	0.010
Azinphos-methyl	<0.010	0.010	Fentin Acetate	<0.010	0.010	Phorate sulfone	<0.010	0.010
Azoxystrobin	<0.010	0.010	Fenuron	<0.010	0.010	Phorate sulfoxide	<0.010	0.010
Bendiocarb	<0.010	0.010	Fipronil (SP)	<0.0035	0.0035	Phosmet (SP)	<0.010	0.010
Benomyl-Carbendazim	<0.010	0.010	Fipronil (Sum)	<0.005	0.005	Phosmet (Sum)	<0.010	0.010
Bentazone (SP)	<0.010	0.010	* Fipronil Sulfide	<0.010	0.010	Phosmet-oxon	<0.010	0.010
Bentazone-methyl	<0.010	0.010	Fipronil Sulfone	<0.005	0.005	Phosphamidon	<0.010	0.010
Benthiavalicarb-isopropyl	<0.010	0.010	Flamprop	<0.010	0.010	Phoxim	<0.010	0.010
Bioallethrin	<0.010	0.010	Flazasulfuron	<0.010	0.010	Picolinafen	<0.010	0.010
Bixafen	<0.010	0.010	Flonicamid (SP)	<0.010	0.010	Picoxystrobin	<0.010	0.010
Boscalid	<0.010	0.010	Flonicamid (Sum)	<0.010	0.010	Pinoxaden	<0.010	0.010
Bromacil	<0.010	0.010	Florasulam	<0.010	0.010	Pirimicarb	<0.010	0.010
Bromoxynil	<0.010	0.010	Fluazifop Methyl	<0.010	0.010	Pirimicarb Desmethyl	<0.010	0.010
Bromuconazole	<0.010	0.010	Fluazifop-P	<0.010	0.010	Pirimicarb Desmethyl Formamide	<0.010	0.010
Buprofezin	<0.010	0.010	* Fluazifop-P-butyl	<0.010	0.010	Prochloraz (SP)	<0.010	0.010
Butachlor	<0.010	0.010	Fluazinam	<0.010	0.010	Promecarb	<0.010	0.010
Butocarboxim	<0.010	0.010	Flubendiamide	<0.010	0.010	Propachlor	<0.010	0.010
* Butoxicarboxim Sulfoxide	<0.010	0.010	Fludioxonil	<0.010	0.010	Propachlor Oxalamic Acid	<0.010	0.010
Butralin	<0.010	0.010	Flufenacet	<0.010	0.010	Propamocarb	<0.010	0.010
Buturon	<0.010	0.010	Flufenacet (Sum)	<0.010	0.010	Propanil	<0.010	0.010
Cadusafos	<0.010	0.010	Flufenacet ESA	<0.010	0.010	Propaquizafop	<0.010	0.010
Carbaryl	<0.010	0.010	Flufenacet OA	<0.010	0.010	Propargite	<0.010	0.010
Carbetamide	<0.010	0.010	Flufenoxuron	<0.010	0.010	Propham	<0.010	0.010
Carbofuran (SP)	<0.010	0.010	Flumioxazin	<0.010	0.010	Propiconazole	<0.010	0.010
Carbofuran-3-hydroxy	<0.010	0.010	Fluometuron	<0.010	0.010	Propoxur	<0.010	0.010
Carboxin	<0.010	0.010	Fluoxastrobin	<0.010	0.010	Proquinazid	<0.010	0.010
Carfentrazone-ethyl	<0.010	0.010	Flupyradifurone	<0.010	0.010	Prosulfocarb	<0.010	0.010
Chlorantraniliprole	<0.010	0.010	Fluquinconazol	<0.010	0.010	Prosulfuron	<0.010	0.010
Chlorbromuron	<0.010	0.010	Fluroxypyr	<0.010	0.010	Prothioconazole	<0.010	0.010

ANALYTICAL REPORT

TL- 475

Sample Code: AL-20/032182
Description: MUESTRA N°2: BEL/FL_08/02
Sample Type: RAISIN
Finalized Date: 03/16/2020

ANALYTICAL RESULTS

SOP: PE-674 **Technique: LC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
Chlorfluazuron	<0.010	0.010	Fluroxypyr-meptyl	<0.010	0.010	Pymetrozine	<0.010	0.010
Chloridazon	<0.010	0.010	Flusilazole	<0.010	0.010	Pyracarbolid	<0.010	0.010
Chloridazon (Sum)	<0.010	0.010	Flutolanil	<0.010	0.010	Pyraclostrobin	<0.010	0.010
Chloridazon Desphenyl	<0.010	0.010	Flutriafol	<0.010	0.010	Pyraflufen	<0.010	0.010
Chloroxuron	<0.010	0.010	* Fluxapyroxad	<0.01	0.01	Pyraflufen-ethyl	<0.010	0.010
Chlorsulfuron	<0.010	0.010	Foramsulfuron	<0.010	0.010	Pyraflufen-ethyl (Sum)	<0.010	0.010
Chlorthiophos	<0.010	0.010	Forchlorfenuron	<0.010	0.010	Pyridalyl	<0.010	0.010
Clethodim	<0.010	0.010	Formetanate	<0.010	0.010	Pyridate	<0.010	0.010
Clethodim Sulfone	<0.010	0.010	Formothion	<0.010	0.010	Quinclorac	<0.010	0.010
Clethodim Sulfoxide	<0.010	0.010	Fosthiazate	<0.010	0.010	Quinoxyfen	<0.010	0.010
Clofentezine	<0.010	0.010	Fuberidazole	<0.010	0.010	Quizalofop-ethyl	<0.010	0.010
Clomazone	<0.010	0.010	Halosulfuron-methyl	<0.010	0.010	Rimsulfuron	<0.010	0.010
Clothianidin (SP)	<0.010	0.010	Haloxyfop	<0.010	0.010	Rotenone	<0.010	0.010
Coumaphos	<0.010	0.010	Haloxyfop (Sum)	<0.010	0.010	Saflufenacil	<0.010	0.010
Crimidine	<0.010	0.010	Haloxyfop-2-ethoxyethyl	<0.010	0.010	Sebuthylazine	<0.010	0.010
Cyanazine	<0.010	0.010	Haloxyfop-methyl	<0.010	0.010	Sethoxydim	<0.010	0.010
Cyantraniliprole	<0.010	0.010	Hexaflumuron	<0.010	0.010	* Sethoxydim (Sum)	<0.010	0.010
Cyazofamid	<0.010	0.010	Hexazinone	<0.010	0.010	Spinetoram	<0.010	0.010
Cyclanilide	<0.010	0.010	Hexythiazox	<0.010	0.010	Spinosad (A+D)	<0.010	0.010
Cycloate	<0.010	0.010	Imazalil	<0.010	0.010	Spirodiclofen	<0.010	0.010
Cycloxydim (SP)	<0.010	0.010	Imidacloprid (SP)	<0.010	0.010	Spiromesifen	<0.010	0.010
Cyenopyrafen	<0.010	0.010	Indaziflam	<0.010	0.010	Spirotetramat (SP)	<0.010	0.010
Cyflufenamid	<0.010	0.010	Indoxacarb	<0.010	0.010	Spirotetramat (Sum)	<0.010	0.010
* Cyflumetofen	<0.010	0.010	Iodosulfuron Methyl	<0.010	0.010	Spirotetramat-cis-enol	<0.010	0.010
Cyhalofop-butyl	<0.010	0.010	Ioxynil (SP)	<0.010	0.010	Spirotetramat-cis-keto-hydroxy	<0.010	0.010
Cyhexatin	<0.010	0.010	Isocarbophos	<0.010	0.010	Spirotetramat-enol-glucoside	<0.010	0.010
Cymoxanil	<0.010	0.010	Isoprocarb	<0.010	0.010	Spirotetramat-mono-hydroxy	<0.010	0.010
Cyromazine	<0.010	0.010	Isoproturon	<0.010	0.010	Spiroxamine	<0.010	0.010
Demeton S	<0.010	0.010	Isoxaben	<0.010	0.010	Sulcotrione	<0.010	0.010
Demeton-S-methyl (SP)	<0.010	0.010	Isoxathion	<0.010	0.010	Sulfosulfuron	<0.010	0.010
Demeton-S-methyl-sulfone	<0.010	0.010	Ivermectin	<0.010	0.010	Sulfotep	<0.010	0.010
Demeton-S-sulfoxide	<0.010	0.010	Lenacile	<0.010	0.010	Sulfoxaflor	<0.010	0.010
Desmedipham	<0.010	0.010	Linuron	<0.010	0.010	Tebufenozide	<0.010	0.010
Desmetryn	<0.010	0.010	Lufenuron	<0.010	0.010	Teflubenzuron	<0.010	0.010
Dialifos	<0.010	0.010	Mandipropamid	<0.010	0.010	Tepraloxydim	<0.010	0.010
Dichlofluanid	<0.010	0.010	Matrine	<0.010	0.010	Terbufos	<0.010	0.010
Dichlormid	<0.010	0.010	MCPA	<0.010	0.010	Terbufos-sulfone	<0.010	0.010
Dichlorvos	<0.010	0.010	Mecarbam	<0.010	0.010	Terbufos-sulfoxide	<0.010	0.010
Diclofop	<0.010	0.010	Mepanipyrim (SP)	<0.010	0.010	TFNA	<0.010	0.010
Diclofop-methyl	<0.010	0.010	Meptyldinocap	<0.010	0.010	TFNG	<0.010	0.010
Diclofop-methyl (Sum)	<0.010	0.010	Mesosulfuron-methyl	<0.010	0.010	Thiabendazole	<0.010	0.010
Diethofencarb	<0.010	0.010	Metaflumizone	<0.010	0.010	Thiacloprid	<0.010	0.010

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ANALYTICAL REPORT

ACCREDITED Testing Laboratory TL- 475

Sample Code:	AL-20/032182	Sample Type:	RAISIN
Description:	MUESTRA N°2: BEL/FL_08/02	Finalized Date:	03/16/2020

ANALYTICAL RESULTS

SOP: PE-674 **Technique: LC-MS/MS** **Units: mg/kg** **Legislation:** **Uncert: ± 40 %**

Parameter	Result	LOQ	Parameter	Result	LOQ	Parameter	Result	LOQ
Diflubenzuron	<0.010	0.010	Metamitron	<0.010	0.010	Thiamethoxam (SP)	<0.010	0.010
Dimefuron	<0.010	0.010	Metazachlor	<0.010	0.010	Thidiazuron	<0.010	0.010
Dimethachlor	<0.010	0.010	Metconazole	<0.010	0.010	Thifensulfuron Methyl	<0.010	0.010
Dimethenamid-P	<0.010	0.010	Methabenzthiazuron	<0.010	0.010	Thiobencarb	<0.010	0.010
Dimethoate	<0.010	0.010	Methamidophos	<0.010	0.010	Thiocyclam	<0.010	0.010
Dimethomorph	<0.010	0.010	Methiocarb (SP)	<0.010	0.010	Thiodicarb (SP)	<0.010	0.010
Dinotefuran	<0.010	0.010	Methiocarb (Sum)	<0.010	0.010	Thiofanox	<0.010	0.010
Diuron	<0.010	0.010	Methiocarb sulfone	<0.010	0.010	Thiofanox Sulfone	<0.010	0.010
DMST	<0.010	0.010	Methiocarb sulfoxide	<0.010	0.010	Thiofanox Sulfoxide	<0.010	0.010
DNOC	<0.010	0.010	Methomyl (SP)	<0.010	0.010	Thiophanate-methyl (SP)	<0.010	0.010
Dodemorph	<0.010	0.010	Methoprotryne	<0.010	0.010	Tolfenpyrad	<0.010	0.010
Dodine	<0.010	0.010	Methoxyfenozide	<0.010	0.010	Tolylfluanid (SP)	<0.010	0.010
Edifenphos	<0.010	0.010	Metobromuron	<0.010	0.010	* Tolylfluanid (Sum)	<0.010	0.010
Emamectin	<0.010	0.010	Metolachlor	<0.010	0.010	Triasulfuron	<0.010	0.010
Epoxiconazole	<0.010	0.010	Metolcarb	<0.010	0.010	Triazophos	<0.010	0.010
Ethaboxam	<0.010	0.010	Metoxuron	<0.010	0.010	Triazoxide	<0.010	0.010
Ethiofencarb	<0.010	0.010	Metrafenone	<0.010	0.010	Trichlorfon	<0.010	0.010
Ethiofencarb sulfone	<0.010	0.010	Metsulphuron-methyl	<0.010	0.010	Triclopyr	<0.010	0.010
Ethiofencarb sulfoxide	<0.010	0.010	* Milbemectin (Sum)	<0.010	0.010	Tricresyl phosphate	<0.010	0.010
Ethiprole	<0.010	0.010	Milbemycin A3 (SQ)	<0.010	0.010	Tricyclazole	<0.010	0.010
Ethirimol	<0.010	0.010	Milbemycin A4 (SQ)	<0.010	0.010	Tridemorph	<0.010	0.010
Ethofenprox	<0.010	0.010	Monocrotophos	<0.010	0.010	Trifloxystrobin	<0.010	0.010
Ethoxyquin	<0.010	0.010	Monolinuron	<0.010	0.010	Triflumizole (SP)	<0.010	0.010
Etoxazole	<0.010	0.010	Monuron	<0.010	0.010	* Triflumizole (Sum)	<0.010	0.010
Famoxadone	<0.010	0.010	Neburon	<0.010	0.010	Triflumizole FM 6-1	<0.010	0.010
Fenamidone	<0.010	0.010	Nicosulfuron	<0.010	0.010	Triflumuron	<0.010	0.010
Fenamiphos (SP)	<0.010	0.010	Nitenpyram	<0.010	0.010	Triforine	<0.010	0.010
Fenamiphos (Sum)	<0.010	0.010	Norflurazon	<0.010	0.010	Triticonazole	<0.010	0.010
Fenamiphos-sulfone	<0.010	0.010	Novaluron	<0.010	0.010	Vamidothion	<0.010	0.010
Fenamiphos-sulfoxide	<0.010	0.010	Omethoate (SP)	<0.010	0.010	Zoxamide	<0.010	0.010
Fenbuconazol	<0.010	0.010						

Note: The results in this report reflect the state in which the sample was received by the laboratory. Total or partial reproduction of this report is prohibited without express written consent. The uncertainties are calculated and can be available upon request. A: Accredited subcontract, N: Non-accredited subcontract.

ANALYTICAL REPORT

Sample Code:	AL-20/032182	Sample Type:	RAISIN
Description:	MUESTRA N°2: BEL/FL_08/02	Finalized Date:	03/16/2020

TECHNICAL DEFINITIONS

Informational Text

Prothioconazole: Prothioconazole-desthio (Sum of Isomers) (F)

Aldicarb (Sum): sum of Aldicarb, Aldicarb-sulfone, and Aldicarb-sulfoxide

Captan (Sum): sum of Captan and Tetrahydrophthalamide expressed as Captan

Carbendazim and benomyl (sum of benomyl and carbendazim expressed as carbendazim)

DDT (Sum): sum of DDD-pp+DDT-op, DDE-p,p and DDT-pp

Dicofol (Sum): sum of Dicofol and 4,4'-Dichlorobenzophenone

Dieldrin (Sum): sum of Aldrin and Dieldrin

Dimethomorph (sum of isomers)

Disulfoton (Sum): sum of Disulfoton (SP), Disulfuton-sulfone, and Disulfuton-sulfoxide

Endosulfan (A+B+Sulf): sum of Endosulfan Alfa, Endosulan Beta, and Endosulfan sulfate

Fenamiphos (Sum): sum of Fenamiphos (SP), Fenamiphos-sulfone, and Fenamiphos-sulfoxide

Flonicamid (sum of flonicamid, TFNA and TFNG expressed as flonicamid)

Folpet (Sum): sum of Folpet and Phthalimide

Haloxyfop (Sum): Sum of Haloxyfop, Haloxyfop-methyl, and Haloxyfop-2-ethoxyethyl

Heptachlor Epoxide A is also referred to as trans-Heptachlor Epoxide

Heptachlor Epoxide B is also referred to as cis-Heptachlor Epoxide

Methiocarb (Sum): sum of Methiocarb (SP), Methiocarb sulfoxide, and Methiocarb sulfone

Oxydemeton-methyl (Sum): sum of Oxydemeton-methyl and Demeton-S-methyl-sulfone

Parathion-methyl (Sum): sum of Parathion-methyl and Paraoxon-methyl

Phosmet (Sum): sum of Phosmet and Phosmet-oxon

Quintozene (Sum): sum of Quintozene and Pentachloroaniline

Spirotetramat (Sum): sum of Spirotetramat (SP), Spirotetramat-cis-enol, Spirotetrmat-enol-glucoside, Spirotetramat-cis-keto-hydroxy, and Spirotetramat-mono-hydroxy

Sum of Pyraflufen-ethyl and Pyraflufen, expressed as Pyraflufen-ethyl

*This parameter falls outside the current accreditation scope.

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INFORME DE RESULTADOS

Informe Nº : 399668

Sr./es: L.I.R.A. S.A.
Pelagio B. Luna 361
(5360) - Chilecito
Atención: Mariana Palacios
De: JLA ARGENTINA S.A.
Fecha: 20/02/2021

Muestra: JLA108805 **PASAS DE UVA**

Fecha Ingreso: 11/02/2021
Fecha Análisis: 19/02/2021
Referencia: Nº Muestra: 13-O - Código: 13-O-FRE/FL - Variedad: Flame

ANALISIS SOLICITADO	Resultado	LDM	Unidad	Método
*** Ocratoxina A**	**ND**	0,2	µg/kg	AOAC 2000.03:2019

NOTA 1: La extracción, identificación y transporte de la Muestra fue responsabilidad del cliente. Los resultados corresponden a la fracción de muestra analizada.
NOTA 2: LDM: Límite de Detección del Método. Los resultados menores al LDM son expresados como "ND" (No Detectado).
LCM: Límite de Cuantificación del Método. Los resultados entre LDM y LCM son expresados como "<LCM" (menor al LCM).

Aprobado electrónicamente por:Karmalita Pablo

COPIA INFORMATIVA
El Informe de Resultado válido es el original firmado y sellado en papel membretado

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INFORME DE RESULTADOS

Informe Nº : 363117

Sr./es: L.I.R.A. S.A.
Pelagio B. Luna 361
(5360) - Chilecito
Atención: Mariana Palacios
De: JLA ARGENTINA S.A.
Fecha: 13/05/2020

Muestra: JLA82811 **PASAS DE UVA**

Fecha Ingreso: 09/05/2020
Fecha Análisis: 13/05/2020
Referencia: Nº Muestra:03-A - Código:03-A-1059 TRU/TH - Variedad:Thompson

ANALISIS SOLICITADO	Resultado	LDM	Unidad	Método
*** Aflatoxina G2**	**ND**	0,1	µg/kg	AOAC 991.31:2019
*** Aflatoxina G1**	**ND**	0,1	µg/kg	AOAC 991.31:2019
*** Aflatoxina B2**	**ND**	0,1	µg/kg	AOAC 991.31:2019
*** Aflatoxina B1**	**ND**	0,3	µg/kg	AOAC 991.31:2019
*** Aflatoxinas Totales**	**ND**		µg/kg	AOAC 991.31:2019

NOTA 1: La extracción, identificación y transporte de la Muestra fue responsabilidad del cliente. Los resultados corresponden a la fracción de muestra analizada.
NOTA 2: Todos los resultados de aflatoxinas están expresados en µg/kg (microgramos por kilogramo o ppb) y están corregidos por recuperación (recuperación del método entre 70% - 110%).
LDM en µg/kg: G2=0,1 ; G1=0,1 ; B2=0,1 ; B1=0,3.
LCM en µg/kg: G2=0,3 ; G1=0,5 ; B2=0,3 ; B1=0,5.
El resultado de Aflatoxinas Totales, es informado como TR (trazas), cuando las fracciones se encuentran debajo del LCM.
NOTA 3: LDM: Límite de Detección del Método. Los resultados menores al LDM son expresados como "ND" (No Detectado).
LCM: Límite de Cuantificación del Método. Los resultados entre LDM y LCM son expresados como "<LCM" (menor al LCM).

Aprobado electrónicamente por:Tamborini Luciano

COPIA INFORMATIVA
El Informe de Resultado válido es el original firmado y sellado en papel membretado

• Certificado de conformidad con los Principios de las Buenas Practicas de Laboratorio de la OCDE declarado por el OAA. Registro Nº 9
• Inscripto en SENASA como Compañía Controladora y Certificadora de Granos y Subproductos destinados a Exportación. Nº 016
• Laboratorio AUTORIZADO por SENASA Nº LA0055 (0099/0119) en los rubros: Aflatoxinas, Zearalenona, Plaguicidas organofosforados y clorados, Piretroides, Composición y Microbiología en Matrices Vegetales, Análisis Químicos y Bacteriológicos en aguas.
• Socios de AAM (Asociación Argentina de Microbiología) Nº4471 AATA (Asociación Argentina Tecnólogos Alimentarios) Nº1362

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RESULTS OF ANALYSIS

Report Nº : 364815

To: L.I.R.A. S.A.
Pelagio B. Luna 361
(5360) - Chilecito
At: Mariana Palacios
From: JLA ARGENTINA S.A.
Date: 29/05/2020

Sample: JLA86083 **RAISIN**

Date of Sampling: 21/05/2020
Date of Analysis: 29/05/2020
Reference: Sample Number: 01-B - Code: Lot 05-1060 - Variety: Thompson - Condition: Finished product

REQUESTED ANALYSIS	RESULT	MDL	UNIT	METHOD
*** Bacillus cereus**	**< 100**		CFU/g	ISO 7932:2004

NOTE 1: Sampling and sample transportation was done by the client. The results belong to the fraction of the analyzed sample.
NOTE 2: EN: Estimated Number | CFU/g: Colony Forming Unit per gram. | MPN/g: Most Probable Number per gram.

Electronically approved by:Viale Daniel

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The report valid, is the original signed and stamped in letterhead

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RESULTS OF ANALYSIS

Report Nº : 363951

To: L.I.R.A. S.A.
Pelagio B. Luna 361
(5360) - Chilecito
At: Mariana Palacios
From: JLA ARGENTINA S.A.
Date: 20/05/2020

Sample: JLA82812 **RAISINS**

Date of Sampling: 09/05/2020
Date of Analysis: 20/05/2020
Reference: Lot:05-1057

REQUESTED ANALYSIS	RESULT	MDL	UNIT	METHOD
*** Total coliforms**	**< 10**		CFU/g	FDA:BAM:Ch.4:2002
*** Escherichia coli**	**Not Detected**		/g	ISO 7251:2005
*** Salmonella spp.**	**Not Detected**		/25 g	ISO 6579-1:2017
*** Molds**	**450**		CFU/g	ISO 21527-1:2008
*** Yeasts**	**< 10**		CFU/g	ISO 21527-1:2008
*** Listeria monocytogenes**	**Not Detected**		/25 g	ISO 11290-1:2017

NOTE 1: Sampling and sample transportation was done by the client. The results belong to the fraction of the analyzed sample.
NOTE 2: EN: Estimated Number | CFU/g: Colony Forming Unit per gram. | MPN/g: Most Probable Number per gram.

Electronically approved by:Viale Daniel

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RESULTS OF ANALYSIS

Report Nº : 364856

To: L.I.R.A. S.A.
Pelagio B. Luna 361
(5360) - Chilecito
At: Mariana Palacios
From: JLA ARGENTINA S.A.
Date: 29/05/2020

Sample: JLA86082 **RAISIN**

Date of Sampling: 21/05/2020
Date of Analysis: 29/05/2020
Reference: Sample Number: 01-M - Code: 01-M-1060 D-I / TH - Variety: Thompson - Condition: Passes de-stemmed

REQUESTED ANALYSIS	RESULT	MDL	UNIT	METHOD
*** CADMIUM**	**ND**	0,01	mg/kg	ICP-MS
*** LEAD**	**<0,02**	0,01	mg/kg	ICP-MS

NOTE 1: Sampling and sample transportation was done by the client. The results belong to the fraction of the analyzed sample.
NOTE 2: MDL: Method Detection Level. The results lower than MDL are reported as "ND" (Not Detected).
MQL: Method Quantification Level. The results between MDL and MQL are reported as "<MQL" (lower than MQL).

Electronically approved by:Cabanillas Ivan

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The report valid, is the original signed and stamped in letterhead

• Certificado de conformidad con los Principios de las Buenas Practicas de Laboratorio de la OCDE declarado por el OAA. Registro Nº 9
• Inscripto en SENASA como Compañía Controladora y Certificadora de Granos y Subproductos destinados a Exportación, Nº 016.
• Laboratorio AUTORIZADO por SENASA N° LA0055 (0059/0119) en los rubros: Análisis Químicos y Bacteriológicos en aguas.
• Socios de AAM (Asociación Argentina de Microbiología) Nº4471 AATA (Asociación Argentina Tecnólogos Alimentarios) Nº1362

U.S. FOOD & DRUG ADMINISTRATION

FOREIGN SUPPLIER VERIFICATION PROGRAM

—

Recertification Questionnaire Submission

} Foreign Supplier
} **L.I.R.A. S.A.**
} Date: 2021-03-04

As required by 21 C.F.R., §1.506 (a); (a)(2); (b); (c); and elsewhere, all foreign supplier verification procedures and activities are to be conducted and/or re-conducted at a frequency appropriate to the relevant procedure/activity and the corresponding hazard profile for the relevant food. Based upon United Safety Agents' *(USA)* assessment of L.I.R.A. S.A.'s operation, an annual recertification request for updated information and food safety documents has been sent out. The following pages contain the specifics of USA's request, along with L.I.R.A. S.A.'s corresponding responses to each inquiry. *Note: Most questions can be properly interpreted, if preceded by "Within the past 400 days;"*

START

01) Has L.I.R.A. S.A.'s Food Safety Plan or Program been revised in any way?
Response: **No**

02) Has L.I.R.A. S.A.'s HACCP Plan been revised in any way?
Response: **Yes**

03) Has any change occurred to L.I.R.A. S.A.'s product Ingredients?
Response: **No**

04) Has L.I.R.A. S.A.'s Allergen Control Procedure been revised in any way?
Response: **No**

05) Has any change occurred to L.I.R.A. S.A.'s product Labeling?
Response: **No**

06) Has L.I.R.A. S.A.'s Onsite Audit report expired or been updated?
Response: **Yes**

07) Has L.I.R.A. S.A. undergone a recall, for any reason?
Response: **No**

U.S. FOOD & DRUG ADMINISTRATION

FOREIGN SUPPLIER VERIFICATION PROGRAM

—

Recertification Questionnaire Submission

} Foreign Supplier
} **L.I.R.A. S.A.**
} Date: 2021-03-04

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08) Has L.I.R.A. S.A. been inspected by the United States Food & Drug Administration?

Response: **No**

09) Have any food items been stopped, held, or rejected by U.S. Customs, for any reason?

Response: **No**

10) Has the U.S. FDA issued L.I.R.A. S.A. a Warning Letter in relation to its facility or product(s)?

Response: **No**

11) Does L.I.R.A. S.A. perform laboratory analysis on its product(s)?

Response: **No**

12) Has any batch or lot tested positive for any biological or chemical hazard?

Response: **No**

13) Has L.I.R.A. S.A.'s conformance with FSVP, or its appendant regulations, changed in any way?

Response: **No**

14) Are L.I.R.A. S.A.'s products considered to be “Ready To Eat” when leaving its facility?

Response: **Yes**

14a) What hazard(s) remain uncontrolled?

Response:

15) Would you like to share any additional information?

Response: **No**

15a) Additional information:

Response:

U.S. FOOD & DRUG ADMINISTRATION

FOREIGN SUPPLIER VERIFICATION PROGRAM

—

Recertification Questionnaire Submission

} Foreign Supplier
} **L.I.R.A. S.A.**
} Date: 2021-03-04

C E R T I F I C A T I O N: By entering your name below, you certify that the information provided on and in connection with this form is true, accurate, and complete to the best of your knowledge. You understand that any false statements or deliberate omissions on this document – or any other document – that you provide to United Safety Agents may be grounds for disqualification from successful FSVP verification or, if discovered after FSVP approval takes place, could result in your product's FSVP approval status being revoked or terminated, and may result in your products or shipments being rejected from entry into the United States.

Certified by: **Héctor Oscar Frezzi**
Date of Certification: **2021-03-04**
Email Address of Respondent: **lira@familiafrezzi.com**

—

END

Search Results

FEI Number	Firm Name	Physical Address	Mailing Address
3004340039	L.I.R.A. S.A.	Avenida Dr Pelagio B Luna 361, Chilecito, La Rioja, F5360DFD, AR	Calle La Plata 554, Cordoba, Cordoba, X5004AJF, AR

Firm/Supplier Evaluation Resources

The FDA firm and supplier database available on this site includes data associated with inspections classification, inspections citations, compliance actions, recalls, and imports.

Search by Firm Name or FEI Number Help

3004340039

No data found

Three FDA FSMA rules (Foreign Supplier Verification Programs (FSVP) for Importers of Food for Humans and Animals (https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-foreign-supplier-verification-programs-fsvp-importers-food-humans-and-animals); Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Human Food (https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-human-food); and Current Good Manufacturing Practice, Hazard Analysis, and Risk-Based Preventive Controls for Food for Animals (https://www.fda.gov/food/food-safety-modernization-act-fsma/fsma-final-rule-preventive-controls-animal-food)) require that importers and facilities perform certain risk-based activities to verify that their suppliers are meeting applicable U.S. food safety standards. Under these rules, you must evaluate, among other things, the applicable FDA food safety regulations and information relevant to the supplier's compliance with those regulations, including whether the supplier is the subject of an FDA warning letter, import alert, or other FDA compliance action related to food safety, and document the evaluation.

Below is a list of publicly available resources that can be used to meet the requirement set out in these regulations as well as information on their use:

Collapse All | Expand All

- **Warning Letters**
- **Import Alerts**
- **Recalls**
- **Import Refusals**
- **Inspection Classifications**
- **Other Compliance Resources**

Contact

Questions and comments pertaining to the FDA Data Dashboard and source data may be directed by email to: **FDADataDashboard@fda.hhs.gov** (mailto:FDADataDashboard@fda.hhs.gov)

Dashboard Home (../index.htm)

Compliance Dashboards (../cd/index.htm)

Inspections (../cd/inspections.htm)

Compliance Actions (../cd/complianceactions.htm)

Recalls (../cd/recalls.htm)

Imports Summary (../cd/impsummary.htm)

Import Refusals

FSMA Data Search (index.htm)

Firm/Supplier Evaluation Resources (fser.htm)

Approved VQIP Importers (vqip.htm)

TPP Participants (tpp.htm)

Resources

How to Use the Dashboard (../howto.htm)

Glossary (../glossary.htm)

API (../api/index.htm)

Notifications (../notifications.htm

Contact Us (../contact.htm)

(../cd/imprefusals.htm)

Imports
Entry
(../cd/impentry.htm)

Language Assistance Available: Español
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(https://www.fda.gov/about-fda/about-website/language-assistance-services#chinese) | Tiếng Việt
(https://www.fda.gov/about-fda/about-website/language-assistance-services#vietnamese) | 한국어
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(https://www.fda.gov/about-fda/about-website/language-assistance-services#english)

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(https://www.fda.gov/about-fda/about-website/internet-accessibility)

Careers
(https://www.fda.gov/about-fda/jobs-and-training-fda)

FDA Basics
(https://www.fda.gov/about-fda/transparency/fda-basics)

FOIA
(https://www.fda.gov/regulatory-information/freedom-information)

No FEAR Act
(https://www.fda.gov/about-fda/jobs-and-training-fda/no-fear-act)

Nondiscrimination
(https://www.fda.gov/about-fda/about-website/fda-nondiscrimination-notice)

Website Policies
(https://www.fda.gov/about-fda/about-website/website-policies)