UNITED SAFETY AGENTS

FSVP

COMPLIANCE PLAN

DALLAGIOVANNA USA INC.

Name of FSVP Importer

MOLINO DALLAGIOVANNA G.R.V. SRL

Name of Foreign Supplier

MILLED GRAIN PRODUCT | WHEAT FLOUR | SOFT/ENRICHED/UNBLEACHED/BLEACHED

Name of Product

JUNE 17, 2022

Date of Initial Verification / Reverification

JUNE 19, 2023

Date of FSVP Plan Expiration

VERIFICAITON COMPLETE | APPROVED FOR IMPORT

Result of Verification

NUMBER 01

Version

– Confidential –

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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 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 within 24 hours of FDA's request. Electronic records are considered to be on-site if they are accessible from an on-site location. Records obtained by FDA are subject to the disclosure requirements found under Part 20. **Please contact USA immediately** to report a change in a foreign supplier's processes or status, upon contact by FDA, or with any questions that you may have by email at info@unitedsafetyagents.com, or by telephone at +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 on-site 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 on-site 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

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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 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 page eleven, Ongoing Document Requirements found on page twelve, and Ongoing Verification Activities & Frequency of Ongoing Verification Activities found on page fourteen.

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: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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 twenty-eight through thirty-six for substantiation of the FSVP QI's / PCQI's credentials.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ATTESTATION *of* REVIEW & ASSESSMENT

21 C.F.R., §1.506, (d)(3) provides that *"You may rely on a determination of appropriate foreign supplier verification activities . . . made by an entity other than the foreign supplier if you review and assess whether the entity's determination regarding appropriate activities. . . . You must document your review and assessment, including documenting that the determination of appropriate verification activities was made by a qualified individual."* **Please review this FSVP plan in its entirety and document your review below.**

I, _____ certify that I reviewed this FSVP plan on _____ and found
type name *today's date*

its contents to be acceptable.

Reviewer's Name: _____

Reviewer's Signature: _____

Reviewer's Title: _____

Supplier: Molino Dallagiovanna G.R.V. SRL | Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: April 13, 2022 | Review End: June 17, 2022

DESIGNATION *of* ROLES & SUMMARY *of* REVIEW

FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: Dallagiovanna USA Inc. (aka: Dallagiovanna USA Corp.) | FDA FEI: N/A

Physical Address: 5 Cheryl Lane | DUNS No.: 128741405

City: Boonton Township | State: New Jersey, 07005-9005 | Country: United States

Mailing Address: 5 Cheryl Lane

City: Boonton Township | State: New Jersey, 07005-9005 | Country: United States

Phone Number: +1 (551) 278-9155 | Email Address: accounting@dallagiovannausa.com

Name *of* Representative*(s)*: Ms. Lina Pisciotta | Title: Managing Director

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

Company Name: Molino Dallagiovanna G.R.V. SRL | FDA FFR: 10558094792

Manufacturing Address: Località Pilastro, No. 2 | FDA FEI: 3012959860

City: Gragnano Trebbiense | Province/Territory: Piacenza, 29010 | Country: Italy

Office Address: Località Pilastro, No. 2

City: Gragnano Trebbiense | Province/Territory: Piacenza, 29010 | Country: Italy

Phone Number: +39 0523 787155 | Email Address: mariagrazia@dallagiovanna.it

Name *of* Representative*(s)*: Ms. Maria Grazia De Pascali | Title: QC/QA

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

Agent/QI Name: Claudio Innocenti | Signature: Claudio Innocenti

Title: Partner & Preventive Controls Qualified Individual. | Date: June 17, 2022

Support PCQI: William J. Barber | Signature: W. J. Barber

Title: Preventive Controls Qualified Individual.

SUMMARY *of* REVIEW

Details *of* Product(s)	*Is foreign supplier expected to implement controls for*			**Comments**
	Biological Hazards	**Chemical Hazards**	**Physical Hazards**	
Wheat Flour Intended for Cooking/Baking by Consumer. Various product-names/sizes. See Addendum for full list.	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	☑ Yes ☐ No ☐ *Undetermined*	Verified & Approved.
	☐ 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: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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Review Start: April 13, 2022 Review End: June 17, 2022

REGISTER *of* SUBSTANTIATING DOCUMENTS

HAZARD ANALYSIS

☒ *Requested* ☒ *Required* ☒ *Received* ☒ *Reviewed*

NOTES Molino Dallagiovanna's HACCP and Food Safety Plan received.
Dated: December 12, 2021.
Version: No. 13.
Includes: Food Safety and Quality Management System, Establishment Standard, Checking the Product, Process Control, Production Flowcharts and Layout, Legislative and Regulatory List, lab Analysis Plan for Raw Materials and Finished Products, Cereal Storage Activities (Warehouses), and Shelf Life Study.

ON-SITE AUDIT

☒ *Requested* ☒ *Required* ☒ *Received* ☒ *Reviewed*

NOTES Molino Dallagiovanna's BRC Onsite Audit Report received.
Dated: December 17, 2021.
Re-audit Due Date: December 21, 2022.
Audit Grade: AA.
Number of Minor Non-conformities: 4. All with corresponding corrective actions.
Previous Audit Grade: A.
Previous Audit Date: November 30, 2020.
Note: On-site audit report was not exclusively 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: Dates range, but fall within late 2021 and early 2022.
Tested for: Biological hazards such as E. Coli, Salmonella ssp., etc., Heavy Metals, Natural Toxins such as Aflatoxin B1, B2, G1, G2, etc.
Laboratory: Water & Life Lab srl.
Note: The detection limit (LOD) of the UNI EN ISO 21571: 2013 + UNI EN ISO 21569: 2013 method, relating to the qualitative research of p35S, t-NOS, 35S-terminator, NPTII is equal to 0.01% of target DNA on the total DNA extracted.

OTHER FOOD SAFETY RECORDS

☒ *Requested* ☒ *Required* ☒ *Received* ☒ *Reviewed*

NOTES Completed Foreign Supplier FSVP Questionnaire received.
Dated: April 13, 2022.
Completed by: Ms. Maria Grazia De Pascali.
Note: Edits requested by USA. Response outstanding at time of Review End.

Molino Dallagiovanna's Recall Plan received.
Dated: February 10, 2022.
Version: No. 7.

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: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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

- ☑ if a change or update occurs
- ☑ annual basis *(regardless of change)*
- ☐ *other:*_____

HACCP PLAN / HARPC PLAN

- ☑ if a change or update occurs
- ☑ annual basis *(regardless of change)*
- ☐ *other:*_____

ON-SITE AUDIT RESULTS

- ☑ if a change or update occurs
- ☑ annual basis *(regardless of change)*
- ☐ *other:*_____

LABORATORY TESTING RESULTS

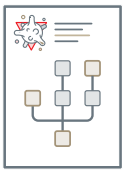
- ☑ if positive results are returned
- ☑ if recall or import refusal occurs
- ☑ if inspection occurs
- ☑ on an annual basis
- ☐ on a per-batch/shipment basis
- ☑ Chemical ☑ Biological
- ☐ *other:*_____

FDA REGISTRATION

- ☑ if a change or update occurs
- ☑ bi-annual basis *(regardless of change)*

FACILITY LICENSE

- ☐ if a change or update occurs
- ☐ annual basis *(regardless of change)*
- ☑ *not applicable*



RECALL PLAN

- ☑ if a change or update occurs
- ☐ annual basis *(regardless of change)*
- ☐ *other:*_____

PRODUCT LABEL

- ☑ if a change or update occurs
- ☑ annual basis *(regardless of change)*
- ☐ *other:*_____

QUALIFICATIONS

- ☑ if a change or update occurs
- ☐ annual basis *(regardless of change)*
- ☐ *other:*_____

IMPLEMENTATION RECORDS

- ☑ if recall or import refusal occurs
- ☑ if inspection occurs
- ☐ on an annual basis
- ☐ on a per-batch/shipment basis
- ☐ *other:*_____

FSVP QUESTIONNAIRE

- ☑ 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: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

INITIAL VERIFICATION ACTIVITIES

To confirm that all relevant or identified food safety hazards requiring a control have been significantly minimized or prevented, the below enumerated activities were used to initially verify Wheat Flour (“product” or “imported product”), supplied by Molino Dallagiovanna G.R.V. SRL (“supplier” or “foreign supplier”), imported by Dallagiovanna USA Inc. (“importer” or “FSVP importer”):

RELEVANT FOOD SAFETY RECORDS, including a review of the foreign supplier's relevant food safety records, including Molino Dallagiovanna G.R.V. SRL's Hazard Analysis and Critical Control Plan (“HACCP Plan”); food safety plan/program; implementation records; and internal monitoring procedures. Per §1.506(d)(1)(ii)(C) and (e)(1)(iii), documentation of each record, including the dates of review, the general nature of the records reviewed, the conclusions of the review, and documentation that the review was conducted by a FSVP qualified individual were completed.

SAMPLING AND/OR TESTING of the imported product, including the assessment of one or more certificates of analysis – for testing conducted to determine the presence or absence of all relevant or identified hazards requiring a control. Per §1.506(d)(1)(ii)(B) and (e)(1)(ii), documentation of the report or reports, the number of samples tested, the tests conducted, the date(s) on which the tests were conducted and the date(s) of the report(s) of the testing, the results of the testing, information identifying the laboratory or laboratories conducting the testing, and documentation that the review was conducted by a qualified individual (ISO 17025-accreditation requested) were completed.

THIRD-PARTY ON-SITE AUDIT REPORT, including the assessment of Molino Dallagiovanna G.R.V. SRL's on-site audit report. Per (e)(1)(i)(B) Molino Dallagiovanna G.R.V. SRL's on-site audit report was not relied upon to approve the supplier because United Safety Agents (“USA”) could not definitively confirm – or rule out – that the report considered FDA food safety regulations.

FOREIGN SUPPLIER FSVP QUESTIONNAIRE, including a review and assessment of the Molino Dallagiovanna G.R.V. SRL's reported critical/process/supply-chain controls for biological, chemical, environmental, allergenic, and physical hazards; facility cleaning information; staff hygiene details; pest control procedures; HACCP, TACCP, and VACCP; traceability procedures; release procedures; packaging format; customer complaint handling procedures; and plans/information relating to a recall and/or food safety issue. Per §1.506(d)(1)(ii)(D) and (e)(1)(iv)(B), documentation of each activity conducted in accordance with paragraph (e)(1)(iv), including a description of the activity, the date on which it was conducted, the findings or results of the activity, any corrective actions taken in response to significant deficiencies identified, and documentation that the activity was conducted by a FSVP qualified individual (“QI”) were completed.

OTHER APPROPRIATE SUPPLIER VERIFICATION ACTIVITIES, including a review of Molino Dallagiovanna G.R.V. SRL's compliance history, including whether Molino Dallagiovanna G.R.V. SRL is the subject of an FDA Warning Letters; Import Alerts; or other FDA compliance actions related to food safety. Per §1.506(d)(1)(ii)(D) and (e)(1)(iv)(B), documentation of each activity conducted in accordance with paragraph (e)(1)(iv), including a description of the activity, the date on which it was conducted, the findings or results of the activity, any corrective actions taken in response to significant deficiencies identified, and documentation that the activity was conducted by a FSVP QI were completed.

NOTE

Per §1.506(d)(3), Dallagiovanna USA Inc. relied on the determination of appropriate foreign supplier verification activities made by an entity other than the foreign supplier (USA) and reviewed and assessed whether the determination was appropriate. Dallagiovanna USA Inc. has documented its review and assessment, including documenting that the determination of appropriate verification activities was made by a FSVP QI. Dallagiovanna USA Inc.'s attestation of review and assessment can be found on page number nine of this FSVP. USA's certifications and qualifications can be found on page numbers twenty-eight through thirty-six of this FSVP.

***Note**: see next page for Ongoing Verification Activities.*

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ONGOING VERIFICATION ACTIVITIES

To confirm that all relevant or identified food safety hazards requiring a control, for Wheat Flour ("product" or "imported product"), supplied by Molino Dallagiovanna G.R.V. SRL ("supplier" or "foreign supplier"), continue to be significantly minimized or prevented prior to public distribution, up-to-date versions of all documents used during the initial FSVP verification and approval processes will be re-acquired at least once every three years – or sooner, per the following document-specific requirements:

An updated version of Molino Dallagiovanna G.R.V. SRL's FOOD SAFETY PLAN will be required if any change or update occurs. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing requirement and USA will confirm annually that the version on file remains current and faithfully illustrates all processes, monitoring procedures, etc., or acquire and review Molino Dallagiovanna G.R.V. SRL's most up-to-date copy.

An updated version of Molino Dallagiovanna G.R.V. SRL's HACCP PLAN will be required if any change or update occurs. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing requirement and USA will confirm annually that the HACCP Plan on file remains current and faithfully illustrates all supply chain controls and/or process/critical control procedures, or acquire and review Molino Dallagiovanna G.R.V. SRL's most up-to-date copy.

An updated version of Molino Dallagiovanna G.R.V. SRL's ON-SITE AUDIT REPORT will be requested annually, or if any change or update occurs prior to year's end. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing request and USA will acquire and review the updated Report from the supplier annually, or sooner if a change has been made.

Updated LABORATORY TESTING RESULTS for all relevant biological and chemical hazards will be required if a positive result is returned, recall or import refusal occurs, facility inspection takes place, or – at minimum – on an annual basis. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing requirement and USA will acquire the results from the supplier annually.

Confirmation that Molino Dallagiovanna G.R.V. SRL's FOOD FACILITY REGISTRATION remains active with FDA will be made annually by USA.

An updated copy of USA's FSVP SUPPLIER QUESTIONNAIRE will be required if any change or update occurs. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing requirement and USA will confirm annually that the details relayed via the questionnaire on file remain current or acquire a newly completed version.

The supplier's COMPLIANCE STANDING/HISTORY will be checked by USA via FDA's Data Dashboard annually – at a minimum ¬– or sooner in the event that USA is made aware of new information.

An updated version of the product's LABELING will be required if any change or update occurs. Molino Dallagiovanna G.R.V. SRL has been informed of this ongoing requirement and USA will confirm annually that the label on file remains current.

NOTE

USA's assessment of the product's labeling is restricted to the label's allergen disclosure statement and should not be interpreted to mean that the label meets all requirements of the Federal Food, Drug, and Cosmetic Act (FD&C Act), the Food Allergen Labeling and Consumer Protection Act (FALCPA), or all other applicable sections of 21 CFR Part 101. It shall remain Dallagiovanna USA Inc.'s responsibility to independently confirm that the product label follows all regulations prior to import.

FREQUENCY *of* VERIFICATION ACTIVITIES

All Ongoing Verification Activities will be conducted and re-conducted at their individually noted frequency, as appropriate to confirm that each hazards requiring a control continues to be significantly minimized or prevented by the supplier. Or, if not controlled by the supplier, is properly disclosed to the appropriate party. Document frequency-specific determinations can be found on page number twelve of FSVP.

***Note**: It is understood that the above actions are applicable only if USA continues to serve as the FSVP QI.*

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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: Molino Dallagiovanna G.R.V. SRL FEI: 3012959860 Date: June 17, 2022

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

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

REVISION LOG *for* FSVP PLAN

Version No.	Date *of* Change	Description *of* Revision
No. 01	June 17, 2022	Product and supplier underwent initial FSVP verification.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ANALYSIS & DETERMINATION *of* BIOLOGICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☒ ***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.*** ☐ ***Other***	1	3	Biological hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the application of a heat and/or chemical kill-step, implementing and following raw material supplier approval procedures, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes laboratory testing of finished product to confirm the absence of biological hazards. Details: Six (6) Certificates of Analysis received. Dated: Late 2021 and early 2022. Tested for: E. Coli, Salmonella ssp., etc. Laboratory: Water & Life Lab srl. 02. Supplier utilizes Current Good Manufacturing Practices via a closed loop system help control for the presences of biological hazards in product and facility. 03. Supplier has implemented a cleaning program and environmental monitoring for microbiological and biological hazards. 04. All staff undergoes formal food hygiene training. 05. All staff issued protective clothing. 06. All production operatives are required to cover head/facial hair within the processing/manufacturing area. 07. Adequate toilet and hand washing facilities provided. 08. Product is positively released. ———————NOTE——————— Product's naturally low aW levels impede bacterial growth and survivability.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified biological hazards. Product is intended for cooking/baking by end customer and is not typically consumed in its raw form. ——————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Prod. Category No.: 6. Subcategory: Flour. Storage: Shelf-Stable. ——————— ———————

Legend *for* Hazard Analysis & Determination

M&B: Micro & Biological. Hazards may include bacteria, viruses, parasites, and environmental pathogens.

C: Chemical. Hazards may include radiological hazards, food allergens, substances such as pesticides and drug residues, natural toxins, decomposition, and unapproved food or color additives.

P: Physical. Hazards may include potentially harmful extraneous matter that may cause choking, injury or other adverse health effects.

Probability (*P.*): Assesses the probability that the hazard will occur in the absence of controls. (§1.503, (c))

Severity (*S.*): Assesses the severity of the illness or injury if the hazard were to occur. (§1.503, (c))

P. & S. Assessment Scale: **1** - Low, **2** - Moderate, **3** - High, **S** - Serious adverse health consequences or death.

Hazard(s) Controlled: Are the supplier's method(s) adequate to ensure that the relevant hazard(s) are controlled.

Source

Office of Food Safety in the Center for Food Safety and Applied Nutrition at the U.S. Food and Drug Administration's Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry. Appendix 1: Potential Hazards for Foods and Processes. (Hazards Tables)

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ANALYSIS & DETERMINATION *of* CHEMICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Drug residues*** ☐ ***Heavy metals*** ☐ ***Industrial chemicals*** ☒ ***Pesticides*** ☒ ***Mycotoxins/Toxins*** ☐ ***Radiological*** ☐ ***Unapproved colors & additives*** ☒ ***Chemical hazards due to mis-formulation*** ☐ ***Other***	1	2	Chemical hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – implementing and following appropriate raw material supplier approval procedures, and/or subjecting raw material(s) and/or finished product(s) to laboratory testing. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes raw material inspection and approval procedures to control for hazards posed by chemical agents prior to production. 02. Supplier utilizes laboratory testing to verify that product is free from chemical hazards prior to release. Details: Supplier submits finished product to laboratory for analysis. See provided CoA. ——————————NOTE—————————— Recent laboratory testing report for testing conducted to determine presence/absence of Pesticides is requested.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified chemical hazards. Product is intended for cooking/baking by end customer and is not typically consumed in its raw form. ——————————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Prod. Category No.: 6. Subcategory: Flour. Storage: Shelf-Stable. ——————————— ———————————

Legend *for* Hazard Analysis & Determination

M&B: Micro & Biological. Hazards may include bacteria, viruses, parasites, and environmental pathogens.

C: Chemical. Hazards may include radiological hazards, food allergens, substances such as pesticides and drug residues, natural toxins, decomposition, and unapproved food or color additives.

P: Physical. Hazards may include potentially harmful extraneous matter that may cause choking, injury or other adverse health effects.

Probability (*P.*): Assesses the probability that the hazard will occur in the absence of controls. (§1.503, (c))

Severity (*S.*): Assesses the severity of the illness or injury if the hazard were to occur. (§1.503, (c))

P. & S. Assessment Scale: **1** - Low, **2** - Moderate, **3** - High, **S** - Serious adverse health consequences or death.

Hazard(s) Controlled: Are the supplier's method(s) adequate to ensure that the relevant hazard(s) are controlled.

Source

Office of Food Safety in the Center for Food Safety and Applied Nutrition at the U.S. Food and Drug Administration's Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry. Appendix 1: Potential Hazards for Foods and Processes. (Hazards Tables)

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ANALYSIS & DETERMINATION *of* ALLERGENIC HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☐ ***Undeclared allergens - Incorrect label*** ☐ ***Undeclared allergens - Cross-contact*** **ALLERGENS** ☐ ***Milk*** ☐ ***Eggs*** ☐ ***Fish*** ☐ ***Shellfish*** *(Crustacean)* ☐ ***Tree nuts*** ☐ ***Peanuts*** ☑ ***Wheat*** ☑ ***Soybeans*** ☐ ***Sesame****	3	3	Allergens themselves can not be directly controlled. However, the presence of allergens – or a given allergen – can be controlled. The presence of allergenic hazards can be effectively controlled through the utilization of a number of control measures, including – but not limited to – staff training for common food allergens, avoiding cross-contact, and proper food labeling. These may be effective methods to ensure that allergens are not ingested by a person who will be experience a negative reaction. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier certifies that: A) WHEAT is present in product. Some products may contain traces of SOY. B) a documented allergen control program is in use. C) a dedicated process line and a documented cleaning procedure are in place to prevent contamination. D) all employees undergo allergen training and processes have been put in place to reduce the likelihood of cross contact or unintentional introduction of allergens into processing area. ———NOTE——— ---------- Labeling Requirements ---------- - 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.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control the hazard posed by allergenic adulteration. 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 applicable regulations prior to import. _____ ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Prod. Category No.: 6. Subcategory: Flour. Storage: Shelf-Stable. _____ _____

Legend *for* Hazard Analysis & Determination

M&B: Micro & Biological. Hazards may include bacteria, viruses, parasites, and environmental pathogens.

C: Chemical. Hazards may include radiological hazards, food allergens, substances such as pesticides and drug residues, natural toxins, decomposition, and unapproved food or color additives.

P: Physical. Hazards may include potentially harmful extraneous matter that may cause choking, injury or other adverse health effects.

Probability (*P.*): Assesses the probability that the hazard will occur in the absence of controls. (§1.503, (c))

Severity (*S.*): Assesses the severity of the illness or injury if the hazard were to occur. (§1.503, (c))

P. & S. Assessment Scale: **1** - Low, **2** - Moderate, **3** - High, **S** - Serious adverse health consequences or death.

Hazard(s) Controlled: Are the supplier's method(s) adequate to ensure that the relevant hazard(s) are controlled.

Source

Office of Food Safety in the Center for Food Safety and Applied Nutrition at the U.S. Food and Drug Administration's Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry. Appendix 1: Potential Hazards for Foods and Processes. (Hazards Tables)

*Per Food Allergy Safety, Treatment, Education and Research Act, food packages will need to reflect allergen labeling for sesame beginning on January 1, 2023.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ANALYSIS & DETERMINATION *of* ENVIRONMENTAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☒ ***Recontamination with environmental pathogens.*** ☐ ***Bacterial pathogen survival of a lethal treatment.*** ☐ ***Bacterial growth and/or toxin formation due to lack of time / temperature control.*** ☐ ***Recontamination due to lack of container integrity.*** ☐ ***Bacterial growth and/or toxin formation due to poor formulation control.*** ☐ ***Bacterial growth and/or toxin formation due to reduced oxygen packaging.*** ☐ ***Other***	1	2	Hazards posed by ineffective processes or environmental pathways can be controlled by the utilization of Current Good Manufacturing Practices, positively releasing finished product, avoiding cross-contamination, carefully monitoring production process, subjecting raw material(s) and/or finished product(s) to laboratory testing, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Hazard posed by recontamination with environmental pathogens is controlled through Current Good Manufacturing Practices. 02. Supplier has implemented a cleaning program and environmental monitoring for microbiological and biological hazards. 03. All product is positively released and hermetically sealed. ———————NOTE——————— Product's naturally low aW levels impede bacterial growth and survivability.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control FDA identified environmental hazards. Product is intended for cooking/baking by end customer and is not typically consumed in its raw form. ——————— ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Prod. Category No.: 6. Subcategory: Flour. Storage: Shelf-Stable. ——————— ———————

Legend *for* Hazard Analysis & Determination

M&B: Micro & Biological. Hazards may include bacteria, viruses, parasites, and environmental pathogens.

C: Chemical. Hazards may include radiological hazards, food allergens, substances such as pesticides and drug residues, natural toxins, decomposition, and unapproved food or color additives.

P: Physical. Hazards may include potentially harmful extraneous matter that may cause choking, injury or other adverse health effects.

Probability (*P.*): Assesses the probability that the hazard will occur in the absence of controls. (§1.503, (c))

Severity (*S.*): Assesses the severity of the illness or injury if the hazard were to occur. (§1.503, (c))

P. & S. Assessment Scale: **1** - Low, **2** - Moderate, **3** - High, **S** - Serious adverse health consequences or death.

Hazard(s) Controlled: Are the supplier's method(s) adequate to ensure that the relevant hazard(s) are controlled.

Source

Office of Food Safety in the Center for Food Safety and Applied Nutrition at the U.S. Food and Drug Administration's Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry. Appendix 1: Potential Hazards for Foods and Processes. (Hazards Tables)

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

ANALYSIS & DETERMINATION *of* PHYSICAL HAZARDS

FDA Identified Hazard(s)	P.	S.	Control Measure(s)	Hazard(s) Controlled
☒ ***Metal*** ☐ ***Glass*** ☐ ***Extraneous Matter*** ☐ ***Plastics*** ☐ ***Stones*** ☐ ***Wood*** ☐ ***Natural Component of Food*** ☐ ***Other***	1	2	Physical hazards can be effectively controlled through the utilization of a number of different control measures, including – but not limited to – the utilization of an operational and calibrated metal detector during and/or after the production process, sieving raw material and/or finished product, optical sorting machinery, visual inspection, appropriate and consistent raw material supplier approval methods, and/or through the utilization of a number of other appropriate control measures. ——— SUPPLIER CONTROL MEASURES ——— 01. Supplier utilizes an operational and calibrated metal detector to control hazards posed by physical agents. Critical Limits: In-line Metal Detector. Ferrous: 2.5 mm. Non Ferrous: 3.5 mm. Stainless Steel: 3.5 mm. 02. Glass and Breakable Plastic Program in use. 03. Supplier sieves incoming ingredients and finished products. 04. All product flows under magnets.	Based upon the information and documentation provided to USA before the above noted Review End date, this supplier has implemented sufficient measures – or certified that sufficient measures are in place – to effectively control physical hazards. Product is intended for cooking/baking by end customer and is not typically consumed in its raw form. ----- HAZARD PROFILE ----- ---------- SOURCE ---------- Appendix 1 (Hazards Tables) Category: Milled Grain Prod. Category No.: 6. Subcategory: Flour. Storage: Shelf-Stable.

Legend *for* Hazard Analysis & Determination

M&B: Micro & Biological. Hazards may include bacteria, viruses, parasites, and environmental pathogens.

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P. & S. Assessment Scale: **1** - Low, **2** - Moderate, **3** - High, **S** - Serious adverse health consequences or death.

Hazard(s) Controlled: Are the supplier's method(s) adequate to ensure that the relevant hazard(s) are controlled.

Source

Office of Food Safety in the Center for Food Safety and Applied Nutrition at the U.S. Food and Drug Administration's Hazard Analysis and Risk-Based Preventive Controls for Human Food: Draft Guidance for Industry. Appendix 1: Potential Hazards for Foods and Processes. (Hazards Tables)

Supplier: Molino Dallagiovanna G.R.V. SRL Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: April 13, 2022 Review End: June 17, 2022

ASSESSMENT *of* FOREIGN SUPPLIER

1.0 FOREIGN SUPPLIER INFORMATION

1.1. Supplier name: Molino Dallagiovanna G.R.V. SRL 1.2. Supplier country: Italy

1.3. Products manufactured/supplied: Wheat Flour | Ingredient for Cooking/Baking

1.4. Is the supplier certified to a Global Food Safety Standard and audited annually? ☑ Yes ☐ No ☐ N/A

Standard: BRC; IFS Food; ISO 9001; ISO 22000

2.0 SUPPLIER PROCEDURES, PROCESSES & PRACTICES

2.1. Does supplier follow current GMPs? ☑ Yes ☐ No

2.2. Does the supplier have SOPs in place? ☑ Yes ☐ No ☐ N/A

2.3. Does the supplier have allergen controls in place to prevent cross-contamination? ☑ Yes ☐ No ☐ N/A

2.4. Does the supplier have a HACCP/PC plan for the product manufactured for the importer? ☑ Yes ☐ No ☐ N/A

2.5. Has the supplier's HACCP/PC plan been reviewed and approved by USA's PCQI? ☑ Yes ☐ No

PCQI(s): *C. Innocenti (PCQI. Member, USA LLC)*

3.0 SUPPLIER PERFORMANCE HISTORY

3.1. To the best of USA's knowledge, has the supplier been the subject of a public FDA Alert/Warning Letter?

☐ Yes ☑ No ☐ N/A *Description:* *No, Import Alert & Warning Letter search-results, which were conducted on – or about – the Review End date, have been attached to this FSVP Plan.*

3.2. Has the supplier provided timely and adequate responses to all requests and issues related to food safety?

☑ Yes ☐ No *Description:*

4.0 SUPPLIER APPROVAL

4.1 Have USA's PCQI(s) identified and evaluated the known and reasonably foreseeable hazards for each product imported from the supplier and are there preventive controls in place to adequately control the hazards?

☑ Yes ☐ No *PCQI(s):* *C. Innocenti (PCQI. Member, USA LLC)*

4.2. After reviewing all hazards and the supplier's performance, have USA's PCQI(s) determined appropriate verification activitie(s) that will be conducted and documented on an ongoing basis to verify the preventive controls are effectively controlling the hazard(s)? ☑ Yes ☐ No

PCQI(s): *C. Innocenti (PCQI. Member, USA LLC)*

4.3 **Is the foreign supplier approved for import into the United States under FSVP** ☑ Yes ☐ No

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Claims Made Against Product

No claims have been made against the raw materiel / product type.

Overview *of* Foreign Supplier's Commercial Operation

Milling, blending and packaging of soft wheat flours in several formats paper bags and bulk. Packaging of semolina and re-milled semolina in 5 and 10 kg paper bags. Mixing of semi-finished preparations based on different cereal flours and other ingredients. Including external warehouses in via Mottaziana of Borgonovo Valtidone. Outsourced packing of flour in 0.5 and 1 kg format. Trading of other mixes, flours, semolina and yeast.

Testing Program & Accreditation

Supplier utilizes third-party laboratories to conduct biological and chemical hazard analysis of finished products.

Six (6) Certificates of Analysis received from supplier. Dated: Dates range, but fall within late 2021 and early 2022.
Tested for: Biological hazards such as E. Coli, Salmonella ssp., etc., Heavy Metals, Natural Toxins such as Aflatoxin B1, B2, G1, G2,
Laboratory: Water & Life Lab srl. Note: The detection limit (LOD) of the UNI EN ISO 21571: 2013 + UNI EN ISO 21569: 2013 method, relating to the qualitative research of target DNA on the total DNA extracted.

Water & Life accredits n. 0081. Merieux Nutriscience n. 0051.

Supplier & Product Allergen Information

Supplier certifies that: A) wheat is present in products, B) a documented allergen control program is in use, C) a dedicated process line and a documented cleaning procedure are in place to prevent contamination, D) all employees undergo allergen training and processes have been put in place to reduce the likelihood of cross contact or unintentional introduction of allergens into processing area.

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), tthe 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 applicable regulations prior to import.

Packaging Type & Shipping / Handling Requirements

Supplier certifies that packaging is accredited for food use. Ambient shipping and handling requirements.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

REVIEW *of* GENERAL FOOD SAFETY PROGRAM

Supplier GFSI Status & Historical Performance

Supplier appears to be following CGMPs and utilizes an established food safety program. Products supplied by this supplier have been verified and are approved for import.

Close Supplier Monitoring

No. Supplier/product will be re-assessed and re-verified to the standards of the Foreign Supplier Verification Program on an annual basis, or sooner if necessary.

General Comments & Verification Timeline

Products supplied by this supplier have been verified and are approved for import. Supplier/product will be re-assessed and re-verified to the standards of the Foreign Supplier Verification Program on an annual basis (or sooner if necessary). This FSVP will expire one year from its above the above noted "Review End" date.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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.

Product Names

- Enriched Wheat Flour Type 00, Unbleached (1kg)
- Enriched Wheat Flour Type 00, Bleached for Pizza (1kg)
- Enriched Wheat Flour Type 00, Unbleached for Fresh Pasta (1kg)
- Soft Wheat Flour Type 00, for Shortcrust (1kg)

IMPORTANT: 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 applicable regulations prior to import.

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Supplier: Molino Dallagiovanna G.R.V. SRL | Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: April 13, 2022 | Review End: June 17, 2022

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

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Charles Nolan

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07/09/2020

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Gerald Wojtala, Executive Director
International Food Protection Training Institute

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

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AAFCO
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Certificate # 223faa17

Supplier: Molino Dallagiovanna G.R.V. SRL | Product: Wheat Flour | Ingredient for Cooking/Baking

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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

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Produce Safety ALLIANCE

AFDO | CONNECT · SHARE · IMPACT · PROTECT | 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: Molino Dallagiovanna G.R.V. SRL | Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: April 13, 2022 | Review End: June 17, 2022

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Bob Bauer

completed on

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Institute for Food Safety and Health

Gerald Wojtala, Executive Director
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Joseph Corby, Executive Director
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delivered by Lead Instructor

Bob Bauer

completed on

09/14/2017

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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

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Supplier: Molino Dallagiovanna G.R.V. SRL Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: April 13, 2022 Review End: June 17, 2022

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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

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
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Supplier: Molino Dallagiovanna G.R.V. SRL | Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: April 13, 2022 | Review End: June 17, 2022

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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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CERTIFICATE OF TRAINING

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the Food Safety Preventive Controls Alliance course:

Foreign Supplier Verification Programs

delivered by Lead Instructor

tina coil

completed on
06/13/2017

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

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Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) | Review Start: April 13, 2022 | Review End: June 17, 2022

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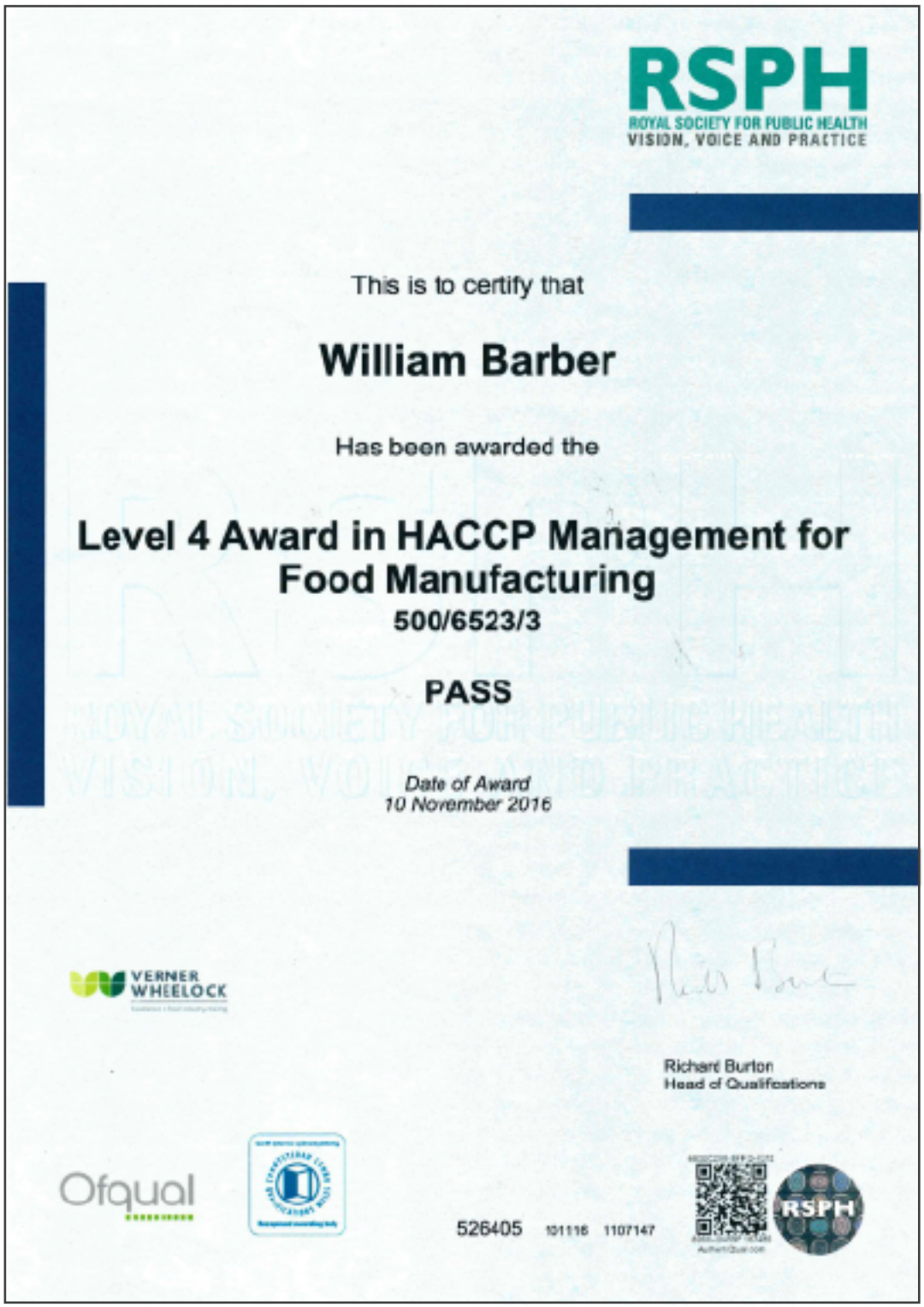

RSPH
ROYAL SOCIETY FOR PUBLIC HEALTH
VISION, VOICE AND PRACTICE

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

Supplier: Molino Dallagiovanna G.R.V. SRL Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: April 13, 2022 Review End: June 17, 2022

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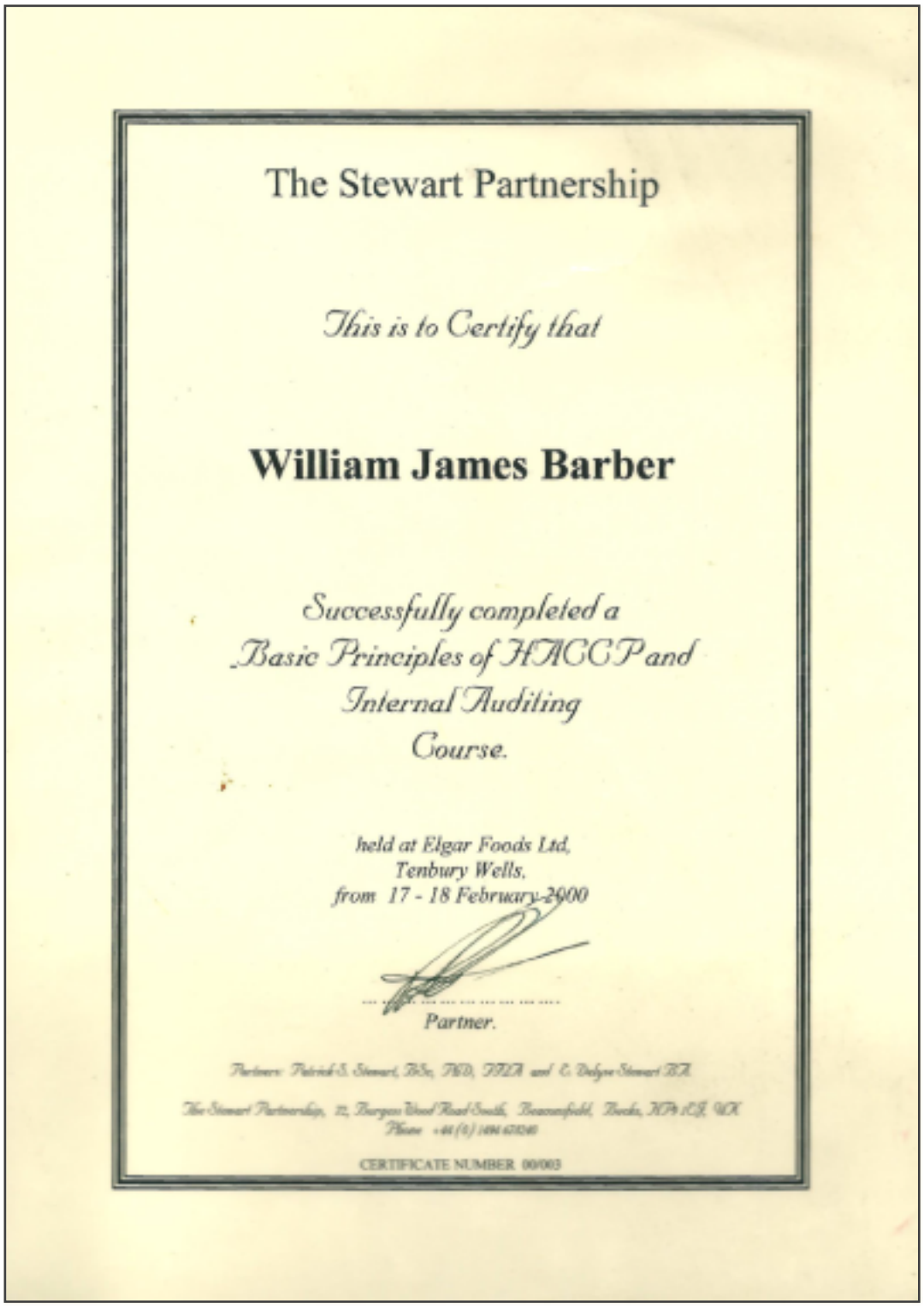

The Stewart Partnership

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 C. Dalyn Stewart BA

The Stewart Partnership, 22, Burgess Wood Road South, Beaconsfield, Bucks, HP9 1EJ, UK
Phone +44 (0) 1494 671040

CERTIFICATE NUMBER 00003

Supplier: Molino Dallagiovanna G.R.V. SRL Product: Wheat Flour | Ingredient for Cooking/Baking

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: April 13, 2022 Review End: June 17, 2022

QUALIFICATIONS *of* SUPPORTING QI

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 0739/024907A/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.

QUALIFICATIONS *of* SUPPORTING QI

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	U1050074

CONTINUED

AWARDED SEPTEMBER 2007 0709/024307/A/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

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 KAB.

Supplier: Molino Dallagiovanna G.R.V. SRL

Product: Wheat Flour | Ingredient for Cooking/Baking

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

Review Start: April 13, 2022 Review End: June 17, 2022

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 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 Manual

Prepared according to the principles of *Codex Alimentarius*,
in compliance with Reg. (EC) N. 852/2004, with the BRC Global Standard for Food Safety
(edition 8), the IFS Food Standard (edition 7) and al
***Food Safety Modernization Act FSMA FDA*(PUBLIC LAW 111–353 — JAN. 4, 2011)**
ISO 22000 and 2018

Date approval	Revision	Edit	Written by:	Approved by:
14/11/2014	1st Issue Rev.00	Prepared according to BRC and IFS Global Standards for Food Safety (Edition 6)	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
19/11/2015	Rev. 01	Prepared according to the BRC Standard (edition 7) and IFS (edition 6)	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
08/11/2016	Rev. 02	Renewal of production layouts and flows	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
21/12/2016	Rev. 03	Rework has been entered in risk analysis	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
22/05/2017	Rev. 04	New packaging line, (LINE E), new warehouse	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
06/11/2017	Rev. 05	IOP 14 rework management, compliance FSMA, IOP 15 treatments, new D + E LINE metal detector limits, installation MAGN12 and MAGN11 forecast	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
17/10/2018	Rev. 06	New plant (Molino C) New batch coding HACCP team Natural yeast in ATM New treatment time interval container	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ Maria Grazia De Pascali	Sergio Dallagiovanna Direction
16/04/2019	Rev. 07	Installation New magnets (MAGN 11 and MAGN 13 New one HACCP team	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
23/10/2019	Rev. 08	BRC rev. 8 including preventive controls FSMA, external site finished product storage	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
25/03/2020	Rev. 09	Adaptation to ISO 22000 ed. 2018	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
06/16/2020	Rev. 10	Inserting the bagging line 5 e automated warehouse	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
10/12/2020	Rev. 11	Par. 2.4 insertion of references to FDA legislation for fruit allergens a shell	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
26/10/2021	Rev. 12	Review of HACCP Team, new Contact Emergency	Maria Grazia De Pascali RAQ Donatella Fraioli AAQ Laura Gazzola AAQ	Sergio Dallagiovanna Direction
23/12/2021	Rev. 13	Risk Assessment for compressor use in oil bath	Maria Grazia De Pascali RAQ Donatella Fraioli AAQ Laura Gazzola AAQ	Sergio Dallagiovanna Direction

Section I.

Section II

Attachments

Attached1Production flowcharts and layouts
Annex 2 Legislative and regulatory list
Annex 2 to Manlab Analysis plan for raw materials and finished products Annex 3 Cereal storage activities (warehouses)
Annex 5 Shelf life study
Attachment 6 BRC Preventive Controls for Human - Food Rule comparison

SECTION I.

1 COMPANY PROFILE

Business name	Molino Dallagiovanna GRV Srl
Activities	Grain milling; ISTAT code 10.61.10 (Nace 2007)
Registered office and factory	Via Pilastro, 2 - 29010 Gragnano Trebbiense (PC)
Telephone and Fax	0523787155; 0523787450
E-mail	info@dallagiovanna.it
VAT number	IT00112590336
Start of business	12/16/1961
Health authorization	Health Authorization N ° 119 of 26/01/06 and subsequent amendments and additions
Feed production authorization	Law 183/05 code AM000024024PCIT
BRC Site Code	1357883
IFS Code	50536
USA FDA Registration Number	10558094792
Director	Sergio Dallagiovanna
Emergency contact	Sabrina Dallagiovanna +39 335 6879749 sabrina @dallagiovanna.it
Product	Storage at room temperature
Production volumes	*Grain grinding capacity of 300 T / 24H*
Target customers	B2B and B2C
Company surface	See Corporate Management Manual (MGQ)
Number of employees	About 50
Work shifts	Full-time offices 8: 00-18: 00; production 3 shifts 6: 00-14: 00, 14: 00-22: 00, 22: 00-6: 00; shed 8: 00-12: 00, 12: 00-14: 00, 14: 00-18: 00 and possibly 14: 00-22: 00.

2 THE HISTORY

The history of Molino Dallagiovanna begins in 1832, when the family started a business linked to the grinding of cereals. The first cylinder mill was installed in 1949, followed by a second in 1960 and a third in 1975. The plant underwent profound transformations in 2000/2004: high automation and a doubling of production capacity which today can be quantified as a maximum of 300 T / 24 hours. Subsequently, in 2009, an area was built for the packaging of the products, separated from the production plant, in which a White Art laboratory was also inaugurated for the production of bread, pasta, pastry and pizza to be able to test the flours with the collaboration of Maestri of Taste and being able to

organize meetings, workshops and courses with the main training institutions (CAST Alimenti, Richemont Club, Ial Emilia-Romagna).
Molino Dallagiovanna is among the last companies in Italy to carry out the exclusive wheat washing process, eliminated by the most modern technologies for economic reasons, but crucial for obtaining a better flour, eliminating grain impurities, favoring homogeneous wetting and softening of the almond and consequently facilitating its subsequent milling.
The evolution of the company has always been conceived with a view to offering its customers raw materials produced with high quality standards in a context of hygiene and safety, combining the most modern technologies with the tradition of production.
The production plant has been certified and compliant with the requirements of the BRC, IFS and ISO 22000 Global Standard for food safety since 2016.
The milling facility is constantly evolving and has been expanded and strengthened with restructuring interventions conceived and implemented with the aim of bringing about a substantial modernization of the plants and production environments, achieving an appreciable continuous improvement.
In fact, between 2015 and 2016, the plant was expanded through the construction of a new mixing plant and 23 new flours suitable for the storage of ingredients and finished products.
At the beginning of 2017, the Company began construction of a storage area (adjacent to the warehouse used as a warehouse) which has become a fully automated warehouse; recently installed a new packaging line including 4 flour storage silos.
Finally, in the second half of 2017, the Company, by winning funding through a PSR of the Emilia-Romagna Region, began the construction of a new milling plant with the aim of reaching the grinding capacity of 300 T in 24 hours, or doubling the own production. The works were completed in August 2018.

3 FIELD OF APPLICATION

The Food Safety Plan applies to the company activities listed below.

1. Milling of common wheat (*Triticum aestivum*)to obtain:

- ➢ packaged and bulk flours for human consumption;
- ➢ by-products for human consumption (bran, tritello, bran, germ) packaged and in bulk.

2. Production of mixtures consisting of different flours of cereals, seeds and legumes (semi-finished products for pizzeria and bakery), natural yeast, packaged;

3. Marketing of packaged and bulk flours of cereals for food use including gluten free and gluten lactose free.

The Food Safety Plan includes all stages of the production process, from procurement to packaging and distribution of the related finished products.

The aim is to ensure customers achieve high food safety standards in compliance with the most recent and restrictive regulations. The policy, requirements and procedures documented in this Manual are subject to changes taking into account regulatory developments.
This Manual describes and conducts a risk analysis and Critical Control Points to determine which stages of production must be controlled to reduce the risk, bring it to acceptable levels and prevent failures in the process itself.
There**risk assessment**was carried out in compliance with the principles of*Codex Alimentarius*, of the Global Standards for Food Safety BRC (edition 8 - August 2018) and IFS (edition 7), also referring to the Manual of correct hygiene practice for the Milling Industry prepared by Italmopa (Associazione Industriali Mugnai d'Italia) and evaluated compliant with the provisions of EC Reg. n. 852/2004, according to opinion no. 0044953 of 01/07/19 of the Ministry of Health,

Introduction to PREVENTIVE CONTROLS in food production (FSMA FDA-USA): included in BRC rev.8

BRC Version 8 was drafted to take into account all the requirements of the American FDA law on the modernization of food safety (FSMA) of the US president in January 2011, it is the largest modernization of the food safety system in the United States since the advent of the*Food Drug and Cosmetic Act*of 1938.

In general**the requirements of the Preventive Control Regulation focus on prevention**-than reacting - to problems that can cause food poisoning and can be**applied to companies in the United States of America or abroad**that produce, transform, package or handle food products.**Such companies must have written plans which identify hazards, specify the steps that have been put in place to reduce or prevent these hazards, identify monitoring procedures, record the results of the monitoring and specify what actions will be taken to correct the problems that arise. .**The FDA has the authority to evaluate such plans and continue to inspect manufacturing sites to ensure plans are implemented and followed.
Beyond the final preventive check requirements set out in section 103, the preventive check rule also updates and modifies some regulatory requirements*GMP*existing as a new section of the CFR, section 117.

The points of the FSMA requirements that can be found in the respective paragraphs of this manual are summarized below.

FSMA requirements		Paragraphs in this Manual
Basic information	Site description	2. The story 5. Documentation
	Description of the food safety team	1.1 Management commitment and continuous improvement 2.1 HACCP food safety team
	Product description	2.3 Product description 2.4 Identification of intended use
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Hazard analysis		2.10 Hazard identification and analysis
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4 DEFINITIONS

Drinking water:safe water to drink, free from pollutants or harmful organisms and compliant with local legal requirements (Legislative Decree 31/2001 and subsequent amendments, which incorporates Directive 98/83 / EC, on the quality of water intended for human consumption).

Food attendant:anyone who handles or prepares food, whether it is displayed (unpackaged) or packaged.

Food or "food product" or "food product" (art. 2, Reg 178/2002 / EC):any processed, partially processed or unprocessed substance or product intended to be ingested, or which is reasonably expected to be ingested, by humans. This includes beverages, chewing gum and any substance, including water, intentionally incorporated into food in the course of its manufacture, preparation or processing. Feed, residues and contaminants are not included. **Allergen:**a known component of a food that causes physiological reactions due to an immunological reaction (for example nuts and other components identified in the legislation concerning the country in which they are produced or sold).

Hazard Analysis and Critical Control Points (HACCP):system that identifies, assesses and monitors significant hazards to food safety.

Risk analysis:process consisting of risk assessment, management and communication.

Low risk area:an area where the processing or handling of food presents a minimal risk of contamination of the products or growth of microorganisms, or where the subsequent processing or preparation of the product by the consumer will ensure the safety of the product.
Attention to the customer:structured approach to determining and dealing with the needs of an organization to which the company supplies the products and which can be measured by the use of performance indicators.
Audit:a systematic review to verify whether the related activities and results comply with the planned agreements and whether these agreements are implemented effectively and are suitable for achieving the objectives. **Agency:**the person, firm, company or other entity with whom a purchase order is made or who owns the premises where the products in any form originate, or who is otherwise responsible for the commitment or provision of services by the production workers; and of food preparation.
Corrective action:action aimed at eliminating the cause of a detected non-conformity and preventing its recurrence **Cause:** everything that determines or contributes to determining the danger of contamination and therefore the point of risk.

Certification:process by which an accredited certification body, based on an audit performed at a company, provides written assurance of a company's compliance with the requirements of a standard.

Customer:a company or person who is supplied with a finished product or as a component of a finished product.
Codex Alimentarius:the body responsible for establishing internationally recognized standards, professional codes and guidelines, of which HACCP is an example.
Competence:demonstrable ability to apply skills, knowledge and understanding of a job or topic in order to achieve intended results.
Risk communication:the interactive exchange, throughout the risk analysis process, of information and opinions regarding the elements of danger and risks, the factors connected to the risk and the perception of risk, between risk assessment managers, risk managers , consumers, food and feed businesses, the academic community and other stakeholders, including explaining the findings related to risk assessment and the basis for risk management decisions.

Final consumer:the final consumer of a food is a person who will not use the food as part of a commercial operation or food business.
Contamination:introduction or presence of a contaminant, or undesirable substance in food or in the production environment. Types of contamination include physical, chemical, biological and allergenic contamination. It can also mean contamination when packages are mistakenly mixed.

Business continuity:a circumstance that allows a company to plan and respond to incidents that can cause a business disruption, in order to continue with activities at a predetermined acceptable level.

Correction:action to eliminate a detected non-conformity (e.g. reworking, downgrading to a product for feed use, etc.)
Action criterion:measurable or observable specification for monitoring an OPRP.
Flowchart:systematic representation of the sequence of phases or operations involved in the production or manufacture of a given food.

Equivalent:referring to different systems, it means capable of achieving the same objectives.
Stages of production, processing and distribution:any stage, including import, from the primary production of a food inclusive up to storage, transport, sale or delivery to the final consumer including and, where relevant, import, production, processing, storage, transport , the distribution, sale and supply of feed.
Supplier:the person, firm, company or other body to which a company's supply order is addressed. **Risk management:**process, distinct from risk assessment, consisting in examining intervention alternatives by consulting interested parties, taking into account the risk assessment and other relevant factors and, if necessary, making adequate prevention and control choices.
HACCP:a system that identifies, assesses and controls hazards of a significant nature for the safety of food products. REG. 852/2004 / EC art. 5: The Principles of the HACCP System are as follows:
a) identify any hazards that must be prevented, eliminated or reduced to acceptable levels;
b) identify the critical control points in the phase or phases in which the control itself is essential to prevent or eliminate a risk or to reduce it to acceptable levels;
c) establish, at the critical control points, the critical limits that differentiate acceptability and unacceptability for the purpose of preventing, eliminating or reducing the identified risks;
d) stable and apply effective surveillance procedures at critical control points;
e) establish the corrective actions to be taken in the event that the surveillance reveals that a certain critical point is not under control;
f) establish the procedures, to be applied regularly, to verify the effective functioning of the measures referred to in letters a) to e);
g) prepare documents and records appropriate to the nature and size of the food business in order to demonstrate the effective application of the measures referred to in letters a) to f).
Food hygiene (Reg. 852/2004 / EC art.2, paragraph 1, letter a): The measures and conditions necessary to control the hazards and ensure the fitness for human consumption of a food product taking into account the intended use.
Packaging:the product, composed of materials of any nature, used to contain and protect certain goods, from raw materials to finished products, to allow their manipulation and their delivery from the producer to the consumer or user, and to ensure their presentation, as well as disposable items used for the same purpose.
Placing on the market:the possession of food for sale, including the sale offer or any other form, free or for a fee, of transfer, as well as the sale itself, distribution and other forms of transfer proper.

Food company:any public or private entity, with or without profit, which carries out any of the activities related to one of the stages of production, processing and distribution of food. **Food company (Reg. 178/2002 / EC art. 3, paragraph 2):**Any public or private entity, with or without profit, which carries out any of the activities related to one of the stages of production, processing and distribution of food.

Accident:an event that has occurred and results in the production or supply of unsafe, illegal or non-compliant products.

Performance indicators:summary of qualified data providing information on levels of compliance with agreed objectives (e.g. customer complaints, product indications and laboratory data).

Weeds: Insects, birds, rodents or any other animal capable of directly or indirectly contaminating food products.
Food law:laws, regulations and administrative provisions
concerning food in general, and food safety in particular, both in the European Community and at national level; it includes all stages of production, processing and distribution of food and also of feed produced for animals intended for food production or administered to them. **Critical limit:**measurable value that separates acceptability from unacceptable, established to determine whether a CCP remains under control, if it is exceeded or disregarded, the products must be handled as potentially unsafe.

Acceptable limit:level of a food safety hazard not to be exceeded in the finished product
Job description:a list of the responsibilities of a particular position held within a company.

Distributor brand:a trademark, logo, copyright or address of a distributor.
Packaging material:material in direct contact with food.
Control measure:an action or activity that can be applied to prevent or eliminate a significant food safety hazard or reduce it to an acceptable level.
Mill:plant for the processing and transformation of cereals into flours and by-products, consisting of the grinding plant and complementary structures such as silos, warehouses and service rooms. **Monitoring:** actions taken to assess whether a process works as expected (it is applied during an activity and provides information for an action within a specified time frame)
Non-compliance:the non-fulfillment of a given safety, legal or quality requirement on the products or of a specific system requirement.
Food business operator:the natural or legal person responsible for ensuring compliance with the provisions of food law in the food business under its control.
Certification body:a company that provides certification services, accredited to operate by an authoritative body.
Genetically modified organism (GMO):an organism whose genetic material has been altered by genetic modification techniques, therefore its DNA has genes it generally does not contain. **Danger:**a biological, chemical, physical or allergenic characteristic or radiological substance present in the food or a condition of the food, potentially capable of causing adverse health effects. **Prerequisite:**basic environmental and operational conditions of food companies necessary for the production of a safe food. They control generic hazards through the*good manufacturing practices*and good hygiene practices and are considered within the HACCP study.
Procedure:agreed method for carrying out an activity or process, implemented and documented in the form of detailed instructions or process description (e.g. log chart of activities). **Unprocessed products:** unprocessed food products, including products that have been divided, separated, sliced, sliced, boned, chopped, skinned, crushed, chopped, cleaned, trimmed, hulled, ground, chilled, frozen, deep-frozen or thawed.

Primary products:products of primary production including products of the land, livestock, hunting and fishing;
Processed products:food products obtained from the processing of unprocessed products. These products may contain ingredients necessary for their processing or to give them specific characteristics.

Cleaning: The removal of unacceptable substances, for example earth or cereals other than wheat.
Control point (CP) or PRP-operational:control measure or combination of control measures applied to prevent or reduce a significant food safety hazard to an acceptable level where the action criterion and measurement or observation allow effective control of the process and / or product

Critical Control Point (CCP):a stage where a control measure can be applied to prevent or reduce a significant food safety hazard to an acceptable level, the defined critical limit and measurement allow for corrections to be applied
Fundamental requirement:a standard requirement relating to a system that must be adequately implemented, maintained and monitored continuously by the company, since the partial or total lack of conformity will have serious repercussions on the integrity or safety of the product supplied. **Product recall:**the measures aimed at obtaining the return of unsuitable products by customers and final consumers.
Product collection:measures aimed at obtaining the return of unsuitable products from customers but not from final consumers.
Rejection: Substance or product outside the commercial cycle or utility chain, which is to be eliminated; is destined for landfill / landfill; it is not intended for reuse, recovery or recycling as feed; it cannot be used for any other purpose.
Risk:a function of the probability and severity of an adverse effect on health, resulting from the presence of a hazard.
Stock rotation:the process by which the location and quantity of raw materials, intermediate and finished products are identified and matched to the programs and quantity of products.
Cleaning waste:products and / or materials derived from the physical separation of the grain in the cleaning phase.
Food safety:guarantee that food will not cause harm to consumers when prepared and / or ingested in accordance with its intended use.
Site:a production unit of the company.
Undesirable substance:any substance or product, with the exception of pathogenic microorganisms, present in the product or product intended for animal feed which constitutes a potential danger to animal or human health, or the environment, or which may adversely affect livestock farming. **By-product:** substance or product other than flour and semolina which, regardless of commercial value, depending on its characteristics, can have an agricultural purpose or be destined for human and / or animal nutrition.

Calibration:a series of operations that establish, under the specified conditions, the comparison between quantitative values indicated by an instrument or a measurement system, or values represented by a material measurement or reference material, and the corresponding values provided by the standards.

Traceability:the ability to trace and track a food, feed, livestock or raw material intended or expected to be incorporated into a food at all stages of receipt, production, processing and distribution.

Treatment:any action that causes a substantial modification of the initial product, including heat treatment, smoking, salting, curing, drying, marinating, extraction, extrusion or a combination of these processes.

Validation:confirmation through objective evidence that the requirements for the specific intended use or application have been met, in the case of food safety obtain evidence that a control measure is able to effectively control the significant hazard (it is applied before the activity and provides information on the ability to deliver the expected results)

Risk assessment:the identification, assessment and estimation of the risk levels of a process aimed at determining an adequate control process.

Verify:confirmation through objective evidence of the fulfillment of specific requirements (it is applied after an activity and provides information for confirming compliance)

5 DOCUMENTATION

An integral part of the Food Safety Management System is the documentary apparatus that constitutes the Integrated Company Management System verified and compliant with the requirements of the UNI EN ISO 9001, UNI ISO 45001, ISO 14001, SA 8000 standards and internal documentation:

Management Manual of Quality (MGQ) Integrated	It describes the company Quality System and constitutes the basic reference for the quality management of the company, it is a controlled and confidential document made known internally to all the Corporate Bodies and externally to the certification bodies and to selected customers or suppliers.
Quality Assurance Procedures (PAQ)	The procedures provide, through general guidelines, the executive methods of the activities that affect quality. They are controlled and confidential documents distributed to corporate bodies. Quality Assurance Procedure n ° (XX represents the section n ° of the reference standard and 00 represents the progressive number).
Operating Instructions (IOP)	The operating instructions provide how to perform specific various activities that affect quality. They are controlled and confidential documents distributed to corporate bodies. • Operating Instruction n ° (XX represents the progressive number) • Cleaning Operating Instruction n ° (XX represents the progressive number).
Datasheet Product (STP)	They are documents that summarize the characteristics of the products from the qualitative point of view (ingredients, physico-chemical, rheological and nutritional parameters) and safety (microbiological parameters, allergens, contaminants).
Laboratory Manual (MANLAB)	The Laboratory Manual is an operational instruction for the QC Laboratory that describes in detail: the methods to be used in the laboratory analyzes, the hygiene and behavioral rules that the laboratory analysts must comply with and the registration documentation to be prepared.

Forms (Form)	The forms of the Quality System constitute the support for making quality records, analyzes, final balances, etc. They are controlled and confidential documents distributed to corporate bodies.
Production and Control Plan (PPC)	Documents drawn up on a specific form, which report in sequential order the production and control phases that the product goes through, indicating the characteristics to be checked, the reference documents, the machines / equipment used, the entities of the samples, the responsibilities for the execution of the various phases and the certification documentation to be drawn up.
Company Manual of HACCP self-control	It describes the application of the self-control system and good hygiene practice within the company.
Manual of Traceability Corporate	It describes the application of the company's traceability system with reference to the processes and products sold with reference to the application of the regulations in force.
Evaluation manual occupational safety risks (DVR)	It describes the assessment of business risks with reference to the analysis of the same relating to safety in the workplace, of the methods and improvement plans relating to the safety of operators.
Mansionary	Company Mansion Book that contains all the employee files updated based on the job and training carried out.

The management of the documentation and the related activities necessary for its issuance, management, review, distribution and archiving are defined in PAQ 05.01, while all the descriptive documents in force are included in the Descriptive Documents List (EDD); the list of registration documents in force together with the minimum retention times of documents are reported in the IOP.01 Archiving matrix of quality registration documents (all required registrations are kept for a minimum period, as required by the relevant legislation) . Documents related to sanitary management (risk analysis, HACCP plan, work programs, control programs, technical data sheets, applicable legislation, registrations, etc ...) are managed ensuring their updating, availability,

A list is available for all the documentation relating to the laws applicable to the sector (community and national regulations) (Annex 02 Legislative and regulatory list).
The legislative updating of the sector is first of all guaranteed by the trade association (Italmopa) through circulars; in addition, there is also reserved access to databases, consultation of periodicals in the milling sector (Molini d'Italia, Tecnica Molitoria, Food Ingredients), websites of national and international associations, authorities and institutions (including the Ministry of Health, EFSA, FDA, USDA), certification bodies and journals dealing with issues related to food safety and public health (Il Fatto Alimentare).

The updating of all documents is the responsibility of the Quality Assurance area.

SECTION II

1. COMMITMENT OF THE MANAGEMENT

1.1 Management commitment and continuous improvement

The commitment of the top management in the implementation of the requirements for food safety and of the processes that lead the company to constant improvement represents a**fundamental requirement**for the BRC standard. The Management of Molino Dallagiovanna has drawn up its own Quality and Safety Policy aimed at the commitment to the production of safe food and compliant with customer protocols, communicating it to all employees and posting it on the company bulletin board to be always viewable.
The Management has defined a three-year plan for the development and constant improvement of the culture of quality and food safety integrated into the annual training program.
The annual management review report contains confirmation of the meetings aimed at reviewing the management policy.
Within the PAQ 16.01 procedure, the procedures for reporting, in confidential form, by the staff, of any violations of the safety, integrity, quality and legislative compliance of the products were described.

1.2 Organizational structure, responsibility and authority

Molino Dallagiovanna GRVSrl, in order to better clarify the corporate roles, has defined an organization chart (Annex 1 of the Quality Management Manual) relating to all activities and job descriptions. The organization chart is posted on the company bulletin board.

2. HACCP FOOD SAFETY PLAN

2.1 HACCP Food Safety Team

In order to carry out a HACCP study consistent with the risks that may arise during the production activity, it is necessary to have recourse to people with specific skills.
The company, with reference to the skills acquired through experience in its sector and with reference to the requirements defined in the job description for the various figures and the training received, defined the HACCP group, also indicating an external consultant who participated in the first document review.

Taking into consideration the intrinsic characteristics of the products being analyzed, as well as the peculiarities of the processes necessary for their realization, the following minimum skills of the HACCP group have been identified: technology, knowledge of raw materials, management system, packaging techniques and packaging, notions of microbiology, hygiene, maintenance, good operation.

Technology-It is necessary to have in the Team a component with in-depth knowledge of technological processes in order to be able to outline and define the critical points that must necessarily be governed to ensure the correct production trend.

Knowledge of raw materials (MP)-The Group certainly needs a member who has an in-depth knowledge of the raw materials involved and the critical aspects connected to them (microbiological and chemical contamination).

System-An element of fundamental importance for the Group is the knowledge of the HACCP methodology and the principles underlying it.

Knowledge of Packaging (MC)-Another important aspect of a food product is certainly the packaging, therefore it is necessary for a member of this team to know the packaging materials, the intrinsic characteristics and the critical elements (contamination / transfer), in order to guarantee the product stability along the way. commercial life span.

Microbiology-The microbiological aspects are of fundamental importance for the*food safety*, therefore, it is necessary for a member to bring his own microbiology skills to the Group and be able to intersect them with those previously reported, in order to provide adequate support for identifying the critical issues deriving from the raw materials and processes implemented.

Hygiene-The HACCP Team, in order to conduct a correct risk assessment, must consider the basic concepts and notions of hygiene and cleaning, which are reflected in the management of personnel and the areas frequented daily, i.e. the productive and recreational areas. The Team in its entirety must therefore be able to define the correct behaviors to be maintained before, during and after production, must define the correct location of the spaces, the methods of cleaning and maintaining order, always setting the safety of the product, of the operators and consumer protection.

Maintenance-A team member must have in-depth knowledge of the management and maintenance of the machines involved in production.

Operational capacity-To complete their skills, the Team must also have representatives with good practical knowledge and experience in the management of strictly operational activities involved in the manufacturing processes of the products.

Name	Operating	Maintenance	Hygiene	Microbiology	Knowledge PACKAGING	Knowledge MP	Technology	System	Result
Maria Grazia De Pascali	B.	S.	And	And	S.	B.	B.	B.	LEADER TEAM
Dallagiovanna Sergio	NA	S.	S.	NA	S.	S.	S.	S.	COMPONENT TEAM
Dallagiovanna Pierluigi	And	B.	S.	NA	And	And	B.	S.	COMPONENT TEAM
Dallagiovanna Stefania	B.	NA	S.	S.	B.	B.	S.	S.	COMPONENT TEAM
Oppizzi Davide	And	S.	S.	S.	S.	S.	S.	S.	SUPPORT TEAM
Dallagiovanna Renza	B.	NA	S.	B.	S.	S.	S.	S.	SUPPORT TEAM
Intropido Elena	B.	NA	NA	NA	NA	NA	NA	S.	SUPPORT TEAM
Donatella Fraioli	*B.*	*NA*	*And*	*And*	*S.*	*B.*	*B.*	*B.*	*SUPPORT TEAM*
Laura Gazzola	*B.*	*NA*	*And*	*And*	*S.*	*B.*	*B.*	*B.*	*SUPPORT TEAM*

NA: not applicable
S: enough
B: good
E: high

Following the analysis of the minimum skills of the HACCP group and the profiles present in the company, the following figures were included in the HACCP team:

Maria Grazia De Pascali	RAQ - Team Leader, PCQI
Dallagiovanna Sergio	Management
Dallagiovanna Pierluigi	Administrator
Dallagiovanna Stefania	Head of QC Laboratory and Production
Donatella Fraioli	Add. AQ
Laura Gazzola	*Add. AQ*

The following names are added as supports to the HACCP team for specific needs:

Oppizzi Davide	Packaging Manager Logistics Manager,
Dallagiovanna Renza	Drivers, Biological Administration
Intropido Elena	

2.2 Reference documents

ACTIVITY'	REFERENCE DOCUMENTS
1 - Human resources management	Hiring of IOP Employees 10 IOP Company Regulations 5
2 - Management of suppliers	PAQ procurement 06.01
3 - IT system	Zucchetti RAM Electronics Management 2 production software
4 - Production management	Tests and checks on acceptance PAQ 10.01 Process Control PAQ 09.01 Tests and controls in Production and final PAQ 10.02 Production Managers: Grinders IOP 04 PPC Production and control plan IOP 13 CCP and CP verification. IOP 14 Rework management
5 - Management of equipment and equipment	PAQ Hygienic Quality Assurance 09.02 Production Managers: Grinders IOP 04
6 - Management of measuring instruments	Control of equipment for testing, measurement and testing PAQ 11.01
7 - Lay-out of structures and equipment	Floor plans
8 - Management of the fight against pests	PAQ Hygienic Quality Assurance 09.02
9 - Management of environmental hygiene	Hygienic Quality Assurance PAQ 09.02 From IOP PU 02 to IOP PU 37 PAQ 25 environmental monitoring
10 - Air and water management	Hygienic Quality Assurance PAQ 09.02 PAQ 09.04 control of water potability
11 - Management of waste disposal	Hygienic Quality Assurance PAQ 09.02 IOP PU 22 IOP 11 Purifier management IOP 12 Waste management
12 - Warehouse and transport management	PAQ 15.01 Storage, handling, packaging, conservation and delivery. IOP warehouse management 02

2.3 Product description

The *core business* company is represented by the production and packaging of flours obtained from common wheat (*Triticum aestivum* L.). The "soft wheat flour" is defined by the DPR 09/02/2001 n. 187 which regulates the production and marketing of flours and pasta such as the "*product obtained from the grinding and subsequent sifting of soft wheat freed from foreign substances and impurities* ", while the "whole wheat flour" the "*product obtained directly from the grinding of soft wheat freed from foreign substances and impurities* ". This Decree therefore reports the main characteristics of the flours intended for trade for bread making, pasta making or other food uses:

Type and denomination	Maximum humidity%	Out of a hundred parts of dry matter		
		Ashes		Protein min. (nitrogen x 5.70)
		Minimum	Maximum	
Soft wheat flour type 00	14.50	-	0.55	9.00
Type 0 soft wheat flour	14.50	-	0.65	11.00
Type 1 soft wheat flour	14.50	-	0.80	12.00
Type 2 soft wheat flour	14.50	-	0.95	12.00
Wholemeal soft wheat flour	14.50	1.30	1.70	12.00

The finished flours produced by the Company are obtained directly from the grinding of wheat and consist of mixtures of pure ground wheat flours and dosed in percentages defined according to the recipes, the customer requests about the baked product to be made and the needs commercial. The water activity (aw) is approximately 0.8. The details of the characteristics of the products are shown in the technical sheets Annex 3 PAQ 03.01.

The lists below show the **product categories of the Company**.

Products intended for human consumption deriving from the milling of wheat, for professional use or addressed to the final consumer :

➢ soft wheat flour types 00, 0, 1, 2 and wholemeal (Molino Dallagiovanna brand lines Far Pane, Far Dolci, Far Pasta, Far Pizza, Farina, Molini San Giorgio brand, customized on customer request);

➢ soft wheat flour type 00 in the form of granular flour (Granito - Far Pasta line);

➢ by-products: bran, bran, tritello, farinaccio, wheat germ;

➢ flour and by-products from organic farming (Far Bio line);

➢ broken grain or whole grain after washing;

➢ products deriving from the mixture of the above components (Uniqua White, Yellow, Blue and Red);

➢ Uniqua Verde flour deriving from the grinding and consequent sifting of the cereal *Tritordeum*-, hybrid of durum wheat (*Triticum turgidum* subsp. *durum* L.) and a variety of wild barley (*Hordeum chilense*).

Blends of ingredients produced by the Company or purchased from third parties, intended for human consumption, for professional use or addressed to the final consumer :

- ➢ mixtures consisting solely of ingredients deriving from wheat (Nobilgrano "0" line for Pizza - Soft wheat flours with the addition of cold stabilized wheat germ flour);
- ➢ blends / semi-finished products for bakery, pizzeria and pastry making made up of different ingredients deriving from different raw materials (standard or customized Oltregrano line, Nobilgrano "1");
- ➢ flour with added vitamins with characteristics different from those dictated by national legislation intended for the extra-EC market (in the specific case of the production of flours with characteristics different from national legislation or which diverge from these standards, therefore the mandatory legislation is that of the country of destination or specification of the relative production and without prejudice to all authorizations to produce duly obtained, the company has defined a specific IOP);
- ➢ mixes for bread and pizza based on natural yeast of wheat and dried rye and instant dry yeast.

Products marketed for human consumption, for professional use or addressed to the final consumer :

- ➢ Durum wheat semolina, re-milled durum wheat semolina, whole durum wheat semolina under the Molino Dallagiovanna brand;
- ➢ Molino Dallagiovanna brand gluten-free and gluten-free and lactose-free blends;
- ➢ flour or flakes of cereals and pseudocereals, seeds (corn, spelled, barley, soy, rye, rice, sesame, amaranth, flax, quinoa, teff ...) with the manufacturer's brand;
- ➢ Molino Dallagiovanna brand malted wheat flour;
- ➢ Molino Dallagiovanna brand instant dry yeast for bread making.

Products intended for animal husbandry :

- or downgraded flours;
- or farinaccio, bran, bran, tritello and germ.

Origin of raw materials :

- or The wheat used for the production of flours can have the following origins: Italian, EU, EXTRA EU; for special requests received from customers, specific origins can be agreed.
- or The origin of the other ingredients is specified in the technical data sheets or in specific declarations of the suppliers.

Formats used :packs of 500 g, 1, 5, 10, 25 kg, big bags, bulk goods (tank trucks) based on the type of product.

Packaging :multilayer paper bags with valve (also ultrasonic sealable) or open mouth, polypropylene big bags, PE / PET bags.*In the future use of Nylon / PE (modified atmosphere with N_2).*

Reference markets :artisan bakery and pastry workshops, delicatessens, large-scale distribution, food industry, food service. The company also produces under private label (*private label*).

Services :

- ➢ occasional administration activities during fairs and events;
- ➢ demonstrations and courses at the company bakery laboratory and at third parties;
- ➢ consultancy relating to the White Art;
- ➢ cereal storage activities for third parties.

Note**:**for the services specific HACCP plans are defined according to the needs together with separate instructions in the form of appendices, since they are partly independent from the main activity, but are in application of mandatory laws.

2.4 Identification of intended use

The**soft wheat flours**, i**related by-products**he**durum wheat flours**(also organic, all for food use) are intended for all categories of consumers, except infants, children,
to individuals suffering from*gluten sensitivity*, celiac disease or soy intolerance (*Glycine max*L.), mustard e lupins (as cross contamination).
The**blends**obtained from flour and seeds of different cereals and legumes (semi-finished products for professional use) are also intended for all categories of consumers, except infants, children and those individuals who have various reactions to the following products that cause allergies or intolerances (as reported by Reg. (EC) n. 1169/2011):

- Cereals containing gluten, i.e .: wheat, rye, barley, oats, spelled, kamut or their hybridized strains and derived products.
- Soy and soy products (as cross contamination and / or ingredient).
- Milk and milk-based products, including lactose (as cross contamination and / or ingredient).
- Sesame seeds and sesame seed products (as cross contamination and / or ingredient).
- Nuts and derived products (such as cross contamination).
- Mustard and mustard-based products (such as cross contaminations).
- Lupins and lupine-based products (such as cross contaminations).

Relating to the**USA-FDA legislation**the allergens evaluated in the mixtures obtained from flours and seeds of different cereals and legumes are:

- Cereals containing gluten, i.e .: wheat, rye, barley, oats, spelled spelled, kamut or their hybridized strains and derivatives.
- Soy and soy products (as cross contamination and / or ingredient).
- Milk and dairy products, including lactose (as cross contamination and / or ingredient).
- Nuts (almonds, hazelnuts, walnuts, cashew nuts, pecans, Brazil nuts, pistachios, macadamia nuts, coconuts, pine nuts, chestnuts) and derivatives (such as cross contamination).

The**gluten-free blends**along with those**gluten and lactose free**they are indicated for those who demonstrate*gluten sensitivity*or celiac disease and at the same time intolerance to milk, in particular to the lactose disaccharide.

2.5 Shelf life evaluation

The HACCP Team assessed the shelf life of the products through a shelf life study. This study is explained in detail and is attached to this Manual (Annex 5).

The shelf life attributed to the products is summarized below.

SHELF LIFE PRODUCTS FOR FOOD USE								
RAW MATERIAL	PRODUCT	SACK 25 kg	SACK 10 kg	SACK 5 kg	SACK 1 kg	SACK 0.5 kg	BIG BAG	LOOSE
COMMON WHEAT CONVENTIONAL	FLOUR TYPE "00" AND "0" (ALL REFERENCES)	12 months	12 months	12 months	12 months	12 months	12 months	12 months
	FLOUR TYPE "00" GRANITE	12 months	12 months	12 months	12 months	12 months	12 months	12 months
	LE RUSTICHE (FLOUR TYPE "1" and TYPE "2")	8 months	8 months	8 months	8 months	8 months	8 months	8 months
	UNIQUA WHITE, YELLOW and BLUE (TYPE "1")	8 months	8 months	8 months	8 months	8 months	8 months	8 months
	NOBILGRANO TYPE "1" ENR (SOFT WHEAT FLOUR WITH ADDED WHEAT GERM AND DRIED WHEAT ACID PASTE)	8 months	8 months	8 months	8 months	8 months	8 months	8 months
	WHOLEMEAL FLOUR N	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	WHOLEMEAL FLOUR R	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	WHOLEMEAL FLOUR S	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	UNIQUA RED (INTEGRAL)	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	NOBILGRANO TYPE "0" ENR (SOFT WHEAT FLOUR WITH ADDED WHEAT GERM)	12 months	12 months	12 months	12 months	12 months	12 months	12 months
	BRAN	6 months	6 months	6 months	6 months	6 months	3 months	3 months
	BRUSCH	6 months	6 months	6 months	6 months	6 months	3 months	3 months
	GERM	4 months	4 months	4 months	4 months	4 months	4 months	4 months
COMMON WHEAT BIOLOGICAL	FLOUR TYPE "0" ORGANIC	12 months	12 months	12 months	12 months	12 months	12 months	12 months
	ORGANIC WHOLEMEAL FLOUR	6 months	6 months	6 months	6 months	6 months	3 months	3 months
	ORGANIC BRAN	6 months	6 months	6 months	6 months	6 months	3 months	3 months
	ORGANIC BRUSH	6 months	6 months	6 months	6 months	6 months	6 months	6 months
DURUM WHEAT CONVENTIONAL	DURUM WHEAT FLOUR	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	REMILLED DURUM WHEAT SEMOLINA	6 months	6 months	6 months	6 months	6 months	6 months	6 months
	REMILLED DURUM WHEAT SEMOLINA AND SEMOLINA (Treated with Phosphine)	12 months	12 months	12 months	12 months	12 months	12 months	12 months
TRITORDEUM	UNIQUA VERDE (TRITORDEUM FLOUR)	8 months	8 months	8 months	8 months	8 months	8 months	8 months
WHEAT SOFT / HARD + OTHER CEREALS	OLTREGRANO (ALL REFERENCES)	8 months	8 months	8 months	8 months	8 months	8 months	8 months
NATURAL YEAST	*MIXTURES BASED ON DRIED NATURAL YEAST AND / OR INSTANT DRY YEAST*	*9 months*	/	/	*9 months*	/	/	/
MIX WITHOUT GLUTEN	CRÊPES, PANCAKES, WAFFLES	/	/	/	9 months	/	/	/
	ALL OTHER REFERENCES	12 months	/	/	12 months	/	/	/
SHELF LIFE PRODUCTS FOR FEEDING USE *								
COMMON WHEAT CONVENTIONAL	BRAN	6 months	/	/	/	/	3 months	3 months
	FARINACCIO	6 months	/	/	/	/	3 months	3 months
	GERM	4 months	/	/	/	/	2 months	2 months
COMMON WHEAT BIOLOGICAL	ORGANIC BRAN	6 months	/	/	/	/	3 months	3 months
	ORGANIC BRUSH	6 months	/	/	/	/	3 months	3 months

*** Simple feed:**Italian legislation allows a biological impurity of 5% on the product, this allows to insert waste from grain cleaning (vetches, straw, seeds of other nature) into the by-products for feed use.
The flour must be stored in a cool, dry and ventilated place at a temperature below 25 ° C.

2.6 Description of processes

The purpose of the production process is to create products capable of satisfying the needs and requests of the Customers.

The company implements the production and distribution activities in such a way as to:

- ensure that the Client's needs and contractual requirements are met and that the activities to be carried out are appropriately defined and documented;
- design packaging that meets the required requirements;
- produce in compliance with the established requirements (customer requirements, company standards and mandatory requirements);
- guarantee the efficiency in the use of resources.

Processed products can be grouped into two categories:

- products for food use deriving from the grinding of soft wheat (soft wheat flours and derivatives and relative by-products) and mixtures of cereal, pseudocereal and seed flours;
- products for feed use (bran, tritello, bran, farinaccio) which represent the by-products of soft wheat processing.

Production planning is carried out by the Production Manager who, on the basis of orders and stocks, organizes the production in coordination with the Chief Miller. The main document generated during the production planning phase is the “daily program”, in which the production manager indicates the product description and priorities, for products that are under stock. Not having to follow a pre-established and always valid daily sequence, any urgent orders can be entered during the course of the day.

The production philosophy consists in grinding single varieties or families of varieties of grains classified and stored according to their intrinsic characteristics. This allows to grind homogeneously, with a better yield and without damaging the structure of the product. Through the grinding by variety, basic mixtures are obtained which constitute the finished products in percentage.

The company has three grinding lines inside:

- **Molino A**-Production line Bühler (year 2001)
- **Molino C**-Production line Bühler (year 2018)

The mixing plants are as follows:

- **two 2000 kg mixers**(**MIXER 1 and MIXER 3**) for the production of type “00” and “0” soft wheat flours and blends;
- **a mixer of 1000 kg**(**MIXER 2**) for the production of wholemeal flours, type "2" and "1" of soft wheat and blends;
- **a mixer of 1000 kg**(**MIXER 4**) for the production of semi-finished products and special blends (eg “Oltregrano” line).

By means of a software that controls all the operations carried out at the plant level, it is possible to prepare individual recipes that are always kept constant from the point of view of the chemical-physical and rheological characteristics, which constitute the finished product and which are composed according to the customer's needs and type. of baked product to be made. Flours can be produced by mixing at least 500 kg of components.

Below is a detailed explanation of the machining.

2.7 Process Flow Diagrams

1)Soft wheat flour types 00 and 0 in 10 and 25 kg formats and related by-products (bran, small bran, tritello, germ), 25 kg Tritordeum flour, for food use.

2)Soft wheat flours type 00 and 0 in bulk and relative by-products (bran, small bran, tritello, germ) for food use.

3)Nobilgrano Line - Type 0 soft wheat flours with wheat germ flour in 10 and 25 kg formats for food use.

4)Soft wheat flours type 00 and 0 with the addition of vitamins for food use not intended for the national market in the 25 kg format.

5)Oltregrano blends for pizzeria, bakery and pastry in 5, 10 and 25 kg formats for food use (containing allergens other than gluten, completely segregated line).

6)Soft wheat flour types 00, 0, 1, 2 and wholemeal, durum wheat semolina, re-milled durum wheat semolina, malted wheat flour, in sizes of 5 and 10 kg.

7) A-Type 1 soft wheat flours for food use in the 25 kg format.

B-Type 2 and whole wheat flours for food use in the 25 kg format.

8)Soft wheat flours type 00 in the format of 500 g and 1 kg for food use.

9)Soft wheat flour types 00 and 0 for food use packed in big bags (1000 kg).

10)Gluten-free blends in 1 and 25 kg formats (*traded goods for BRC and outsourcing for IFS*)

11)Semolina, cereal and seed flours, instant yeast, in various formats (*traded goods for BRC and outsourcing for IFS*)

12)Soft wheat flour and semolina and 1 kg and 5 kg tritordeum for food use packaged on the bagging line 5.

These diagrams are represented in Annex 1 of this Manual and also include the production for feed use. They are verified with field tests at least once a year and in any case whenever changes are introduced to the production plant.

The following are described**main phases and generally common to all processes**to better understand the flow diagrams.

Supply and transport of raw materials

The grain coming from the fields or from the storage depots is delivered to the mill by means of canvas trucks or containers. Written contracts are stipulated for grain withdrawals from local suppliers both during the campaign and during the year, in which the supplier assumes responsibility for producing, storing and transporting the grain in the correct hygienic state according to the conditions set by the Supply Specifications. Corporate. On the other hand, as regards the withdrawals of wheat from suppliers who deliver throughout the year (especially foreign), multiple delivery contracts are stipulated and the suppliers themselves are required to have documentation regarding the hygienic-sanitary conditions of the product (cereal passport) and of the medium.

Receipt and unloading of the raw material

When the trucks arrive, the loads are weighed and all documentation is checked. The operator takes a representative sample of the load for the measurement of the humidity and specific weight of the grain and for its organoleptic evaluation. If the goods do not comply with the established parameters, they are rejected. If the load is compliant, however, it is unloaded into one of the two unloading pits equipped with grids with 1 cm x 2 cm holes that prevent the entry of unwanted coarse material.

Pre-cleaning and storage of the raw material

The grain poured into the unloading pit is transported to an air separator, where there is a first separation from foreign bodies (stones, straw, seeds, ...). Subsequently it is stored according to the variety in storage silos for a maximum period of 15 months. The pre-cleaning operation therefore allows to improve the storage conditions, eliminating the lighter impurities with the air and the heavier ones through separator screens with different meshes. In the terminal part of the separator grid there is a magnet that collects the ferrous bodies. The Molino Dallagiovanna storage consists of 29 silos (5 in iron and 24 in concrete).

Mixing and storage of the raw material

The stored grain is removed by opening the shutters, mixed and conveyed again to the separator to be stored in storage silos for a maximum period of 1 month. Molino Dallagiovanna has 6 silos for the storage of mixed grain and if necessary it can use others for use.

Cleaning

In this phase, the cleaning of the grain is completed with the removal of all possible foreign materials. The grain is recalled from the mixed grain storage silos and sent to a separator. Subsequently it passes in a vat, which separates the seeds, and in brushes, to eliminate the dust. The cleaning plant 2018it does not include the next stage of washing and consists of the following machines located on the various floors (from the 4th floor to the ground floor): magnet, MTVA VEGA cleaner, MTSC disconnector-vibrator-destoner, brush, tarara, SORTEX classifier.

Washing and conditioning

The grain from the cleaning arrives in the washing machine through a bucket elevator, falling into a tank of drinking water where there is an auger that transports the grain to a centrifuge, where the outermost parts of the grains are eliminated. The washed grain is transferred to dedicated storage cells (16), where it remains there for 8-72 hours to allow a homogeneous distribution of humidity (8-16 for soft grains, 12-24 for

medium grains, 24-72 for hard grains). The conditioning facilitates the separation of the cortical part from the endosperm and allows the constant and controlled maintenance of humidity during the grinding process. The duration of the storage in the silos for conditioning depends on the characteristics of the grain itself (hardness).
The 2018 cleaning plant does not have a dedicated grain washer, but rather an intensive auger or grain tank (spiral) which loads 8 1st resting silos. Subsequently, after the silos of the 1st bathroom there is another intensive auger(paddle) in which more water is added to increase the humidity of the grain; this auger then loads 4 2nd resting silos.

Second wetting
After the centrifuge passage downstream of the grain washer, if the grain is not sufficiently wet it undergoes a second wetting through the passage in an auger which has nozzles that ensure that the appropriate percentage of humidity is reached; the grain, therefore, is again led to conditioning.

Grinding
The essential purpose of this operation is to open the grain and detach as much as possible the endosperm from the separated cortical part in the form of large and flat scales. After conditioning the grain falls into a dispenser, after which it passes into a brush, which eliminates the dust through the suction of the tarara. Then it is led to the rolling mill B1, with grooved rolls, where the first break occurs. The set of fragments obtained from the first break go to the next Plansichter: the material essentially consisting of cortical parts with still adherent endosperm that does not pass the sieve is sent to the second break (B2), which still detaches the endosperm and provides a mixture of products similar to those of the first break. Continuing in the type C rolling mills we have the re-grinding, that is the reduction in flour of the granular fraction (with smooth cylinders). The endosperm is gradually transformed into flour. During the grinding, the flour obtained is conveyed to a silos where it is mixed to make it homogeneous. *Molino C consists of 18 rolling mills in total and is equipped with 11 disintegrators placed at the exit of the rolling mills.*

Mixing of flours
Once the grinding operation is complete, the flour contained in the grinding silos is discharged into the storage flours for a maximum period of 10 days. Molino Dallagiovanna is able to produce more than 400 different blends (standard and customized), to meet the needs of customers. The mixing consists of weighing the flour out of the farini bowls and sending it to the mixers, where it is turned from 2 to 7 minutes. Once the mixing has been completed, it can be sent to the storage cells for bulk flour located in the production area or to the packaging cells located in the shed.

Transport in tank wagons and packaging
The blended flours are stored in the storage cells for a maximum of 10 days. The tank trucks are filled by taking the flour from the dedicated silos.
The bulk load is divided into 6 different lines on the basis of dedicated silos.
As far as packaging is concerned, Molino Dallagiovanna currently has the following lines:

- **BAGGING 1**-located inside the milling plant for the packaging of wholemeal flours only, type "2" and "1".
- **MANUAL BAGGING**-located inside the milling plant but completely separate from it, for the packaging of mixtures containing allergens (soy, milk and sesame-Oltregrano) and yeasts in the sizes of 5, 10 and 25 kg.
- **BAGGING 2**-located inside the shed for the packaging of only soft wheat flours type "00" and "0" in 10 and 25 kg bags and with vitamins in 25 kg bags.
- **BAGGING 3**-located inside the shed for the packaging of flours in sizes from 10, *15*and 25 kg, including those fortified with vitamins and minerals.
- **BAGGING 4**-located inside the shed for the packaging of flours in 5 and 10 kg formats.
- **BAGGING 5**-located inside the shed for the packaging of flours in 1 and 5 kg formats.

Storage and transport of packaged product

After packaging, the bags are placed on pallets configured with 4 or 5 bags per layer, EPAL, EURO or in plastic according to customer requests and stored in the finished products warehouse, the 1 kg packages are bundled and placed on pallets. The pallets are checked before their use by the employees and in case of unsuitability (dirt, broken parts, protruding nails ...) they are discarded and eliminated.

The bags / packages placed on the pallets are then loaded onto tarpaulin trucks owned by the company or by third parties. The handling is done manually and by forklifts. At the time of loading, the employees check the state of the box, whether it is suitable for the transport of food and whether it is in a correct hygienic-sanitary state. In case of anomalies, they contact the offices immediately. Even in the event of incorrect loading, any problems are communicated immediately and a release is defined with the carrier.

2.8 Identification of areas and risk assessment

The BRC Standard identifies different risk zones within processing and storage facilities, with corresponding levels of hygiene and separation to reduce the potential for product contamination. Following the decision diagram (BRC Edition 8, Appendix 2, figure 7 on page 101) were identified and classified the production areas on the basis of the identified risk.

AREA AND PHASES INVOLVED	RISK LISTING	EXPLANATORY STATEMENT
✓ Grain unloading ✓ Grain storage iron silos	Low-risk area (Phase 3 of the diagram)	The unloading hole is in a suitably covered area, the silos are completely closed.
✓ Grain unloading ✓ Cement silos grain storage ✓ Pre-cleaning	Low-risk area (Phase 3 of the diagram)	The unloading hole and the pre-cleaning are located in a suitably covered area, the silos are completely closed.
✓ Reception and acceptance of other raw materials / ingredients	Area intended for the treatment of closed products (Phase 2 of diagram)	The products are stored immediately after unloading.
✓ Mixing and storage of mixed grain	Low-risk area (Phase 3 of the diagram)	The silos are completely closed and the mixing line is automatic.

✓ First cleaning ✓ *Bagnagrano* ✓ Washing (Lavagrano) ✓ Conditioning in silos ✓ Second wetting ✓ Second cleaning	Low-risk area (Phase 3 of the diagram)	These phases are carried out in a closed plant. Washing and wetting are performed for conditioning purposes to soften the beans; unsuitable water could lead to microbiological contamination, but the external affected part (bran) is removed.
✓ Grinding mill A &*C.*	Low-risk area (Phase 3 of the diagram)	The grinding phase takes place in a completely closed system.
✓ Rework	Low-risk area (Phase 4 of the diagram)	The rework phase takes place in a completely closed plant.
✓ Floured flour storage	Low-risk area (Phase 4 of the diagram)	Storage is in completely closed silos.
✓ Preparation of ingredients	Area intended for the treatment of closed products (Phase 2 of diagram)	The ingredient preparation phase is carried out just before mixing and takes place quickly.
✓ Addition of ingredients (MIXER 1, 2 and 4 and hopper in the shed area)	Low-risk area (Phase 4 of the diagram)	The phase of adding ingredients is partly closed and partly manual and the latter takes place paying attention in a very short time.
✓ Mixing flour / flour and by-products (MIXER 1 and 3, MIXER 2)	Area intended for the treatment of closed products (Phase 2 of diagram)	The mixing phase takes place in a completely closed system.
✓ Product transfer ✓ Flour storage cells	Area intended for the treatment of closed products (Phase 2 of diagram)	The transfer takes place through closed pipes and the storage is in completely closed silos.
✓ Mill area packaging (BAG 1)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged automatically.
✓ Packaging of mixtures with allergens (MANUAL BAG)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged manually.
✓ Packaging in the shed area (BAG 2)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged automatically.
✓ Packaging in the shed area (BAG 4)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged manually.
✓ Packaging in the shed area (BAG 3)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged automatically.
✓ Packaging in the shed area (BAG 5)	Area intended for the treatment of closed products (Phase 2 of diagram)	The product flows into the closed system and is packaged automatically.
✓ Packaging storage	Area intended for the treatment of closed products (Phase 2 of diagram)	The packages placed on pallets during storage are protected by a plastic cap to avoid dust deposits and pests.
✓ Finished product storage	Area intended for the treatment of closed products (Phase 2 of diagram)	The closed sacks / big bags are placed on pallets or in the traditional warehouse or in the automated warehouse.
✓ Vehicle loading for bulk products	Low-risk area (Phase 3 of the diagram)	The product is loaded through inspected and cleaned loading ports.
✓ Vehicle loading for packaged products	Area intended for the treatment of closed products (Phase 2 of diagram)	The products placed on pallets and protected with plastic film and possibly cardboard on request and are loaded onto the vehicles to be delivered.

2.9 Prerequisite Programs (PRPs)*o PREVENTIVE CONTROLS*

The organization, which operates according to a Quality Management System certified according to the UNI EN ISO 9001 and 22000 standards, has prepared GOOD OPERATING PRACTICES (Procedures, Operating Instructions, Regulations) at every stage of its activity, essential and essential requirements to guarantee the technological and sanitary requirements of its products.
Furthermore, the HACCP Food Safety Plan is a fundamental requirement for the BRC and IFS Standards, which require the site to create an environment suitable for the production of safe food.
The Company has always implemented practices aimed at maintaining a high level of hygiene and health in the production departments, to guarantee the Customer the highest quality and safety of the products requested by him.
This manual lists the prerequisite programs (PRP) or*PREVENTIVE CONTROLS*regarding:

- or Construction and planning of buildings and associated services including workspaces and facilities for employees
- or hygiene of premises and facilities;
- or fight against pests;
- or maintenance of plants and buildings;
- or personal hygiene;
- or staff training; production
- or hygiene; transport
- or hygiene;
- or procurement of utilities such as gas, energy and water;
- or management of complaints and non-compliant products;
- or traceability of production and recall / withdrawal of products;
- or allergen control;
- or waste disposal including waste water from the purification plant; supplier
- or insurance and approval.
- or warehouse management
- or (storage) rework
- or cross contamination
- or consumer information
- or measures identified to manage the risks deriving from food fraud and food defense

2.10 Hazard identification and analysis

The HACCP Team has analyzed in detail all the phases to identify the potential hazards in relation to products, processes and plants, as required by the first principle of the HACCP methodology.

The following hazard classes can mainly be distinguished:

- **Biological Hazards** : they are due to the presence of animal organisms and unwanted microorganisms that may be present in the incoming raw materials or that could contaminate the product during the production process.

- **Chemical Dangers** : are undesirable substances that could make the product unfit for consumption. They can be present in incoming raw materials or they can result from product contamination during the production process (*carry-over*And*cross-contamination*).
- **Physical Dangers** : they are represented by foreign bodies of various kinds that can be found in the incoming materials or come into contact with the product during the production process.
- **Food fraud dangers** : fraudulent and intentional replacement, dilution or correction of a product or raw material to obtain an economic advantage
- **Food defense dangers** : malicious contamination of the product

The**types of danger**that can be found in the entire production process are listed in the table below.

The sources used are different, but the Manual of correct hygiene practice can be remembered **by the trade association (ITALMOPA),**the***Bad Bug Book - Foodborne Pathogenic Microorganisms and Natural Toxins*****(FDA, USA) and EFSA**, guidelines for risk analysis in the field of food microbiology published by Ce.I.RSA (Interdepartmental Center for Research and Documentation on Food Safety)

B -Biological	Hazard description	acceptable level	Reference / Source
Bacterial load total mesophilic	General indicator of hygiene, indicates the presence of mesophilic aerobic microorganisms	<100,000 CFU / g	Ce.I.RSA
Molds	Microorganisms present in the environment. Their presence is undesirable because in addition to the alteration of the food it is associated with the production of secondary metabolites, the Mycotoxins (see chemical dangers).	1000 CFU / g maximum	Ce.I.RSA
Yeasts	Microorganisms present in the environment	1000 CFU / g maximum	Ce.I.RSA
Escherichia coli	Gram-negative, enterotoxigenic bacteria derived mainly from faeces.	10 CFU / g maximum	Ce.I.RSA
Salmonella spp.	Salmonella is a rod-shaped, non-spore-forming and Gram-negative bacterium. There is a widespread presence in animals, particularly in poultry and pigs. Environmental sources of the organism: water, soil, insects, various surfaces, animal feces, raw meat, raw seafood, to name but a few. In humans, they cause gastrointestinal upset and typhoid fever.	Absent / 25 g	Ce.I.RSA
Bacillus cereus alleged	Gram-positive, spore-forming facultative bacterium, found in a wide range of foods including meat, milk, vegetables and fish, has been associated with diarrheal-type food poisoning. Emetic outbreaks have generally been associated with rice products, but other starchy foods such as potatoes, pasta and cheese have also been implicated. Food preparations such as sauces, puddings, soups, flans, desserts and salads have often been indicted in food poisoning outbreaks.	<100 CFU / g	Ce.I.RSA
Staphylococci coagulase positive e other species	Gram-positive, ubiquitous bacteria	≤ 100 CFU / g	Ce.I.RSA
Enterobacteriaceae	Group of bacteria mostly related to the intestinal environment	≤ 1000 CFU / g	Ce.I.RSA
Arthropods	Infestations take place throughout the food chain, causing damage to products and microbial contamination. - Plodia interpunctella or Tignola fasciata (cereals, flour and cereal derivatives); - Ephestia kuehniella or Gray flour moth (wheat, bran, cereal products); - Ephestia elutella or Cocoa moth (cereals); - Lasioderma serricorne or tobacco Anobium (cereals); - Tribolium confusum (flour, semolina and derivatives, starchy products); - Cryptolestes ferrugineus (cereals); - Sythophilus granarius or Wheat weevil (kernels of wheat, barley, rice, oats, corn, pasta); - Rhyzopertha dominica (wheat and corn); - Trogoderma granariumriso, (wheat, rice, malted barley); - Trogoderma variable (cereals and seeds); - Oryzaephilus surinamensis or Silvano (dried foods, cereals, pasta); - Tenebrio molitor or Tenebrone millnaio (flours, bran); - Tribolium castaneum or Tribolio of flours (broken cereals, flours, semolina, bran and derivatives).	Absent (maximum content of n ° 50 fragments / 50 g product).	FDA

Rodents	Weeds of all commodities. Mus musculus (mouse) / Rattus rattus (rat) / Rattus norvegicus (sewer rat).	Absent / 50 g of product	FDA
Volatiles	Animals belonging to different species and carriers of harmful microorganisms.	Absent	
C -Chemist		**acceptable level**	**Legislative reference / bibliographic source**
Mycotoxins (Aflatoxins, Ochratoxin A, DON, Zearalenone)	Toxic compounds produced by different types of fungi, belonging mainly to the genera*Aspergillus*, *Penicillium*And*Fusarium*. In particular environmental conditions, when the temperature and humidity are favorable, these fungi proliferate and can produce mycotoxins. They generally enter the food chain through contaminated crops intended for food and feed production, mainly cereals. The presence of mycotoxins in food and feed can be harmful to human and animal health as it can cause various types of adverse effects, such as cancer and mutagenicity, as well as lead to estrogenic, gastrointestinal and renal disorders. Some mycotoxins are also immunosuppressive and reduce resistance to infectious diseases.	Aflatoxin B1: 2 ppb; Total aflatoxins: 4ppb; Ochratoxin A: 3 ppb; DON: 750 ppb; Zearalenone: 75 ppb.	EC Reg. 1881/2006
Heavy metals (Pb, CD)	They can lead to intoxication in human organisms due to the excessive concentration ingested.	0.20; 0.10 ppm	EC Reg. 1881/2006 and subsequent amendments, FDA (USA)
Product residues Phytosanitary	There They presence indicate mostly non-compliance with the waiting times, if not the use of products that are not allowed.	Several limits	EC Reg. 396/2005 and subsequent amendments; FDA (USA)
Products containing allergens	Any cross-contamination with these substances can lead to immune reactions in the body, even to anaphylactic shock.	Absence / Declaration in labeling	Reg UE 1169/2011; FDA (USA)
Chemical substances present in the lines processing and in the environments of production	Lubricating oils, protective paints, plant equipment, inks.	Use of food-grade products	-
Products genetically modified	GMOs are living organisms whose genetic heritage has been permanently modified by inserting genes (portions of DNA) from other organisms, in order to develop new functions in them or to produce new substances (Directive 2001/18 / EC) .	The tolerance threshold for accidental or technically unavoidable contamination must not exceed the limit of 0.9%.	Reg CE 1829/2003

Radiological (Radionuclides)	Radiological risks rarely occur in food; however, when they occur, these hazards can represent a significant risk when exposures are prolonged. Consuming food contaminated with radionuclides increases the amount of radioactivity a person is exposed to, which could have adverse health effects. These effects depend on the radionuclide and the amount of radiation a person is exposed to. For example, exposure to certain levels of radioactive iodine is associated with an increased risk of thyroid cancer. Radiological hazards can be incorporated into food through the use of water that contains radionuclides during production. The source of contaminants in drinking water is the	**USA:** Alpha particles, Beta particles and photon emitters Radio 226 and 228 Uranium 235 and Strontium 238 90 Cesium 134 and 137 Iodine 131 Cobalt 60 Plutonium 239 Americium 241 Tritium **EU:** Sum of strontium isotopes, especially Sr-90: 750 Bq / kg Sum of iodine isotopes, especially I-131: 2000 Bq / kg Sum of isotopes of plutonium and transplutonic elements that emit alpha radiation, in particular Pu-239 and Am-241: 80 Bq / kg Sum of all other nuclides whose half-life exceeds 10 days, specifically Cs-134 and Cs-137: 1250 Bq / kg	WHO (2011), FDA (USA), United States Environmental Protection Agency Reg. (EU) N. 2016/52 Reg. (EU) N. 2016/6
F -Physicist		**acceptable level**	**Legislative reference / bibliographic source**
Foreign bodies metallic	Hard or sharp foreign bodies. Foreign bodies measuring less than 7 mm rarely cause trauma or serious injury, except in risk groups such as infants, the elderly and in-patients.	7 mm	FDA (USA)
Other foreign bodies hard (wood, stones, plastic, glass ...)	Foreign bodies of various kinds originating from raw materials or from the production process.	Absent	-
Biological impurities	Hairs / hairs / insect fragments	Hair / hair: absent. Insect fragments: max 50/50 g	FDA (USA)

D - Willfulness and fraud		**acceptable level**	**Legislative reference / bibliographic source**
Fraud	Counterfeiting or adulteration deliberate / intentional as per specific assessment	Absent	IFS guideline "Product fraud" 2018
Contamination fraudulent products	Food defense as per specific assessment	Absent	guidelines' FDA (Food Defense Plan Builder)

The identified hazards were analyzed to assess the Risk (R) from the point of view of food safety.

The value**R.**it corresponds precisely to the risk and is given by the function**P x G.**where is it:

- **P.**is the probability that the hazard occurs at a specific stage of the process;
- **G.**is the severity, i.e. the possible dimensions of the event.

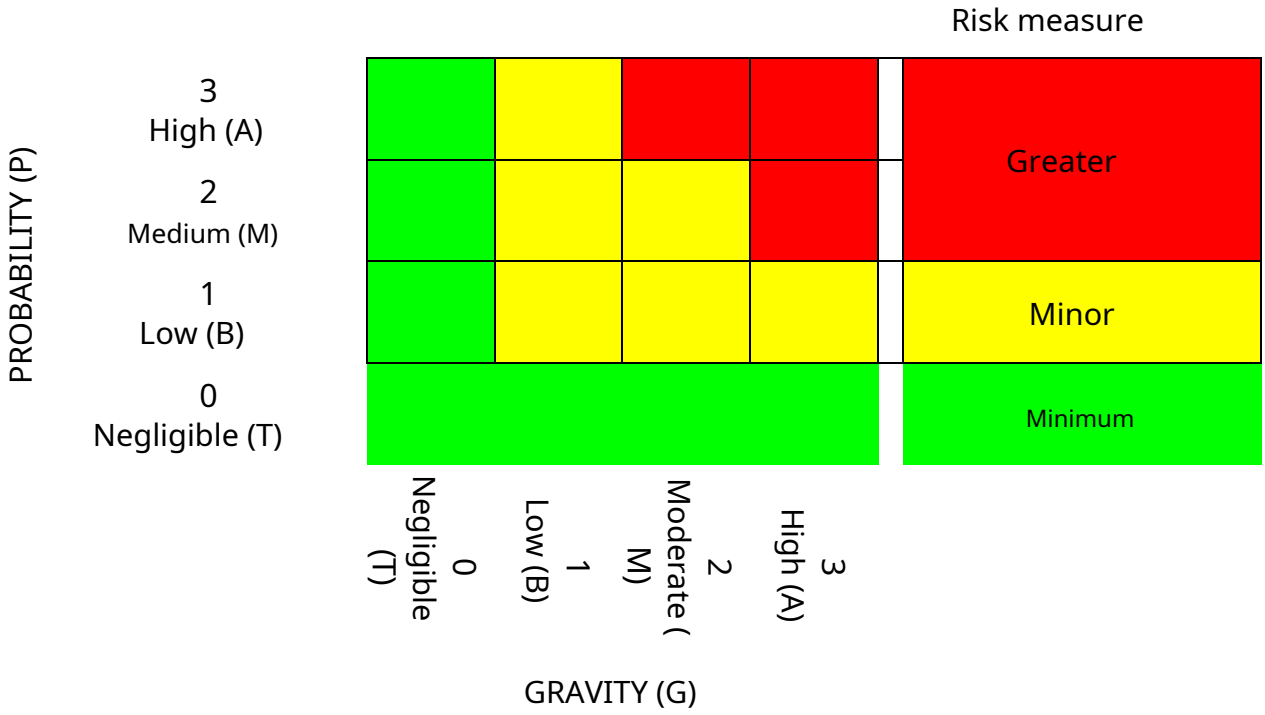
The**probability value P**is divided into three categories:

High 3	→ There is a direct correlation between the detected lack and the occurrence of the hypothesized damage; → Damages occurred due to the same deficiency found in the same company; → The occurrence of the damage resulting from the detected deficiency would not arouse any surprise in the company
Average 2	→ The detected lack can cause damage, even if not automatically or directly; → Some episodes are known in which the lack was followed by damage; → The occurrence of the hypothesized damage would raise a moderate surprise in the company
Low 1	→ The detected deficiency can cause damage only in unfortunate circumstances of events; → Only very rare episodes that have already occurred are known; → The occurrence of the hypothesized damage would cause great surprise in the company

The**G value**it is also divided into three categories:

High 3	Danger of life	→ Acute exposure episode with side effects or total or partial disability; → Chronic exposure with lethal and / or totally disabling and / or partially disabling effects. → (Clostridium botulinum, Lysteria monocytogenes, Vibrio cholerae, Vibrio vulnificus, Salmonella thiphi,, E. coli O157: H7,,)
Average 2	Serious chronic	→ Acute exposure episode with reversible disability effects; → Chronic exposure with reversible effects. → (Brucella spp, Campylobacter spp, Salmonella spp, Shygella spp, Streptococcus type A, Yersinia Enterocolitica, Hepatitis A virus, mycotoxins)
Low 1	Mild	→ Acute exposure episode with rapidly reversible disability; → Chronic exposure with rapidly reversible effects → (Bacillus spp, Clostridium perfringens, Staphylococcus aureus, Norwalk virus, parasites, heavy metals)

Risk assessment scale: ithe product of P x G can give**values ranging from 1 to 9**.



For the purposes of the assessment, the following legend applies:

	Risk (R) (R = G x P)	
R = 0		There is no health risk for the consumer
1 <R ≤ 4		Identification of O-PRPs through decision tree and application of operational PRPs, evaluating any synergies;*the decision tree is applied* *A significant risk is conceivable only as a result of repeated and serious abuses / errors and extreme circumstances. Periodic and planned monitoring of operating procedures is required to ensure that the hazard does not actually translate into a product safety risk*
R ≥ 6		**Decision tree application for evaluation of any CCP;** **An appropriate combination of control measures must be selected.***There is a high probability that the risk will arise directly undermining the safety of the food. Close and constant monitoring of the danger is necessary to ensure that it does not manifest itself. The product must not be passed to the next stage until the hazard is within the critical limits.*

The phases of the process with the relative dangers and the risk quotation have been summarized below.

PROCESS STEPS AND DANGERS ASSOCIATES		G.	P.	R.	Justification
1 - Receipt of grain raw materials, other raw materials, packaging primary					**Justification**
F.	Weed arthropods	1	3	3	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	2	2	They can derive from raw materials or from the storage environment, cleaning and washing reduce their presence
F.	Rodents and their macroscopic traces	2	2	4	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Volatiles and their macroscopic traces	2	2	4	
C.	Mycotoxins	3	3	9	These substances can be present in grains; the correct management of suppliers and grains in the warehouses allows to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	
C.	Heavy metals (Lead and Cadmium)	3	1	3	They come from raw materials
C.	Residues of plant protection products	3	1	3	These substances can be present in grains; the correct management of suppliers makes it possible to prevent their introduction
C.	Molecules from unsuitable materials: maintenance greases and plant materials	1	2	2	The materials used internally on materials in direct contact with food during maintenance are all food grade and correct hygiene practices require the sanitization of machinery before reuse in production.

C.	(raw material containing allergen)	3	2	6	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.
C.	Radionuclides	*3*	*1*	*3*	Radiological risks rarely occur in food; however, when they do occur, these hazards can pose a significant risk when exposures are prolonged
D.	*Willful, fraud*	*3*	*1*	*3*	Risks rarely occur, however they are mitigation actions have been defined e defined control procedures

2 - Unloading and storage of iron silos					**Justification**
F.	Weed arthropods	1	3	3	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
F.	Rodents and their macroscopic traces	2	1	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Volatiles and their macroscopic traces	2	1	2	
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses allows to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	

F.	Other foreign bodies	3	2	6	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
C.	Residues of plant protection products	3	1	3	These substances can be present in grains; the correct management of suppliers makes it possible to prevent their introduction
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.
D.	*Willful, fraud*	*3*	*1*	*3*	Risks rarely occur, however they are mitigation actions have been defined e defined control procedures

3 - Pre-cleaning and storage of cement silos					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses allows to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	

C.	(raw material containing allergen)	3	2	6	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

3A - Mixing and storage of mixed grain					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses make it possible to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	
C.	(raw material containing allergen)	3	2	6	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

4 - First cleaning of Molino A and Cleaning of Molino C					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk

B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses make it possible to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	
C.	(raw material containing allergen)	3	1	3	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

5 - Washing / second wetting and conditioning in silos					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	2	2	The management of the phase through cleaning and environmental conditions reduces the presence of molds and yeasts
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses make it possible to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	3	9	

F.	Other foreign bodies	3	1	3	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
C.	(raw material containing allergen)	3	1	3	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

6 - Second cleaning of Molino A and Molino C					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
C.	Mycotoxins	3	2	6	These substances can be present in grains; the correct management of suppliers and grains in the warehouses make it possible to prevent their introduction
F.	Ferrous and metallic foreign bodies	3	1	3	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	1	3	

C.	(raw material containing allergen)	3	1	3	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

7– Grinding of Molino A and Molino C and storage of flours 7B Reworking					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	They can come from raw materials or from the storage environment
F.	Ferrous and metallic foreign bodies	3	2	6	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	1	3	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

8 - Mixing Mixer 1 8B Mixing Mixer 3					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger. Between the mixer and the packaging line there is a magnet and a sifter
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

8 C - Mixing Mixer 2					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger. There is no sifter between mixer and integral line
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

9 - Storage cell for loose and mixed flours					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

10 - Mixing ingredients by hand containing allergens e bagging line mixing 4					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger. There is no sifter between mixer and line 4
F.	Other foreign bodies	3	2	6	
C.	(raw material containing allergen)	3	1	3	The allergens present in the raw materials on the farm are gluten and soy / mustard / lupine for traditional flours, while for the semi-finished products there are also milk derivatives, nuts and sesame. Good processing practices do not allow for the exclusion of contamination crusade from soy / mustard / lupine as they derive from upstream stages of the supply. Adequate instructions regarding food consumption and the requirement to wear protective gowns during activities further reduce the danger. Defined a specific procedure for the processing of semi-finished products in order to avoid cross-contamination with the production of traditional flours
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.
11 - Manual packaging (5-10kg) (metal detector) bagging 4					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	

B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

12 - Shed Area - Sieving, packaging (magnet), packaging storage, PF bagging storage 2					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves and magnets to reduce the danger. Present sifter
F.	Other foreign bodies	3	2	6	
F.	Rodents and their macroscopic traces	3	1	3	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

12A - Molino Area - Sieving, packaging (bagging line 1), packaging storage, PF storage					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	2	6	

B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.
B.	Molds and yeasts	2	1	2	The management of the phase through cleaning and environmental conditions reduces its presence

12B - Shed Area - Sieving, packaging (magnet + metal detector), packaging storage, PF bagging storage 3 12 C- bagging 5					**Justification**
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are sieves, adequate magnets to reduce the danger. Present MD and sifter
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

13 - Mill Area Loading loose product into tank wagons					**Justification**
F.	Weed arthropods	2	1	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Volatiles and their macroscopic traces	3	1	3	
F.	Ferrous and metallic foreign bodies	3	1	3	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger.
F.	Other foreign bodies	3	1	3	
B.	Molds and yeasts	2	1	2	Regular cleaning of tank wagons reduces the risk

B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.
D.	Willful, fraud	3	1	3	Risks rarely occur, however they are mitigation actions have been defined e defined control procedures

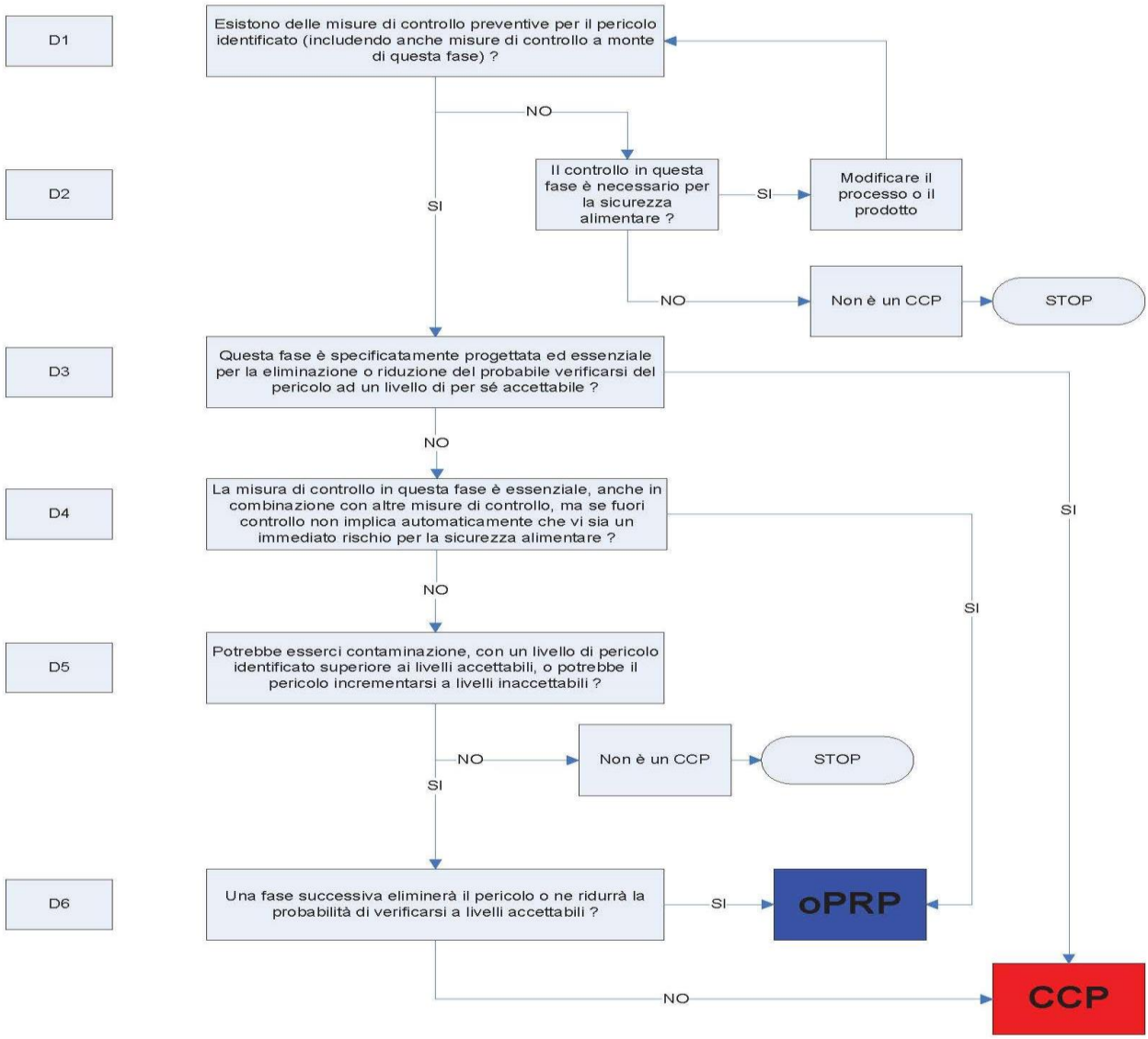
13 A - Shed vehicle loading !					**Justification**
F.	Weed arthropods	2	1	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
F.	Rodents and their macroscopic traces	3	1	3	
F.	Volatiles and their macroscopic traces	3	1	3	
D.	Willful, fraud	3	1	3	Risks rarely occur, however they are mitigation actions have been defined e defined control procedures

These values are used by the HACCP Team to evaluate thesignificance of the risk , define a correct and effective way to establish the priority of interventions and the strength of the control measures to be adopted. In order to classify the control measures as O-PRP or CCP we used the decision tree, shown below.

With regard to the danger of food fraud and food defense, please refer to the specific assessments which also identify the control measures adopted to manage the risk (measures classified as PRP)

2.11 Determination, analysis and management of CCPs and O-PRPs (CPs)

The Decision Tree used is the following:



Applying this decision tree to each phase with significant hazards having PXG> 1, the following results are obtained:

CCP 1 - PASSING THROUGH THE MAGNET OF THE FINISHED PRODUCT CCP 2 - PASSING THROUGH THE METAL DETECTOR OF THE FINISHED PRODUCT

APPLICATION OF THE DECISION TREE TO CLASSIFY MANAGEMENT MEASURES

1 - Receipt of grain raw materials, other raw materials, primary packaging

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X		X		
Allergens:												
- Soy presence	X					X		X		X		
Organic:												
Insects	X					X		X		X		
microorganisms	X					X		X		X		

2 - Unloading and storage of iron silos

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X		X		
Organic:												
microorganisms	X					X		X		X		

PHASE 3 - Pre-cleaning and storage of cement silos

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X		X		
Allergens:												
- Soy presence	X					X		X		X		
Organic:												
microorganisms	X					X		X		X		

4– First cleaning of Molino A and Cleaning of Molino C

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of non-metallic foreign bodies	X					X		X	X		CP	
- Presence of metallic foreign bodies	X					X		X	X		CP	

5– Washing / second wetting and conditioning in silos

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of metallic foreign bodies	X					X		X		X		
Organic:												
microorganisms	X					X		X		X		

6– Second cleaning Molino A and Molino C

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Chemistry												
- Presence of mycotoxins	X					X		X		X		
Particle:												
- Presence of non-metallic foreign bodies	X					X		X	X		CP	
- Presence of metallic foreign bodies	X					X		X	X		CP	

7- A & C grinding and flours storage

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X	X		CP	
- Presence of metallic foreign bodies	X					X		X	X		CP	
Biological:												
- Presence of insects	X					X		X		X		

7B - Rework

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X	X		CP	

8 / 8B- Mixing Mixer 1 and Mixer 3

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X		X		
Organic:												
microorganisms	X					X		X		X		

8 C- Mixing - Mixer 2

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X	X		CP	

9- Storage cell for loose and mixed flours

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Organic:												
microorganisms	X					X		X		X		

10- Mixing of ingredients by hand containing allergens and mixing of the Bagging line 4

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X		X		
- Presence of metallic foreign bodies	X					X		X		X		

11- Manual packaging (Metal detector) bagging 4

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X	X		CP	
- Presence of metallic foreign bodies	X				CCP							

12- Shed-sieving, packaging area (MAGNETI), packaging storage, product storage Line 2

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X	CP					
- Presence of metallic foreign bodies	X					X		X		X		CCP MAGN09

12 B- Shed area-sieving, packaging (MAGNETI + MD), packaging storage, product storage Line 3

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X	CP					
- Presence of metallic foreign bodies	X					X		X		X		CCP MAGN 10

12 C- Shed area-sieving, packaging (MAGNETI + MD), packaging storage, product storage Line 5

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X	CP					
- Presence of metallic foreign bodies	X					X		X		X		CCP MAGN 16

12A Mill-sieving, packaging (magnet), packaging storage, product storage area

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Presence of non-metallic foreign bodies	X					X		X	X		CP	
- Presence of metallic foreign bodies	X					X		X		X		CCP 7

13 - Loading of bulk product into tank wagons

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Infesting arthropods	X					X		X		X		
- Rodents and their traces	X					X		X		X		
- Birds and their traces	X					X		X		X		
- Presence of foreign bodies - Not metallic	X					X		X	CP BU1			
Presence of foreign bodies - metallic	X					X		X		X		CCP MAG N 8

13 A- Vehicle loading shed

DANGER	D1		D2		D3		D4		D5		D6	
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO
Particle:												
- Infesting arthropods	X					X		X		X		
- Rodents and their traces	X					X		X		X		
- Birds and their traces	X					X		X		X		

2.11.1 Control plan

The following pages show the tables that describe in detail the**control plan**of the process. More specifically, those phases that distinguish the various production lines have also been added to the various parts common to all flows.

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	1A - Receipt grain	Wrong identification goods	Check bill accompaniment or	Identification of the goods first of the exhaust	Each delivery	Identification clear of goods	Module 10.01_03	Load lock until correct identification of product	Responsible procurement nto	Management review annual: Trend of NC for errata identification
		Contamination biological, chemical and physics	Supplier qualification	To verify conditions hygienic ed fitness of the vehicle Request documentation about cleaning	Each delivery	The vehicle it must be suitable for transport of cereals, the coverage must be intact and the medium does not must have transported in precedence critical substances or harmful	Stamp with check-list on ddt	Awareness raising of the driver e reporting to supplier	Millers Responsible procurement nto	Management review annual: Trend of NC grain suppliers
				Check the presence and i contents of the documentation provided about i post treatments collection of cereal	Each delivery	It must be present the documentation	Module 10.01_03	reminder documentation to suppliers with right not to unload the goods	Responsible procurement nto	Management review annual: Trend of NC grain suppliers

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	1A - Receipt grain			Sampling loading and controls sensory on product	Each delivery	Absence of odors anomalous ed strangers. The smell it must be that typical of grain without hints of moldy, stale or produced chemists	Module 10.01_03	Challenge to the supplier, reject the goods	Responsible procurement nto Millers	Management review annual: Trend of NC grain suppliers
						Absence of live insects. Do not more than 4 insects dead	Module 10.01_03	Challenge to the supplier, reject the goods	Responsible procurement nto	
		Contamination biological, chemical and physics	Supplier qualification	Check humidity, specific weight of the kernels e of waste	Each delivery	Humidity as per contract or in absence there yes refers to Ager contract. The PS must be above 70 kg / hl. Impurity <2%	Module 10.01_03	If PS lower analysis is needed impurities and if these exceed 8% takes care of it quick analysis of DON	Responsible procurement nto Responsible Production	Management review annual: Trend Humidity, PS e impurities supplies, trend NC for 3 parameters
				Quick analysis Mycotoxins	The first delivery after the truck of proof of a new contract. Then every 300 tons delivered.	Lower residues within the limits of the law	Module 10.01_03	If higher than legal limits refusal of cargo e NC opening a supplier / If presence significant reporting to supplier e monitoring	Responsible procurement nto QC laboratory	Management review annual: Trend results mycotoxins supplies, trend NC for mycotoxins on the grains

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
	1B - Reception other subjects prime		Check extraordinary for possible problems of origin (accidents nuclear, for example grain Russian / Ukrainian)	Analyses radioactivity Declaration supplier	The first delivery after the truck of trial. Each delivery	Lower residues within the limits of the law	Module 10.01_03	If higher than legal limits or presence significant refusal of cargo e NC opening a supplier	Responsible procurement nto QC laboratory	Management review annual: Analysis trend radioactivity supplies, (if applicable)
		Non-compliance analytic	Contract purchase with features merchandise and analytical	Analysis of laboratory for check the compliance with contract	Each delivery	Responsiveness to specifications reported in contract of purchase/ data sheet	Module 10.01_03	Challenge to the supplier e decision of how to re-classify the commodity / Refusal of the load	Responsible supplies chin	Management review annual: Analysis trend merchandise supplies, trend NC by parameters merchandise
PRP		Wrong delivery goods	Check bill accompaniment or	Identification of the goods first of the exhaust	Each delivery	Identification clear of goods	Module 10.01_03	Non acceptance of the goods e reporting to supplier	Responsible procurement nto Responsible Warehouse	Management review annual: Trend of NC for errata delivers
PRP		Contamination biological	Supplier qualification	To verify conditions hygienic and fitness of the vehicle	Each delivery	The vehicle it must be suitable for transport of foods, not must present abnormal odors o to be soiled	Stamp with check-list on ddt	Awareness raising of the driver e reporting to supplier	Responsible procurement nto Responsible Warehouse	Management review annual: Trend of NC other suppliers MP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Non-compliance analytic	Contract purchase with features analytical deliveries e certificate of analysis supplier who accompanies the goods	Analysis of laboratory for check the compliance with certificate / card technique as per analytical plan	Each delivery	Compliance with specifications reported in contract of purchase / card technique	Module 10.01_03 Module 06.01_09 Module 13.01_01	Challenge to the supplier e decision of how re-classify the commodity / Not acceptance of load	Responsible procurement nto QC laboratory	Management review annual: NC trend analytical
PRP	**1C - Reception primary packaging**	Presence of odors pungent / dirty a on the packaging	Supplier qualification	Visual inspection e olfactory packaging al receipt	Every reception	Absence of odors strangers e	Stamp on bubble	Rejected goods	Responsible Warehouse e packaging	Management review annual: Trend of NC suppliers primary packaging
PRP	***Shipment goods***	*Fraud and food defense*	See the two specific risk assessments							Management review annual: Trend of NC suppliers for fraud or food defense

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	2 - Exhaust e storage silos iron	Contamination biological	Cleaning e protection	Hole coverage for unloading with cloth and closure gates Cleaning holes Bottom cleaning silos Probes silos temperature	After each I unload After each I unload Once / year Continuously	Entrance weeds Absence of dirt and dust Absence of dirt and dust Temperature below 30 ° C	/ / Module 09.02_02 Software production	Reporting to the employees of always keep closed the doors Immediate cleaning Handling of the mass e aeration	Chief Miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
				Pest control	Weekly Monthly firm external	Absence of muridae in the hole	Module 09.01_19B Activity report monitoring	Reporting to RAQ	Millers RAQ	Management review annual: Pest trend control
		Failure correspondence between weight indicated on ddt and that downloaded	Agreements with the supplier	Comparison ddt and weight found after unloading	Any discharge	Correct weight as from contract	Module 10.01_03	Reporting to supplier	Responsible procurement nto	Management review annual: Trend of weight differences grain to the unloading

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	3 Pre-cleaning e storage silos concrete 3A Mixing and storage mixed grain	Bad operation cars Contamination biological	Maintenance installations Cleaning floor	Check effectiveness pre-cleaning e scraps	Daily	Efficient	Maintenance	Plan review maintenance	Millers	Management review annual: Trend of NC pre-cleaning
				Control and cleaning magnet separator Inspection of the cell	Daily Monthly	Clean ed efficient Absence infestations	Module 09.02_02	Step up cleaning Interventions localized	Chief Miller RAQ	Management review annual: Trend of NC presence cell infestations grain storage
CP	4 - Before Molino cleaning To and Molino cleaning C.	Bad operation cars: presence of bodies metallic strangers e non-metallic	Maintenance installations	Check effectiveness cleaning and scraps	Daily	Clean ed Efficient	Maintenance	Plan review maintenance	Chief Miller	Review quarterly: indices sanitation: CP
				Control and cleaning magnet ferrite 2800 Gauss - MAGN01	Daily Check strength attractiveness yearly from external company	Clean ed efficient Efficiency magnet > 2000 Gauss	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
				Control and cleaning magnet 1800 Gauss - MAGN14 (under balance cleaning Molino C)	Daily Check strength attractiveness yearly from external company	Clean ed efficient *Magnet efficiency > 1300 Gauss*	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP
PRP	**5 - Washing, second wetting e conditioning in silos**	Contamination biological water	Analyses microbiological	Potability analysis	Half yearly	Legal limits	Certificates analytical approved	Disinfection of the plant	RAQ	Management review annual: Trend analysis result water
			Analyses concentration Free active chlorine	Analyses instrumental with photometer	Monthly	Legal limit (0.2 ppm)	Module 09.01_16	If> 0.2 ppm verify correct setting pump of dosage	QC laboratory	
		Contamination biological	Cleaning plan	Disassembly e cleaning machine scrubber with steam cleaner	Weekly	Clean wash	Module 09.02_02	Step up cleaning	Millers	Management review annual: Trend of NC for cleaning inadequate
		Dosing error water	Check operation plant	Check water dispenser	Every 2 hours	Second variety grain	Module 09.01_05	Modify water dosage	Millers	/
		Contamination biological	Visual inspection emptying cells	Empty cells e clean	Every turn	No grain adhered to the walls	Module 09.01_07	Intervention localized	Chief Miller	Management review annual: Trend of NC x adhesion grain

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Times error rest	Training personal	Humidity control	Every grinding	Grain moisture 16.5-17%	Module 09.01_07	Change times rest	Millers	Management review annual: Trend of NC x moisture out std
CP	6 - Second Molino cleaning A and Molino C	Bad operation cars	Maintenance installations	Check effectiveness cleaning and scraps	Daily	Efficient	Maintenance	Plan review maintenance	Chief Miller	Management review annual: Trend of NC maintenance x ineffectiveness cleaning
				Control and cleaning magnet ferrite 2100 Gauss - MAGN02	Daily Check strength attractiveness yearly from external company	Clean ed efficient Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP
				Control and cleaning magnet 1800 Gauss - MAGN15 (balance rolling mill B1 del Molino C)	Daily Check strength attractiveness yearly from agency external	Clean ed efficient *Efficiency magnet > 1500 Gauss*	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP
PRP	7 - Grinding TO&C.	Contamination biological	Cleaning plan	Check status machinery e external cleaning ed internal	Weekly external Daily internal	Absence of insects e adhered flour	Module 09.02_02	Blowing of the machinery e analyses monitoring periodical company external	Millers Cleaning ladies RAQ	Review quarterly pest trend control

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP		Potential contamination organic for presence of eggs insects	Entoleter (disruptor ad bump)	Verification correct operation	Half yearly	Machinery working and efficient	Maintenance	Awareness raising on the maintenance	Chief Miller	Management review annual: Trend of NC for not correct operation
PRP		Contamination particle	Check cylinders	Maintenance cylinders	Half yearly	Intact cylinders	Maintenance	Step up maintenance cylinders	Millers	Management review annual: Trend of NC for cylinders not intact
CP		Presence of bodies strangers	Buratto of safety single channel	Control of rejects	Start of round BU2 and BU4	Tumbler integrity: see photo	Module 15.01.06	Check integrity jerseys	Attended miller Clerk packaging	Review quarterly: indices sanitation: CP
PRP	**7B - Rework**	Foreign bodies	Packaging integrity Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Avoid that cochlea do not download e block product eliminating the problem	Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07
CP		Foreign bodies ferrous	Maintenance installations	*Control and cleaning magnet 9000 Gauss - MAGN 03 (review)*	Daily Check strength attractiveness yearly from external company	Clean ed efficient *Magnet efficiency > 2000 Gauss*	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	8 - Mixing flour (mixer 2000 kg) MIXER 1 [Pre-blend vitamins]	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Product blocked	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
		Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Monthly	Mixer cleaned up	Module 09.02_02	Immediate cleaning	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
		Product not compliant (QC)	Sampling batch 20 quintals for laboratory analysis QC	Moisture, ashes, proteins, gluten, Falling Number, Alveograph, Farinographer (it depends on typology of product)	Annex 02 IOP 07 Frequency withdrawals	Compliance with data sheet	10.02_02	Modification of the recipe	Responsible production	Management review annual: Trend of analytical results (humidity etc ..)
PRP	8B Mixing new flour plant 2015 (2000 kg) MIXER 3	Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Once / month	Mixer emptied and cleaned	Module 09.02_02	Immediate cleaning	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	8 C Mixing wholemeal flour (1000 kg) MIXER 2	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Product blocked	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Once / month	Mixer emptied and cleaned	Module 09.02_02	Immediate cleaning	Attended miller	
CP	**8C - Passage magnet from silos 31-32 in silos 50 (wholemeal flours)**	Foreign bodies ferrous	Magnet a drawer in Neodymium 9000 Gauss - MAGN12	Visual inspection e cleaning	Daily Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CP
PRP	**9 - Storage for flours bulk and mixed**	Contamination biological	Cleaning plan fariniere	Aspiration of the dust and residual flour from the extractor	Once / year for silos molino. Every 4 months for silos shed (33-34)	Clean farini bowls	Module 09.02_02	Immediate cleaning	Millers Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	**10 - Blending ingredients a hand containing allergens MIXER 4**	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Avoid that mixer not drains and block product eliminating the problem	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	**10 -Mixing bagging line 4 5 - 10 kg**	Foreign bodies	Packaging integrity Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Avoid that cochlea do not download e block product eliminating the problem	Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
CP	**11 Line packaging manual Bagging 4**	Foreign bodies ferrous	Magnet a drawer in Neodymium 10000 Gauss - MAGN13	Visual inspection e cleaning	Every 8 hours Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01_26 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CP
PRP	**11 Line packaging manual Bagging 4**	Packaging incorrect / label wrong	Training personal	Pre-check operating	Each operation from packaging or	Packaging prepared correctly for use	Module 09.01_10	Line stopped, change of packaging using those correct	Responsible packaging RAQ	Annual review: trend NC / complaints for packing or incorrect label
		Wrong filling	Weight check	Check weight statistic	Each operation from packaging or	Correct weight (Law 690 of 1978)	Module 09.01_10A			Annual review: trend NC / complaints for weight incorrect
CCP		Foreign bodies metallic	**Metal passage line D detector Bagging 4 (MAGN05)**	Search bodies ferrous extraneous e non-ferrous	Start, at each now and at the end of each batch	Absence of bodies metallic strangers	Module 09.01_20	Tape stops, packaging comes checked and done re-pass min. 3 times. If metal detector signals again presence of metals then product is blocked and comes inspected.	Responsible packaging	Review quarterly: indices sanitation: CCP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Malfunction or metal detector	***Test with specimens spherical in bars Ferrous 2,5 mm Non Ferrous 3.5 mm*** ***316 stainless steel 3.5 mm***	Verification correct operation	Hourly	Detection pollutant test	Module 09.01_20	Last locked hour of production	Clerk Packaging RAQ	
CCP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products.**	Damage sifter of safety	Magnet in neodymium 9000 Gauss - MAGN09 before the sieving	Visual inspection e cleaning	Each turn (8 hours) Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01_17 Relationship of measurement	Product block	Employee to packaging	Review quarterly: indices sanitation: CCP
CP		Presence of bodies strangers	Buratto of safety single channel BU5	Control of rejects	Every 8	Tumbler integrity: see photo	Module 09.01_10	Check integrity jerseys	Clerk packaging	Review quarterly: indices sanitation: CP
CCP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products.**	Foreign bodies metallic	Metal passage E line detector - Bagging 3 (MAGN10)	Search bodies ferrous extraneous e non-ferrous	Start, at each now and at the end of each batch	Absence of bodies metallic strangers	Module 09.01_20	Tape stops, packaging comes checked and done re-pass min. 3 times. If metal detector signals again presence of metals then product is blocked and comes inspected.	Responsible packaging	Review quarterly: indices sanitation: CCP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Malfunction or metal detector	***Test with specimens spherical in bars Ferrous 2,5 mm Non Ferrous 3.5 mm*** ***316 stainless steel 3.5 mm***	Verification correct operation	Hourly	Detection pollutant test	Module 09.01_20	Last locked hour of production	Responsible packaging RAQ	
CP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products. FIRST Packaging or 10 and 25 kg Line bagging 3 and 4**	Foreign bodies ferrous	Magnet a drawer in Neodymium 10000 Gauss - MAGN11	Visual inspection e cleaning	Every 8 hours Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01_25 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CP
PRP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products.**	Packaging incorrect / label wrong	Training personal	Pre-check operating	Every operation from packaging or	Packaging prepared correctly for use	Module 09.01_10	Line stopped, change of packaging using those correct	Responsible packaging RAQ	Annual review: trend NC / complaints for packing or incorrect label
		Failure to weld sack	Visual inspection on line	Correct control positioning sack and bank towards welding machine	Continuous	Welding correct ed effective	Module 09.01_10	Line stopped, sacks made review the machine welding machine		Annual review: trend NC / complaints for failure to weld

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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
	Packaging or 10 and 25 kg	Wrong filling	Weight check	Bag weighing a sample (for 25 kg) Check weight statistic (for 10 kg)	Each operation from packaging or	Correct weight (for 10 kg Law 690 of 1978)	Module 09.01_10 Module 09.01_10B	Check weight packs previous and following	Responsible packaging	Annual review: trend NC / complaints for weight
CP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products. LINE 5 of 1 kg and 5 kg**	Damage sifter of safety	Magnet in neodymium 9000 Gauss - MAGN17 before the sieving	Visual inspection e cleaning	Each turn (8 hours) Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01_27 Relationship of measurement	Product block	Employee to packaging	Review quarterly: indices sanitation: CP
CP		Presence of bodies strangers	Buratto of safety single channel BU6	Control of rejects	Every 8	Tumbler integrity: see photo	Module 15.01_06	Check integrity jerseys	Clerk packaging	Review quarterly: indices sanitation: CP
CCP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products.**	Foreign bodies metallic	Metal passage detector line F - Bagging 5 (MAGN16)	Search bodies ferrous extraneous e non-ferrous	Start, at each now and at the end of each batch	Absence of bodies metallic strangers	Module 09.01_20A	Tape stops, packaging comes checked and done re-pass min. 3 times. If metal detector signals again presence of metals then product is blocked and comes inspected.	Responsible packaging	Review quarterly: indices sanitation: CCP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Malfunction or metal detector	*Test with specimens* ***spherical in bars Ferrous 1.8 mm*** *Non ferrous 2 mm 316 stainless steel 3.00 mm*	Verification correct operation	Hourly	Detection pollutant test	Module 09.01_20A	Last locked hour of production	Responsible packaging RAQ	
CP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products. FIRST Packaging or 1 and 5 kg Line bagging 5**	Foreign bodies ferrous	Magnet a drawer in Neodymium 10000 Gauss - MAGN17	Visual inspection e cleaning	Every 8 hours Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01_27 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CP
PRP	**12 - Area Shed. Sieving, packaging (magnet), storage packaging, storage products.**	Packaging incorrect / label wrong	Training personal	Pre-check operating	Every operation from packaging or	Packaging prepared correctly for use	Module 09.01_10	Line stopped, change of packaging using those correct	Responsible packaging RAQ	Annual review: trend NC / complaints for packing or incorrect label
		Failure sack gluing	Visual inspection on line	Check presence of glue e scraps	Continuous	Gluing correct ed effective	Module 09.01_10	Line stopped, sacks made review the machine welding machine		Annual review: trend NC / complaints for failure to weld

Claudio Innocenti

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
	Packaging or 1 and 5 kg	Wrong filling	Weight check	Automatic weighing packs e relative waste statistical control weight (for 1 and 5 kg)	Each operation from packaging or	Correct weight (for 1 kg and 5 kg Law 690 of 1978)	Module 09.01_10 Module 09.01_10B	Check weight packs previous and following	Responsible packaging	Annual review: trend NC / complaints for weight
CP	**12 A - Molino area Sieving, packaging (magnet), storage packaging, storage products**	Presence of bodies strangers	Buratto of safety single channel BU3	Control of rejects	Third round	Tumbler integrity: see photo	Module 15.01_06	Check integrity jerseys	Attended miller Clerk packaging	Review quarterly: indices sanitation: CP
CCP		Damage or sifter of safety	Magnet in ferrite 2100 Gauss - MAGN06 Before the sieving (Mixer plant 3)	Visual inspection and cleaning	Daily Check strength attractiveness yearly from agency external	Clean (at least 90% with absence of particles) and efficient (trial attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller clerk	Review quarterly: indices sanitation: CCP
CCP		Foreign bodies ferrous	Magnet in Neodymium 4300 Gauss - MAGN04 first bagging wholemeal flours	Visual inspection e cleaning	Daily Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CCP

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
CCP	**12 A - Molino area Sieving, packaging (magnet), storage packaging, storage products**	Foreign bodies ferrous	Magnet a drawer in Neodymium 9000 Gauss - MAGN07 first packaging products containing allergens	Visual inspection e cleaning	Before use Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 09.01.18 Relationship of measurement	Product block	Clerk packaging	Review quarterly: indices sanitation: CCP
PRP		Infestation (storage finished products)	Area control warehouse	Visual inspection The products are kept away from the floor e at a distance of at least 50 cm from the walls	Weekly Monitoring monthly	Absence infestations	Module 09.01_19A Catch report agency external	Intervention located on base to company directives external	Responsible Warehouse RAQ	Review quarterly: pest trend control
		Aging product	Training personal	Check rotation warehouse	Daily	The products do not must have less than ¼ of the shelf life	Stocks (FIFO policy)	Product downgraded intended for animal husbandry / refusal	Responsible Warehouse Responsible Production	Annual review: trend amount of product downgraded for aging
		Damage packs	Training personal	Check integrity packaging	Any load	Packaging intact	Attachment 01 PAQ 13.01	Segregation - product not compliant	Responsible Warehouse	Annual review: trend NC for damage packages (packaging broken)

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
CCP	**13 - Loading bulk product in tank wagons**	Damage sifter of safety	Magnet in neodymium 9000 Gauss - MAGN08 before flour storage Randomly	Visual inspection e cleaning	Daily Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Employee to packaging	Review quarterly: indices sanitation: CCP
PRP		Contamination biological	Cleaning plan fariniere	Aspiration of the dust and residual flour from the extractor	Once / year (best in June)	Clean farini bowls	Module 09.02_02	Immediate cleaning	Millers Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07
CP	**13 - Loading bulk product in tank wagons**	Presence of bodies strangers	Buratto of safety single channel	Control of rejects	Third round of BU1 work	Tumbler integrity: see photo	Module 15.01.06	Check integrity jerseys	Attended miller Clerk packaging	Review quarterly: indices sanitation: CP
PRP	**13 A Load vehicles shed (in tanks and big bag)**	Contamination biological e particle	Status check tank interior	Tank cleaning	Cleaning with indoor air monthly, external cleaning half yearly	Tanks they must be clean, without dirty in the vents of load or in the top of the cistern, without contamination and from insects	Module 09.02_02	Send the cistern al wash Sensitization and driver	Driver	Management review annual: Trend of results of monthly inspections Check list 09.02.07

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
			Check cage present in the nozzle of load	Visual inspection cage	Any load	Integrity cage	/	Awareness raising driver e replacement cage	Driver	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP			Status check sleeves mouths of I unload	Visual inspection	Once at month	The sleeves don't they must be dirty	/	Awareness raising driver and lady to cleaning and immediate cleaning sleeve	Clerk at cleaning Driver	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP			Status check big bag	Visual inspection e olfactory	Any load	Big bags must be clean through blowing, be in good condition and covered with hood of plastic	Module 15.01_03	Big elimination dirty / unclean bags suitable e reporting to supplier	Millers Driver	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	**13 - Loading bulk product in tank wagons 13 A Load vehicles shed (in tanks and big bag) and bags e pallet**	Contamination organic, chemistry and physics	Status check vehicle	To verify conditions hygienic ed fitness of the vehicle Request documentation about cleaning	Any load	The vehicle it must be suitable for transport of products food, not it must be foul smelling e must be in good condition	Module 15.01_02 Module 15.01_03	Awareness raising of the driver / reporting to supplier	Responsible Warehouse	Management review annual: Trend of results of monthly inspections Check list 09.02.07

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	**Shipment goods**	*Fraud and food defense*	See the two specific risk assessments							Management review annual: trend NC for fraud and food defense on final product

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		Rev.13 23/12/2021	

Food Safety Manual

Prepared according to the principles of *Codex Alimentarius*,
in compliance with Reg. (EC) N. 852/2004, with the BRC Global Standard for Food Safety
(edition 8), the IFS Food Standard (edition 7) and al
***Food Safety Modernization Act FSMA FDA*(PUBLIC LAW 111–353 — JAN. 4, 2011)**
ISO 22000 and 2018

Date approval	Revision	Edit	Written by:	Approved by:
14/11/2014	1st Issue Rev.00	Prepared according to BRC and IFS Global Standards for Food Safety (Edition 6)	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
19/11/2015	Rev. 01	Prepared according to the BRC Standard (edition 7) and IFS (edition 6)	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
08/11/2016	Rev. 02	Renewal of production layouts and flows	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
21/12/2016	Rev. 03	Rework has been entered in risk analysis	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
22/05/2017	Rev. 04	New packaging line, (LINE E), new warehouse	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
06/11/2017	Rev. 05	IOP 14 rework management, compliance FSMA, IOP 15 treatments, new D + E LINE metal detector limits, installation MAGN12 and MAGN11 forecast	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ	Sergio Dallagiovanna Direction
17/10/2018	Rev. 06	New plant (Molino C) New batch coding HACCP team Natural yeast in ATM New treatment time interval container	Andrea Dallagiovanna RAQ Costanza Rizzi - AAQ Maria Grazia De Pascali	Sergio Dallagiovanna Direction
16/04/2019	Rev. 07	Installation New magnets (MAGN 11 and MAGN 13 New one HACCP team	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
23/10/2019	Rev. 08	BRC rev. 8 including preventive controls FSMA, external site finished product storage	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
25/03/2020	Rev. 09	Adaptation to ISO 22000 ed. 2018	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
06/16/2020	Rev. 10	Inserting the bagging line 7 e automated warehouse	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
10/12/2020	Rev. 11	Par. 2.4 insertion of references to FDA legislation for fruit allergens a shell	Andrea Dallagiovanna RAQ M.Grazia De Pascali - AAQ Donatella Fraioli - AAQ	Sergio Dallagiovanna Direction
26/10/2021	Rev. 12	Review of HACCP Team, new Contact Emergency	Maria Grazia De Pascali RAQ Donatella Fraioli AAQ Laura Gazzola AAQ	Sergio Dallagiovanna Direction
23/12/2021	Rev. 13	Risk Assessment for compressor use in oil bath	Maria Grazia De Pascali RAQ Donatella Fraioli AAQ Laura Gazzola AAQ	Sergio Dallagiovanna Direction

Summary of Comments on HACCP.pdf

Page: 1

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:41:25 AM
Please update number of Revision in all pages: **Rev.14 21/04/2022**

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:44:41 AM
Add a box below:
Sergio Dallagiovanna
Direction

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:44:24 AM
Add a box below:
Maria Grazia De Pascali RAQ
Donatella Fraioli AAQ
Laura Gazzola AAQ

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:44:05 AM
Add a box below: **Review of HACCP Team, Claviceps spp**

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:43:23 AM
Add a line and a bow below: **21/04/2022**

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:43:06 AM
Add a box below: **Rev. 14**

Following the analysis of the minimum skills of the HACCP group and the profiles present in the company, the following figures were included in the HACCP team:

Maria Grazia De Pascali	RAQ - Team Leader, PCQI
Dallagiovanna Sergio	Management
Dallagiovanna Pierluigi	Administrator
Dallagiovanna Stefania	Head of QC Laboratory and Production
Donatella Fraioli	Add. AQ
Laura Gazzola	*Add. AQ*

The following names are added as supports to the HACCP team for specific needs:

Oppizzi Davide	Packaging Manager Logistics Manager,
Dallagiovanna Renza	Drivers, Biological Administration
Intropido Elena	

2.2 Reference documents

ACTIVITY'	REFERENCE DOCUMENTS
1 - Human resources management	Hiring of IOP Employees 10 IOP Company Regulations 5
2 - Management of suppliers	PAQ procurement 06.01
3 - IT system	Zucchetti RAM Electronics Management 2 production software
4 - Production management	Tests and checks on acceptance PAQ 10.01 Process Control PAQ 09.01 Tests and controls in Production and final PAQ 10.02 Production Managers: Grinders IOP 04 PPC Production and control plan IOP 13 CCP and CP verification. IOP 14 Rework management
5 - Management of equipment and equipment	PAQ Hygienic Quality Assurance 09.02 Production Managers: Grinders IOP 04
6 - Management of measuring instruments	Control of equipment for testing, measurement and testing PAQ 11.01
7 - Lay-out of structures and equipment	Floor plans
8 - Management of the fight against pests	PAQ Hygienic Quality Assurance 09.02
9 - Management of environmental hygiene	Hygienic Quality Assurance PAQ 09.02 From IOP PU 02 to IOP PU 37 PAQ 25 environmental monitoring
10 - Air and water management	Hygienic Quality Assurance PAQ 09.02 PAQ 09.04 control of water potability
11 - Management of waste disposal	Hygienic Quality Assurance PAQ 09.02 IOP PU 22 IOP 11 Purifier management IOP 12 Waste management
12 - Warehouse and transport management	PAQ 15.01 Storage, handling, packaging, conservation and delivery. IOP warehouse management 02

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Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:46:12 AM
Below "Dallagiovanna Stefania", please add this name: **Fabio Susta**.
Chief Miller, Head of Maintenance Service

B -Biological	Hazard description	acceptable level	Reference / Source
Bacterial load total mesophilic	General indicator of hygiene, indicates the presence of mesophilic aerobic microorganisms	<100,000 CFU / g	Ce.I.RSA
Molds	Microorganisms present in the environment. Their presence is undesirable because in addition to the alteration of the food it is associated with the production of secondary metabolites, the Mycotoxins (see chemical dangers).	1000 CFU / g maximum	Ce.I.RSA
Yeasts	Microorganisms present in the environment	1000 CFU / g maximum	Ce.I.RSA
Escherichia coli	Gram-negative, enterotoxigenic bacteria derived mainly from faeces.	10 CFU / g maximum	Ce.I.RSA
Salmonella spp.	Salmonella is a rod-shaped, non-spore-forming and Gram-negative bacterium. There is a widespread presence in animals, particularly in poultry and pigs. Environmental sources of the organism: water, soil, insects, various surfaces, animal feces, raw meat, raw seafood, to name but a few. In humans, they cause gastrointestinal upset and typhoid fever.	Absent / 25 g	Ce.I.RSA
Bacillus cereus alleged	Gram-positive, spore-forming facultative bacterium, found in a wide range of foods including meat, milk, vegetables and fish, has been associated with diarrheal-type food poisoning. Emetic outbreaks have generally been associated with rice products, but other starchy foods such as potatoes, pasta and cheese have also been implicated. Food preparations such as sauces, puddings, soups, flans, desserts and salads have often been indicted in food poisoning outbreaks.	<100 CFU / g	Ce.I.RSA
Staphylococci coagulase positive e other species	Gram-positive, ubiquitous bacteria	≤ 100 CFU / g	Ce.I.RSA
Enterobacteriaceae	Group of bacteria mostly related to the intestinal environment	≤ 1000 CFU / g	Ce.I.RSA
Arthropods	Infestations take place throughout the food chain, causing damage to products and microbial contamination. - Plodia interpunctella or Tignola fasciata (cereals, flour and cereal derivatives); - Ephestia kuehniella or Gray flour moth (wheat, bran, cereal products); - Ephestia elutella or Cocoa moth (cereals); - Lasioderma serricorne or tobacco Anobium (cereals); - Tribolium confusum (flour, semolina and derivatives, starchy products); - Cryptolestes ferrugineus (cereals); - Sythophilus granarius or Wheat weevil (kernels of wheat, barley, rice, oats, corn, pasta); - Rhyzopertha dominica (wheat and corn); - Trogoderma granariumriso, (wheat, rice, malted barley); - Trogoderma variable (cereals and seeds); - Oryzaephilus surinamensis or Silvano (dried foods, cereals, pasta); - Tenebrio molitor or Tenebrone millnaio (flours, bran); - Tribolium castaneum or Tribolio of flours (broken cereals, flours, semolina, bran and derivatives).	Absent (maximum content of n ° 50 fragments / 50 g product).	FDA

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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 8:48:41 AM
A better translation could be: **Mesophilic total microbial count.**

Author: Laura.Gazzola Subject: Casella di testo Date: 5/31/22, 9:02:46 AM
Add a line between Enterobacteriaceae and Arthropods

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 9:03:35 AM
0,2g/kg

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 9:12:43 AM
Reg. EC N. 2021/1399 amending Reg. EC N. 1881/2006.

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 8:54:17 AM
Add: **Sclerozi of Claviceps spp**

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 9:01:37 AM
Sclerotia: fungal structures from Claviceps species replacing kernels on grain ears or seeds on grass heads, visible as large discoloured sclerotia.

Rodents	Weeds of all commodities. Mus musculus (mouse) / Rattus rattus (rat) / Rattus norvegicus (sewer rat).	Absent / 50 g of product	FDA
Volatiles	Animals belonging to different species and carriers of harmful microorganisms.	Absent	
C -Chemist		**acceptable level**	**Legislative reference / bibliographic source**
Mycotoxins (Aflatoxins, Ochratoxin A, DON, Zearalenone)	Toxic compounds produced by different types of fungi, belonging mainly to the genera *Aspergillus*, *Penicillium* And *Fusarium*. In particular environmental conditions, when the temperature and humidity are favorable, these fungi proliferate and can produce mycotoxins. They generally enter the food chain through contaminated crops intended for food and feed production, mainly cereals. The presence of mycotoxins in food and feed can be harmful to human and animal health as it can cause various types of adverse effects, such as cancer and mutagenicity, as well as lead to estrogenic, gastrointestinal and renal disorders. Some mycotoxins are also immunosuppressive and reduce resistance to infectious diseases.	Aflatoxin B1: 2 ppb; Total aflatoxins: 4ppb; Ochratoxin A: 3 ppb; DON: 750 ppb; Zearalenone: 75 ppb.	EC Reg. 1881/2006
Heavy metals (Pb, CD)	They can lead to intoxication in human organisms due to the excessive concentration ingested.	0.20; 0.10 ppm	EC Reg. 1881/2006 and subsequent amendments, FDA (USA)
Product residues Phytosanitary	They presence indicate mostly non-compliance with the waiting times, if not the use of products that are not allowed.	Several limits	EC Reg. 396/2005 and subsequent amendments; FDA (USA)
Products containing allergens	Any cross-contamination with these substances can lead to immune reactions in the body, even to anaphylactic shock.	Absence / Declaration in labeling	Reg UE 1169/2011; FDA (USA)
Chemical substances present in the lines processing and in the environments of production	Lubricating oils, protective paints, plant equipment, inks.	Use of food-grade products	-
Products genetically modified	GMOs are living organisms whose genetic heritage has been permanently modified by inserting genes (portions of DNA) from other organisms, in order to develop new functions in them or to produce new substances (Directive 2001/18 / EC) .	The tolerance threshold for accidental or technically unavoidable contamination must not exceed the limit of 0.9%.	Reg CE 1829/2003

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Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 2:30:17 AM
Their presence indicate

Author: Laura.Gazzola Subject: Evidenziato Date: 5/30/22, 11:26:11 AM

Author: Laura.Gazzola Subject: Evidenziato Date: 5/30/22, 11:26:07 AM

Author: Laura.Gazzola Subject: Casella di testo Date: 5/31/22, 9:15:42 AM
Add a line between "Product residues phytosanitary" and "Product containing allergens".

Author: Laura.Gazzola Subject: Nota Date: 6/1/22, 2:34:39 AM
- Milling products of barley, wheat, spelt and oats (with an ash content lower than 900mg/100g): maximum level 100 µg/kg.

- Milling products of barley, wheat, spelt and oats (with an ash content equal or higher than 900mg/100g): maximum level 150 µg/kg.

- Barley, wheat, spelt and oats grains placed on the market for the final consumer: maximum level 150 µg/kg.

- Wheat gluten 400 µg/kg.

Author: Laura.Gazzola Subject: Nota Date: 5/30/22, 11:45:29 AM
EC Reg. 1399/2021 that modifies EC Reg. 1881/2006.

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 9:20:38 AM
Alkaloids of Ergot are toxins produced by a fungi Claviceps purpurea that parasitizes rye and other cereals. Presence of these substances in food can cause negative effects on health and can therefore represent a risk for health.

Author: Laura.Gazzola Subject: Nota Date: 5/31/22, 9:18:28 AM
Add: **Alkaloids of Claviceps spp.**

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Author: Laura.Gazzola Subject: Nota Date: 6/1/22, 2:36:17 AM
8 - Mixing Mixer 1
8B - Mixing Mixer 3

8 - Mixing Mixer 1 8B Mixing Mixer 3					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger. Between the mixer and the packaging line there is a magnet and a sifter
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

8 C - Mixing Mixer 2					Justification
F.	Weed arthropods	1	2	2	The implemented prevention activity (Pest Control) together with the characteristics of the process significantly reduce the possibility of contamination by pests. The controls carried out on incoming raw materials help to maintain the average risk
B.	Molds, yeasts	1	1	1	
F.	Ferrous and metallic foreign bodies	3	3	9	Foreign bodies in the production in question are on average influencing, the process takes place in a closed environment, along the entire production line there are adequate sieves or magnets to reduce the danger. There is no sifter between mixer and integral line
F.	Other foreign bodies	3	2	6	
B.	Salmonella spp., E. coli, Bacillus cereus, Enerobacteriaceae, Staphylococci	3	1	3	The process takes place in a closed cycle and with grain cleaning activities that favor the reduction of microorganisms present on the MP, while for microorganisms related to human activities that can be prevented with the application of correct hygiene rules and were therefore considered in the risk analysis as one family.

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:13:58 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:01 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:06 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:13 AM
DELETE

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	1A - Receipt grain	Wrong identification goods	Check bill accompaniment or	Identification of the goods first of the exhaust	Each delivery	Identification clear of goods	Module 10.01_03	Load lock until correct identification of product	Responsible procurement nto	Management review annual: Trend of NC for errata identification
		Contamination biological, chemical and physics	Supplier qualification	To verify conditions hygienic ed fitness of the vehicle Request documentation about cleaning	Each delivery	The vehicle it must be suitable for transport of cereals, the coverage must be intact and the medium does not must have transported in precedence critical substances or harmful	Stamp with check-list on ddt	Awareness raising of the driver e reporting to supplier	Miller's Responsible procurement nto	Management review annual: Trend of NC grain suppliers
				Check the presence and i contents of the documentation provided about i post treatments collection of cereal	Each delivery	It must be present the documentation	Module 10.01_03	reminder documentation to suppliers with right not to unload the goods	Responsible procurement nto	Management review annual: Trend of NC grain suppliers

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:17 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:21 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:26 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:30 AM
DELETE

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	1A - Receipt grain			Sampling loading and controls sensory on product	Each delivery	Absence of odors anomalous ed strangers. The smell it must be that typical of grain without hints of moldy, stale or produced chemists	Module 10.01_03	Challenge to the supplier, reject the goods	Responsible procurement nto Millers	Management review annual: Trend of NC grain suppliers
						Absence of live insects. Do not more than 4 insects dead	Module 10.01_03	Challenge to the supplier, reject the goods	Responsible procurement nto	
		Contamination biological, chemical and physics	Supplier qualification	Check humidity, specific weight of the kernels e of waste	Each delivery	Humidity as per contract or in absence there yes refers to Ager contract. The PS must be above 70 kg / hl. Impurity <2%	Module 10.01_03	If PS lower analysis is needed impurities and if these exceed 8% takes care of it quick analysis of DON	Responsible procurement nto Responsible Production	Management review annual: Trend Humidity, PS e impurities supplies, trend NC for 3 parameters
				Quick analysis Mycotoxins	The first delivery after the truck of proof of a new contract. Then every 300 tons delivered.	Lower residues within the limits of the law	Module 10.01_03	If higher than legal limits refusal of cargo e NC opening a supplier / If presence significant reporting to supplier e monitoring	Responsible procurement nto QC laboratory	Management review annual: Trend results mycotoxins supplies, trend NC for mycotoxins on the grains

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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:34 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:48:10 AM
substitute with RAW MATERIALS

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:49:26 AM
substitute with PROCUREMENT

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:44 AM
DELETE

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:48 AM
DELETE

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements / check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
	1B - Reception other subjects prime		Check extraordinary for possible problems of origin (accidents nuclear, for example grain Russian / Ukrainian)	Analyses radioactivity Declaration supplier	The first delivery after the truck of trial. Each delivery	Lower residues within the limits of the law	Module 10.01_03	If higher than legal limits or presence significant refusal of cargo e NC opening a supplier	Responsible procurement nto QC laboratory	Management review annual: Analysis / end radioactivity supplies, (i applicable)
		Non-compliance analytic	Contract purchase with features merchandise and analytical	Analysis of laboratory for check the compliance with contract	Each delivery	Responsiveness to specifications reported in contract of purchase/ data sheet	Module 10.01_03	Challenge to the supplier e decision of how to re-classify the commodity / Refusal of the load	Responsible supplies chin	Management review annual: Analysis trend merchandise supplies, trend NC by parameters merchandise
PRP		Wrong delivery goods	Check bill accompaniment or	Identification of the goods first of the exhaust	Each delivery	Identification clear of goods	Module 10.01_03	Non acceptance of the goods e reporting to supplier	Responsible procurement nto Responsible Warehouse	Management review annual: Trend of NC for errata delivers
PRP		Contamination biological	Supplier qualification	To verify conditions hygienic and fitness of the vehicle	Each delivery	The vehicle it must be suitable for transport of foods, not must present abnormal odors o to be soiled	Stamp with check-list on ddt	Awareness raising of the driver e reporting to supplier	Responsible procurement nto Responsible Warehouse	Management review annual: Trend of NC other suppliers MP

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:14:53 AM
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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:15:15 AM
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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Non-compliance analytic	Contract purchase with features analytical deliveries e certificate of analysis supplier who accompanies the goods	Analysis of laboratory for check the compliance with certificate / card technique as per analytical plan	Each delivery	Compliance with specifications reported in contract of purchase / card technique	Module 10.01_03 Module 06.01_09 Module 13.01_01	Challenge t the supplier e decision of how re-classify the commodity / Not acceptance of load	Responsible procurement nto QC laboratory	Management review annual: NC trend analytical
PRP	**1C - Reception** primary packaging	Presence of odors pungent / dirty a on the packaging	Supplier qualification	Visual inspection e olfactory packaging al receipt	Every reception	Absence of odors strangers e	Stam / on bubble	Rejected goods	Responsible Warehouse e packaging	Management review annual: Trend of NC suppliers primary packaging
PRP	***Shipment goods***	*Fraud and food defense*	See the two specific risk assessments							Management review annual: Trend of NC suppliers for fraud or food defense

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:52:14 AM
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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:15:24 AM
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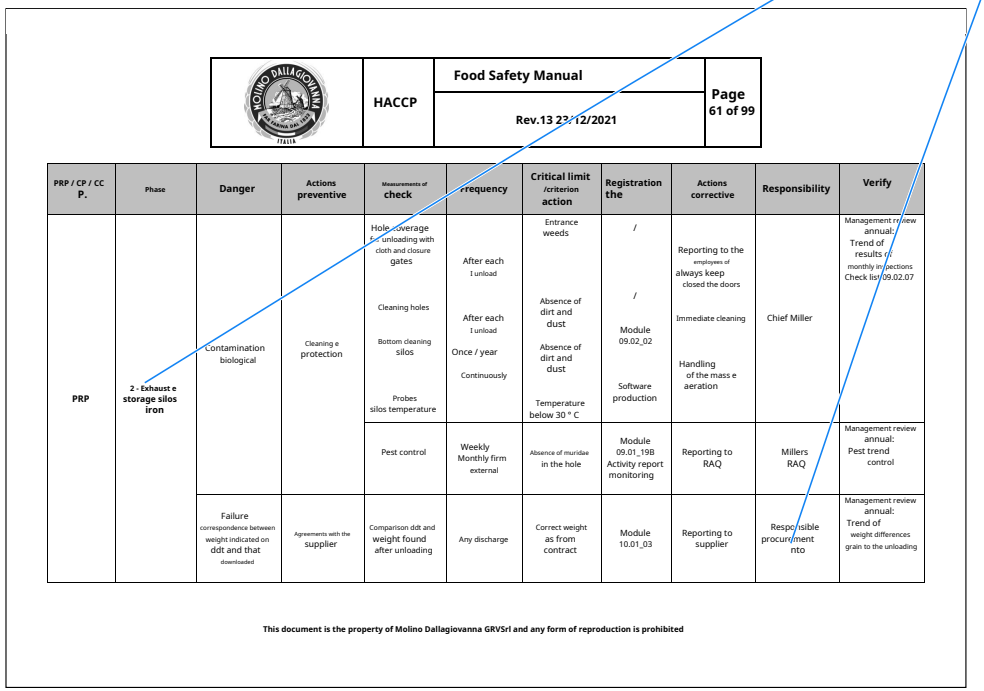

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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	2 - Exhaust e storage silos iron	Contamination biological	Cleaning e protection	Hole coverage for unloading with cloth and closure gates Cleaning holes Bottom cleaning silos Probes silos temperature	After each 1 unload After each 1 unload Once / year Continuously	Entrance weeds Absence of dirt and dust Absence of dirt and dust Temperature below 30 ° C	/ / Module 09.02_02 Software production	Reporting to the employees of always keep closed the doors Immediate cleaning Handling of the mass e aeration	Chief Miller	Management review annual: Trend of results m monthly inspections Check list 09.02.07
				Pest control	Weekly Monthly firm external	Absence of muridae in the hole	Module 09.01_19B Activity report monitoring	Reporting to RAQ	Millers RAQ	Management review annual: Pest trend control
		Failure correspondence between weight indicated on ddt and that downloaded	Agreements with the supplier	Comparison ddt and weight found after unloading	Any discharge	Correct weight as from contract	Module 10.01_03	Reporting to supplier	Responsible procurement nto	Management review annual: Trend of weight differences grain to the unloading

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:53:47 AM
MACHINERY

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:53:09 AM
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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:54:11 AM
MACHINERY

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:54:07 AM
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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criteria action	Registration the	Actions corrective	Responsibility	Verify
PRP	3 Pre-cleaning e storage silos concrete 3A Mixing and storage mixed grain	Bad operation cars Contamination biological	Maintenance installations Cleaning floor	Check effectiveness pre-cleaning e scraps	Daily	Efficient	Maintenance	Plan review maintenance	Millers	Management review annual: Trend of NC pre-cleaning
				Control and cleaning magnet separator	Daily	Clean ed efficient	Module 09.02_02	Step up cleaning	Chief Miller RAQ	Management review annual: Trend of NC presence cell infestations grain storage
				Inspection of the cell	Monthly	Absence infestations		Interventions localized		
CP	4 - Before Molino cleaning To and Molino cleaning C.	Bad operation cars: presence of bodies metallic strangers e non-metallic	Maintenance installations	Check effectiveness cleaning and scraps	Daily	Clean ed Efficient	Maintenance	Plan review maintenance	Chief Miller	Review quarterly: indices sanitation: CP
				Control and cleaning magnet ferrite 2800 Gauss - MAGN01	Daily Check strength attractiveness yearly from external company	Clean ed efficient Efficiency magnet > 2000 Gauss	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 3:56:23 AM
A & C

PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criteria for acti...n	Registration the	Actions corrective	Responsibility	Verify
		Times error rest	Training personal	Humidity control	Every grinding	Grain moisture 16.5-17%	Module 09.01_07	Change times rest	Millers	Management review annual: Trend of NC x moisture out std
CP	6 - Second Molino cleaning A and Molino C	Bad operation cars	Maintenance installations	Check effectiveness cleaning and sc...	Daily	Efficient	Maintenance	Plan review maintenance	Chief Miller	Management review annual: Trend of NC maintenance x ineffectiveness cleaning
				Control and cleaning magnet ferrite 2100 Gauss - MAGN02	Daily Check strength attractiveness yearly from external company	Clean ed efficient Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP
				Control and cleaning magnet 1800 Gauss - MAGN15 (balance rolling mill B1 del Molino C)	Daily Check strength attractiveness yearly from agency external	Clean ed efficient *Efficiency magnet > 1500 Gauss*	Module 15.01.16 Relationship of measurement	Step up cleaning	Miller RAQ	Review quarterly: indices sanitation: CP
PRP	7 - Grinding TO&C	Contamination biological	Cleaning plan	Check status machinery e external cleaning ed internal	Weekly external Daily internal	Absence of insects e adhered flour	Module 09.02_02	Blowing of the machinery e analyses monitoring periodical company external	Millers Cleaning ladies RAQ	Review quarterly pest trend control

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PRP / CP / CCP.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
PRP	8 - Mixing flour (mixer 2000 kg) MIXER 1 [Pre-blend vitamins]	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Product blocked	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
		Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Monthly	Mixer cleaned up	Module 09.02_02	Immediate cleaning	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
		Product not compliant (QC)	Sampling batch 20 quintals for laboratory analysis QC	Moisture, ashes, proteins, gluten, Falling Number, Alveograph, Farinographer (it depends on typology of product)	Annex 02 IOP 07 Frequency withdrawals	Compliance with data sheet	10.02_02	Modification of the recipe	Responsible production	Management review annual: Trend of analytical results (humidity etc ..)
PRP	8B Mixing new flour plant 2015 (2000 kg) MIXER 3	Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Once / month	Mixer emptied and cleaned	Module 09.02_02	Immediate cleaning	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	8 C Mixing wholemeal flour (1000 kg) MIXER 2	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Product blocked	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07

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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
		Contamination biological	Cleaning plan	Aspiration of the dust and residual flour from mixer	Once / month	Mixer emptied and cleaned	Module 09.02_02	Immediate cleaning	Attended miller	
CP	8C - Passage magnet from silos 31-32 in silos 50 (wholemeal flours)	Foreign bodies ferrous	Magnet a drawer in Neodymium 9000 Gauss - MAGN12	Visual inspection e cleaning	Daily Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CP
PRP	9 - Storage for flours bulk and mixed	Contamination biological	Cleaning plan fariniere	Aspiration of the dust and residual flour from the extractor	Once / year for silos molino, Every 4 months for silos shed (33-34)	Clean farini bowls	Module 09.02_02	Immediate cleaning	Millers Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	10 - Blending ingredients a hand containing allergens MIXER 4	Foreign bodies	Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Avoid that mixer not drains and block product eliminating the problem	Attended miller	Management review annual: Trend of results of monthly inspections Check list 09.02.07
PRP	10 -Mixing bagging line 4 5 - 10 kg	Foreign bodies	Packaging integrity Prohibition of introduction foreign material in the departments	Visual inspection	Every production	Absence material not authorized	Pre-checks operational	Avoid that cochlea do not download e block product eliminating the problem	Clerk packaging	Management review annual: Trend of results of monthly inspections Check list 09.02.07

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 10:16:03 AM
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PRP / CP / CC P.	Phase	Danger	Actions preventive	Measurements of check	Frequency	Critical limit /criterion action	Registration the	Actions corrective	Responsibility	Verify
	Packaging or 1 and 5 kg	Wrong filling	Weight check	Automatic weighing packs e relative waste statistical control weight (for 1 and 5 kg)	Each operation from packaging or	Correct weight (for 1 kg and 5 kg Law 690 of 1978)	Module 09.01_10 Module 09.01_10B	Check weight packs previous and following	Responsible packaging	Annual review: trend NC / complaints for weight
CP	12 A - Molino area Sieving, packaging (magnet), storage packaging, storage products	Presence of bodies strangers	Buratto of safety single channel BU3	Control of rejects	Third round	Tumbler integrity: see photo	Module 15.01_06	Check integrity jerseys	Attended miller Clerk packaging	Review quarterly: indices sanitation: CP
CCP		Damage or sifter of safety	Magnet in ferrite 2100 Gauss - MAGN06 Before the sieving (Mixer plant 3)	Visual inspection and cleaning	Daily Check strength attractiveness yearly from agency external	Clean (at least 90% with absence of particles) and efficient (trial attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller clerk	Review quarterly: indices sanitation: CCP
CCP		Foreign bodies ferrous	Magnet in Neodymium 4300 Gauss - MAGN04 first bagging wholemeal flours	Visual inspection e cleaning	Daily Check strength attractiveness yearly from external company	Clean (at least 90% with absence of particles) and efficient (try attractiveness) Efficiency magnet> 2000 Gauss	Module 15.01.16 Relationship of measurement	Product block	Miller Clerk packaging RAQ	Review quarterly: indices sanitation: CCP

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Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 4:05:44 AM
A

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 4:05:59 AM
E

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 4:11:17 AM
Modify with **AA.**
Please copy exactly the letters written in the example above (RAAGGGPNN).

Author: Laura.Gazzola Subject: Evidenziato Date: 5/31/22, 4:11:09 AM
Modifiy with **GGG**.
Please copy exactly the letter written in the example above (RAAGGGPNN).

3.9 Traceability

The details of the management of the activities of identification, withdrawal and recall of the products are reported in PAQ 08.01.

Traceability is guaranteed by using a management system, an IT system that controls production and records the operations carried out by identifying the moment in time; everything is also supported by paper records.

The lots of the various productions are assigned and identified as follows:

Packaged products:SAAGGG code letter bagging machine_NN.S = bags

YY = current year

DD = Julian day

Bagging machine letter code:

TO	Bagging line 1
C.	Bagging line 2
D	Bagging line 3
And	Bagging line 4
F.	Bagging line 5
G.	Oltregrano bagging line

NN = progressive number of packaging

E.g .: S22019F01 (product bagged in the bagging plant line 5)

The products that can be packaged at our copacker will be identified by the letter**B.**placed at the end of the lot; the letter refers to the address of the copacker's factory shown on the bag.

Bulk products:*RAAGGGPNN R = bulk*

YY = current year

DD = Julian day

P = unique letter which stands for "production"

NN = progressive number of processing

Ex: R18260P06

Packaged and bulk products from a plant that is not fully automated: *Instead of S / R there is SM (= manual bag) and RM (= manual bulk)*

Marketed products:load on the computer management program of the "batch identifier" and the expiry date of the product as declared by the supplier in the accompanying document. The production operator enters the supplier lot in the "customer lot" field.

The "Infinity" administrative management software receives the information relating to the production batches directly from the "RAM" production software. The traceability code of the product (lot) is affixed to all transport documents and for each product sold, in such a way as to allow in a short time to trace the products both sold and still in stock.

realization of the product, from the moment in which the raw material, the packaging, the ingredients are introduced into the company up to the shipment of the finished product, their handling flows in the plant and the flows of all the personnel engaged in production activities, highlighting the location of the changing rooms, toilets, the flows that operators must follow to access them.

As mentioned in the risk analysis, the areas of the plant were identified as low risk or intended for the treatment of closed products.

4.4 Building structure and areas intended for handling raw materials, preparation, transformation, packaging and storage

The Molino Dallagiovanna company is located in the open countryside, its structure is in good condition and there are no companies nearby or activities that could negatively affect the work. The company has outdoor areas for the parking of trucks that must unload-load the raw material or finished products and has defined ways of managing the entrances of vehicles and cars.

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collaborators or customers or third party vehicles.
The general structure of the premises has been designed in order to rationalize the production flow from the arrival of raw materials to the finished product.

The design of the premises was made in such a way as to:

- allow the easy carrying out of the necessary cleaning and disinfestation operations;

- to prevent, as far as possible, the accumulation of dust, dirt and anything that could pollute the product;

- prevent as much as possible the entry of contaminants and / or pests from the external environment;

- the premises are kept clean, subjected to the necessary maintenance and generally kept in good condition; they are also equipped with effective lighting and ventilation systems. The cleaning of the premises is scheduled periodically and is organized according to the relevant instructions.

Within the structure there are several rooms, each used for one or more specific activities in order to reduce the possible cross-contamination between the products in different phases of the processing flow. The premises are made ensuring perfect waterproofing against atmospheric agents to prevent infiltrations and drips on the systems and in the workplace. The internal flooring is made with materials suitable for processing capable of supporting the weight of the systems.
The walls are easily cleaned and maintained in conditions suitable for the work carried out in the room and kept in good condition by promptly eliminating cracks to avoid the accumulation of deposits and the nesting of weeds.
Ceilings are easily cleanable, waterproof, made to prevent mold growth and kept in good condition to prevent condensation, dirt build-up or falling particles.

The superstructures, including the ducts of the utilities, are made and positioned in such a way as to avoid the accumulation of dirt, the formation and dripping of condensate and the fall of particles; the disused canalization is sealed or eliminated by promptly maintaining the attached structural parts. The doors are easy to clean, the doors and ramps to the outside are kept closed even towards unauthorized persons; the internal doors destined to remain closed do not have cavities and, when possible, devices are applied that allow their automatic closing. The windows are made and managed in such a way as to prevent the accumulation of dust and pests; the windows intended for ventilation are adequately shielded to prevent the entry of pests.

Windows that do not have insect protection nets because they are not intended for ventilation are kept permanently closed by affixing blocks.
The lighting allows the control of the product and of the processes in particular in the rooms where it is necessary to carry out the processing.
Ventilation systems prevent condensation or dust; air conditioning and filtration systems

2.12 Review of the HACCP plan

Verification of effectiveness validates the ability of the food safety management system to prevent contamination that may preclude the healthiness of the product. The verification takes into account any new legislation, national or international alerts, technical / scientific innovations, significant changes in product, process, structures or operational staff, the suitability of any treatments applied during the performance of the activities (including recall / withdrawal), of the results of periodic internal audits, of customers or official control bodies, of the results of monitoring relating to control measures and CCPs and of the results of analytical checks carried out on products and in the various phases of processes. In this sense, the company periodically assesses the adequacy of the critical limits, especially in cases where the critical limits coincide with any legal limits. The internal laboratory follows recognized or internal validated test methods (also through comparison cycles with external laboratories with tests accredited by Accredia or similar) using good laboratory practices with analysis protocols and standardized calibration methods.

On the basis of the information resulting from the verification, the preventive actions, the control measures and the HACCP plan are periodically approved or modified, maintaining documentary evidence. On an annual basis, the HACCP Team, in agreement with the General Management, carries out the Review of the system in order to identify areas for improvement. This activity considers:

. the status of the actions resulting from previous management reviews
. changes in external and internal factors relevant to the system, including changes in the organization and its context
. results of monitoring and measurements;
. results of the verification activities of the PRP, CCP and O-PRP
. results of analytical checks on raw materials and finished products;
. progress of complaints and returns;
. non-conformity of product and process;corrective actions
. performance of external suppliers
. inspections and analyzes carried out by the supervisory bodies;
. any RASFF alerts;
. any reports for food fraud
. results of internal audits
. review of the risks and the appropriateness and effectiveness of the actions taken to address them
. degree of achievement of objectives

At the end of the review, any objectives for improving the system are defined. The activity is recorded in the document "Review of the Management of the Quality System of Molino Dallagiovanna" or possibly in the Quarterly Reviews.

Validation is considered within the review, i.e. the verification of the effectiveness that validates the ability of the food safety management system in the prevention of contamination that can preclude the healthiness of the product.

3 FOOD SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 Manual on food safety and quality

The procedures, operating instructions and practices of the site were first built on the structure of the ISO 9001 standard and subsequently were enlarged and enriched with compliance with other standards relating to food safety.

3.2 Control of the documentation

The Company ensures that the documentation produced is kept under control through a tabular matrix (EDD-List of Descriptive Documents of Quality).
The operational instruction IOP 01 encodes the quality registration documents (forms) describing the method of archiving (Manager, place and timing).
Furthermore, each document forming part of the Quality System reports in the initial part a summary of the revision and changes made over the years.

3.3 Compilation and keeping of records

The site regularly records its quality and food safety parameters through specific Forms, periodically reviewed like the rest of the Quality System documentation.
The records are kept for a minimum period equal to the shelf-life of the product plus 12 months.

3.4 Internal audits

Annually, the QAM defines a program of internal audits that has a variable frequency according to the risk associated with the activity and the results obtained in the previous audits.
The criteria adopted are the following:

- 2 checks / year in departments with CCP management (packaging)
- 1 audit per year for all other functions
- \+ 1 verification with respect to the previous ones in the event that non-conformities were found from internal audits of the previous period
- At least 4 verification dates within a year

evidence of the application of the criteria is included in the annual audit program (Mod. 17.01.01). in addition to the internal audit program, monthly inspections are also carried out with a specific check list.

3.5 Approval of the supplier of raw materials and services and control of performance

The company has provided through the dedicated procedure (PAQ 06.01 Procurement) to define the methods for managing the procurement of raw materials:

- Soft wheat suppliers conferred with multiple deliveries distributed throughout the year;
- suppliers of soft wheat from local farmers;
- suppliers of ingredients and finished products;
- packaging suppliers.

The procedure for evaluating raw materials and suppliers follows the logic of the points dealt with by the BRC Standard itself:

1) 2.7.2 analysis of the risks associated with the supplier's product→2) 3.5.1.1 evaluation of raw materials → 3) 3.5.2.1 approval and control procedures→4) 3.5.1.2. supplier evaluation→5) 3.5.1.3 purchase through agents or brokers 6) 3.5.1.4 handling exceptions to the approval process→7) 3.9.3 effective traceability system

A matrix has been prepared to highlight the risk analysis of each supplier. *The substitution and fraud risk was listed through a specific assessment.*
For suppliers of raw materials, ingredients, finished products and packaging, acceptance control programs are planned through operating instructions to the unloading staff and the QC laboratory.

The criteria for the qualification of suppliers are described in detail in PAQ 06.01 and are generally based on the examination of the following elements (downstream of the risk analysis on the supplier):

- request to fill in the Supplier Approval Questionnaire;
- request for existing certifications, in particular the Food Safety Standard and the report;
- second-party audit at the supplier (for suppliers at risk);
- request for documentation concerning the food safety of the product supplied (technical sheet, HACCP plan extract, flow chart, allergen policy and management, traceability, GMO policy);
- traceability test.

In fact, the application of supplier qualification criteria is designed to reduce the risk of acquiring unsuitable supplies that can pose a risk to the consumer.
The same procedure PAQ 06.01 also defines the management methods of service providers.
At the moment, the management of outsourced production processes for BRC purposes is not applicable, for IFS purposes the packaging of the product in packets of kg is classified as outsourcing and managed as such.

3.6 Specifications

The Company requests all raw materials from its suppliers and archives the updated technical specifications; By filling out the Questionnaire, the supplier undertakes to inform Molino Dallagiovanna GRV about any change that occurs in the production process and that leads to the need for a new verification for compliance purposes.
The company has also proceeded to issue complete technical data sheets for all finished products using an automatic system that requires the compilation of a word sheet using the data entered in an excel document.
Furthermore, the Company archives the specifications defined with the customer (specifications) and undertakes to respect them as a mandatory requirement.

3.7 Corrective and preventive actions

The company manages the non-conformities arising internally or transmitted by customers through the opening of corrective actions, for which an effectiveness check is required to close the non-conformity itself. Corrective actions may include an immediate resolution or an experimentation period to assess the effectiveness of the transposition.
The preventive actions implemented along the entire production process are described in point 2.10 of this Manual.

3.8 Control of non-conforming products

With regard to products deemed non-compliant that are stored at the company or for which a complaint has been received from the customer, the company has managed to manage them through the PAQ 13.01 procedure.*Management of non-conformities and complaints*customers". It considers all non-conformities from the acceptance of the raw material to the delivery of the finished products to the complaints received by the company. The term NON-CONFORMITY means the non-fulfillment of a specified requirement.
The term NON-CONFORMITY OF MINIMUM ENTITY means non-conformities that can be resolved immediately by the person responsible for the action, immediately restoring the situation.

The term COMPLAINT means the non-satisfaction of the product by the customer.
Thenon-compliant product it will be identified with the appropriate "Non-compliant product" notice (Annex 1 PAQ 13) to prevent its use.
In case theproduct isalready stored in the special silos it is necessary to indicate on the report the silos in which it was stored and to place the adhesive label on the silos with the words "NOT CONFORMING".
In the event that the non-compliance concerns the process, the activities subject to the non-compliance must be suspended pending a decision.
For thenon-compliant packaged products that return from the customer or that have been produced in the company and that can be used for food use, a dedicated area has been allocated, identified with a sign bearing the words "PRODUCTS TO REWORK", the product is placed the attachment 1 of PAQ 15 " pallet identification sheet "with useful information and the sheet" BLOCKED BATCH - NOT COMPLIANT BATCH "awaiting instructions from the Production Manager.
Regarding products that have expired or are not suitable for food use that must be destined for zootechnical use (eg. expired flours, processing waste or food by-products withdrawn from the company destined for zootechnical use) they are placed in places well identified with specific signs ("NON-CONFORMING GOODS - FOR ZOOTECHNICAL USE") separate from food areas.
For food products for which a downgrading and the use in a subsequent processing since the standard of characteristics does not meet the requirements is identified with the sign "LOTTO BLOCCATO" and subsequently, based on the decision of the Production Manager, it is sent for reworking into a lower quality basic flour.

3.9 Traceability

The details of the management of the activities of identification, withdrawal and recall of the products are reported in PAQ 08.01.

Traceability is guaranteed by using a management system, an IT system that controls production and records the operations carried out by identifying the moment in time; everything is also supported by paper records.

The lots of the various productions are assigned and identified as follows:

Packaged products:SAAGGG code letter bagging machine_NN S = bags

YY = current year

DD = Julian day

Bagging machine letter code:

TO	Bagging line 1
C.	Bagging line 2
D.	Bagging line 3
And	Bagging line 4
F.	Bagging line 5
G.	Oltregrano bagging line

NN = progressive number of packaging

E.g .: S22019F01 (product bagged in the bagging plant line 5)

The products that can be packaged at our copacker will be identified by the letter**B.**placed at the end of the lot; the letter refers to the address of the copacker's factory shown on the bag.

Bulk products:*RAAGGGPNN R =*
bulk
YY = current year
DD = Julian day
P = unique letter which stands for "production"
NN = progressive number of processing
Ex: R18260P06

Packaged and bulk products from a plant that is not fully automated: *Instead of S / R there is SM (= manual bag) and RM (= manual bulk)*

Marketed products:load on the computer management program of the "batch identifier" and the expiry date of the product as declared by the supplier in the accompanying document. The production operator enters the supplier lot in the "customer lot" field.

The "Infinity" administrative management software receives the information relating to the production batches directly from the "RAM" production software. The traceability code of the product (lot) is affixed to all transport documents and for each product sold, in such a way as to allow in a short time to trace the products both sold and still in stock.

Furthermore, the administration records the purchase of primary packaging and its use in the system according to the FIFO method. Warehouse employees report every batch change of the packs used, identified by the supplier pallet sheet. Through the registration of the packaging (RAM mask) and the purchase invoices of the packaging it is possible to trace and identify the history of the primary packages.

3.10 Claims management

The management of complaints received from customers is described in the PAQ 13.01 procedure "Management of non-conformities and customer complaints".

Complaints are duly registered and filed using both a document in excel format ("returns-complaints from 2006 to today") and the paper form described in the procedure itself.

3.11 Incident management, product withdrawal and recall

The management of the collection / recall activity is described in the PAQ 08.01, while the management of emergencies is dealt with in the PAQ 17.01.

The emergencies identified in the company are the following:

A. lack or non-potability of well water (see specific procedure defined for the control of water potability);

B. fire: the plant meets the requirements of the law and in any case any products contained in the premises subject to fire will be isolated for further evaluation and possible waste and managed in the manner of PAQ 13.1;

C. black out: in the event of a power failure, the uninterruptible generator is used to guarantee lighting, the use of the lifts, the fire-fighting network and the power supply of the computers. The production activities are blocked until the electricity is restored, the mill is made to go idle to empty the existing product and the computer starts production starting from the first stages of processing, the operators manually start the air compressors;

D. product tampering: in the event that the site control procedures highlight potential product tampering, the alert team will be activated to verify the validity of the problem and manage the food safety of the product.

E. malfunctions or attacks on cyber security systems

The Food Defense Plan was drawn up through the guidelines dictated by the FDA (Food Defense Plan Builder), the Food Defense itself is performed by the Team coordinated by Maria Grazia De Pascali and is composed of the following figures:

- Sergio Dallagiovanna (Employer);
- Stefania Dallagiovanna (Production Manager, QC Laboratory and Personnel Manager);
- Davide Oppizzi (Warehouse Manager);
- Laura Gazzola (Quality Assurance);
- Donatella Fraioli (Quality Assurance).

The risk analysis is periodically reviewed in the annual Management review.
The company exports to the USA and the plant is registered with the FDA with the number 10558094792.
All external personnel are registered through the appropriate form at the reception and informed about the behavior to be followed according to company rules. In the event of a visit by the FDA, the company will check the details of the Inspector and the mandate by contacting the FDA office fooddefense@fda.hhs.gov .

With regard to the withdrawal and recall of products, in order to protect the health of the consumer, the company implements the following procedure:

- evaluation of the problem and opening of the non-conformity in the company;
- identification of the non-compliant batch;
- identification of the customers to whom the lot has been sold;
- immediate notice by telephone, e-mail or fax to customers using Form 08.01_01 Rev00 and subsequent written communication via PEC or email with communication confirmation not to transform and isolate the product conferred;
- reporting to the competent authority (local AUSL) in order to activate the alert procedure if the product is not identifiable because it is subsequently sold to the final consumer.

The company carries out tests of the effectiveness and efficiency of the traceability system at least annually by means of simulations and / or tests carried out internally or by involving a customer who has been asked to carry out the simulation.

3.12 Attention to the customer and communication

The company ensures that every policy and customer request is understood, implemented and communicated to the relevant staff. Where there are special requests from customers to follow processing methods, ethical codes or specific identifications, the staff concerned is informed through clear operating instructions.
If there are also specific customer requests to raw material suppliers and / or other suppliers, these will be transmitted to the supplier in an effective and timely manner.

4 ESTABLISHMENT STANDARDS

4.1 External Standards

The plant fully complies with the requirements expressed in Annex II of Regulation (EC) No. 852/2004.
The external area surrounding the plant is periodically cleaned and kept in order, checking the adequacy of the fencing, the rainwater drainage systems, the flooring around the plant and the green areas, avoiding the accumulation of waste.
There is attention to preventing the formation of puddles, the accumulation of dust or stagnant water, in particular in the vicinity of access roads and areas adjacent to warehouses.

4.2 Security

The Company, with reference to food safety, the interference risks related to safety in the workplace, the possible risks of accidental or voluntary contamination of the productions, has established the rules for access to internal and external collaborators, visitors, bodies surveillance, service providers and transporters.

The Company therefore proceeded to:

1. Draw up an internal company regulation (IOP 05);
2. identify specific paths for personnel flows;
3. define and separate areas most at risk for food safety;
4. block the openings from the outside for which free access is not provided;
5. all visitors, contractors, customers and control bodies are received at the reception, recording the data of the person entering and exiting on the appropriate form. The people who are registered are informed about the risks present in the company and the safety regulations ("Rules of access to the establishment"), are accompanied or are assigned a company manager;
6. visibly identify the external operator or visitor to make him immediately recognizable and verify the need to receive the documentation relating to the activity;
7. define a work permit (PDL) for companies that have to carry out work activities within the areas of the plant; this permit refers to workplace safety regulations (interference risks) and food safety regulations (*food safety*And*food defense*);
8. establish the verification of correct insertion among qualified suppliers for companies that have to carry out work activities;
9. define the risks present in the workplace by drawing up a Single Document for the Evaluation of Interference Risks, including food safety;
10. carry out proper training and information for personnel in order to increase sensitivity and attention to issues of safety in the workplace and food safety;
11. Procedures have been put in place to ensure that the 10 and 25 kg finished product is kept in safe storage and transport conditions with the total closure of the bag valve.

4.3Layout, product flow and separation

The different steps of the manufacturing processes have been visualized in the flow chart which represents the characteristic development of the entire production process from the acceptance of the product to the production, packaging and shipment of the finished product.
In order to highlight any potential cross-contamination points, difficult cleaning, difficult maintenance and to initiate the appropriate actions aimed at reducing possible product contamination, the plant plan is updated highlighting the position of the machinery, the movement of products, waste and production workers.

In particular, the plan of the plant derives from observations carried out on the workplace and allows to identify the type and location of all the areas that take part in the

realization of the product, from the moment in which the raw material, the packaging, the ingredients are introduced into the company up to the shipment of the finished product, their handling flows in the plant and the flows of all the personnel engaged in production activities, highlighting the location of the changing rooms, toilets, the flows that operators must follow to access them.

As mentioned in the risk analysis, the areas of the plant were identified as low risk or intended for the treatment of closed products.

4.4 Building structure and areas intended for handling raw materials, preparation, transformation, packaging and storage

The Molino Dallagiovanna company is located in the open countryside, its structure is in good condition and there are no companies nearby or activities that could negatively affect the work. The company has outdoor areas for the parking of trucks that must unload-load the raw material or finished products and has defined ways of managing the entrances of vehicles and cars.

collaborators or customers or third party vehicles.
The general structure of the premises has been designed in order to rationalize the production flow from the arrival of raw materials to the finished product.

The design of the premises was made in such a way as to:

- allow the easy carrying out of the necessary cleaning and disinfestation operations;

- to prevent, as far as possible, the accumulation of dust, dirt and anything that could pollute the product;

- prevent as much as possible the entry of contaminants and / or pests from the external environment;

- the premises are kept clean, subjected to the necessary maintenance and generally kept in good condition; they are also equipped with effective lighting and ventilation systems. The cleaning of the premises is scheduled periodically and is organized according to the relevant instructions.

Within the structure there are several rooms, each used for one or more specific activities in order to reduce the possible cross-contamination between the products in different phases of the processing flow. The premises are made ensuring perfect waterproofing against atmospheric agents to prevent infiltrations and drips on the systems and in the workplace. The internal flooring is made with materials suitable for processing capable of supporting the weight of the systems.
The walls are easily cleaned and maintained in conditions suitable for the work carried out in the room and kept in good condition by promptly eliminating cracks to avoid the accumulation of deposits and the nesting of weeds.
Ceilings are easily cleanable, waterproof, made to prevent mold growth and kept in good condition to prevent condensation, dirt build-up or falling particles.

The superstructures, including the ducts of the utilities, are made and positioned in such a way as to avoid the accumulation of dirt, the formation and dripping of condensate and the fall of particles; the disused canalization is sealed or eliminated by promptly maintaining the attached structural parts. The doors are easy to clean, the doors and ramps to the outside are kept closed even towards unauthorized persons; the internal doors destined to remain closed do not have cavities and, when possible, devices are applied that allow their automatic closing. The windows are made and managed in such a way as to prevent the accumulation of dust and pests; the windows intended for ventilation are adequately shielded to prevent the entry of pests.

Windows that do not have insect protection nets because they are not intended for ventilation are kept permanently closed by affixing blocks.
The lighting allows the control of the product and of the processes in particular in the rooms where it is necessary to carry out the processing.
Ventilation systems prevent condensation or dust; air conditioning and filtration systems

air are periodically maintained and cleaned and the procedures and timing of the operations to be carried out have been contractually defined with an external company.
The toilets and changing rooms are easy to clean (with resistance to cleaning or disinfection devices), accessible, well-lit, separated from the processing rooms without opening directly onto the food handling rooms. The washbasins - present in a quantity congruent to the number of operators and positioned so as to facilitate hand washing - are marked and equipped with hot and cold water. There is soap for hand washing and drying is with disposable paper.
The toilets are present in a quantity congruent to the number of operators - they are equipped with effective drainage systems and with an effective ventilation system.
The changing rooms for staff are located in the special room in the area adjacent to the refreshment area. With regard to the warehouse used for packaging and storage located in the building apart from the milling plant, the staff has been trained on how to behave, the same one changes before accessing and while the packaging worker remains in his own area, the employees of the logistics can range in various areas.
In this area there is a walkway on the parts of the bagging line 2 packaging systems for the purpose of being able to access the plant, however, since the product is not exposed, these walkways do not represent a risk.
The company will shortly intend to have access with a badge in order to control access to authorized persons only with an automated system.

4.5 Services - water, ice, air and other gases

WATER is used in the production process during the preliminary phase that precedes milling (for conditioning the grain for grinding) and for cleaning and sanitizing activities. The water comes from a private well and the possibility of contamination from the collection to the point where it is used is precluded, as it flows in dedicated circuits.
A disinfection program is carried out in the supply network with an automatic chlorination system to remedy possible microbiological contaminations: the water distribution system from a private well is then connected to a dosing system for a sodium hypochlorite solution 14% M / M for disinfection.

The chemical and microbiological quality is checked every six months by an external accredited laboratory (sampling point indicated on the plan), while the concentration of free chlorine (by law less than 0.2 mg / L) is checked monthly by taking an aliquot of water from the machine scrub through a quick tool, the Digital Colorimeter (also called photometer); it allows to determine the concentration of free or total chlorine with a colorimetric method: the reaction between chlorine and reagent gives a particular color to the water which, when suitably processed by the photocell inside the instrument, allows the operator, even non-specialized ones, to read directly in the Display the value in mg / L accurately.
The AIR used in the pneumatic transfer processes is filtered and the filters are regularly maintained according to internal planning. For this reason, the HACCP Team has assessed that:
1) the risk of chemical contamination due to the use of oil bath compressors is low as food oil certified according to USDA-H1 is used and to avoid accidental contacts, downstream of the

compressors oil-resistant filtration coils are installed consisting of n. 1 deoiler microfilter that guarantees a residual fat <0.01 mg / $m_3$of air and n. 1 activated carbon filter.
2) the risk of biological contamination of the flour in contact with the pneumatic / pump air is medium. This evaluation is also supported by the analytical results carried out on the flours as per the control plan. Nevertheless, the company has prepared to sample the air that comes into contact with the product, in 4 different points of the plant in order to monitor microbiological contamination:

- Molino C plant air: Molino C flour pump
- Molino A plant air: flour transfer pump to Mixer 3 (ground floor) and flour homogenization pump 1 (compressor floor)
- Bagging system air: bagging pump 3

4.6 Equipment

The equipment (systems and components, tools, containers, handling means) and tools intended to come into contact with the products comply with the requirements of the legislation in force; processing is carried out avoiding contact of the product with toxic materials.

The equipment is positioned in such a way as to allow easy use, favoring maintenance and cleaning, are suitable for contact with detergent or disinfection products and when necessary are permanently sealed to the floor.

Disused equipment is removed from the processing rooms and placed in dedicated areas in order to reduce possible cross-contamination. The fixed pipes of the systems are made avoiding blind spots, guaranteeing total drainage and allowing easy access to the valves and fittings - however limited - for cleaning.

The grinding activity, the transfer of the flour to storage, the mixing and the activities up to the packaging take place with pipes suitable for contact with food without contact with the outside in a closed cycle. The storage silos are arranged in such a way as to avoid product blocks or obstructions.

4.7 Maintenance

Maintenance is divided as follows:

- ➢ Extraordinary maintenance: designed to restore the general functioning of the equipment, it is normally carried out by specialized personnel of the manufacturing company or on companies to which the service has been contracted.
- ➢ Ordinary maintenance: designed to check and keep the instrumentation in good working order; it can be on a daily, weekly or monthly basis, depending on the case.

Extraordinary maintenance interventions that occur during work are carried out by technicians from external companies who issue their intervention report.

Procedures and operating instructions of the Quality System for plant maintenance:

- PAQ 09.01 process control procedure;
- PAQ 09.02 procedure for hygienic quality assurance;
- IOP. 04 Production managers: grinders.

Preventive and ordinary maintenance is planned for all environments (internal and external), equipment and tools that influence the hygienic-sanitary quality and legality of the product, specifying for each maintenance element, the position, the type of intervention, the frequencies, the responsibilities in order to keep them in good condition, reducing the risk of contamination. Through the PAQ. 09.02 Hygienic Quality Assurance has defined the operating procedures for:

- Cleaning and sanitizing of systems and environments
- Plant maintenance
- Defense interventions against infestations
- Staff hygiene
- Safety in the workplace
- Support for recording the interventions performed.

The maintenance program is related to the company evaluation and the results of the HACCP study carried out by the company. Some possible elements subject to maintenance are summarized.

- external and internal environments not included among those specified below;
- walls of processing departments and warehouses;
- processing departments, warehouses (internal and external)
- ceilings of processing departments, warehouses;
- corridors of processing departments, warehouses;
- windows, lighting systems;
- Toilet;
- locker rooms;
- waste rooms and waste containers present in the processing departments, warehouses and outside;
- internal water distribution network (joints, filters, softeners, taps, etc.);
- internal and external drainage system;
- systems and their components with particular attention to the detachable or detachable parts placed above the product (for example bolts);
- mobile pipes, shelves, conveyor belts and trolleys;
- tools.

The means of transport are periodically maintained according to the planned maintenance program in order to maintain the conditions that allowed the issuance of the health authorization. Temporary repairs are limited to a maximum and in any case timely repair is carried out by restoring the safety and legality conditions for the processing of the product.
For products used in maintenance activities (for example mineral or synthetic oils, greases, pastes,

anti-friction coatings, anti-corrosion products) suitability for use in the food industry is verified (including absence of allergens) and the use procedures provided by manufacturers or equipment manufacturers are respected (safety data sheets are kept) and any useful information.

The maintenance staff checks the suitability of the maintenance tools by putting them back in the designated sites at the end of the intervention.
The tanks of the raw material, the handling environments have the ability to keep the products in the conditions for the maintenance of the characteristics.
The containers, including those destined for waste, are made of easily cleanable material (they are resistant to cleaning or disinfection aids) and subjected to regular maintenance.
The equipment is equipped with the control devices necessary to guarantee food safety and legality.

The tools used in processing or in quality control laboratories to ensure food safety and legality (for example thermometers, scales, analysis instruments, etc.) are identified and subjected to regular calibration with, when possible, reference systems recognized in international field (SIT or homologous); for each of these instruments at least the usual measurement range, the maximum acceptable error, the method, the frequency and the responsibility of calibration are defined.

4.8 Staff facilities

The toilets and changing rooms are easily cleanable, accessible, well lit, separated from the processing rooms without opening directly onto the food handling rooms. The washbasins - present in a quantity congruent to the number of operators and positioned so as to facilitate hand washing - are marked and equipped with hot and cold water. There is soap for washing hands and the drying system with absorbent paper, which is considered the best system to remove as much as possible the microorganisms from the hands.
The changing rooms for staff are located in such a way as to allow staff direct access, without resorting to any external passage, to the production, packaging or storage area. All lockers are present in relation to the number of employees.
The vending machines present in the company are controlled to prevent contamination deriving from food poisoning as they are subjected to regular maintenance and management by the external company. With regard to the prevention of the introduction of allergens into the site, the staff was informed about the behavior to be taken to avoid introducing allergens from snacks into the site.

4.9 Control of chemical and physical contamination of the product - Areas intended for handling raw materials, preparation, transformation, packaging and storage

Chemical Contamination Control:chemical storage areas are set up, assigning the responsibilities of storage, identification, control and use; in particular

the storage of sanitizing materials and cleaning tools is carried out in a dedicated place, easily cleanable and with the possibility of locking it away from the places where food products are handled (production, packaging or sale). Chemicals are stored in identified containers. The utensils intended for cleaning the exteriors or the toilets are
placed in such a way as to avoid contamination with the equipment used for cleaning the production, packaging and sales premises.
Metal control:the staff is forbidden to introduce cutting material that is not allowed in the production areas. Single-blade cutters distributed in controlled form are allowed.
The staff is equipped with detectable pen. However, metal contamination can derive from the use of systems (screws, bolts, fragments, powders) characterized by augers and elevators. **Glass and fragile plastics:**contamination from glass can come from milling plants, while pieces of fragile rubber / plastic can come from plants, packaging materials and personnel. The glass windows near the processing sites are monitored on a daily basis, despite the areas being low risk and the plants closed. The company has taken steps to draw up a list of the materials present (glass and plastics) and to train the operators on the pre-operational checks to be carried out, paying attention to any breakages or damage that could contaminate the product. Lighting fixtures, facility monitors, probes and product indicators that have glass or hard plastic parts are kept in good condition and tested to prevent potential contamination of the product in the event of breakage.

In the event of a break with the production of fragments, the processing is immediately stopped; the displayed product is isolated and identified as non-compliant, starting the cleaning procedures in the area, avoiding compressed air but rather vacuum cleaners.
The recording of the breakage incident is managed by reporting on the NON-CONFORMITY REPORT (Form 13.01_01).
Wood:in the production areas the only tools allowed are pallets, which must be introduced both in the milling area and in the packaging / storage area in good condition, after checking by the operators to verify their suitability (not wet, without parts that come off and nails that come out). **Paper:**in the production areas, the grinders responsible for opening the bags of ingredients have been trained to prevent physical contamination of the raw materials during the manual opening phase.

4.10 Identification of foreign bodies and tools for removal

Following the production flow, foreign bodies are eliminated through the following aids:

- Screens, separators and sieves
- Magnets
- Buratti
- Metal detector

The operators have been trained and made aware to avoid incorrect operations and to ensure that these tools are regularly checked on the basis of the established periodicity. IOP 13 extensively describes the methods of testing such aids.

4.11 Order and hygiene

The company formalized the PAQ 09.02 procedure as part of the QMS by defining:

- Cleaning and sanitizing of systems, environments and trucks;
- plant maintenance;
- interventions to support the defense against infestations;
- personal hygiene;
- workplace safety.

The attached Operating Instructions are as follows:

- IOP 02 Warehouse management
- IOP 04 Production managers: grinders
- IOP 05 Company regulation
- IOP 08 Organic production
- IOP PU XX Methods of cleaning

The products used for cleaning are suitable for use in the food industry, are registered and come with a technical and safety data sheet.
Verification of the effectiveness or necessity of cleaning is carried out through checks on the cleanliness of the premises and equipment carried out before, during and at the end of the work.
On a monthly basis, the QAM carries out checks at the production areas to assess the cleanliness of the environments.

An environmental monitoring program was defined based on the risk assessment conducted by the quality team and the production manager in October 2019 by crossing the data relating to the presence of molds, yeasts and coliforms in the various stages of the production process and the equipment and systems of the mill and packaging for their research (frequencies and reference limits included in attachment 2 to MANLAB). Program effectiveness is assessed annually in the management review and takes into account specific considerations made by the assessment team in October 2019.

4.12 Waste management / disposal

The waste is distinct in the processing areas, in general it is introduced into intact containers, identified by specific coloring and easily opened with a pedal opening.

They can be summarized in the following types:

- waste deriving from the pre-cleaning activity (dust, stones, straw, foreign bodies, etc ...) which are collected in paper bags, segregated in a specially identified area and disposed of with a specific company for reuse;
- waste deriving from pre-cleaning and cleaning activities (breaks, shriveled grains, etc ...) which are stored in dedicated areas to then be ground and destined for zootechnical use;

- waste deriving from handling and packaging: paper, cardboard, wooden pallets, plastic, iron are stored in a suitably identified area and disposed of with a special company for separate collection;
- process effluents deriving from the grain washing water removed by means of the pipes that convey to a purifier owned by the company. The sludge and purification waste are disposed of with an authorized disposal company who issue documentation as per current legislation;

- used oils, stored in special containers placed in closed external areas and collected by companies authorized for disposal;
- containers of chemicals (for example: detergents and disinfectants).

4.13 Management of surplus food and products for animal feed

The company usually produces mainly at the request of customers and on the basis of the quantities requested by them. Surplus products can be donated to staff, customers or organizations; when it comes to products *private label* this takes place with the prior authorization of the customer.
The by-products for animal feed are labeled and stored in a specific, easily identifiable area.

4.14 Pest control

Molino Dallagiovanna GRV Srl for the management of the *pest control* decided to be supported by a specialized company, entrusting it with the contract for monitoring the traps together with the statistical control of the catches and the execution of specific disinfestation treatments during the year.
Internally, however, there is a weekly monitoring carried out by the operators. In addition, the company has defined with a third party the evaluation of the activities carried out and of the system implemented by the company and by the external company through an annual inspection.
A floor plan of all areas of the plant is available at the Quality Office, in which the traps are indicated divided by color according to the pest (crawling, flying, muridae insects). All products used for pest control are provided with a technical and safety data sheet.
The company carrying out the monitoring issues a dated and signed visit report and prepares a written report indicating:

- results of monitoring;
- any actions taken for monitoring (cleaning, station maintenance, replacement of baits);

- any infestation and its causes according to the capture limits defined on the basis of the criticality of the area and reported on the modules themselves;
- any changes to the monitoring program;
- conclusions on the outcomes of the activity.

In general, for the control of pests, practices are applied for the elimination of shelters, disfavouring the approach, permanence and proliferation of pests throughout the company perimeter and inside; for example, waste is regularly eliminated, vegetation is contained, any source of attraction is removed or made inaccessible.

The*pest control*it is implemented by positioning traps for flying and crawling insects, while the baits and traps of the muridae are present only outside the factory, not inside the production areas.

Treatment of product packaged in containers

To protect the finished packaged products from insect infestations in foodstuffs, including the most susceptible ones (wholemeal flours, durum wheat semolina, by-products, references from the Oltregrano line, ...) and those destined for non-EU exports, the Company together with the company specialized in pest control has implemented an operational treatment instruction (IOP 15) which involves the use of hydrogen phosphorus (phosphine) with a concentration of 0.3 kg for each treatment (conc. g 4 / mc environment) inside of a container (20 feet with a capacity of approx. 300 quintals) placed along the perimeter, canal side, of the warehouse used for storage.

The contact time with the active ingredient is**72 h**(3 days), after which they are needed**96 h**(4 days) of ventilation during which the product cannot be handled. The time interval between the start of the treatment and the release of the product in total is**17 days**. The treatments carried out are recorded on the specific form Mod. 09.01_23.

Treatment of environments

Always considering the objective of pest control, the Company has signed a contract with the External Company in order to carry out, as needed, also following the monthly monitoring, treatments with Pyrethrum (Kenyatox) and Cypertrin microtaps in the following environments: silos department of packaging, bagging department, packaging lines of 1, 5 and 25 kg, flour storage warehouse including the automated warehouse and cartoning department.

The external firm provides an intervention report.

Volatile risk management

Currently the company does not believe it should introduce measures to prevent the entry of birds into buildings or nesting on loading and unloading areas as the problem does not exist, the risk has instead been identified as a potential at external grain storage sites. for which suppliers were asked to define adequate prevention measures.

4.15 Storage facilities

Raw materials, ingredients and materials are stored in order to prevent deterioration and contamination. For a description of the two external storage warehouses, please refer to Annex 3 of this Manual.

The silos dedicated to soft wheat are periodically cleaned and checked and the temperature probes monitored.

The products for food use are separated from those for feed use and are placed on suitable pallets positioned at a certain distance from the walls.

During storage, we try to keep the finished products separate from the packaging as much as possible; more specifically, the latter are in turn divided in an orderly manner and protected by a plastic cover that protects them from dust.

The PAQ 15.01 procedure and the IOP 02 operating instruction describe the measures adopted by Molino Dallagiovanna to manage the handling, storage, packaging, conservation and shipping of products in order to prevent damage, replacements and loss.

4.16 Shipping and transportation

When the loads of soft wheat arrive, the operators check the condition of the vehicle and the load, while the driver is asked to provide the documentation relating to cleaning and previous loads.
With regard to the loads dedicated to finished products for food use, the vehicles are checked daily before loading (absence of infestations, abnormal odors, state of cleanliness).
The vehicles owned by the company dedicated to the transport of food goods are provided with health authorization issued by the competent authorities. Flour in bulk is transported in dedicated tanks identifiable with indelible marking; the tanks are regularly blown with air and washed every six months.

5 CHECKING THE PRODUCT

5. 1 Product design / development

For this aspect, please refer to the entire chapter 7 of the MAQ which defines all the activities relating to the design and research and development of new products.

Furthermore, PAQ 04.01 is the procedure that describes the management of research and development activities.

5.2 Product labeling

All products are labeled to meet all legal requirements in the country of use and include all necessary and useful information for the professional user or the end consumer.

The references for the labeling are the mandatory ones established by national, community and extra-community legislation.

The procedures for approving labels and packaging are described in the procedure PAQ 04.01.

5.3 Allergen management

The company has separated and segregated the production area of semi-finished products containing allergens (soy, milk, nuts and sesame both as ingredients and as cross contamination) on the basis of the study conducted in the manner described in PAQ 09.03. This area is equipped with completely dedicated services and tools. The operators were given specific instructions to carry out these processes.
In these products, allergens are correctly indicated on the label.
As a company policy, all suppliers of ingredients or finished products are required to manage their allergens as a presence in the declaration of the ingredients and as *cross-contamination*.

5.4 Product authenticity, declarations and chain of custody

The Company monitors information regarding threats to the supply chain that may present risks of adulteration or counterfeiting of raw materials through the ITALMOPA trade association, food and food safety portals, government sources.
In particular, as regards the raw material obtained from organic farming, a probable target of counterfeiting, the company has adopted the policy of purchasing only Italian organic wheat, verifying and accurately analyzing the documentation issued by the supplier and carrying out checks relating to residues of plant protection products.

5.5 Product packaging

The choice of packaging materials is made in accordance with the requirements of current legislation for materials intended for contact with food. The company usually carries out an assessment of suppliers for procurement purposes, as recalled in the PAQ 06.01 procedure and selects operators who can guarantee high quality standards (ISO 22000 certification, BRC,...).
Employees have been trained in the good management of packaging materials to prevent chemical (allergens, dust, inks), physical (foreign bodies, greases, ...) and errors in use.

5.6 Product control and laboratory analysis

The company has formalized in the Man Lab the operating procedures for carrying out checks both on raw materials and on the process and on the finished product.
The company uses its own QC laboratory that performs chemical-physical, rheological and organoleptic analyzes on raw materials, ingredients and finished products; moreover, the company relies on external laboratories by contracting analyzes that are periodically performed respecting the frequency indicated in Annex 2 of the Man Lab.

5.7 Product distribution

The company has formalized in Annex 2 of the Man Lab the final checks necessary to liberalize the lot and allow its distribution.

6 PROCESS CONTROL

6.1 Control of operations

The company has structured PAQ 09.01 Process control, which defines the operating procedures for controlling the production process of Molino Dallagiovanna, which include:

- Production planning;
- start of orders;
- control in the production phases;
- NC management;

- termination of the orders;
- plant maintenance;
- management of recipe changes.

The management of orders received by customers is described in detail in IOP.03 - Customer order management.
Production management is described in detail in IOP.04 - Production managers: Grinders.

Warehouse management is described in detail in IOP.02 - Warehouse management.
The production in accordance with Reg. (EC) 834/2007 is widely described in IOP 08 Organic production.

6.2 Labeling and package control

The packaging staff places the appropriate packages along the lines. The responsibility for the creation of the labels lies with the Quality Department, which delivers them to the packaging staff.

The methods for approving labels and packaging are described in PAQ 04.01 Management of research and development activities.

6.3 Quantity - weight, volume and number control

The company has defined the weight control methods in the two documents "IOP 02 Warehouse employees" and IOP 04 "Production managers: Grinders". Sampling is done on the basis of what is established by law 690/78 and reported in the form 09.01_21. In the packaging plant of the 1 kg line (bagging 5), the weight control is automatic in line.

6.4 Calibration and monitoring of measuring and control instruments

Through the PAQ 11.01 procedure, the Company has formalized the Control of equipment for testing, measurement and testing through a list of instruments present in the company and the relative documentation concerning management and maintenance.

7 STAFF

7.1 Training: areas intended for the handling of raw materials, preparation, transformation, packaging and storage

The QAM plans annual employee training. Training meetings are planned according to company needs, in particular for newly hired operators at the beginning of the activity.
The staff is therefore trained on the fundamental rules of hygiene, on the risks and on the correct behavior to be respected during the execution of their duties; in particular, the practices to be maintained to prevent possible contamination are communicated, making sure that the rules set out are understood and respected in order to encourage spontaneous behavior within the work environment.

The external staff who carry out activities within the company (for example maintenance workers, pest control services, cleaners and sanitizers, etc ...) are responsible for these operations, intervene in compliance with applicable laws in force, have skills on the aspects related to the objective of the intervention and the information relating to good sanitation practices to be respected in the execution of the activities in the food establishment.
Likewise, visitors are required to respect the behavioral protocol to be maintained within the establishment.

7.2 Staff hygiene: areas intended for handling raw materials, preparation, transformation, packaging and storage

The general conditions of cleanliness and care of the staff are periodically assessed during the monthly inspections. An IOP 05 Company Regulation has been formalized which defines the methods, rules and behaviors to be followed.
The company has contractually formalized the supply of clothing for internal staff and the methods of washing, cleaning and replacing the garments with an external company. In addition, the activities to be carried out to maintain the state of clothing and seasonal changes were considered.

7.3 Medical checks

The operator or possibly external operators who access the processing rooms are obliged to notify their supervisor / reference figure of the production site in case of gastrointestinal diseases, respiratory tract problems or skin infections.
The collaborator may be assigned to tasks without risk of transmission of pathogens to food, while the external operator will not have access to the production areas.

7.4 Protective clothing: employees or visitors to production areas

IOP 05 Company Regulations describes the protective clothing to be used in production areas. Visitor garments are supplied sealed as purchased directly from the supplier, are to be worn before entering the production and packaging areas and are disposable.

8 PRODUCTS MARKETED

PAQ 06.01 defines the documentation to be requested from suppliers, the Man Lab defines the checks to be performed including compliance of the labels.

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MANAGEMENT OF IDENTIFICATION ACTIVITIES E TRACEABILITY, WITHDRAWAL / RECALL

INDEX

Reference standards	Quality registration documentation recalled
Contractual legislation UNI EN ISO 9001 § 7.6 standard Descriptive documents of the company Quality System MGQ.Sez.7.5.3 - Identification and traceability IOP.01 - Archiving matrix of documents of quality recording	Mod.08.01_01 Recall module Mod.08.01_02 Customer communication module Mod.08.01_03 Label and carton traceability register

State of review of the procedure

DATE	REVISION	MODIFICATION	APPROVAL
02-11-2002	00	Issue	
20.05.2015	01	Crisis team entered	
28-04-2016	02	Added additional modules	
21-12-2016	03	New management of market recall and traceability	
22/09/2018	04	New traceability management	
30/10/2019	05	Traceability log of labels and cartons	
19/03/2021	06	Rev. Chapter 4 and new batch name	
10-02-2022	07	New batch coding	Sergio Dallagiovanna

1. PURPOSE

This procedure defines the methods for identifying the finished product, starting from receipt and during all stages of production, in order to facilitate its traceability.

The procedure also manages emergency or crisis situations that may give rise to the activities of:

Withdraw

"It will indicate any measure aimed at preventing the distribution and exposure of a dangerous product, as well as its offer to the consumer "(2001/95 / EC).

Recall

“It will indicate the measures aimed at obtaining the return of a dangerous product that the manufacturer or the distributor has already supplied or made available to consumers "(2001/95 / EC).

The withdrawal procedure concerns the activities that the company has reason to believe that the product imported, produced, transformed, processed or distributed does not comply with the safety requirements.

The recall is the procedure implemented in cases where the product has already reached the consumer.

2. FIELD OF APPLICATION

The purpose of this procedure is to create the traceability system in the company drawn up with reference to the mandatory legislation.

The traceability system has the purpose of documenting the history of the production process in question through the identification of raw materials, ingredients, materials that contribute to the activities related to the "product", the responsibilities of the operators, the recording of material flows and organizations that contribute to the training, marketing and supply of the product. The company has defined as the UMR (MINIMUM TRACEABLE UNIT) the ½ Kg for packaged products, while for bulk products the quantity delivered to the single customer.

What is indicated in this procedure applies to all products covered by the company activity.

3. OPERATING METHODS

A "contact list for product recall ". This list shows all the names of the CRISIS MANAGEMENT COMMITTEE in turn made up of staff belonging to the HACCP TEAM and reported in the organization chart displayed at the entrance to the Company in the most updated version. Each member of the Team has a well-defined role in the management of the Crisis; the roles are shown in the contact list.

The staff of the HACCP Team has both the competence to decide whether the non-conformity is class 1, class 2 or class 3, and the full authority to decide autonomously the measures to be taken.

An accidental event may be related to the quality of the product with no impact on safety or it may present a safety aspect. Not all non-conformities result in a product recall, the internal accidental event management team must analyze the accidental event, determine the potential risk, decide the actions to be taken and check the communication relating to that event.

Team members will then decide which experts to contact based on the scope of the incident and the results of their analysis. As soon as an accidental event is detected, it is necessary to manage it effectively and thoughtfully, in order to prevent the accidental event from degenerating.

4. CLASSIFICATION OF CLASSES

The need to withdraw and / or recall a product can be determined by multiple non-conformities. The methods of managing this withdrawal and / or recall can be very different, so it was decided to group the non-conformities into three classes based on the severity of the related effects:

CLASS 1:non-conformities that result in death or permanent disability or temporary disability (e.g. presence of foreign bodies such as glass, etc.) and which requirerecall of the product.

CLASS 2:non-conformities that cause non-immediate damage (e.g. contaminants such as mycotoxins, pesticides, heavy metals, etc. in quantities exceeding the legal limits) and which requirewithdraw of the product. CLASS 3:all other non-conformities that have less serious effects than those of class 1 and class 2 but which in any case require thewithdraw of the product.

This classification is inspired by the “EFSA-risk communication” document and by the warning system guideline of 11/13/08 Intesa Stato Regioni.

The following are the Application Phases to be implemented when the Crisis is activated:

1) Meeting of the Crisis Management Team in order to evaluate the reporting of non-compliance in terms of:

- Affected product.
- Study of the accidental event (type, where and when the event took place, sales lot, location of the non-compliant product, etc.).
- Potential consequences (class 1, 2 or 3 i.e. high, medium or low risk) by assessing whether or not the non-compliance has an impact on the safety of the product.
- Arrival of the product to the final consumer.
- Storage of the recalled goods in the warehouse and related block also of the upper and lower interface (80 quintals for each interface).

2)In case of goods that have reached the consumer:identification of the recall criteria based on the severity of the risk (ascertained or to be ascertained) according to the Alert System Guidelines (State-Regions Agreement of 13 November 2008 - see image 1) and precisely:

- Evaluation of serious acute effects (immediate effects such as on allergic subjects, immunosuppressed, elderly, pregnant women, etc.) which require the publication of the recall in the press, radio, TV and at least one communication method between publication of the recall on one's own website or social network. (Class 1 recall)
- Evaluation of severe chronic effects (long-term effects, i.e. cumulative toxic effects on the health of those who consume the food or their descendants) which provide for at least one method of communication between publication of the recall on its website or on social networks in addition to the publication of the recall by affixing signs in the points of sale concerned. (Class 1 recall)
- Assessment of the need for a scientific assessment to ascertain the existence of a serious risk by following the criteria set out in the EFSA "Risk Communication Guidelines" document for determining the level of risk. In the event of an unknown risk, as a precaution, and in order to take measures to protect health if the product has gone to the final consumer, the product must be withdrawn from the market and as regards the recall, at least proceed with the affixing of signs at the points of sale. (Class 1 recall)

3)In case of goods that have not reached the consumer:identification of the criteria for withdrawal based on the severity of the risk (ascertained or to be ascertained) according to the Guidelines of the Alert System (State-Regions Agreement of 13 November 2008 - see image 1) and precisely:

- Evaluation of the high, medium or low or unknown risk and immediate withdrawal of the goods. (Class 2 or 3 retreat)

4) Where the recall of the goods is foreseen, inform the Competent Health Authority by filling in the "Recall Form" Mod. 08.01_01 specially drawn up by the Ministry of Health stating:

- the sales denomination; the
- brand of the product;
- name and business name of the FBO in whose name the product is marketed;
- production lot;
- identification mark of the establishment; name
- of the manufacturer and location of the plant;
- expiry date of the product;
- description weight / volume sales unit;
- reason for the recall;
- instructions to the consumer for the management of the purchased
- product; product photography.

5) Preparation of the list of customers and drafting of the press release by completing the form 08.01_02 "Notice of alert to customers";

6) Preparation and distribution of the recall / withdrawal notice as previously described;

7) Communication within three working days to the BRC / IFS certification body and the organic product certification body (if relevant) and FDA in case of product destined for the American market for the following situations:

to. Any product recall;

b. Any recall and / or withdrawal of the product following an official request for reasons related to food safety and food fraud

c. All visits by the Health Authority resulting in notifications and / or sanctions issued by the Health Authority.

8) Check the effectiveness of the recall / withdrawal;

9) Control of the recalled / withdrawn product;

10) Decision on the destination of the recalled / withdrawn product;

11) Correction of the causes that led to the activation of the procedure.

During the evaluation phase it is very important to collect as much information as possible on the subject, in order to identify the type of situation faced and the key actions to be taken quickly. The information collected will be recorded by the QAM in a report in an appropriate manner as it will be used for analyzes requested at subsequent times.

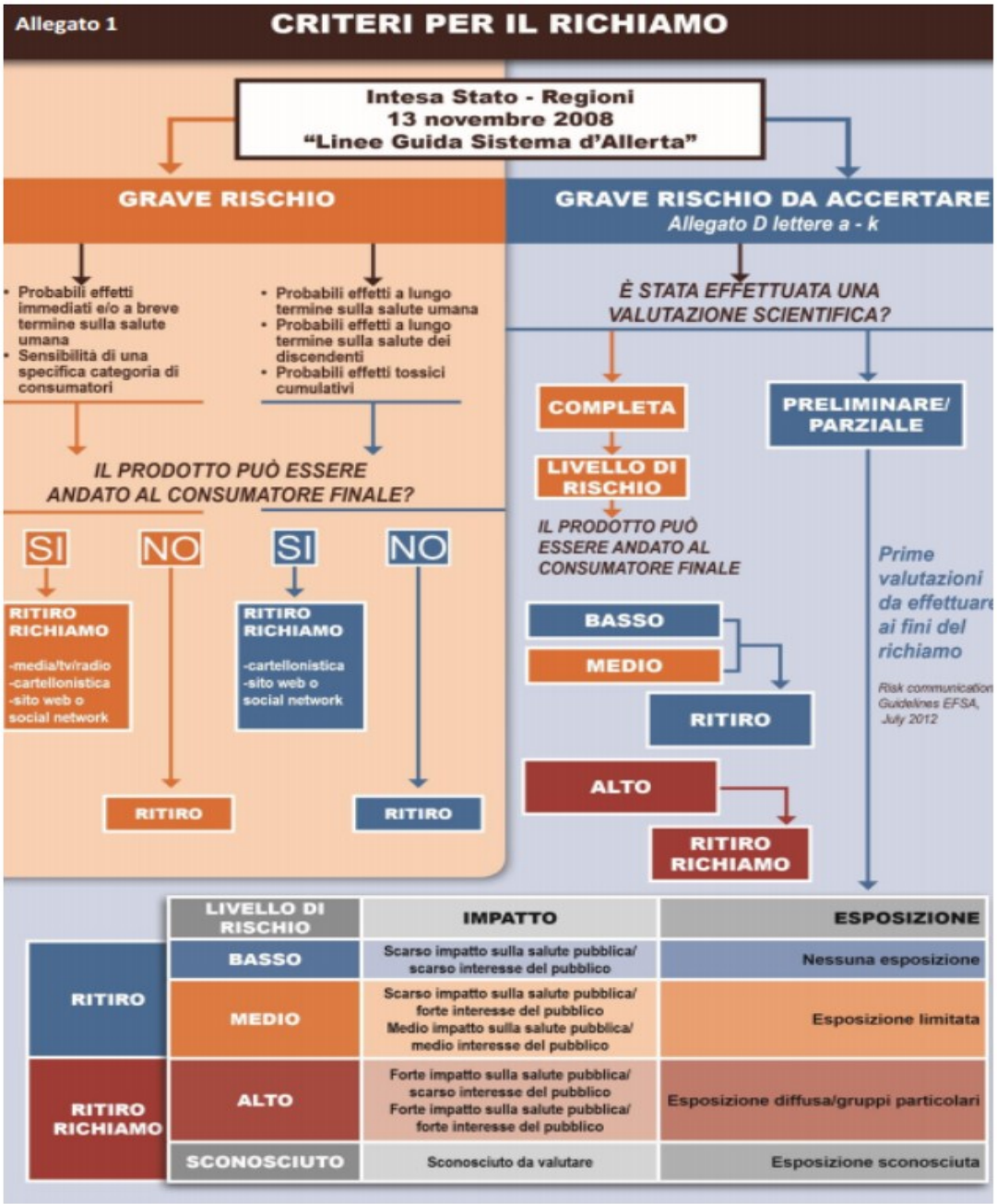
Allegato 1
CRITERI PER IL RICHIAMO
Intesa Stato - Regioni
13 novembre 2008
"Linee Guida Sistema d'Allerta"
GRAVE RISCHIO
GRAVE RISCHIO DA ACCERTARE
Allegato D lettere a - k
Probabili effetti immediati e/o a breve termine sulla salute umana
Sensibilità di una specifica categoria di consumatori
Probabili effetti a lungo termine sulla salute umana
Probabili effetti a lungo termine sulla salute dei discendenti
Probabili effetti tossici cumulativi
È STATA EFFETTUATA UNA VALUTAZIONE SCIENTIFICA?
COMPLETA
PRELIMINARE/ PARZIALE
LIVELLO DI RISCHIO
IL PRODOTTO PUÒ ESSERE ANDATO AL CONSUMATORE FINALE?
SI
NO
SI
NO
IL PRODOTTO PUÒ ESSERE ANDATO AL CONSUMATORE FINALE
RITIRO RICHIAMO
-media/tv/radio
-cartellonistica
-sito web o social network
RITIRO RICHIAMO
-cartellonistica
-sito web o social network
RITIRO
RITIRO
BASSO
MEDIO
RITIRO
ALTO
RITIRO RICHIAMO
Prime valutazioni da effettuare ai fini del richiamo
Risk communication Guidelines EFSA, July 2012
LIVELLO DI RISCHIO
IMPATTO
ESPOSIZIONE
RITIRO
BASSO
Scarso impatto sulla salute pubblica/ scarso interesse del pubblico
Nessuna esposizione
MEDIO
Scarso impatto sulla salute pubblica/ forte interesse del pubblico
Medio impatto sulla salute pubblica/ medio interesse del pubblico
Esposizione limitata
RITIRO RICHIAMO
ALTO
Forte impatto sulla salute pubblica/ scarso interesse del pubblico
Forte impatto sulla salute pubblica/ forte interesse del pubblico
Esposizione diffusa/gruppi particolari
SCONOSCIUTO
Sconosciuto da valutare
Esposizione sconosciuta

Fig. 1

5. IDENTIFICATION CRITERIA

The table below summarizes the forms used for the daily registration of product identification and traceability.

PHASE	PRODUCT	RESPONSIBLE	DOCUMENTS
MP reception	Wheat, ingredients	REP / RAQ CON	Delivery of goods supplied Form 10.01_03 Form 10.01_04 Form 10.01_06 Biological MP load register Prints from PLC software
Receipt of packaging pr.	Bags, Big bags	ADM MAG	Computer system Delivery note and acceptance documentation
Receipt of packaging sec.	Plastic film, cartons and layers, wooden pallets or plastic	ADM MAG	Computer system Delivery note and acceptance documentation
Receipt of product marketed	Marketed products	REP / RAQ CON	Delivery note and acceptance documentation Warehouse load register from organic farming
Transformation	Final product	MOL	Mod.09.01_05 Mod.09.01_07 Mod.09.01_13 Prints from PLC software
Bulk product	Finished product delivered in bulk / Big bag	EBITDA / ADM	Ddt goods Organic product loading-unloading register Mod.09.01_03
Packaging	Finished product (0,5, 1, 5, 10, 25 kg)	MAG / Co-packer	Computer system Form 09.01_10; 09.01_10A lot number, expiry date Organic product register Annex 1 PAQ 15.01
Product shipping	Finished product, too marketed	ADM	Management information system Ddt goods

6. TRACEABILITY

The company has indicated the methods of identification of the products in the various stages of production as reported in the previous chapter in order to guarantee the traceability of its productions.

The identification of the product is an essential requirement to guarantee, in addition to food safety, the satisfaction of the final customer as well as a tool for the company to monitor any reported non-conformities. In fact, every load destined for the Customer is perfectly identified at every point of the production process, as well as all the activities to which it is subject are documented.

Below are the methods that the Molino Dallagiovanna company puts in place in order to guarantee the traceability of its products.

PACKAGED AND BULK PRODUCTS

Traceability is guaranteed by using a management system, an IT system that controls production and records the operations carried out by identifying the moment in time; everything is also supported by paper records.
The lots of the various productions are assigned and identified as follows:

Packaged products:SAAGGG code letter bagging machine_NN S
= bags

YY = current year

DD = Julian day

Bagging machine letter code:

TO	Bagging line 1
C.	Bagging line 2
D.	Bagging line 3
And	Bagging line 4
F.	Bagging line 5
G.	Oltregrano bagging line

NN = progressive number of packaging

E.g .: S22019F01 (product bagged in the bagging plant line 5)

The products that can be packaged at our copacker will be identified by the letterB.placed at the end of the lot; the letter refers to the address of the copacker's factory shown on the bag.

Bulk products:RAAGGGPNN R =
bulk

YY = current year

DD = Julian day

NN = progressive number of machining

Ex: R18260P06

Through the lot number of the finished product, traceability and traceability is guaranteed, i.e. it is possible to trace the individual batches of the incoming raw materials used in the production of the finished product and vice versa to know for each individual batch of raw material in which finished products it ended up. .

The "Infinity" administrative management software receives the information relating to the production batches directly from the "RAM" production software. The traceability code of the product (lot) is affixed to all transport documents and for each product sold, in such a way as to allow in a short time to trace the products both sold and still in stock.

Furthermore, the administration records the purchase of primary packaging and its use in the system according to the FIFO method. Warehouse employees report every batch change of the packs used, identified by the supplier pallet sheet. Through the registration of the packaging (RAM mask) and the purchase invoices of the packaging it is possible to trace and identify the history of the primary packages.

Marketed products

Load on the computer management program of the "batch identifier" and the expiry date of the product as stated by the supplier in the accompanying document. The production operator enters the supplier in the "customer lot" field.

Primary packaging

The administration records the purchase of primary packaging and its use in the system according to the FIFO method. Warehouse employees report every batch change of the packs used, identified by the supplier pallet sheet. Through the records of the packaging (RAM mask) as well as on the paper available to operators and the purchase invoices of the packaging, it is possible to trace and identify the history of the primary packages.

SALES MANAGEMENT

The administration clerk receives data relating to production batches and quantities from packaging, production and the warehouse and enters them on the management software.

Each customer will receive the relative transport document which will report the data of the production batch delivered. The traceability code of the product is affixed to all transport documents and for each product sold. This system allows in a short time to trace the products both sold and still in stock (even in the case in which the product should be withdrawn-recalled or stopped in the company).

MANAGEMENT OF MEANS OF TRANSPORT

The transport document shows the identification data (plate) of the vehicle that carries out the transport if it is carried out with company vehicles and of the carrier's data in case of use of external carriers.

In the case of containers it is preparedAnnex 2 PAQ 15.01 Container Verificationfor the purpose of checking the essential data, the inspection points in accordance with the instructions of the US Customs and the FDA and the control activities of the container.

PACKAGING MANAGEMENT

The administration records the purchase of primary packaging and its use on the computer system, according to the FIFO method (First In First Out, first to enter, first to exit). Warehouse employees report every batch change of the packs used, on forms 09.01.10 and 09.01_10A during product packaging operations.

The ecommerce warehouse staff guarantee the traceability of the labels and cartons used for packaging by registering the supplier's batch number on the 08.01_03 form.

The Quality Department, which prints the labels on the bags, records the batch of labels on the customer order confirmation.

7. BUSINESS INTERRUPTION MANAGEMENT AND EMERGING PROBLEMS

In all cases in which DIR, ReCOM, RAQ identify risk situations for:

- The disruption of a business process, the manufacture of products, services and / or delivery which could result in loss of revenue, disruption of the business process or damage to the competitive position as a result of an external problem or influence / internal, as a result of a negative verification by competent Bodies or Authorities or for the activity of NGOs.
- Emerging issues: a seemingly unrelated problem or series of events, which can generate negative news and / or reputational damage to the corporate brand, if or when it goes public or could result in significant amounts of fines, penalties, premium increases, legal damages , unscheduled expenses, and other costs. Events such as emerging issues that require action to prevent the situation of a crisis.

The crisis committee set up meets to analyze the information available and define the actions to be taken with methods, times and responsibilities to be formalized in the report of corrective and preventive actions.

8. MANAGEMENT OF THE DEMONSTRATIVE DOCUMENTATION

The archiving methods, times and persons responsible for these documents are defined in IOP.01 - ARCHIVING MATRIX OF QUALITY REGISTRATION DOCUMENTS.

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Below are the methods that the Molino Dallagiovanna company puts in place in order to guarantee the traceability of its products.

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F.	Bagging line 5
G.	Oltregrano bagging line

NN = progressive number of packaging

E.g .: S22019F01 (product bagged in the bagging plant line 5)

The products that can be packaged at our copacker will be identified by the letterB.placed at the end of the lot; the letter refers to the address of the copacker's factory shown on the bag.

Bulk products:RAAGGGPNN R = bulk

YY = current year

DD = Julian day

NN = progressive number of machining

Ex: R18260P06

Through the lot number of the finished product, traceability and traceability is guaranteed, i.e. it is possible to trace the individual batches of the incoming raw materials used in the production of the finished product and vice versa to know for each individual batch of raw material in which finished products it ended up. .

Summary of Comments on Microsoft Word - Paq 08.01_rev07 gestione identificazione,rintracciabilità,richiamo.doc

Page: 8

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 5:02:10 AM
Write on the line below:
S = bags

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 4:58:01 AM
please modify with the following statement:
AA = current year

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 4:57:44 AM
please modify with the following statement:
GGG = Julian day

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 4:58:26 AM
modifiy with: **A**

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 4:58:51 AM
modify with: **E**

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 5:01:47 AM
Write on the line below:
R = bulk

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 5:00:13 AM
please modify with the following statement
AA = current year

Author: Laura.Gazzola Subject: Evidenziato Date: 6/1/22, 5:00:45 AM
please modify with the following statement:
GGG = Julian day

Audit Report

1.Audit Summary			
Company name	MOLINO DALLAGIOVANNA GRV Srl	Site Code	1357883
Site name	MOLINO DALLAGIOVANNA GRV Srl		
Scope of audit	Milling, blending and packaging of soft wheat flours in several formats paper bags, big bags (1000 kg) and bulk. Packaging of semolina and re-milled semolina in 5 and 10 kg paper bags. Mixing of semi-finished preparations based on different cereal flours and other ingredients. Including external warehouses in via Mottaziana and via Corniola of Borgonovo Valtidone (PC). Outsourced packing of flour in 0,5 and 1 kg format. Trading of other mixes, flours, semolina and yeast.		
Exclusions from scope	None		
Justification for exclusion	None		
Audit Start Date	2021-12-15	Audit Finish Date	2021-12-17
Re-audit due date	2022-12-21	Head Office	No

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
FSMA Preventative Controls and FSVP Preparedness	Passed	Milling, blending and packaging of soft wheat flours in several formats paper bags, big bags (1000 kg) and bulk. Packaging of semolina and re-milled semolina in 5 and 10 kg paper bags. Mixing of semi-finished preparations based on different cereal flours and other ingredients. Including external warehouses in via Mottaziana of Borgonovo Valtidone (PC). Outsourced packing of flour in 0,5 and 1 kg format. Trading of other mixes, flours, semolina and yeast.	None
Choose a module	Choose an item		

2. Audit Results					
Audit result	Certificated	Audit grade	AA	Audit type	Announced

2. Audit Results

Previous audit grade	A	Previous audit date	2020-11-30
Certificate issue date	2022-01-26	Certificate expiry date	2023-02-01

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	4

3.Company Details

Address	Via Pilastro 2 29010 Gragnano Trebbiense (PC)		
Country	Italy	Site Telephone Number	+3905230787155
Commercial representative Name	Mr Sergio Dallagiovanna	Email	molino@dallagiovanna.it
Technical representative Name	Mrs Maria Grazia De Pascali	Email	mariagrazia@dallagiovanna.it

4.Company Profile

Plant size (metres square)	10-25K sq.m	No. of employees	51-500	No. of HACCP plans	1-3

Shift Pattern	3 in milling, 2 in packaging
Subcontracted processes	Yes
Other certificates held	IFS Food; ISO 9001; ISO 22000; ISO 22005; ISO 14000; ISO 45000; ISO 14067; Organic; SA 8000; Halal; Kosher
Regions exported to	Europe North America South America Asia Oceania Choose a region

4.Company Profile

Company registration number	119 on 26/03/1986
Major changes since last BRCGS audit	Replacement of the doors of the mill; completed the automation of the mill; insertion of AGV forklifts without man on board

Business started in 1961
Sanitary Authorization 119 Mun. Gragnano Trebbiense (PC) on 26/03/1986, various updates, last on 12/2020 sent to SUAP automatic warehouse and new line 5 for packing in 1-3kg.
FDA registration number: 10558094792. Emergnecy contact: Mrs Sabrina Dallagiovanna sabrina@dallagiovanna.it and phone number +393356879749.
25000sqm total area - 12000sqm covered of which 2400sqm packaging (6 packing lines) and 1500sqm automatic warehouse. The difference is the mill (a and C) distributed on 6 floors.
There are also two external warehouses for the storage of grain located in the municipality of Borgonovo Valtidone
Process: soft wheat milling, blending of soft wheat flours (core business) packed in paper bags of 500 g, 1 kg, 5 kg, 10 kg, 25 kg, PE big bag of 1000 kg and bulk; packing of durum wheat semolina in 5 and 10 kg paper bags; production of mixes for Pizza and bakery in paper bags of 5, 10 and 25 kg.
Outsourced packing of 0,5 and 1 kg format flour.
Trading of gluten free mixes, gluten and lactose free mixes and other recipes done and packed by supplier, durum wheat and semolina, dried yeast.
Work shifts: offices full-time (8am-6pm) 5 days/week; milling 3 shifts (6am–2pm, 2pm-10pm, 10pm-6am) 5 days/week; packing 2 shifts per day for 5 days/week.
51 employees: Permanent employees 47 and temporary workers 4
No Recalls/ Withdrawals.
Correct use of BRC logo.

5.Product Characteristics

Product categories	15 - Dried food and ingredients VM - FSMA Preventative Controls and FSVP Preparedness Category Category				
Finished product safety rationale	Ambient stable product; not suitable for direct consumption but to be used as ingredients for food preparations that must be cooked in order to be consumed; aw <				
High care	No	High risk	No	Ambient high care	No
Justification for area	The products belong to the "non-perishable" category; during the milling and packaging treatment they are not exposed to the air but conveyed in closed tubes and machines. Ambient stable product; not suitable for direct consumption but to be used as ingredients for food preparations that must				

5.Product Characteristics

	be cooked in order to be consumed
Allergens handled on site	Cereals containing gluten Soya Milk Sesame Choose an allergen Choose an allergen Choose an allergen
Product claims made e.g. IP, organic	Organic, Kosher, Halal
Product recalls in last 12 Months	No
Products in production at the time of the audit	Farina di grano tenero tipo 00 Brioches 25kg; Farina di grano tenero tipo 00 le Divine Monica 5kg; Farina di grano tenero Napoletana 25kg; Granito 1kg; Oltregrano Gruppo IT 25kg e Cerealpiù 25kg

6.Audit Duration Details

On-site duration	22 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	none		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2021-12-15	08.30	18.30
2	2021-12-16	08.30	18.30
3	2021-12-17	08.30	12.30

	Auditor number	Name	Role
Auditor Number	20291	Chiara Gerletti	Lead Auditor
Second Auditor Number	N/A		Please select

Present at audit

Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)

Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Sergio Dallagiovanna - Management	X			X
Davide Oppizzi – warehouse manager	X	X	X	X
Stefania Dallagiovanna – laboratory	X		X	X
Maria Grazia De Pascali Quality manager	X	X	X	X
Laura Gazzola - quality control and assurance new employee	X	X	X	X
Fraioli Donatella – Quality	X	X	X	X
Umberto Paganini – miller chief	X	X		X
Damiano Di Quinto – grains descharging operator		X		
Paolo Civardi – Oltregrano Operator		X		
Corrado Casella – operator at filling line n. 5		X		

GFSI Audit History

Date	Scheme/Standard	Announced/Unannounced
2021-12-15	IFS Food	Announced
2021-12-15	BRCGS Food	Announced

Non-Conformity Summary Sheet

Critical or Major Non Conformities Against Fundamental Requirements				
No	Clause	Detail	Critical or Major	Ant. re-audit date

Critical			
No.	Clause	Detail	Ant. Re-audit date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	3.5.4.2	L'audit annuale effettuato presso l'outsourcer Eredi Fontanella non ha messo in evidenza che nel mod. 04 utilizzato dall'azienda per l'evidenza della gestione del metal detector non sono riportati gli orari in cui il controllo è effettuato (quindi non è possibile capire se il controllo è stato effettuato ad inizio e fine insacco) e la modalità con cui viene allontanato l'eventuale prodotto NC. The annual audit carried out at the outsourcer Eredi Fontanella did not reveal that in the form. 04	Richiesto al nostro outsourcer Eredi Fontanella di prevedere di registrare il controllo orario del Metal Detector e di specificare le modalità di espulsione del prodotto non conforme: Revisionato il "Modulo di produzione" Mod. 04 con l'indicazione dell'orario di controllo del funzionamento del metal detector e la specifica dell'espulsore del prodotto non conforme. Eseguita la formazione al personale di Eredi Fontanella.	Poichè l'unico punto critico identificato dall'HACCP è rappresentato dal metal detector è stata effettuata formazione specifica in riferimento alla gestione ed al controllo del metal in accordo a quanto richiesto dai requisiti espressi negli standard GFSI. Since the only critical point identified by HACCP is represented by the metal detector, specific training was carried out in reference to the management and control of the	L'attività di controllo era stata considerata ma non formalizzata sul modulo di registrazione. The control activity had been considered but not formalized on the registration form.	2022-01-04	C. Gerletti

Minor							
		used by the outsourcing company to demonstrate the management of the metal detector, the times in which the check is carried out are not shown (therefore it is not possible to understand if the check was carried out at the beginning and end of the bagging) and the manner in which it is removed any NC product.	It has been requested to our outsourcer Eredi Fontanella to introduce the registration of the time control of the Metal Detector and to specify the methods in which the non-compliant product is expulsed. It has been revised the "Production Form" Mod. 04 with the recording of the time control of the metal detector specifying the methods of expulsion of the non-compliant product. Eredi Fontanella operator was trained about the revision of the form Mod. 04.	metal in accordance with the requirements expressed in the GFSI standards.			
2	4.3.1	Durante l'audit on site un'attrezzatura (pompa per distribuire sostanze liquide: forse per trattamenti insetticidi perimetrali?) probabilmente non utilizzata da diverso tempo (c'erano delle ragnatele attorno) era stata lasciata giacente e incustodita nel corridoio che comunica tra l'area insacco ed il magazzino dei prodotti commercializzati During the on-site audit an equipment (pump to distribute liquid substances: perhaps for perimeter insecticide treatments?) Probably not used for some time (there were cobwebs around) had been left lying and unattended in the corridor that communicates	La pompa è stata rimossa dal corridoio. The pump has been removed from the corridor.	Eseguita la formazione agli autisti circa le modalità di gestione della pompa di distribuzione del disinfettante anti-Covid19 utilizzata per sanificare le motrici degli automezzi. It has been made a training to drivers on how to manage the distribution pump of the anti-Covid19 disinfectant used to sanitize the vehicles.	Mancata definizione delle regole di gestione della pompa di distribuzione del disinfettante anti-Covid19 utilizzata per sanificare le motrici degli automezzi. Failure to define the management rules of the anti-Covid 19 disinfectant distribution pump used to sanitize the vehicles.	2022-01-04	C. Gerletti

Minor							
		between the bagging area and the warehouse of marketed products					
3	4.5.3	Nel controllo dell'aria compressa non è stato considerato il rischio chimico dovuto all'utilizzo di compressore a bagno d'olio nell'impianto del mulino In the compressed air controls, the chemical risk due to the use of an oil bath compressor in the mill plant was not considered	Inserimento dell'analisi del rischio dovuto all'utilizzo del compressore a bagno d'olio (presenza di filtri antiolio e interventi di manutenzione preventiva): aggiornamento della PAQ 25.01 e conseguente aggiornamento metodo di monitoraggio Insertion of the risk analysis due to the use of the oil bath compressor in the mill (presence of oil filters and preventive maintenance program): updating of PAQ 25.01 and description of the managing method	La verifica dei monitoraggi del sistema di filtrazione a valle dei compressori e le rispettive manutenzioni saranno inserite nella check list delle ispezioni interne al fine di verificare che il sistema attuato e descritto sia quello effettivamente attuato dai manutentori. Eventuali sostituzioni dei compressori con altri di tipo oil free comporteranno una ridimensione del risk assessement The verification of the monitoring of the filtration system downstream of the compressors and the respective maintenance will be included in the check list of internal inspections in order to verify that the system implemented and described is the one actually implemented by the maintenance technicians. Any replacement of the compressors with other oil-free ones will result in a reduction of the risk assessment.	Nella gestione del rischio chimico tale attività era già stata presa in considerazione sebbene non formalmente riportata né mai effettivamente approfondita e verificata. In the management of chemical risk, this activity had already been taken into consideration, although it was not formally reported or never actually investigated and verified.	2022-01-04	C. Gerletti

Minor							
4	7.4.1	Nel regolamento per l'uso e la gestione dell'abbigliamento del personale non sono state dettagliate le istruzioni relative all'uso delle scarpe: la seconda mattina di audit, un dipendente è arrivato al lavoro con le calzature già indossate The instructions for the use of shoes were not detailed in the regulations for the use and management of personnel clothing: on the second morning of the audit, an employee arrived at work with the shoes already worn	Revisione della IOP 5 "Regolamento Aziendale" inserendo le istruzioni relative all'uso delle scarpe antinfortunistiche come abbigliamento di lavoro. It has been revised IOP 5 "Company Regulations" by inserting the instructions relating to the use of safety shoes as workwear.	Eseguita la formazione a tutti i dipendenti del magazzino, mulino e autisti e previsto controllo durante le ispezioni on site. It has been made the training to all employees of the warehouse, mill and drivers and specific control added during onsite inspections	Non formalizzata la gestione delle scarpe antinfortunistiche come abbigliamento da lavoro. The management of safety shoes as workwear has not been formalized.	2022-01-04	C. Gerletti

Comments on non-conformities
Comments

Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No	Clause	Detail	Re-audit due date

Major							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company has established a Policy for quality and food safety dated 22.09.2021 which includes Worker Safety Responsibility with specific expansion of attention towards workers also and above all following a pandemic problem; Process quality; Customer satisfaction; reduction of environmental impact; supplier management; staff training; legislative update.
The objectives are formalized as outputs following the Management Review. Last Management Review of 11.08.2021 relating to the period 01.01.2021 - 30.06.2021

Formalized a Plan for the dissemination of the Food safety culture, dated 09/24/2019 with the last update of 2021: some activities were closed in 2019 and 2020:
- agents / representatives, administrators and marketing training carried out specifically for the management of returns, orders and complaints with customers, how to detail the problem in the NC report and bring it back to the company in order to allow an analysis of the problem. For this purpose, a form has been provided where the possible cases of rheological complaints are detailed in order to help in the description: meeting on 28.10 and 02.12.21
- production and warehouse: cleaning systems to prevent insects on 6 and 7.12.2021, training carried out by the external consultant Mr. Monti
- staff on 04.10.21 (see training chap. 7)
- commercial: quality, returns, complaints, customer management and documents of finished products by 04.2022 also because a new person has been hired
- cleaners involved in the training of 06 and 07.12.21
- 09.10.21 marketing
- new development of the safety document at the fair
The new project for 2022 has not yet been defined and will be reviewed in the last quarter.

Present box for anonymous reports: no report detected

Monthly meetings of the HACCP TEAM
The team meets on a monthly basis and formalizes the topics in the Meeting Minutes document. Checked the meetings of November and October 2021 in which the following topics were defined: pandemic situation, HACCP review, complaints and NC, results of internal inspections, pest monitoring, possible inspections by the competent authority, state of self-control analyzes. 25.11.21 and 29.10.21

Following requests from some certification bodies, the company has decided to divide the Management Review into two half-yearly analyzes.
Last Management Review of 11.08.2021 relating to the period 01.01.2021 - 30.06.2021 includes:
- Audit outcome assessment: Third party audit relating to all certifications (SA8000, ISO 9001, BRC and IFS, ISO 22000, etc ...) with identification of reported deviations and evidence of corrections / AC
- Integrated Quality Management System: Safety in the workplace; Environmental system; Quality System: Weeds: no threshold exceeding; treatment with Pro-Fume for Mill A (cleaning and grains), mixing and loading + bagging + silos department; insecticide April and May.
Confirmation of the validity of the Quality
Policy Input elements:
- Internal audits, supplier audits, external warehouse inspections
- NC and complaints
- Corrective and preventive actions
- Customer satisfaction
- Complaints
- Staff training and resource requirements
- Customer satisfaction.

The company is equipped with version 8 of the standard both on computer and paper support. The Management is always present both at the initial and final meeting
Deviations from the previous audit have been resolved.

1.2 Organizational structure, responsibilities and management authority

Company organization chart formalized in Attachment 1 of the MGQ updated to 01.12.2021 in which all the company functions and the names of the operators are reported.
Administrators:
Pierluigi, Sergio Dallagiovanna
General Management Sabrina and Paolo Dallagiovanna RAQ
and Team Leader Maria Grazia De Pascali Quality Department
Dr. Fraioli Donatella and laura Gazzola Sales Manager and Mrk
Sabrina Dallagiovanna Administration Manager Sergio and
Paolo Dallagiovanna Purchasing Manager Stefania
Dallagiovanna
Production manager Stefania Dallagiovanna on whom they depend
- Res. CQ Stefania Dallagiovanna on which laboratory + R&D staff depend
- Rep. Packaging Davide Oppizzi
- Head of Logistics and Drivers Mrs renza Dallagiovanna
- Maintenance Alessandro Lovero
Chief Miller and maintenance Massimo Zorzetto left at the beginning of December and the function is vacant to date Paolo Ghizzoni
Umberto Paganini
Paolo Veneziani
Damiano Di Cunto

Resp. Drivers Renza Dallagiovanna on which the drivers depend (transport of PF in bulk only, 7 own vehicles and 8 drivers)

Verified training of Maria Grazia De Pascali (self-control systems auditor 12.11.2019 certificate n.118) Personal Name Record updated to 11.2019
PCQI 242aebc4 of 17.09.2016 + BRC conversion issue 7 to 8 of 30.09.2019

Function substitutes are indicated in the substitutes table (attachment 01 to PAQ 7.01, updated on 01.12.2021):
ex. Administrative Manager E. Intropido, Department of AQ MG de Pascali and D. Fraioli; Production Manager R. Dallagiovanna; Chief Miller P. Veneziani in the job descriptions (updated to 28.11.2019) and checked those of the QA Manager; Chief Miller and Maintenance Manager

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification

2 The Food Safety Plan - HACCP

HACCP manual in rev. 12 of 26.10.21 drawn up in compliance with the guidelines of the Codex Alimentarius with the additions provided for the standards BRC issue 8, IFS issue 7 and FSMA, ISO 22000: update due to change in the corporate structure
Field of application: soft wheat milling; production of mixtures consisting of different flours of cereals, seeds and legumes, packaged natural yeast; marketing of packaged and bulk gluten free and lactose and gluten free cereal flours for food use.

HACCP team
M. Grazia De Pascali TL
Pierluigi, Sergio and Stefania from Giovanna
Fraioli Donatella
Laura Gazzola
Product description: type 00, 0, 1 and 2 soft wheat flour, whole wheat flour as defined by current legislation (DPR 9/02/2001 n. 187). Humidity 14.5%, ashes, proteins. All products contain gluten. Except for some products defined as gluten free (with ministerial authorization) made at an external supplier up to packaging in a 1kg bag and internal labeling = affixing of the personalized label.
There may also be products obtained by mixing some products internally. Products with
allergens (overseas range) which may contain soy, milk, sesame, etc.... Sizes 500g, 1kg, 5kg,
10kg, 25kg, big bag 1000kg, bulk in tank
Bran, bran, tritello, farinaccio and wheat germ by-products Wheat
origin Italy, EU, non-EU
Reference markets: artisan bakery workshops, pastry shops, pizzerias, delicatessens, food industry, large-scale distribution
Intended use: all consumers, excluding celiacs or sensitive gluten; the blends contain gluten, milk, soy, mustard, lupine, sesame, nuts therefore not suitable for allergic individuals.
Shelf life evaluated in attachment 5: 12 months for 0 and 00 flour; full 6 months; Type 1, 2, Oltregrano 8 months; Semolina 12 months (after fumigation treatment); gluten-free mix 9-12 months.

PXG = R 3x3 matrix, if R≥ 6 analysis in the decision tree
The assessment of the incidence of risk for all the hazards analyzed was assessed for each step of the flow chart. For each R, the decision tree with 6 questions (with identification also PRP-O) was applied, from which 2 CCPs arose:

CCP1 = magnet before packaging (bagging 2 + Oltregrano line + bulk load in the tank because there is no MD)

CCP2 = MD on the packaged product (line 3 + line 4 + Line 5) Defined the critical
limits for each CCPs and PRPOs, in particular for the magnets: MAGN01
efficiency> 2000gauss
MAGN14 efficiency> 1500 gauss
MAGN02 efficiency> 2000gauss
MAGN15 efficiency> 1500gauss
MAGN03 efficiency> 2000 gauss
MAGN07, 08,11,12,13 Neodymium efficiency> 2000 gauss
Safety tumbler BU1, BU 2, BU 3 and BU4, BU 5 = absence of insects, CE, mesh integrity

Biological: animals (birds, arthropods, rodents); microorganisms (molds, total coliforms, E. coli, salmonella, B. cereus, staphylococci, enterobacteria)
Chemicals: micotox (Aflatox B1 and total; OTA, DON, Zearalenone); heavy metals (Cd, Pb); residues of plant protection products (EC Reg. 396/2005); cross-contamination with allergens; substances from environments and maintenance (lubricating oils, paints); GMOs; radiological (USA + Ispra limits)
Physical: metallic CE, other CE (stones, wood, glass, etc.); biological impurities (dander, hair, parts of insects) Fraud: Counterfeiting and / or adulteration (assessed on MP)
Food Defense: Food Defense Plan Builder
Formalized analysis for the destination of risk areas: the company has identified low risk areas (eg grinding) and areas intended for closed product treatment (eg PF storage).

1 HACCP study
There are 12 flow diagrams (update 10 of 16.06.2020) divided according to the product line and the type of packaging

1. 0 and 00 type flours in sizes of 10 and 25kg. Tritordeum flour (barley and durum wheat) of 25kg (rev. 10 of 16.06.2020)
Identified:
CPs
Grain acceptance
Magnets from MP and SL Buratto cleaning
plants
CCP = MAGN09 on 25kg bagging line 2 - MD line 3 10kg and 25kg bagging line

2. Type 0 and 00 flours in bulk (rev. 10 of 16.06.2020)
CP:
Grain acceptance
Magnets
Buratto
CCP = MAGN08 silos destination 11/16 - MAGN06 silos destination mixing plant 2015

3.Nobilgrano - Type 0 flours with wheat germ flour in sizes of 10 and 25kg (rev. 10 of 16.06.2020) CP:

Grain acceptance
Magnets
Buratto
CCP = MAGN09 on 25kg bagging line 2 - MD line 3 10kg and 25kg bagging line

4. Type 0 and 00 flours with vitamins in 25kg format (rev. 10 of 16.06.2020) CP:

Grain acceptance
Magnets
Buratto
CCP = MAGN09 on 25kg bagging line 2 - MD line 3 10kg and 25kg bagging line

5. Oltregrano blends line and Greci line sizes 5, 10 and 25kg. Line with allergens (sesame, soy, milk as ingredients + cross contaminations)
Flour to which the other ingredients containing allergens are added Mixer
4
CCP = Magnet MAGN07
Manual packaging for manual insertion of the packaging

6. Flours type 00, 0, 1, 2 and wholemeal, semolina, malted wheat flour made up of 5 and 10kg
Bagging and mixing starting from SL already obtained by the mill. Bagging line 4
CP = magnets
CCP = MD

7A. Type 1 flours of 25kg depending on the packaging line, the CCP can be the magnet or the MD 7B. type 2 and wholemeal flours size 25kg. bagging 1 for wholemeal product; others bagging 3

8. Type 00 flours in 500g and 1kg format, 0.5-1kg format blends = on the SF obtained it is transferred to the supplier in outsourcing for packaging (the packaged package returns to its headquarters). CCP = MAGN06 on the bulk product

9. Flours type 0 and 00 big bags of 1000kg. bulk silos from 11 to 16 CCP = MAGN08

10. Gluten-free mixes consisting of 1 and 25kg traded goods already packaged with label application only (F. Caremoli) = no CCP or CP

11. Semolina, cereal flours (eg rice) and seeds, instant yeast, in various formats (25kg, 1kg for yeast) traded goods already packaged with only label application = no CCP or CP
If semolina in 5kg format is required, it is repackaged according to diagram no. 6 inside (so 5kg is not traded goods).

12. Flour type 0, 00 formed by 1 and 5kg. Tritordeum flour (barley and durum wheat) 1kg, semolina 1-5kg CPs

Grain acceptance
Magnets from MP and SL cleaning plants

Buratto
CCP = MAGN09 on 25kg bagging line 2 - MD line 3 10kg and 25kg bagging line - MD 16 bagging line 5

Food by-products Bran
Feed Bran and farinaccio
Two mills, A and C, which provide for two grain cleanings
Confirmation of the flow charts of 16.06.2020 at the HACCP review.
There are two holes: one outside the mill which loads the 5 iron silos; an internal one that loads the concrete silos (internal because inside the mill)

Field check of the flow diagrams carried out with various dates in June and October 2021 for all the different diagrams

For the control and management of CPPs and PRPOs there is a formalized Operating Instruction (IOP. 13)
Present a magnet in pre-cleaning (MAGN00) with verification 2 vv / week (cleaning)
CCPs Molino
MAGN 04 wholemeal bagging (line 1)
MAGN 06 mixer 3
MAGN 07 SL ultramarine line + with MAGN 08
allergens in bulk for silos 11-16
1vv / day CPs Molino
control foreseen
MAGN 01 1st cleaning Molino A MAGN 02 2nd
cleaning Molino A MAGN 03 product review
MAGN 12 from silos 31 and 323 to silos 50
MAGN 14 under-balance cleaning Molino C
MAGN 15 rolling mill scale B1 Molino C
Inspection scheduled 1 v / day

CCPs bagging shed
MAGN 09 bagging line 2 every 8
hours CPs bagging shed
MAGN 11 line E - Bagging 3 and line D - Bagging 4 = every 8 hours MAGN
13 bagging line 4 = at the start of use and every 8 hours
MAGN 17 bagging line 5 = at the start of use and every 8 hours (at the moment it only works one shift)

BURATTI AND PLANSICHTER
CPs Molino
BU1 centrifuge sifter silos 11-16 = in the 3rd work shift BU2
Molino safety plansichter A = at the start of the shift BU3
Mixer safety plansichter 3 = in the 3rd work shift BU4 Molino
safety plansichter C = at the beginning of the shift CPs
bagging shed
BU5 safety plansichter bagging line 2 = every 8 hours
BU6 sifter bagging line 5

Present 3 MD:
Bagging line 3: 10 and 25kg = MAGN 10 Bagging
line 4: 5 and 10kg (manual) = MAGN 05 Bagging
line 5: 1 and 5kg MAGN 16
Check at the beginning, every hour and at the end of each packaged lot of test
specimens: limit 2.5 mm FE; 3.5 mm No Fe; 3.5 mm SS (AISI 316) bagging 3, 4 limit
1.8 mm FE; 2.0 mm No Fe; 3.0 mm SS (AISI 316) bagging 5
all the discarded products are made to pass 3 times before finally discarding (even a single waste passage, the product is discarded).

Critical limits
Magnets = cleaning
Buratti = presence of breakage in the "silks" with registration of insects, lumps of flour, various fragments)

Plansichter = check for insects with registration on Form 15.01_06 “Safety plansicheter scraps
In the same instruction are defined the ACs following the loss of control of the CCPs and CPs. Indicate the registration cards

Review report of the HACCP Manual and Flows formalized on 26.10.21.
The critical limit defined for the magnets is validated annually by an external company
Present Magnet 13, 11 Magnetic Measurement Report Gaussian Towers as a function of distance = contact 11000gauss, at 20mm 350
Annual MD critical limit validation with CEIA report

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The Quality System is organized in the HACCP manual + quality manual. To these are added procedures, operating instructions, annexes, registration forms and forms

3.2 Document Control

PAQ 05.01 rev. 3/2019 Document and Data Control which includes IT data management (new IT service provider activated for software / hardware management including antivirus and remote management + server. Weekly cloud backup of all data recorded in the internal system of the company.
EDD Quality Descriptive Documents List updated on 14.09.21
IOP 01 Archiving Matrix of Quality Registration Documents rev. 8 of 13.11.2021
Drafting, verification, distribution, list of distributed documents; archiving and retention at least 2 years (also for recordings).
The management of documents of external origin owned by customers was also identified and formalized

3.3 Record completion and maintenance

PAQ 05.01 rev. 3/2019 Document and Data Control which includes IT data management (new IT service provider activated for software / hardware management including antivirus and remote management + server. Weekly cloud backup of all data recorded in the internal system of the company.
EDD Quality Descriptive Documents List updated on 14.09.21
IOP 01 Archiving Matrix of Quality Registration Documents rev. 8 of 13.11.2021
Drafting, verification, distribution, list of distributed documents; archiving and retention at least 2 years (also for recordings).
The management of documents of external origin owned by customers was also identified and formalized

3.4 Internal audits

In the Audit Plan formalized in Audited Management Systems: BRC, IFS.
The frequencies have been divided into 4 dates which foresee the verification of production and packaging in the months of June and October; the other requirements are assessed at least once a year.
Both standards used
Meetings of 17.06.21; 18.10.21; 05.11.21; 17.11.21.
External auditor Dr. Sabrina Gramigna (CV updated to 2019)
The deviations are reported in the audit report: the personnel job descriptions have not been signed and frequency of the magnets check every 3 years - pass at least to annual verification

Periodic internal inspections, monthly frequency with assignment of scores for each point on the check list: 1 = good; 2 = sufficient; 3 = insufficient registration on Mod. 09.02_07 (rev. 06) carried out by MG De Pascali and D. Fraioli Checklist for checking facilities, premises and environments which also includes food defense checks divided by work and control areas (including external areas and tunnels), including personnel attire and behavior.
Check those of 23.11.2021, 23.09.2021, 28.10.21 no NC detected.
The check list also includes the verification of the integrity of the specula in the mill, of the windows, of the lamps, etc.
The detection of any NCs are recorded directly and the resolution proposed immediately (if possible). At the bottom of each report there is also an evaluation of the overall score for each area and aspect evaluated

Also added check list for external sites relating to the storage of grains; monthly frequency:
Corniola Grain deposit, 19.10.21 (result 86%) + Mottaziana Grano 26.11.21 (result 83%)
carried out by Andrea Dallagiovanna on a monthly basis as long as there is the presence of wheat registered in Mod. 09.02_07 rev. 6 and carried out on a monthly basis. Result <67% required mitigation actions.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

The Organization has defined procedures and methods for recording the qualification and monitoring of suppliers and checking the raw materials and services it procures.
The documented procedure is as follows:
Procurement PAQ 06/01 rev 12 of 14.11.2021. It applies to all suppliers who have influence on food safety and quality on PF (ingredients, grain, packaging, plants and equipment).
Suppliers are classified according to the type of product supplied:
PM: origin, risk of fraud and / or substitution, chemical and toxicological, microbiological, EC, GMO, allergens, strategic importance of PM in recipes
A score between 1 and 3 is assigned to each item, where 1 = low risk - 2 = medium risk - 3 = high risk

The overall risk of PD is assigned by the sum of the individual scores assigned; in particular <10 R Low; 11 and 20 MEDIUM; > 21 High, formalized in Annex I (updated on 05.11.21) where the annual assessment of the supplier is also considered.
MP packaging risk parameters are identified the chemical risk and CE. LOW = 2; MEDIUM 3-4; HIGH> 4, also in this case considered the NCs detected with summation scores that determine the overall supplier risk
The result obtained is the following:
WHEAT = LOW with default score Semolina
(f. Mininni) = MEDIUM
If supplier risk medium or high initial audit if not GFSI

Annex I shows the data relating to the supplier and the MP with the assignment of a final risk score based on the risk assessment defined for MP vs. Supplier (study formalized in the MP risk analysis document, update of 14.11.21 which includes microbiological, chemical-physical, radiological, food fraud danger) + number of NC detected that may possibly increase the risk class. The update of the file with the overall assessment of the degree of risk is carried out once a year, the latest on 05.11.21.
Eg supplier of Mininni semolina to which a low risk class was assigned (score 10), during the year 3 NCs were detected, attributable to blackheads, branes and insects. The overall score is equal to 10 + 3 = 13, medium risk class but mitigation action foreseen only for the NC critical presence of insects: programmed max 3 filth on purchased product.

No high-risk suppliers were identified
The same management method occurs for Traded product suppliers; ex. Riso Scotti starts from a risk score starts at 8 but during the year the presence of broken bags was detected 8 times (not critical because it does not impact on food safety).

ORGANIC WHEAT SUPPLIER MANAGEMENT
The management of organic MP suppliers is entirely in the hands of Renza Dallagiovanna. All suppliers are activated and monitored during the year both in reference to the quantities of product supplied and in reference to the required accompanying documents (identification of the farmer) and for monitoring supporting documentation (PAP, renewal of certifications, declarations of seeds) . They are part of the analytical monitoring of the formalized annual analysis plan.

FRAUD EVALUATIONS

Formalized in MDG Document Fraud risk analysis updated 04.11.2021
The parameters used for the fraud risk assessment are identified in: historical data of fraud activity linked to the specific MP + economic factors that make fraud possible + simplicity of fraud activation + complexity of the supply chain + analysis for the evidence of fraud. The risk assessment is reported in the score table 5x5 probability of occurrence x detectability with assignment of the degree of risk linked to the MP and the supplier.
Low ≤ 7
Average 8-17
High> 17
High fraud risk identified for organic and conventional wheat purchased from brokers. Mitigation actions include:
presence of supply contract (see those of traceability) + merchandise checks on receipt; for the organic product the PAPs and the farmer's documents are verified to maintain the classification as organic.

The measures implemented in place are considered sufficient for the control of the low risk
Medium risk identified for example in Senatore Cappelli Bio soft wheat flour for which multiresidual analysis is also provided every 3 years; organic amaranth

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Check the hygienic suitability of the means of transport upon receipt and signature for sampling. The person in charge of unloading also carries out a visual check during unloading: in case of detection of anomalous odors and colors, he is responsible for informing the laboratory

The MANLAB document (issue 4 of 14.06.2019) defines all the checks to be carried out upon receipt of the MP (grains, semolina) + PF obtained by the company = samples taken in bagging and / or before loading the bulk + analysis of ingredients and packaged products.

The same document includes the samples to be taken during the production activities (flour and wheat based).
WHEAT: checks on the basis of the sample taken by the unloader
Visual and olfactory control, humidity and specific weight, proteins, falling number and DON for Canadian origin also OTA. The micotoxes are carried out on the second truck and after 3000q but if from the primary analysis the value> 600ppb analysis also carried out on the next load.
For the product withdrawn by farmers, the first 20 supplies relating to the DON value are evaluated in order to understand the criticality of the crop and consequently define a control plan according to the vintage.
SEMOLINA: accompanying certificate required from the supplier (ash, protein, humidity, color, including the values from technical specifications) + humidity, proteins + 1v / month complete analyzes = flour only semolina; regrind = alveogram + farinogram. DON 1vv / month and OTA 1vv / 2 months programmed
Example certificate Mininni regrind semolina batch L041221 + alveogram and farinogram verification

GLUTEN: accompanying certificate required + agglutination time (internal) + 2% addition to weak and strong flour to verify the growth (W and P / L) = eg. Lot n. 9184934 referred to the transport document 39 of 11.01.21 Supply control sheet of 25.09.2020

OTHER INGREDIENTS (improvers, sesame, flax, quinoa, amaranth, spelled, oats, barley, milk powder, starch, etc ...) check only the documentation of the load: stamp applied on delivery note
Same thing for the packaging

Preserved CC of semolina, gluten, BIO wheat; finished flours of customers who request it, overseas references

3.5.3 Management of suppliers of services

The assessment of the service providers is carried out in compliance with what is defined in point 3.5 of the Procurement procedure; in particular, the documents to be requested and evaluated as initial qualification are defined: Transport and storage = contract + health authorization
Maintenance = contract
Machines and plants = contract, use and maintenance manual, CE declaration + MOCA Grain storage = contract + HACCP
Laundry = contract
PF outsourcing packing 0.5-1kg flour packaging = contract, annual audit (last on 29.11.2021 carried out by D. Fraioli and L. Gazzola with formalization in the Supplier Qualification Audit Checklist), haccp extract + authorization

health + allergen declaration Analysis
laboratory = accreditation Calibration
= contract + accreditation
Marketed products = Contract, annual analyzes, attachment 2 questionnaire
Other products marketed supplier brand = attachment 2

3.5.4 Management of Out sourced processing

Currently, the only outsourced process is attributable to the packaging of flour in 0.5 and 1kg Udvs carried out at the Eredi Fontanella site in Monte Cremasco (CR).
Present contract with the outsourcer dated 30.11.2021 which includes compliance with the hygiene and food safety regulations in force (EC Reg. 852/2004 and 178/2006).
Provide the packaging instructions in the purchase order (Mod. 06.01_04): eg. Order dated 29.07.21 pack -2000kg of Uniqua Blu Type "00" Flour 1kg Molino Dallagiovanna; report batch S21203P19 and expiry date 19/03/22

- 1000kg Tritordeum Uniqua green flour Molino Dallagiovanna, batch S21152P10, expiry 27/01/22
- 1000kg Flour Tritordeum (corte Rivalta - Tomato farm), batch S21112P14, deadline 22.04.22
- Discard 10kg of head from the beginning,

Documentation required: Production Form (verified completed by Eredi Fontanella Vittorino snc which include PRP controls, CCPs of 02.08.21) + Weight control and numerosity according to the size of the lot = in the case of a specific order, 50 pieces are checked. Also present delivery note for the flour used for bagging the above products

Annex 2 PAQ 06 rev. 01ENG Raw Material Suppliers Approval Questionnaire which includes General information, contacts in case of emergency, certifications, procurement management; HACCP and Quality System (CCPs, latest haccp revision); disinfection; checks on MPs; facility structure; transport; traceability; ethical trade; documentation available. + Allergens declaration: presence of gluten and soy; they mainly deal with the packaging of flours, rice and corn (also in the form of flour).
Last audit by Molino Dallagiovanna on 29.11.2010 using the Checklist which includes the evaluation of food safety aspects, PRP (pest management, storage, cleaning and sanitation, personnel management, traceability, etc ...), annual verification frequency. Traceability test was also carried out during the audit.
To date, the company is used for the packaging of a single customer brand product (R.)

Final risk supplier evaluation = 12 AVERAGE maintain annual audit + rotation analysis by type of product.

3.5.4.2 Minor NC. The annual audit carried out at the outsourcer Eredi Fontanella did not reveal that in the form. 04 used by the outsourcing company to demonstrate the management of the metal detector, the times in which the check is carried out are not shown (therefore it is not possible to understand if the check was carried out at the beginning and end of the bagging) and the manner in which it is removed any NC product.

3.6 Specifications

Technical sheet Farina Oltregrano La Ricca. EU and non-EU wheat origin. Ingredients: cereals (wheat flour, durum wheat semolina, corn flour, rye flour, oats, quinoa, amaranth, wheat germ, barley), soy flour, sesame seeds, toasted whole soy, linseed, natural yeast, enzymes. Shelf life 8 months. GMOs absent + ionizing radiation + allergen declaration possible cross contaminations on the finished product: milk, mustard, lupine, nuts. Issue 21.04.2020

Technical sheet Oltregrano Il Contadino. EU and non-EU wheat origin. Ingredients: wheat flour, sunflower seeds, whole rye flour, barley, whole oats, flax seeds, natural yeast, enzymes, antioxidant: L-ascorbic acid. Shelf life 8 months. GMOs absent + ionizing radiation absent + allergen declaration possible cross contaminations on the finished product: soy, milk, mustard, lupine, nuts. Issue 21.04.2020
All the sheets include references to chemical-physical parameters (appearance and presentation, humidity, ash, heavy metals, aflatoxins and OTA) and microbiological (CBT, fungi, coliforms and salmonella) as well as nutritional values.

Flour 00 Sweets MR. Origin of the wheat ITALY. Ingredients: type 00 soft wheat flour. Shelf life 12 months. GMOs absent + ionizing radiation absent + allergen declaration possible cross contaminations on the finished product: soy, mustard, lupine. Issue 23.06.2020. References to chemical-physical parameters (appearance and presentation, humidity, ash, proteins, pesticides, heavy metals, aflatoxins B1 and total, Zearalenone, DON and OTA), rheological (dry gluten, falling number, W, P / L) and microbiological (CBT, fungi, Enterobacteriaceae, E. coli, B. cereus, Coagulase positive staphylococci, salmonella) as well as nutritional values. Issue 23.06.2020

Special preparation for gluten-free bread and pizza (issue 28.02.2019). Ingredients: starches (corn, potato starch, tapioca starch), milk powder, rice flour, thickener: powdered cellulose, dextrose, vegetable fiber, salt, thickener: hydroxypropylmethylcellulose. Source of fiber. Shelf life 12 months. GMOs absent + ionizing radiation absent + allergen declaration on the finished product: Milk. Issue 28.02.2019
For gluten-free products packaged by the supplier present Food Compliance Declaration of the packaging material PET / PE 90my (12PET + 78PE) and PET / PE 82my (12PET + 70PE). Provider CFlli issue 08.01.2020

Remilled durum wheat semolina (technical data sheet received from the supplier Molino Mininni issue 16.01.2020) contains a description of the product "Remilled semolina for industrial and artisanal bakery ....." chemical-physical and rheological parameters (humidity, proteins, ashes, dry gluten and wet, gluten index, yellow inidce, falling number, cellulose, presence of soft wheat, filth test, W / P / L, water absorption, stability, granulometry, aflatoxin B1 and total, OTA, DON, Zearalenone, Pb and Cd) , microbiological (CBT, fungi, enterobacteria, salmonella, B. cereus, E. coli, coagulase positive staphylococcus, salmonella), nutritional values. Allergens: gluten-containing cereals present, possible cross-contamination with soy

Grains used came from different suppliers eg. Cereals Padenna, Valcima, Terrepadane Agricultural Consortium, Az. Agr. Cascina Pozzarello, Motta Warehouse, Grandi Paolo, Manara group. Mainly used grains of Italian origin with the addition of the Austrian "Capo" type
- Valcima arrival of 31.08.21 equal to 153q with transport document 736 of 31.08.21; white wheat var. Bologna lot 20211910 (lot assigned by M.DG).
Attached to the document is this cereal passport; cleaning of the vehicle used for the transport (to be paid by the supplier) with declaration of the last product transported
- Cereals Padenna arrival of 07.09.21 in quantities equal to 301q with transport document 57 and internal lot assigned 20211961
Attached to the document is this cereal passport; cleaning of the vehicle used for the transport (to be paid by the supplier) with declaration of the last product transported
- Vitamins internal batch 20201271 supplier IMCD, manufacturer SternVitamin. Technical data sheet Elcovit 210096 updated to 01.15.2021 and contains iron, Niacin, Vitamins B1, B2, folic acid. Includes support on flour and microbiological parameters.

3.7 Corrective and preventive actions

Corrective actions are managed through Procedure 13.01, Request form for corrective and preventive actions. They are detailed and defined for each NC and / or complaint, managing everything directly in the file Mod. 13.01_01 Registration of NC and / or Mod. 13.02_01 Registration of complaints

The NCs are summarized in a file that also identifies complaints (complaints - NC year 2020). For each deviation are developed: Investigations of the causes - correction - founded / unfounded - AC or AP - possible return - verification of the effective application of the correction
NC report mod. 13.01_01 where they are formally registered.

In the course of 2021, 74 complaints were registered (including all, including those from e-commerce) and provide for reports relating to rheological problems, foreign bodies, the presence of mold on bags

- 03.2021 San felice srl presence of mold on Uniqua blue bag of 25 kg lot S21022_18 (from this complaint others have arrived on other products).

The verification was able to detect the growth of mold on the bags in contact with the pallet that had not been properly dried.

The disputed products have been disposed of by customers and / or returned for disposal by issuing a credit note.

The supplier of the pallets (LC Pallet) did not take the responsibility of having brought undried pallets (as explicitly requested by Molino Dallagiovanna): since it is impossible to verify the humidity of each pallet purchased, it was decided to use a plastic interlayer between the pallet and the first bags placed on it. No complaints have been detected since the first application of the CA.

07/19/2021 Oltregrano Gruppo IT lot 21172P03 (flour 00) the customer claims the presence of flour with a reddish hue and not a white one. The product is packaged in the mill area which, during the night, had processed whole wheat flour without carrying out the correct cleaning of the bagging system and the following day, continuing the packaging of the white flour, the problem of contamination arose because the operator of the Oltregrano line he did not discard the bagging start head because the product was the same between one day and the next. It was decided to provide for the elimination of the first head, again in the Oltregrano packaging line, with registration of the activity in the bagging module.

In total, 10 CAs were formalized following detection and analysis for complaints: for delivery of a pre-printed reel with pre-printed EAN; FOSS no longer functional; contamination between flours; bag closure; filament in flour = erosion of the surface of the bagging elevator cup 3 (modified the frequency of checks for structure integrity); palletization other than that required; mold.

3.8 Control of non-conforming product

The management of NC products is contained in the HACCP Manual in point 3.8 where the different NC product cases are identified: depending on the case, the procedures include identification of the product with a special sign in order to make it blocked, NC analysis which could lead to downgrading of the product into a product for zootechnics or as a product to be reworked or its complete elimination

The NC product detected must be identified: if present in the loose state the discharge is blocked if already present in the form of packaged PF it is isolated and identified with a "non-compliant product" sign.

Returns from customers can be reworked after verification, otherwise they are destined for zootechnical use (if aligned with the legal parameters)

The NCs are summarized in a file that also identifies complaints (complaints - NC year 2020). For each deviation are developed: Investigations of the causes - correction - founded / unfounded - AC or AP - possible return - verification of the effective application of the correction; NC report mod. 13.01_01 where they are formally registered.

Data analyzed up to 09/2020 Quality complaints 13 of which the presence of insects in the grain received as MP and the presence of cockroaches, contract parameters (proteins)

Example n.20 of 24.11.2020 receipt of bussard wheat with a protein value found at the analysis lower than that established in the contract. Cargo rejected.

n. 18 of 06.11.2020 wheat on receipt detects the presence of live insects; second sample has the same problem = load rejected due to infestation

Internal audit NCs are also formalized.

The NC identified in the monthly check list used for internal inspections are detected and treated directly in the check list

3.9 Traceability

Each PF is assigned a unique identifying lot: S =
products sold in bags;
R = produced in bulk;
AA = last two digits of the packaging year; DD =
Julian days of packaging;
PNN = progressive number of bagging.
Ex. S18260P06

The batch of the product delivered by the mill for packaging is shown on the 1kg product unit packaged externally; that is, if sent in bulk, the lot will contain the initials "R"

Rework (IOP14 rev. 1 of 09.05.2018) = re-entry of a PF within a phase of the production process (rejection of the bagging heads for the passage to packaging of flour of different strength (e.g. medium / strong) in the reworked product procedure identification): NC products for rheology, production scraps, products returned by customers, products close to the expiration date.
DO NOT INCLUDE damaged products, blocked due to food safety problems, products with vitamins, animal nutrition, scraps fallen to the ground, cleaning residues.
Identified re-entry points are: Mixer 1/3 for bulk - grinding - Mixer 4 (only for super grain) - bagging line packaging hopper (4 manual). The quantity to be reworked must not exceed 10% of the quantity in production. Reworking consists in making the starting characteristics of the product lose by mixing them into different products.

There is a dedicated sheet for reworking (Mod. 09.01_22 Reworked register) where traces of reworking operations are kept: date, place of reworking, indication of the reference that is recovered with its own lot, quantity, identification of the destination product + his lot, destination silos, any observations + employee signature.

List of flours by type of Strength Annex 1 IOP 2 (warehouse management): waste rising but not falling weak / medium / strong not vice versa

From MP to PF
Bag Printed with customized graphics Loblaw supplier Postumia Cartotecnica SpA lot CPC / 2021/122293/2 arrived with delivery note n. 2401 of 20.05.21 in a quantity of 100 800 pieces.
This lot was used from 11.06.21 to 03.12.21 (5 production lots of different PFs) for a total quantity of 84,979 sales units with a stock of 15821. The lots of PFs made with the packaging were:
- S21160P07 = 18430
- S21215P05 = 19480
- S21252P06 = 15770
- S21301P04 = 15870
- S21336P12 = 15410
Mass balance compliant time taken 30 minutes

From PF to MP
Pizza Loblaw 1kg batch S21252P06 expiry 09.09.2022; packaged 15770 sales units. Product packaged in customer brand Loblaw (Canada), vitaminized product.
The lot was sold entirely on 09.17.2021.
From the lot inserted on the primary wrapping it is possible to extract all the MPs used on the day of production start 09.09.21:
- primary packaging lot CPC / 2021/122293/2 supplier Postumia
Grains used came from different suppliers eg. Cereals Padenna, Valcima, Terrepadane Agricultural Consortium, Az. Agr. Cascina Pozzarello, Motta Warehouse, Grandi Paolo, Manara group. Mainly used grains of Italian origin with the addition of the Austrian "Capo" type
- Valcima arrival of 31.08.21 equal to 153q with transport document 736 of 31.08.21; white wheat var. Bologna lot 20211910 (lot assigned by M.DG).
Attached to the document is this cereal passport; cleaning of the vehicle used for the transport (to be paid by the supplier) with declaration of the last product transported
- Cereals Padenna arrival of 07.09.21 in quantities equal to 301q with transport document 57 and internal lot assigned 20211961
Attached to the document is this cereal passport; cleaning of the vehicle used for the transport (to be paid by the supplier) with declaration of the last product transported
- Vitamins internal batch 20201271 supplier IMCD, manufacturer SternVitamin. Technical data sheet Elcovit 210096 updated to 01.15.2021 and contains iron, Niacin, Vitamins B1, B2, folic acid. Includes support on flour and microbiological parameters.
The vitamins are dosed in the dedicated cells on the first floor of mill A where the Oltregrano department is also located

- Printed bag with customized graphics supplier Postumia Cartotecnica Spa (BRC Pacakging Materials certified), technical data sheet updated to 31.08.2018 and FCD of 23.11.2021.

Papers
Customer specifications "Guidance Document GD0016" update of 04.28.2015 the parameters and characteristics of the product are those of the technical data sheet defined by Molino Dallagiovanna; request for expression of the expiry date in YYYYMM (in letters) DD
Technical sheet 00 Pizza Loblaws C / Vitamine. Origin: EU. Including physical and chemical and rheological characteristics

(moisture, ash, protein, dry gluten, Falling number, W, P / L, Aflatox B1 and total, OTA, DON, ZEA, Pb, Cd, pesticides), microbiological (CBT, molds and yeasts, enetrobacteriae, E. coli , Salmonella, B. cereus, Coagulase positive staphylococci); GMO, ionizing radiation, Shelf life 12 months; allergens: gluten present as an ingredient, may contain soy and mustard; nutritional values. Updated on 19.07.21
Alveogram check of the PF carried out internally on 09.09.21 11.03 am - proteins 12.2
Rheological and chemical-physical checks of the grains in acceptance reported in Form 10.01_03: humidity, specific weight, hardness, zeleny, proteins, wet gluten, falling number, weeds, filth test, mycotoxins (any according to the provisions)

Production sheet: line 5 register of products and by-products bagged daily (mod.09.01_10C) which shows the bagging date - 09.09.21 - MP silos = 53 - 10kg of waste from the packaging head - total quantity bagged equal to 15770 - check the integrity of the sifter present at the unloading from the silos before the packaging machine - check the line integrity - check print and label presence on the bundle - packaging lot - weight check carried out on the weight scale - flour lot used - expiry date - date shown on the bag : 2022 / SE / 09 - verification of data saving in the software - operator signature.
Statistical printing of the weight on weight scale with Siemens AG automatic discarder serial n. LB8542857: weigh 15813 pieces rejected 6 because under weight (P - = 25g), weight set at filling scale open at 1010g.
Verification of correct functioning of the MD: from 9.30 of 09.09.21 ending at 16.30 + 10.09.21 starting at 8.00 to 16.30 start / end check and at every hour (recorded on Mod. 9.01_20A) Fe 1.8mm - Non Fe specimens 2.0mm - SS 3.0mm.

Magnet Control 17 in Mod. 09.01_27 of 09.09.21 and 10.09.21 (carried out every day before the resumption of activities)
Verification of safety Plansicheter rejects (Mod. 15.01_06) carried out every day before the beginning of the bagging: 0 insects found on the sieve.

Packing list of container SEGU 5488854 complete because it contained 20 pallets (100x120) with shipment of 01.10.2021. The carrier is chosen by the customer. SEAL H1310077
Vehicle verification form indicating the suitability of the means of transport formalized in Mod. 15.01_02 Vehicle verification: genoa Trasporti verification relating to Cleanliness, absence of material, absence of water infiltrations. Specifically for containers, a form has been prepared for specific verification in reference to integrity, cleaning and hygiene, the presence of other incompatible products, photos of the cargo shipped, loading methods; the card includes the 7 verification points as required by the FDA protocol + verification and registration of the seal.
Registrations made in the mill and related to the CCPs and PRP-Os controls with registration in Mod. 15.01.16, date 09.09.21 + Verification of safety plansichter (presence of insects) with registration in Mod. in the 3rd shift (22.00 - 6.00) 2 live Mixer 3 tribbles were detected
The grinding of the Bologna-type national wheat began on 08.09.21 with registration of the quantity in the Process Data Sheet (mod.09.01_05) in which a broken bearing of the iron silo elevator (external for grain storage) was also registered
The grains are purchased on the commodity exchange and agreed with the various brokers who act for the sale; for example, the Padenna Cereals contracts of 08.27.2021 for 1600T to be delivered on journeys of 400T per month from September to December 2021 have been verified; Carlo Paolini broker of Valcima contract n.24313 of 08.26.2021 for 3200-3500 T distributed monthly until April 2022
Time taken 1 hour and compliant test

Internal traceability test
The company carries out traceability tests according to a formalized plan (for compliance with the various certifications present): semi-annual for organic products, generic; packaging.
- one per year for traceability of the "La Piacentina" supply chain of 17.11.21 Farina 00 La Piacentina DTRF 25kg on lot S212218P14 sent to the SOM customer with invoice 11651 of 29.09.21
- 05.2021 Grano Nazionale lot 20211112 supplier Michelini cereals of 24.05.21 Test
performed in 95 minutes

3.10 Complaint-handling

Procedure 13.01 rev. 4 Management of NC and customer complaints
The complaints are summarized in a file that also reports the NC (complaints - NC year 2021) in which the type of complaint is identified by assigning the flag "quality" or "disservice".
Investigation of the causes - correction - founded / unfounded - AC or AP - possible return - verification of the effective application of the correction

Each complaint is analyzed in detail in Form 13.02_01 Complaints Registration.
In the course of 2021, 74 complaints were registered (including all, including those from e-commerce) and provide for reports relating to rheological problems, foreign bodies, the presence of mold on bags. No complaints for the presence of foreign bodies.

- 03.2021 San Felici srl presence of mold on blue Uniqua bag of 25 kg lot S21022_18 (from this complaint others have arrived on other products whose attributable cause is the same).
The verification was able to detect the growth of mold on the bags in contact with the pallet that had not been properly dried.
The disputed products have been disposed of by customers and / or returned for disposal by issuing a credit note.
The supplier of the pallets (LC Pallet) did not take the responsibility of having brought undried pallets (as explicitly requested by Molino Dallagiovanna): since it is impossible to verify the humidity of each pallet purchased, it was decided to use a plastic interlayer between the pallet and the first bags placed on it. No complaints have been detected since the first application of the CA.
07/19/2021 Oltregrano Gruppo IT lot 21172P03 (flour 00) the customer claims the presence of flour with a reddish hue and not a white one. The product is packaged in the mill area which, during the night, had processed whole wheat flour without carrying out the correct cleaning of the bagging system and the following day, continuing the packaging of the white flour, the problem of contamination arose because the operator of the Oltregrano line he did not discard the bagging start head because the product was the same between one day and the next. It was decided to provide for the elimination of the first head, again in the Oltregrano packaging line, with registration of the activity in the bagging module.
03.12.21 Brusa srl presence of insects in 00 flour for panettone batch 21028_19. The product was manufactured in January 2021 and expiring in 2022. Complaint not considered founded.

The 5kg machine did not seal the package closure well and it was necessary to intervene on the sealing system.

In total, 10 ACs were formalized for pre-printed reel delivery with pre-printed EAN; FOSS no longer functional; contamination between flours; bag closure; filament in flour = erosion of the surface of the bagging elevator cup 3 (modified the frequency of checks for structure integrity); palletization other than that required; mold.

Withdrawal report n. 2021/373 of 03.02.2021 by MiPAAF "Le Dolcissime" shortcrust pastry flour

3.11 Management of incidents, product withdrawal and product recall

Management of accidents described in point 3.11 contained in the HACCP manual, detailed in PAQ 17.01 Emergency management (rev. 03 of 23.03.2020) with examples such as lack of drinking water, fire, blackout, health emergency. Within the procedure, a table was drawn up for each situation identified with the identification of preventive measures, emergency measures to be adopted, the crisis team and the person in charge of managing the emergency itself.

Procedure Management of Identification and Traceability activities, Withdrawal / Recall (PAQ 08.01 rev. 6 of 19.03.2021)
Defines the activities to be implemented for the management of crisis situations related to NC on food: health alerts, receipt of alerts from part of the suppliers, NC analysis of external laboratories, etc ...
A list of contacts for product recall made up of industrial customers has been prepared (annex 2 to the procedure) with an indication of the reference in case of emergency; updated to 03.09.2019, the contacts are checked every year

Corporate Crisis TEAM = HACCP TEAM
Reported to communicate the alert to the certification body within 3
days No recall from the previous audit

Emergency simulation of 21.07.2021: hypothesized contamination by sesame allergen in batch R21007_01 Farina 0 La Piacentina DTRF PC. Test completed in 4 hours

Details of non-applicable clauses with justification

Clause / Section Ref	Justification
3.5.2.3	No live animals

4. Site standards

4.1 External standards

The company is located in the municipality of Gragnano Trebbiense (PC) in an artisan / rural area. The neighboring companies do not appear to have an impact on production
Externally there are for grain storage: 5 iron silos with a total capacity of 4500 tons managed by a single unloading hole, independent from the other internal silos present in the structure of the central body of the Mill; 24 concrete cells for 5,500 tons for flour storage and mixing in bagging 60 silos of different sizes from 1000qli to 75qli.

Plant consisting of 3 buildings: packaged / bagging shed, mill and bulk mixing and grain silos. Since 2020 the internal area has been organized differently for automatic warehouse insertion for the PF: single-lot and single-reference: before each access, a barcode label is printed to identify the pallet (data entry - name, lot and TMC - manual by of the operator dedicated to the activity
3 mills of which 1 decommissioned (B) located in the same body of Molino A.
Molino C of 200ton / 24 hours, mill A of 100ton / 24 hours, warehouse 3500m2 for bagging and storage of the product,
The external areas are in a good state of maintenance and cleanliness, such as not to act as a receptacle for animals and pests.

4.2 Site security and food defense

The company is fenced, to date 7 access cameras. The site is manned 24 hours a day. The company is registered with FDA 10558094792.
Locked silos, kept in the mill management room. Access stairs with padlock. Unloading areas locked and protected with alarms and cameras.
Access Management (PAQ 20.01 rev. 00) dedicated reception, company entirely fenced. The pit and the external silos are monitored by an alarm system and cameras. Registration required for access.

Visitors are registered upon arrival at the establishment. Monthly
checklist includes verification of the food defense control
Food defense team: Management, Production manager, Logistics manager, QA, Packaging management

Risk assessment formalized through the use of the FDPB program updated on 05.11.2021. At the external storage sites, access is monitored only to authorized personnel, some also with video surveillance (PF stock)

4.3 Layout, product flow and segregation

Present plans updated to 16.06.2020: external areas with iron silos and their pit; internal Molino area, packaging area, storage area with two loading bays
Molino area which includes the A and C with the internal drain hole. The processes and, consequently, the flows of the mill have been divided by floor: 6 divided by mill + basement where the compressors and handling machines are present.
Mixing area and bulk loading; this construction includes the changing rooms for staff and the refreshment
area 4 silos for the packaging lines: bagging 2, bagging 4 manual, bagging 3
The flows (product, MP, packaging, personnel, waste) are updated on 16.06.2020

All areas have been classified as low risk, closed product treatment (wheat and flour in tubes) in packaging and storage (vehicle loading and unloading, bulk tank attachment points, grain unloading), given the type of product.

The physical separation of the product is guaranteed by the same plants which are all closed.

4.3.1 Minor NC. During the on-site audit an equipment (pump to distribute liquid substances: perhaps for perimeter

insecticide treatments?) Probably not used for some time (there were cobwebs around) had been left lying and unattended in the corridor that communicates between the bagging area and the warehouse of marketed products

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Walls properly maintained.
Properly maintained floors and surfaces.
Properly managed downloads.
Processes that do not require a considerable amount of water.
Ceilings in good condition.
There are no false ceilings, no artificial ventilation systems and no dust extraction. The windows are protected against breakage
Doors communicating with the external environment adequately designed and managed Doors in good condition
Lighting is adequate Ventilation is considered adequate

4.5 Utilities - water, ice, air and other gases

Only well water is used which is stored in a storage tank where chlorination takes place. Chlorinated water is used both for the private houses present and at the mill: grainshop for Molino C and grainswash for Molino A. Also used for cleaning activities. The wastewater directed to the purifier.

Present a plan with the detail of the water distribution updated to 26.10.21. Two identified points where the water comes into contact with the product: scrubbery and gritty bath, both sampled every year: every six months with chemical rotation, all those attached A d. Lgs. 31/2001 for well including chlorine value; microbiological every two months (CBT, e. coli, enterococci).

Internal chlorine check at least 1 vv / month: 06.12.2021 sampling from grains washer and grains bath = 0.2ppm; previous of 10.11.2021 sampling from grain washer = 0.2ppm and grain-bath = 0.20ppm

The analysis parameters are described in Annex 2 to MANLAB:
RdP 21WL0087670 of 11.11.21: coliforms, enterococci, E. coli. Grain-wash sampling RdP 21WL0091346 dated 09.12.21: grain-washing sampling chemical analysis

Transfer of products and SL takes place through compressed air generated through compressors that feed the packaging area.
The type of compressors includes different models between the mill and the packaging area: in the mill the compressors (Kaeser) are in an oil bath with filters positioned in the valleys of the dispensing point, an oil separator microfilter (type Kaeser KE with aerosol residue <0.01 mg / m^3) and one with activated carbon to eliminate humidity. Scheduled maintenance and replacement of oil and air filters once a year, last on 09.11.21 by Remco.
Compressor oil type Kaeser - Sigma Fluid FG 460, technical and safety data sheet dated 26.07.2015 In the packaging department the compressors are oil free.
4 sampling points identified (mill C flour pump, bagging pump, flour transfer pump, flour homogenizer transfer pump) compressed air with air passage on filter: CBT, fungi. Biennial frequency RdP 21/000532642 DATED 15.11.21 Transfer pump 1 flour homogenizer (M8027), counts microorganisms 8 UFC / mc; molds and yeasts <4 UFC / mc

RdP 21/000532644 of 15.11.21 Molino C flour pump (M1610) counts microorganisms <5 UFC / mc; molds and yeasts <1 CFU / mc

4.5.3 Minor NC. In the compressed air controls, the chemical risk due to the use of an oil bath compressor in the mill plant was not considered.

4.6 Equipment

The equipment is well maintained; even the disused Molino B is maintained and controlled in order to minimize the risk of contamination of the adjacent Molino A.
The equipment is for the most part made of stainless steel (AISI 304); the specula of Molino A are in

hard non-breakable plastic material and, like all transparent surfaces, are subjected to pre-operational checks to verify their integrity.
In the new Molino C there are no speculae and / or openings both to avoid the introduction of CE and to avoid breakage and consequent contamination with CE from the equipment itself.
With the installation of the new line 5, this technical dossier relating to the Food Compliance declaration for the parts in contact (Aluminum, AISI 304, carbon parts coated with epoxy paint) of 30.06.2020
Italpack packaging machine consisting of plastic (PS) and steel tubes of 06.12.2019

4.7 Maintenance

There is a scheduled maintenance plan (mod. 09.02_01A rev.0) with update relating to 2021 divided by department: Grain storage, Molino A, Molino C, Cleaning C, Bagging, Flour storage, etc....
Each machine / system has been identified with the synoptic codes present in the management machine room; ex. Pneumatic filter code 4M115, grinder 3M006.
The registration of the interventions is reported in the Maintenance Interventions register (Mod.09.02_03) prepared for each machine / system as detailed in the program

Checked some interventions carried out in
* Grain storage
- Suction filter: 11.01.21 visual check; 19.1.21 sleeve replacement performed by Dicunto; 13.07.21 visual inspection

* Cleaning of mill A
- Svecciatoi battery: 10.02.21 visual check; 05.08.21 visual inspection
- grinder rejects 3M006: 10.02.21 visual check; 06.04.21 replacement of perforated sheet extraordinary intervention carried out by U. Paganini; 05.08.21 visual inspection
* Molino A
- M86 bucket elevator: 03.08.21 visual check and 08.10.21 replacement of belt and elevator buckets
* Molino C:
- Rolling mill R1G (M1663 A7B): 22.02.21 visual check; 12.08.21 visual inspection; 09.09.21 SPB 4500 belts replacement extraordinary intervention
- 3-channel optical sorter: 12.02.21 visual check; 03.03.21 ordinary maintenance carried out by Buhler; 05.08.21 visual inspection; 20.10.21 ordinary maintenance carried out by Buhler
- second wetting water filter (M1202): monthly check with disassembly and washing, the last one on 19.11.21 and the previous one on 18.10.

Bagging line program planned six-monthly preventive maintenance: February and August with the declination of the machines and systems undergoing maintenance.
For each machine this activity registration form with identification of the equipment and registration of the date and type of intervention; ex.
* 3 + 5 bagging filter: visual inspection in January and July + replacement of sleeves on 20.02.21
* 25kg bagging machine line 2: visual checks twice a year carried out in February and August
* 25kg bagging machine line 3: visual checks twice a year carried out in February and August

There is a register for the recording of temporary repairs, Mod. 09.02_06.

Present technical data sheets of food grade lubricants used by Nils production company, eg. Food TTF (FG H) declaration of the containing also the declaration allergens free, OGM free and BSE absence of 23.04.21
Chain Food HT and Ripress Synt
Having read the technical and safety data sheet of the food grade lubricant used in the compressor (Sigma lubricant NSF H1 rev. 07/26/2015)

Air filters subject to external maintenance

4.8 Staff facilities

The whole plant is classified as LOW microbiological RISK
The staff changing rooms are in a separate area from the production and packaging areas. The external passage is not protected but the workspace is considered all low risk and enclosed product.

There are double compartment lockers where civilian clothes are stored, with a sloping roof.
The changing room is suitable in relation to the type of process and product (structural and managerial characteristics).
Presence of bathrooms with adequate supply of sinks without manual operation.
Equipped with hot and cold water, hand washing detergent, disposable paper towels / air devices, the only hand washers positioned at the production entrance.
Smoking is not allowed inside the structure, the only area allowed to smoke at the entrance to the office (external area) The company has a refreshment area equipped for staff. There is no canteen service. The staff does not consume meals in the changing room according to defined rules.
The need for dedicated facilities / changing rooms for visitors is not required. Visitors are required to wear scrubs and caps.

An ad hoc changing room is provided for the personnel working in the “allergen zone” of the Oltregrano line where there is the blue overalls that the operator must wear before proceeding to the work. the suit must be worn exclusively for work in this department in order not to contaminate the other references produced on the site with allergens (milk, sesame, soy).

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

The management and storage of chemical products is correctly managed. There
are technical and safety data sheets for the products.
The products are stored in a closed place accessible only by authorized personnel

4.9.2 Metal control

METALS
There is a management procedure on the use of metal tools (stapler, single blade cutter and knives). It is forbidden for staff to bring these tools from home without authorization from the company. There is monthly monitoring

Throughout the production phases, starting from the pre-cleaning of the grain up to the bagging, there are magnets, sieves, sieves, gravimetric separation, separation grids, etc ... to make sure to separate the "food" part from all contaminants and / o Unnecessary by-products.
In addition to the magnets on the bagging lines 3 and 4 there are two metal detectors (CCPs)

There is a management procedure on the use of metal tools (stapler, single blade cutter and knives). It is forbidden for staff to bring such utensils from home without authorization from the company. There is monthly monitoring

4.9.3 Glass, brittle plastic, ceramics and similar materials

PLASTIC AND FRANGIBLE MATERIALS
Verification of the integrity of glass and rigid frangile plastics is carried out on a daily basis by the operators of the mill and by the operators of the packaging lines. Any anomalies are immediately reported to the quality area in order to plan any replacement and / or temporary repairs (only if strictly necessary).

Verification of the integrity of glass and rigid frangile plastics is carried out on a daily basis by the operators of the mill and by the operators of the packaging lines. Any anomalies are immediately reported to the quality area in order, if necessary, to schedule replacement and / or temporary repairs (only if strictly necessary), registration in Mod. 09.01_05 Process Card + Buratti Cleaning registered in Mod. 09.02_04 + Mod. 15.01_06 Plansifter rejects and Mod. 15.01_04a and b relating to the cleaning of plansifter channels.
Management aspects of breakages are included in the Company Regulations Company provisions for personnel (IOP 05), the actions to be implemented in the event of breakage are reported:
- stop production
- notify the QA Manager
- breakage accident registration (Form 16.01.01)
- cleaning of the affected area
- forty
- change of clothes

- inspection of the cleaning area and line release

Glass, plastic and wood register last updated on 26.10.21 which identifies all the surfaces and specifications according to the different areas. Used as a reminder of the monthly checks attached to internal inspections.

4.9.4 Products packed into glass or other brittle containers

NA

4.9.5 Wood

WOOD
During processing and packaging there are no wooden equipment and / or parts of them.
For the PF, wooden pallets are used whose contact is protected by inserting a cardboard interlayer with waterproofing treatment to avoid contamination with mold following storage with high humidity and / or "poorly protected" transport. The change in the type of interlayer took place following some complaints received from customers.

4.9.6 Other physical contaminants

Any contaminants coming from the packaging of the MPs are potentially present only in the production area of the overseas recipes because the rest of the packaged flour comes from the mill and its storage silos.
The recipe of the overseas area includes small silos with load cells for the automatic dosage of minor ingredients and the manual addition of the other ingredients with manual weighing by the operator. The attention to the prevention of contamination by the packaging of the MPs was reiterated during the training sessions.

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

Throughout the production phases, starting from the pre-cleaning of the grain up to the bagging, there are magnets, sieves, sieves, gravimetric separation, separation grids, etc ... to make sure to separate the "food" part from all contaminants and / o Unnecessary by-products.
In addition to the magnets on the bagging lines 3, 4 and 5 there are metal detectors (CCPs)

4.10.2 Filters and sieves

Filters, sifters, gravimetric separators, plansichters have variable dimensions depending on the processing phase of the grain / flour in which they are found. The company has set up control systems for both the verification of their integrity and the control of their waste; ex. Registration Mod. 15.01_16 Mpodule verifying magnets and safety plansichter Molino: presence of insects with registration of any discovery. Attention threshold 1 insect in winter - max 3 in summer; alarm threshold> 1 insect in winter -> 3 insects in summer.

BURATTI AND PLANSICHTER
CPs Molino
BU1 centrifuge sifter silos 11-16 = in the 3rd work shift BU2
Molino safety plansichter A = at the beginning of the shift BU3
Mixer safety plansichter 3 = in the 3rd work shift BU4 Molino
safety plansichter C = at the beginning of the shift CPs bagging
shed
BU5 safety plansichter bagging line 2 = every 8 hours
BU6 sifter bagging line 5

Critical limits
Tumblers = presence of breakage in the "silks" with registration of the presence of insects, lumps of flour, various fragments)
Plansichter = verification of the presence of insects with registration on Form 15.01_06 "Waste plansicheter safety

4.10.3 Metal detectors and X-ray equipment

Present 3 MD:
Bagging line 3: 10 and 25kg = MAGN 10 Bagging
line 4: 5 and 10kg (manual) = MAGN 05 Bagging
line 5: 1 and 5kg MAGN 16

Check at the beginning, every hour and at the end of each packaged lot of test specimens: limit 2.5 mm FE; 3.5 mm No Fe; 3.5 mm SS (AISI 316) bagging 3, 4 limit 1.8 mm FE; 2.0 mm No Fe; 3.0 mm SS (AISI 316) bagging 5
all the discarded products are made to pass 3 times before finally discarding (even a single waste passage, the product is discarded).

4.10.4 Magnets

Present a magnet in pre-cleaning (MAGN00) with verification 2 vv / week (cleaning) CCPs
Molino
MAGN 04 wholemeal bagging (line 1)
MAGN 06 mixer 3
MAGN 07 SL ultramarine line + with MAGN 08
allergens in bulk for silos 11-16
1vv / day control foreseen

CPs Molino
MAGN 01 1st cleaning Molino A MAGN 02 2nd cleaning Molino A MAGN 03 product review
MAGN 12 from silos 31 and 323 to silos 50
MAGN 14 under-balance cleaning Molino C
MAGN 15 rolling mill scale B1 Molino C
Inspection scheduled 1 v / day

CCPs bagging shed
MAGN 09 bagging line 2 every 8 hours

CPs bagging shed
MAGN 11 line E - Bagging 3 and line D - Bagging 4 = every 8 hours MAGN 13 bagging line 4 = or start of use and every 8 hours
MAGN 17 bagging line 5 = at the start of use and every 8 hours (at the moment only one shift works)
The critical limit defined for the magnets is validated annually by an external company
Present Magnet 13, 11 with date 14.12.2019 Magnetic Measurement Report Gaussian Towers as a function of distance = in contact 11000gauss, at 20mm 350

Check recordings inspections of magnets Mod. 15.01_16 Magnets and Plansichter: 21.11.20 at 5.00 (before the start of work); tumblers of 14.11.2020 2.00 - 3.00.
Every 3 months check the integrity of the tumblers with planning of cleaning interventions
Recording of rejects of the Plansifter in Mod. 15.06_06 with relative cleaning
Duct cleaning registration in Mod. 15.01_04B with equipment list and all cleaned ducts, cleaning date, eg. 02.11.2020

4.10.5 Optical sorting equipment

Buhler optical sorter with 3 channels + 1 for review in mill C installed and tested on 10/08/2018; scheduled maintenance and calibration with quarterly Sortex control. 5 selection programs, varied by the operator according to the quality of the waste.

4.10.6 Container cleanliness - glass jars, cans and other rigid containers

NA

4.11 Housekeeping and hygiene

Present Cleaning procedure PAQ 09-02 (rev. 11 of 10.12.20) + IOP PU = various cleaning operating instructions relating to the description of the interventions to be carried out in the different areas of the company; ex. PU 02 vehicles, PU03 tanks, PU04 grain unloading area, PU14 Cleaning plansichter, etc.... To this is added the Planning of Sanitation interventions (mod. 09.02_04 rev. 3 updated to 17.12.20) divided by areas of intervention: drivers, millers-unloader, cleaners, logistics / packaging workers with reference to the Reference Cleaning Instruction number and specific frequencies.
Sanitation Intervention Registration = specific card for the intervention area (mod. 09.02_02) as well as

divided into Planning, with the possibility of adding registrations with any extraordinary interventions. Eg. 4-monthly mixer cleaning; Cleaning of grinding scales every four months starting from April; cleaning channels plansichter mill AA C quarterly; Every 3 months it checks the integrity of the tumblers with planning of cleaning interventions.
The systems are cleaned with air and suction, no activities with water and / or sanitization are carried out (No chemicals are used).

There are records of cleaning interventions that reflect the formalized planning in Mod 09.02:
three people are dedicated to cleaning the plants externally and are present every day in the mill. The interventions can also be extraordinary depending on the actual processing activities in the mill;
02.12, 07.12 and 09.12 recorded external cleaning of the rolling mills in both mills (a
and C).
The millers, on the other hand, are responsible for the cleaning activities that are carried out following disassembly of machines and / or parts of them; ex. cleaning with vacuum cleaner on 3 and 10. 12 and cleaning of MYFB molino A probe on 1, 3, 7 and 14.12.2021.
The millers are also responsible for checking the integrity and cleaning of the magnets (registration in Mod. 15.01_16) and safety plansichter rejects positioned even before feeding the packaging machines for the possible verification of the presence of insects. The frequency is different between summer and winter with different alarm and attention thresholds:

- Alarm: winter> 1 insect; summer max 3 insects
- Attention: winter max 1 insect; summer max 3

PACKAGING:
- External environment cleaning: 26.11.21 - 22.10.21
- Cleaning sifter safety plansichter bagging 2: 22.10.21
- Automatic warehouse floor cleaning: 22.10.21
- Cleaning sifter safety plansichter bagging 3: 23.10.21
- Cleaning of silos 54 and elevator of 27.11.21 - 23.10.21
- Cleaning of bagging scales: 17.09.21
- Cleaning Silos 33/34 of 23.10.21

Cleaning of the cereal unloading hole: floors once a month including de-wetting

Cleaning Registry Oltregrano (mixer 4 semi-finished products)
Planning of sanitation interventions with registration in Mod. 09.02_04.
As for the mill, here the cleaning is carried out by the cleaning staff: eg. mixer area ceiling (the “dirtiest” part due to the presence of dust coming out of the mixer during the mixing phase - even if the mixer is closed) 1v / week; last of 10.12.2021 carried out by Paolo Civardi; previous of 22.11.21 carried out by the cleaning staff.

The mixer is blown by the preparation officer (P. Civaroli) for each product change and especially when a process is carried out that contains sesame as an ingredient and emptying the channels (7-8kg = waste product for feed)

Vehicle cleaning:
At the washing station 2 vv / year;
Internal cleaning of the bins monthly
External cleaning at an authorized station 2v / year Cleaning
of vehicle pipes every six months
Internal blowing at each load

4.11.7 Cleaning in place (CIP)

NA

4.11.8 Environmental monitoring

A generalized surface buffer plan is foreseen on the surfaces defined in Annex 2 of the MANLAB updated to 20.11.2020 which identifies the sampling point on an annual basis: mixers, purifiers, bagging filling heads, etc.

Acceptability limits defined exclusively for contact surfaces:
CBT <100 cfu / g OPTIMAL; 100-500 cfu / g GOOD; 501-1000 ACCEPTABLE,

coliforms <10 cfu / g;
molds <100 cfu / g OPTIMAL; 100-200 GOOD; 200-300 ACCEPTABLE yeasts
<100 cfu / g

Mixer 2 RdP 21WL0086509 of 15.11.2021 = ok
S1 Molino C purifier RdP 21WL0086533 of 15.11.21 = ok compliant Bagging
filling head 4 RdP 21WL0086538 of 15.11.21 = ok compliant

OPERATOR HANDS AND CLOTHING
Limits: coliforms and staphylococci <10 for hands and clothing; molds for clothing <100
Operator Hands RdP 21WL0091446 of 22.11.21 = ok compliant
White Jacket Operator Mulino RdP 21WL0089949 of 22.11.21 = ok compliant

4.12 Waste

Waste can come from both packaging and maintenance "residues". For the former there is an active contract for removal by dedicated external companies; the others are alienated directly from external companies that carry out maintenance interventions

4.13 Management of surplus food and products for animal feed

Production waste is identified as by-products and is destined for zootechnical feeding: authorization prot. 26224 of 15/06/2006 for feed use (reg 183/2005).
There are no retail brand products.

Bran analysis RdP 21WL0093802 of 06.12.2021: CBT, fungi, salmonella, b. cereus, and. coli, coagulase positive staphylococci, L. monocytogenes

4.14 Pest management

The pest control activities are aimed at monitoring on the basis of 12 annual interventions for rodents, crawling and flying, food insects. Two annual pest control activities as needed + contact insecticides. External Company MB pest control contract:
- Flour Mixing and Loading Section contract of 27.11.2018 for monitoring muridae and other pests
- Contracted Shed Section of 11.27.2018 for monitoring muridae and other pests
- Molino A contract dated 27.11.2018 for monitoring muridae and other pests
- Molino C contract dated 09.26.2018 for monitoring muridae and other pests
- Treatment with contact insecticide in the different areas of 02.01.21 Two-
year validity with renewal for the year 2021

Floor plans
- Automatic warehouse shed. Update of 03.11.20
- External pit and silos + Mill Area. Updated as at 30.10.2019
In the external area, rodenticide bait dispensers are positioned along the perimeter of the structure and along the external perimeter. Internal only catch traps
- Mixing area and interior. Update of 23.10.2019. Commodity insects: beetles, lepidoptera
The monitoring includes the two external grain storage warehouses: Mottaziana managed internally with inspections by MB Disinfestazioni: here there is a shed with bulk grain accumulated inside. At the Corniola site, the grain is stored in silos and the monitoring activity is the responsibility of the facility manager. Any disinfestation treatments on the stored grain are activated following a visual inspection at the unloading.

The positioning of the rodent traps is indicated on the map and by an identification tag on site.
EXTERNAL
Rodents 43 Traps with bait (external rodenticide)
INTERNAL Molino A
22 internal rodents colle (external 18 rodenticides) 37
Lepidoptera
13 beetles

11 cockroaches
8 capture lamps

SHED Packaging 22 internal
rodents glue
9 moths
4 beetles
8 cockroaches
5 capture lamps

NEW FLOUR MIXING DEPARTMENT
10 internal rodents with glue (8 external with rodenticide
bait) 3 catch lamps
12 moths
6 beetles

MOLINO C
3 rodents with external bait 13
internal glue
8 trap for Sitotroga 8
catch lamps 7
ephestia / plodai
5 tribolium
5 cockroaches

Criticality thresholds
Rodents Internal establishment limit 0- external bait threshold for slight gnawing attention, Threshold Average external limit> 30% (calculated on the average of the overall value found divided by number of traps)
Attention threshold added: 10 moths, 1 beetles, 1 cockroaches,
Insuperable limit threshold: Limit 3 beetles, limit 2 cockroaches, 30 Lepidoptera In
case of presence: increase in number of traps, increase in monitoring

For birds considered absent risk (defined in the HACCP) at the production site

Verification of the intervention report of 30.11.21 for all areas: external bait consumption within the limit threshold although there is "physiological" consumption in dispensers n. 13, 14, 15 purification area; absence of inland rodent catches; monitoring lepidoptera, beetles and cockroaches = no warning.
No internal infestation activity in the last year.

The external warehouses for grain storage are monitored with the same method and there are updated plans:

via Mottazziana (Borgonovo Valtidone) plan of 01.10.2013 with two external bait dispensers on the door side and two internal traps on the door side + 1 lamp for catching moths + 2 glue traps for cockroaches.
The shed is completely filled at the beginning of the new campaign which is followed by a treatment with Degesch Platè (hydrogen phosphorus) in a concentration of 12g / ton. No internal capture of muridae, consumption 70% of external bait, 9 + 14 lepidoptera (efestia, plodia), 0 cockroaches.
Inspection and evaluation of the pest control system in Molino Dallagiovanna on 24.09.2021 carried out by Dr. Gramigna Sabrina who reported some points of improvement: provide insecticide treatment for moths in the preventive automatic warehouse for spring 2022.
The site has no bird problems: no passage or nests.

In case of need insecticide interventions, generally 1-2 / year with sulfuryl fluoride (perfume) in the warehouse and the mill emptied; ex. Treatment of 13.08.2021 with fragrance and residual check of 16.08.2021 for Mulino A, Mulino C, Grain cleaning

For semolina to be shipped outside normally with an expiry date of 6 months, treatment in container with phosphorated hydrogen to extend the expiry date to 12 months, or for more delicate flours, eg. wholemeal or mix of flours; ex. Treatment of 04.12.21 with Degesch Platè in 4g / mc concentration of container 1 (there are 2 containers in the company dedicated to treatment). Container release declaration which will be possible only from 21.12.21 to 14.00.

Technical data sheet Douglas product perfumes of March 2017
Sulfuryl padifluoride fumigant gas scent datasheet dated 02/22/2011, used in plants, 48 hours treatment and release after verification with Spectros SF-explor IR, visa issued on 08/19/2018 at 3.00 pm company MB
The products used are stored in a locked cabinet.

4.15 Storage facilities

The site is equipped with 5 external iron silos for grain storage + 24 internal concrete silos. For each type of SL, SL and / or PF silis are intended as needed.
There are also 2 external warehouses for grain: the shed is completely filled at the beginning of the new campaign which is followed by a treatment with Degesch Platè (hydrogen phosphorus) in a concentration of 12g / ton.

The flours are stored in silos as single MP or already as blends (SL) intended for the packaging of PF. The centralized automatic warehouse has also been active for a year. The warehouse allows you to store pallets complete with single and single-lot references. The positioning is carried out automatically (as is the unloading) after registering each pallet in the management system which issues a label with a bar code to be affixed to each pallet. The label shows the identification data of the pallet, i.e. type of product, quantity, no. Layers and pieces by layer, batch, TMC and any notes, for example the pallet reserve for a specific customer.
At the moment, the management of orders for unloading from the automatic warehouse is still in the final settlement phase: some pallets of PF (including the purchased products - traded - are still positioned on the ground and / or on the shelves prepared in the area between the bagging and the entrance to the automatic warehouse.
On these same spans there are some pallets of the most used and high-rotation packaging

The company has also equipped itself with a storage and picking area for the preparation of e-commerce references: the pallets of references sold in e-commerce are positioned here (bags of 0.5-1-3 and 5kg) for the preparation of orders. The area is located behind the automated warehouse.

4.16 Dispatch and transport

For the qualification of transport and storage service providers = contract (contains specific provisions relating to transport) + health authorization + HACCP + signature of the code of ethics defined by Molino Dallagiovanna; also present means for transport carried out by internal staff.

With its own means, the company transports loose flour or packaged product on pallets for direct delivery to the professional.
Transport management is formalized in the PAQ. 15.01 rev. 6 for activities managed exclusively internally: Expected verification of the vehicle before loading for the absence of products other than food and hygienic suitability registered in the Form 15.01_02 Vehicle verification form: example of truck, plate, cleanliness checks, absence of incompatible material, absence of water infiltrations (ok also for tarpaulins): load verified on 11.24.21 Written transporter, recipient M., semitrailer, license plate XA540HT, photo if necessary, signature of whoever loaded the means of transport.
For container shipments it is necessary to fill in attachment 2 Container Loading

Present owned vehicles: 7 tankers and 3 bins vehicles and other external transporters for deliveries of packaged product
For deliveries abroad transport ex work
mod all2 of PAQ 15/01 for checks according to Ct-pat for transport to the USA

Some carriers work exclusively for Molino Dallagiovanna. The products do not require temperature-controlled transport, nor the mandatory closed truck (tarpaulins are also fine as long as the initial inspection is intact and perfectly covering):
Farucci Luigi of 09.10.2017
Marino Trasporti di Beccalossi Dario, contract dated 12/2016 with tacit annual renewal (withdrawal to be communicated 7 days before)
Contract with Giovanni Gangale company dated 10.01.21 not present substitutive declaration signed by FP
Transport dated 10.01.21

Load safety indicated in the annex Substitutive declaration of the deed of notoriety in point e) there is a guarantee of safety of the product from single missions.

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification
4.3.5	No temporary structures in place
4.4.4	No suspending ceilings
4.9.4	No glass or brittle containers
4.10.6	No glass or brittle containers
4.11.7	No CIP
4.12.3	No transfer of trademarked waste
4.15.3	No storage in controlled temperature
4.15.4	No storage in controlled atmosphere
4.15.4	No storage in controlled atmosphere
4.15.5	No outside storage
4.16.3	No transport in controlled temperature status needed

5. Product control

5.1 Product design / development

There is a PAQ 04-01 and PAQ 09-01 product development management procedure and formalized in the project sheet.

Projects completed in 2021
Natural dried yeast chosen by some suppliers; identified the Puratos product to be used in 4 definitive recipes (with the addition of flour and sourdough)
- Non-active pastry yeast
- Non-active yeast for bread and pizza
- Active yeast for bread, pan pizza and pastry
- Active yeast pizza on the plate
To date, the project has not yet started and especially those for outdoor pizza have been thought.

Compliance with the current HACCP of the new references formalized in the Management Review of 16.06.2020: reported mix of gnocchi and Roman pinsa (ref. Pinsa Easy data sheet).

5.2 Product labeling

The flour is packaged in bags of 25kg, 5kg and 1kg depending on the type of product. Suitable packaging is designed for customers' brands (who are solely responsible for the wording on the sales package).

Being very simple products, the indications include the indication of any invented name (eg "Frolla", "brioches", "Panettone") with the legal name ("Soft wheat flour type" 00 ").
The main information is pre-printed on the wrapping and the batch and TMC are printed by ink jet during packaging.

The marketed products are in most cases supplied in neutral packaging identified by the product code, production date, lot and TMC; when used for sale they are labeled.
The packaging operator prepares the necessary wrapping and verifies the legibility of the printouts by registering in the Bagged Products and By-products Register Production Sheet Module: line 5 daily bagged products and by-products register (mod.09.01_10C) which shows the date bagging - 09.09.21 - MP silos = 53 - 10kg of waste from the packaging head - total quantity of bagging equal to 15770 - check the integrity of the sifter present at the silo unloading before the packaging machine - check line integrity - check print and presence label on the bundle - packing lot - weight check carried out on a weight scale
- batch of flour used - expiration date - date shown on the bag: 2022 / SE / 09 - verification of data saving in the software - operator signature.

The marketed products can also arrive with neutral wrapping on which a personalized Molino Dallagiovanna brand label can then be affixed. All the sales units that are supplied in neutral wrapping bear the reference code, the lot and the TMC.

5.3 Management of allergens

There is a procedure Management of allergens PAQ.09.03 rev. 2 of 24.11.2017 which contains the description of the allergens present and used as ingredients: Gluten, milk, soy, sesame
- gluten, an ingredient in flour, indicated on all labels;
- milk and sesame present in some ingredients used in flour mixtures (Oltregrano line), indicated in all the labels of the Oltregrano line, dedicated mixing and bagging (in some cases they also represent cross contamination: in this case the indication May contain traces of ...)
- Soybean contamination from transport and field indicated on all flours. Also present as an ingredient in some MP for the Oltregrano line.
- Mustard and lupine seeds indicated as cross-contamination in the Oltregrano line (as dragging from MP; in this case the indication May contain traces of...).
Cross-contaminations resulting from MP used in other recipes and from contamination of endogenous MP are declared as cross contaminations.
All the technical data sheets present in the company (excluding the marketed products) have been revised in the light of the new allergen evidence, indicating whether the allergen is present as an ingredient, cross-contamination and if present in the company. Only the ingredient and possible cross contamination are indicated on the label.

Oltregrano Cleaning Registry
Planning of sanitation interventions with registration in Mod. 09.0_04. Here, too, cleaning is carried out by the cleaning staff: eg. mixer area ceiling (the “dirtiest” part due to the presence of dust coming out of the mixer during the mixing phase - even if the mixer is closed) 1v / week; latest of 11.12.2021. The mixer is blown by the preparation officer (P. Civaroli) for each product change and especially when a process is carried out that contains sesame as an ingredient and emptying the channels (7-8kg).

On the basis of the information reported by the suppliers in Annex 2 to the evaluation questionnaire sent to each supplier, the production sequence to be adopted in the mixer (mixer 4) of the overstock production area is drawn up:

from the recipe in the absence of allergenic ingredients to the one with more allergens. Required elimination of the production head equal to 25kg and blowing of the line. Scraps destined for farinaccio = annex 2 to PAQ 09.03 rev. 0/2017
Present dedicated dressing room. Personnel dedicated to the dosage of allergens in a dedicated area with disposable clothing (overalls with hood), overshoes
Dedicated equipment of different colors (blue).
Suction in the room where allergens are processed + dedicated pallets and controlled MP pallet storage. Allergen Policy dated 30.06.2020 due to risk assessment modification following modification of the technical data sheets and packaging relating to the declarations of cross contaminations: all declared both used as MPs and as derivatives from the supply chain.

Present monitoring analyzes for mustard and lupine research (not included in the analysis plan but carried out on specific customer request)
RdP 21/000589508 of 15.12.2021 Soft wheat flour 00 Special Pasta Italy batch ODP21338001, search for

mustard and lupine in PCR. The analysis was conducted on the product in storage before being sent to the customer. In fact, the control represents an analysis of unblocking the flour that will be sold in bulk.
RdP 21/000565542 of 01.12.21 Soft wheat flour 00 B Plum batch ODP 21329011 (customer recipe), search for mustard and lupine in PCR
IR 0.40ppm PCR

5.4 Product authenticity, claims and chain of custody

There is a claim on a "Piacentina flour" product made with local wheat. This product is certified ISO 22005/2008 with certificate 04/2007 / RF. Certified organic company CZ / CC 03739.
Vulnerability assessed within the risk analysis of the supplier assessment (06.01 proc.) 6/11/2017. PAQ 06.01 procedure includes authenticity assessment (e.g. organic linseed from india with certificate)

"Product fraud risk analysis document" rev 0 updated on 14/10/2018 which highlights a high risk for organic products, for the 1KG bag packaging service (underweight delivery)

Mass balance records for each organic batch of finished product Claims claimed:
Gluten-free,
Gluten and lactose free,
goods purchased already packaged and labeled with the Dallagiovanna brand in the company. Supplier C. provides declaration of conformity for each batch. Annual analysis for gluten, lactose and milk proteins.

FRAUD EVALUATIONS
Formalized in MDG Document Fraud risk analysis updated 04.11.2021
The parameters used for the fraud risk assessment are identified in: historical data of fraud activity linked to the specific MP + economic factors that make fraud possible + simplicity of fraud activation + complexity of the supply chain + analysis for evidence fraud. The risk assessment is reported in the score table 5x5 probability of occurrence x detectability with assignment of the degree of risk linked to the MP and the supplier.
Low ≤ 7
Average 8-17
High> 17
High fraud risk identified for organic and conventional wheat purchased from brokers. Mitigation actions include:
presence of supply contract (see those of traceability) + merchandise checks on receipt; for the organic product the PAPs and the farmer's documents are verified to maintain the classification as organic.

The measures implemented in place are considered sufficient for the control of the low risk.
Medium risk identified for example in Senatore Cappelli Bio soft wheat flour for which multiresidual analysis is also provided every 3 years; organic amaranth

5.5 Product packaging

The company packs paper material in sacks and bags.
Eg 1kg bag of flour supplier Postumia (BRC / IOP certified) printed paper bags: only white kraft paper + glue printed in flexography = technical data sheet dated 25.11.2018 + food compliance declaration dated 25.11.2019

Big bags in PP supplied by Tela technical Industriale srl; technical sheet 19.04.2018; virgin PP material indicated, food compliance declaration dated 18.11.2019

Primary packaging technical specifications used for the packaging of products supplied by Caremoli:
PET / PE 90my technical data sheet dated 19.09.2017 + food compliance declaration dated 02.04.2019 used for 1kg packaging; on the other hand, for the 25kg bag the Supplier Saccarta food compliance declaration dated 04.04.2019 + technical data sheet updated to 2018 multilayer multi-material paper / PELD 20my is used

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Sampling is carried out on all basic flours for routine checks defined in the MANLAB document for each silos: humidity, proteins, gluten, germination index, alveogram, farinogram, + extensogram 1 vv / month; DON + soy on 2 flours per month; pH, granulometry, total acidity on customer requests
Flour Product Control Registration

On all PF with quantity> 100q sample performed on mixtures (if it is basic flour the previous analyzes are considered): humidity, proteins, gluten, germination index, alveogram, farinogram + extensograph 1 vv / month (each batch for PF intended for panettone / colomba); DON + soy on 2 PF per month.

SL are all the blends obtained for the realization of the Oltregrano references: for each batch of product taken 1 sample of 1kg with details of the reference, lot, indication of the previous production; ex. IT group lot S20336_18, previous production "La Leggera".
Scheduled 2vv / month DON.
If in the previous production there is sesame then sesame search is foreseen (Neogen internal kit, used expiry 10.05.2023).
Soy is declared on the label.

The verified parameters are carried out in an internal laboratory (no micro); scheduled Ring Test with Chopin certified flours; internal verification between operators; verification of the same sample between mills (Alveogram, farinogram, humidity, proteins, falling number, gluten + possible extensograph) on 2 basic flours (strong + weak) and 1 PF
Ring tests carried out in 2020:
Ager circuit - Italmopa test 1/2021 January = compliant (very high acceptability limits); last 2/2021 of October 2021 the results have not yet arrived
Belotti Circuit, Farinogram Monitoring Card, test dated 07.2021 = compliant, 3 tests per year scheduled (January, April and July)

The ANALYSIS at external laboratories are listed in Annex 2 of the MANLAB 1. the basic
and PF flours to be analyzed at external laboratories and on customer requests:
Semi-annual micotx (aflatox, OTA, DON, Zea), GMO, MR, Pb and Cd + microbiological (CBT, fungi, salmonella, B. cereus, e. Coli, enterobacteriaceae, staphylococcus coagulase +) and filth test 8 vv / year
2.MP semester micotx wheat (aflatox, OTA, DON, Zea), GMO, MR, Pb and Cd;
3. PF checks and grinding by-products for food use (bran, middlings, farinaccio) annual frequency micotox (aflatox, OTA, DON, Zea), GMO, MR, Pb and Cd; filth test; microbiological (CBT, fungi, salmonella, B. cereus, e. coli, enterobacteriaceae, staphylococcus coagulase +)
4. MARKETED PRODUCTS and MPs OTHER THAN WHEAT (gluten free, wholemeal rye flour, rice flour, mix più, quinoa, sesame seeds, rye, etc ...) on a three-year rotation, max 2 per year. Analysis requests from suppliers. The analyzes and controls were defined on the basis of the requirements of the technical data sheet: microbiological analyzes (CBT, fungi, salmonella, B. cereus, e. Coli, Enterobacteriaceae, staphylococcus coagulase +), allergens (gluten and lactose)
+ annual analysis requests from product suppliers

RdP 21WL0091357 of 30.11.21 Bologna soft wheat batch P19-11-21_02: multiresidual + glyphosate; Cd, Pb, GMO, micotox (Aflatox, DON, OTA, Zea)
Rdp 21WL0091419 of 29.11.2021 Soft wheat flour Shortcrust 130 lot S21321P04: salmonella, coagulase positive staphylococci, CBT, Enterobacteriaceae, E. coli, yeasts and molds, B. cereus
RdP 21WL0089944 of 24.11.21 Durum wheat semolina lot 061121: salmonella, coagulase positive staphylococci, CBT, Enterobacteriaceae, E. coli, yeasts and molds, B. cereus
RdP 21WL0038482 of 05.07.21 La Pala special mix for pizza (Oltregrano recipe) lot S20302_16: salmonella, coagulase positive staphylococci, CBT, Enterobacteriaceae, E. coli, yeasts and molds, B. cereus
RdP 21WL0061607 of 06.09.21 Oltregrano Cerealpiù lot S21230P08: salmonella, coagulase positive staphylococci, CBT, Enterobacteriaceae, E. coli, yeasts and molds, B. cereus and filth test

Shelf life
Last started in 2020 on Wholemeal Flour R batch S20314_17
T0 microbiological verification: (RDP 20WL76202 of 19.11.20) salmonella, coagulase positive staphylococci, CBT, Enterobacteriaceae, E. coli, yeasts and molds, B. cereus; sensory analysis: appearance, smell, color, taste; baking test carried out internally on 23.11.20; Kreiss essay (RdP 20WL76206 of 13.11.2021)
T1 verification carried out on expiry (03.27.21): odor and oxidation at an external WL laboratory; sensory analysis; proof of baking

For all new products inserted and three-year rotation by type of product. Plan Integral analysis R and La Pala

(Oltregrano): rheological, microbiological and bread-making analyzes.
In 2021 no tests were carried out because no new products have yet been added

5.6.2 Laboratory testing

Water & Life accredits n. 0081
Merieux Nutriscience n. 0051

The verified parameters are carried out in an internal laboratory (no micro); scheduled Ring Test with Chopin certified flours; internal verification between operators; verification of the same sample between mills (Alveogram, farinogram, humidity, proteins, falling number, gluten + possible extensograph) on 2 basic flours (strong + weak) and 1 PF
Ring tests carried out in 2020:
Ager circuit - Italmopa test 1/2021 January = compliant (very high acceptability limits); last 2/2021 of October 2021 the results have not yet arrived
Belotti Circuit, Farinogram Monitoring Card, test dated 07.2021 = compliant, 3 tests per year scheduled (January, April and July)

5.7 Product release

There are no active releases.
The company releases the product after checking all process records, insertion on a PC accessible to packaging and the miller.

5.8 Pet Food

NA

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification
5.2.3	No nutritional values needed
5.2.5	No cooking instructions needed
5.5.2	No liners in use
5.7	No positive release needed
5.8	No pet food produced

6. Process control

6.1 Control of operations

The process controls are those relating to the controls for the functioning of the mill itself and, therefore, relating to the different types of flour to be obtained and of the products according to recipes for the "Oltregrano" line. these can be identified in the verification of the integrity of the sieves, in the absence of insects, in the verification of the magnets and in the correct sequence of the packaging operations by switching from flours with different "strength" and / or in the production of "oversized" products .
for the products marketed and outsourced, the internal analysis plan is applied which includes sampling for the verification of the chemical-physical, rheological and microbiological requirements, as well as compliance with the claims.

During the grinding process, two probes detect the degree of humidity present in the grain in order to dose the right amount of water: this is the control system in Molino A which includes the Grinding machine and that of Molino C which, being more recent, carries out just a wetting of the grain. with these two probes the quantity of water used is automatically dosed by the grinding system on the detection of the average humidity of the grain being processed. other control systems, as previously defined, consist of magnets, sieves, filters, plansischeter, optical sorter and MD.

For the control and management of CPPs and CPs there is a formalized operating instruction.
Filters, sifters, gravimetric separators, plansichters have variable dimensions depending on the processing phase of the grain / flour in which they are found. The company has set up control systems for both the verification of their integrity and the control of their waste; ex. Registration Mod. 15.01_16 Mpodule verifying magnets and safety plansichter Molino: presence of insects with registration of any discovery. Attention threshold 1 insect in winter - max 3 in summer; alarm threshold> 1 insect in winter -> 3 insects in summer.

During packing
The packaging operator prepares the necessary wrapping and verifies the legibility of the printouts by registering in the Products and Bagged By-products Register Form 09.01_10.

Present 3 MD:
Bagging line 3: 10 and 25kg = MAGN 10 Bagging
line 4: 5 and 10kg (manual) = MAGN 05 Bagging
line 5: 1 and 5kg MAGN 16
Check at the beginning, every hour and at the end of each packaged lot of test
specimens: limit 2.5 mm FE; 3.5 mm No Fe; 3.5 mm SS (AISI 316) bagging 3, 4 limit
1.8 mm FE; 2.0 mm No Fe; 3.0 mm SS (AISI 316) bagging 5
all the discarded products are made to pass 3 times before finally discarding (even a single waste passage, the product is discarded).

6.2 Labeling and pack control

The flour is packaged in bags of 25kg, 5kg and 1kg depending on the type of product. Suitable packaging is designed for customer brands.
The main information is pre-printed on the wrapping and the batch and TMC are printed by ink jet during packaging.

The marketed products are in most cases supplied in neutral packaging identified by the product code, production date, lot and TMC; when used for sale they are labeled.
The packaging operator prepares the necessary wrapping and verifies the legibility of the printouts by registering in the Bagged Products and By-products Register Production Sheet Module: line 5 daily bagged products and by-products register (mod.09.01_10C) which shows the date bagging - 09.09.21 - MP silos = 53 - 10kg of waste from the packaging head - total quantity of bagging equal to 15770 - check the integrity of the sifter present at the silo unloading before the packaging machine - check line integrity - check print and presence label on the bundle - packing lot - weight check carried out on a weight scale
- batch of flour used - expiration date - date shown on the bag: 2022 / SE / 09 - verification of data saving in the software - operator signature.

For each product change and especially when a process is carried out that contains sesame as an ingredient and emptying the channels, the discarded product depends on the bagging line (ranging from 7 / 8kg to 75kg). The

product that is emptied to pass to another reference is bagged in the same packaging used for its packaging and correlatedly identified with lot and TMC. All the product subject to the "unscrewing" is identified on a dedicated pallet and intended for "rework" activities, ie it is re-introduced into the mill.
Identified re-entry points are: Mixer 1/3 for bulk - grinding - Mixer 4 (only for super grain) - bagging line packaging hopper (4 manual). The quantity to be reworked must not exceed 10% of the quantity in production. Reworking consists in making the starting characteristics of the product lose by mixing them into different products.

There is a dedicated sheet for reworking (Mod. 09.01_22 Reworked register) where traces of reworking operations are kept: date, place of reworking, indication of the reference that is recovered with its own lot, quantity, identification of the destination product + his lot, destination silos, any observations + employee signature

List of flours by type of Strength Annex 1 IOP 2 (warehouse management): waste rising but not falling weak / medium / strong not vice versa

6.3 Quantity, weight, volume and number control

Weight control provided in compliance with law 690/78 for 5 and 10kg packs with sampling in compliance with the lot size (form 09.01_21 rev. 1). Given the records of the packaging days of 15, 16 and 17.12.2021 and those subject to traceability

On the bagging line 5 (from 1 to 5kg) weight control with dynamic scale on 100% of the packs.

For the 0.5-1 kg product carried out by an external company, the company periodically requests the registrations at each delivery together with the DDT weight registrations and production sheet with CCP control

6.4 Calibration and control of measuring and monitoring devices

There are instrument cards with model, manufacturer, range of use and required accuracy, calibration interval and expiry date, calibration certificate.
"List of measuring instruments" updated on 16.11.2021 Annex 01_PAQ 11.01 and includes scales, metal detectors, magnets, weight dosers and laboratory instruments

Scales calibration
Bench scale Wunder serial n. C1400228030 used for the weight of bagging 2; metric vignette 10.03.2021, verification frequency 2 years. Bilanciai Associati.
Bench scale Wunder serial n. 0330 used for manual 5kg bagging line 4 weight control; metric stamp dated 10.03.21, verification frequency 2 years. Bilanciai Associati.
Weight dosing machine TE / 10_3144 bagging line 4; metric vignette dated 27.07.2020, verification frequency 2 years. New weighing experts
Weight scale for bagging line 5 (1kg format) Italpack model Pack6000, serial number LBL8542857; metric stamp dated 05.17.21, verification frequency every year. New weighing experts.
Gravimetric filler 3 TE / 25 bagging line serial n. 3560, metric stamp dated 27.07.20, verification frequency 2 years. New weighing experts.

Metal detector verification of 11.2021 valid for 1 year
Bagging line 3, CEIA brand serial number 21600245104, annual frequency check by Stad Cert used the specimens in use (Fe = 2.5mm - Non Fe = 3.5mm - Aisi 316 = 3.5mm). Belt block and pneumatic ejector arm (25kg bag) Bagging line 4, CEIA serial number 21400214091, annual frequency check by Stad Cert used the specimens in use (Fe = 2.5mm - Non Fe = 3.5mm - Aisi 316 = 3.5mm). Tape lock with manual bag elimination (5kg)
Bagging line 5 (1kg) CEIA serial number 31002250061, used the specimens in use (Fe = 1.8mm - Non Fe = 2.0mm - Aisi 316 = 3.0mm). Ejector arm with waste segregation box.

Magnets verification of the annual attractive power last of 27.11.21; magnetic Towers

The laboratory instruments are registered and checked as per the defined plan; ex.
- annual frequency: Buhler thermobalance, Chopin by Buhler Alveografo next by 07.2022 with verification carried out on 20.07.2021; Farinograph and Extensograph Brabender by R. Lab. Belotti Instruments next by 10.2022 with verification carried out on 20.10.2021 with temperature probe verification and through calibrated dynamometer
- biennial frequency: Fulgor scale serial number 205295 frequency 2 years, dated 03.2021 by Bilancia Associati

at each use: pH meter with sample solutions

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Training procedure updated on 10.02.2017
The company has in place a training plan called Training Plan updated year by year which includes aspects of food hygiene and safety (CCP, allergens, labeling, food defense), compliance with various certifications, safety in the workplace, external courses various (R&D, Covid emergency), latest issue of 07.01.2021.

06 and 07.12. 21 Hygiene, HACCP, CCPs and PRP-Os monitoring management (and also includes other regulations eg occupational safety), food defense, food fraud, registration in Mod. 18.01_03 carried out from 9.00 - 13.00 with learning test.
In this case, since the training was also used with a view to spreading the food safety culture, a learning test was also carried out on 07.12.21
09.10.21 Product labeling and packaging management to the two employees of the marketing office (included in the plan for the dissemination of the food safety culture)
04.10.21 Hygiene of the means of transport, management of pallets, broken packages, foreign bodies and food defense, complaints, use of the filter for the unloading of bulk flours intended for logistics personnel and drivers
04.10.21 to laboratory personnel in reference to the verification and knowledge of the parameters of the PF technical sheet, ring test for the analyzes
11.10.21 IFS version 7 requirements to members of the QA group
09.28.21 and 09.30.21 Complete training in reference to food safety, site safety, system documentation for the new employee M.DC

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Present an internal regulation on good hygiene practices IOP 05 rev. 7 of 27.12.2016 which covers all the production areas of the company
Prohibits certain behaviors on the part of visitors, indicates rules by contractors and provides rules for all staff working within the company
Rules on clothing, food and smoking.
It is not possible to wear jewelry in exposed parts.
Compliance with the rules by the staff is carried out during periodic inspections

This instruction includes the rules for handling glass, fragile plastics, ceramics and similar materials, wood: daily registration on mod. 09.01_05 process card made by operators to check integrity. In case of glass breakage, the plant must be stopped and RAQ called with consequent quarantine of the products (also valid for ceramics and plastic)

Cutter, sewing needles and eyeglasses: single-blade cutter, any needle breakage must be reported to the AQ (the same for eyeglasses). No needles breakage recorded on the production module
Regulation for internal drivers who drive their own trucks

7.3 Medical screening

The company made a risk assessment regarding the health of workers, visitors and contractors. Considering that the product is low risk, the state of health has no impact on the product itself, however the company has decided that any abnormal health situation is communicated before entering the plant.
Medicines management rules are foreseen, the company is in possession of detectable blue patches (tested the last purchased). If a patch is distributed, the use of an additional protective glove is not envisaged (as the operator does not touch the food). The patch is monitored upon delivery and at the end of the work

7.4 Protective clothing: employees or visitors to production areas

The company made a risk assessment regarding the health of workers, visitors and contractors. Considering that the product is low risk, the state of health has no impact on the product itself, however the company has decided that any abnormal health situation is communicated before entering the plant.
Mewa external company washing with color distinction between the different areas: white for millers; blue for drivers and maintenance workers, sand-colored for bagging line operators

Pants and / or dungarees, smock and white jacket - mill Brown trousers or
jeans, brown jacket, jacket - bagging and drivers White lab coat

7.4.1 Minor NC. The instructions for the use of shoes were not detailed in the regulations for the use and management of personnel clothing: on the second morning of the audit, an employee arrived at work with the shoes already worn.

Details of non-applicable clauses with justification	
Clause / Section Ref	Justification
7.4.6	All clothes can be laundered

Template control	Food	**Version**	1.0

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones
Not applicable
8.2 Building fabric in high-risk and high-care zones
Not applicable
8.3 Maintenance in high-risk and high-care zones
Not applicable
8.4 Staff facilities for high-risk and high-care zones
Not applicable
8.5 Housekeeping and hygiene in the high-risk high-care zones
Not applicable
8.6 Waste / Waste disposal in high risk, high care zones
Not applicable
8.7 Protective clothing in the high-risk high-care zones
Not applicable

Details of non-applicable clauses with justification

Clause / Section Ref	Justification

9 - Traded Products

9.1 Approval and performance monitoring of manufacturers / packers of traded food products

The products marketed by the company consist of both original products from the supplier (eg. Rice flour and rice semolina - certified Scotti BRCGS Food brand) and products made at the Molino's own brand supplier (eg. Semolina in 25 kg bags ; gluten-free products). No Molino customer brand products are marketed.
Semolina is supplied by Molino Mininni (ISO 9001, IFS coid 5152, BRC site code 1529018, Kosher) and arrives entirely packaged in bags while the other products are supplied by Caremoli (FSSC 22000 expiry date 21.09.2024); dry yeast supplied by AB mauri (BRCGS site code 1710458) and under the Molino Dellagiovanna brand; Senatore Cappelli semolina supplier Molino Rachello
The qualification is made on the basis of the receipt of some documents: Technical sheet, annex 2 questionnaire, haccp copy extract.
Checks carried out on suppliers
Supplies of the first sample recorded in the ingredients supplier sheet Mod. 06.01_09; for subsequent deliveries, the Purchasing Manager may decide to carry out further checks which will be recorded in the same card with the indication that these are other deliveries.

In general, traded products are sold under the manufacturer's brand and / or the Molino Dallagiovanna brand.
Management and monitoring system see 3.5.1.1

9.2 Specifications

Technical Sheet of the Supplier Industri Molitoria Mininni = Durum wheat semolina S2SAG rev. 0 dated 05.03.2019, shelf life 180 days from the packaging date, includes chemical-physical parameters, filth test, granulometry, allergens (gluten, possible contamination with soy), micotx, Cd, Pb, microbiologists (CBT, salmonella, B. cereus , e. coli, stafilo, fungi), nutritional values.

Molino Dallagiovanna Extra S2 Durum Wheat Semolina Technical Sheet updated on 23.08.2017 description and list of ingredients, chemical and physical parameters (humidity, ash, protein, wet and dry gluten, falling number, cruscal puncturing, near puncturing, cellulose, presence of soft wheat; grain size;, micotox (Afla + total, DON, OTA, Zea), Pb and Cd, residual pesticides, micro (CBT, fungi, coliforms, E. coli, salmonella, B. cereus), filth test (fragments of insects, rodent hair, CE), GMOs Organoleptic characteristics Allergens: contains gluten may contain traces of soy Shelf life 8 months, store in a cool and dry place Nutritional information Packaging 5kg or 25kg
Organic durum wheat flour Senatore Cappelli issue 25.01.21 which includes chemical-physical, rheological, microbiological, organoleptic characteristics and nutritional values. Allergen declaration: Gluten, contamination with field soy; possibility of contamination also with mustard and lupine.
Also verified certificate of conformity accompanying the goods relating to batch MG21126A002 supplied in 25kg bags

Bread and Pizza semifinished product to be used for the production of gluten free pizza and bread rev. 6 of 02.2019. ingredient: starch, milk powder, rice flour, cellulose powder, dextrose, vegetable fiber, salt, hydropropylmethylcellulose. Organoleptic characteristics, nutritional and microbiological values (CBT, coliforms, salmonella, fungi), Pd, Cd, Hg, As, Micotx (total aflatox, OTA). Packaged in PET bags, GMO free
Attached Caremoli allergen declaration dated 07/19/2019 relating to the exclusive presence of allergens present exclusively as ingredients in the references provided (eg Careno glu fresh pasta 10; Large leavened base mix; fried base mix; Carenoglu Fresh vegan 3 pasta, etc ...)
Primary packaging technical specifications used for the packaging of products supplied by Caremoli:
PET / PE 90my technical data sheet dated 19.09.2017 + food compliance declaration dated 02.04.2019 used for 1kg packaging; on the other hand, for the 25kg bag the Supplier Saccarta food compliance declaration dated 04.04.2019 + technical data sheet updated to 2018 multilayer multi-material paper / PELD 20my is used
Technical Data Sheet Special Preparation for Gluten Free Bread and Pizza: starch, powdered milk, rice flour, powdered cellulose, dextrose, vegetable fiber, salt, hydropropylmethylcellulose. Organoleptic characteristics, nutritional and microbiological values (CBT, coliforms, salmonella, fungi), Pd, Cd, Hg, As, Micotx (total aflatox, OTA). Packaged in PET bags, GMO free. Updated on 13.02.2018

Special preparation for gluten-free cakes and biscuits - Molino Dallagiovanna isseu 31.05.2019

Remilled durum wheat semolina (technical data sheet received from the supplier Molino Mininni issue 16.01.2020) contains a description of the product "Remilled semolina for industrial and artisan bakery ....." chemical-physical and rheological parameters (humidity, proteins, ashes, dry and wet gluten, gluten index, yellow inidce, falling number, cellulose, presence of soft wheat, filth test, W / P / L, water absorption, stability, particle size, aflatoxin B1 and total, OTA, DON, Zearalenone, Pb and Cd), microbiological (CBT, fungi, enterobacteria, salmonella, B. cereus, E. coli, coagulase positive staphylococcus, salmonella), nutritional values. Allergens: gluten-containing cereals present, possible cross-contamination with soy

9.3 Product inspection and laboratory testing

Annex 2 to MANLAB
MARKETED PRODUCTS and MPs OTHER THAN WHEAT (gluten free, wholemeal rye flour, rice flour, mix più, quinoa, sesame seeds, rye, etc ...) on a three-year rotation, max 2 per year. Analysis requests from suppliers.

The analyzes and controls were defined on the basis of the requirements of the technical data sheet: microbiological analyzes (CBT, fungi, salmonella, B. cereus, e. Coli, Enterobacteriaceae, staphylococcus coagulase +), allergens (gluten and lactose), GMO, micotox
+ annual analysis requests from product suppliers

RdP 21WL0095705 of 07.12.21 Gluten-free bread and pizza preparation lot 21101912234: heavy metals, aflatoxins and OTA
RdP 21WL0095707 of 15.12.21 Rice flour lot 216 expiry 02.2022: Pb, Cd, filth test, GMO
RdP 21WL0087678 del 26.11.21 Prepared fresh gluten-free and lactose-free pasta batch 21060112186: gluten and lactose

RdP 21WL0087679 of 17.11.21 Prepared fresh gluten-free and lactose-free pasta batch 21060112186: sulfur dioxide

Microbiological limits: cbt 105 - coliforms 500 - e. coli 10 - psalm absent, mycetes 1000, B. cereus absent in 1g

9.4 Product legality

The packaging supplied by Molino Dallagiovanna is used for the packaging of the semolina, while for the other products the supplier company is fully responsible until the packaging. In this case, neutral packaging is supplied with the indication of the product code, lot, TMC, and packaging date. On the Molino site they are labeled

1kg Caremoli, Mininni, AB Mauri provides internal weight controls
For Caremoli of 25kg and Riso Scotti (rice semolina and rice flour) of 25kg weight checked on 4 bags upon receipt with recording of the data: Mod. 15.01_07 formalization of the methods of action in IOP 2 Warehouse management

9.5 Traceability

Traceability tests carried out on marketed products:
Mix shortcake and Cookies 1kg lot 21080312211 arrived with DDT 2390 dated 06.08.2021 in a quantity equal to 1500kg (= 1500 udv).
The product arrives packaged in 1kg bags and labeled in the company, lot and expiry date are printed on the wrapping at the time of packaging by the supplier Caremoli.
The product was entirely sold between 11.10.21 and 22.11.21 for a total sales quantity of 81.
The required documents include the weight check issued by the supplier on the indicated lot (produced on 04.08.2021): sample check compliance with Law 690/79 = verified 50 weights - compliant batch
Compliant test performed in 30 minutes.

Internal test conducted on Rice Semolina supplier Riso Scotti batch L278D delivery of 07.10.21 with delivery note n. 39809 of 07.10.21 in quantities of 1000kg (40 bags of 25kg). The quantity was entirely sold between 07.10 and 08.11.21. Time taken 15 minutes

Module 11: Meat supply chain assurance

Scope	Click or tap here to enter text.

11.1 Traceability

Click or tap here to enter text.

11.2 Approval of meat supply chain

Click or tap here to enter text.

11.3 Raw material receipt and inspection

Click or tap here to enter text.

11.4 Management of cross-contamination between species

Click or tap here to enter text.

11.5 Product testing

Click or tap here to enter text.

11.6 Training

Click or tap here to enter text.

Module 12: AOECS Gluten-free Foods

Scope	Click or tap here to enter text.

12.1 Senior management
Click or tap here to enter text.
12.2 Management of suppliers of raw materials and packaging
Click or tap here to enter text.
12.3 Outsourced production
Click or tap here to enter text.
12.4 Specifications
Click or tap here to enter text.
12.5 Management of gluten cross-contamination
Click or tap here to enter text.
12.6 Management of incidents, product withdrawal and product recall
Click or tap here to enter text.
12.7 Labelling
Click or tap here to enter text.
12.8 Product inspection and laboratory testing
Click or tap here to enter text.

Additional Specifier requirements

14.1 Traceability

Click or tap here to enter text.
14.2 Finished goods microbial test and hold program
Click or tap here to enter text.
14.3 Gloves
Click or tap here to enter text.

Module 13 FSMA Preventive Controls Preparedness Module Version 2 July 2018			
Clause	Module item	Conforms Y/N	Comments
13.1.1	Handwashing areas, dressing and locker rooms, and toilet rooms must have adequate lighting.	Y	Lo spogliatoio dei dipendenti si trova in area separata, adeguatamente fornito di luce.
13.1.2	Water distribution system must prevent backflow from, or cross-connection between, piping systems that discharge waste water or sewage.	Y	Utilizzata esclusivamente acqua di pozzo che viene stoccata in un serbatoio di stoccaggio dove avviene la clorazione. L'acqua clorata viene utilizzata sia per le abitazioni private presenti e al Molino: bagnagrano per il Molino C e lavagrano per Molino A. Utilizzata anche per le attività di pulizia. Il refluo indirizzato al depuratore. Presente una planimetria con il dettaglio della distribuzione dell'acqua aggiornata al 26.10.21. Due punti identificati dove l'acqua entra in contatto con il prodotto: lavagrano e bagnagrano campionati entrambi ogni anno: semestrale a rotazione chimica tutti quelli allegato A d. Lgs. 31/2001 per pozzo compreso valore di cloro; microbiologiche ogni due mesi (CBT, e. coli, enterococchi). Verifica cloro interna almeno 1 vv/mese: 06.12.2021 prelievo su lavagrano e bagnagrano= 0,2ppm; precedente del 10.11.2021 prelievo su lavagrano=0,2ppm e bagnagrano= 0,20ppm I parametri di analisi vengono descritti nell'allegato 2 al MANLAB: RdP 21WL0087670 del 11.11.21: coliformi, enterococchi, E. coli. Campionamento in bagnagrano RdP 21WL0091346 del 09.12.21: campionamento lavagrano analisi chimica
13.1.3	All food contact surfaces of plant equipment and utensils used in manufacturing, processing, packing, or holding food must be corrosion resistant.	Y	Tutto il processo produttivo è condotto in ambiente chiuso rappresentato da tubi, elevatori, setacci. Data la tipologia di prodotto realizzato, non vi è la possibilità di proliferaizone microbica di microrganismi patogeni. La possible contaminazione crociata con allergeni è gestita attraverso la compartimentazione del reparto "oltregrano" dove vengono realizzate referenze con ingredienti9 diversi dalla farina

	Seams on food-contact surfaces must be smoothly bonded or maintained so as to minimize accumulation of food particles, dirt, and organic matter and thus minimize the opportunity for growth of microorganisms and allergen cross-contact.		
13.1.4	Ice used in contact with food must be manufactured in accordance with Good Manufacturing Practice (GMP) requirements of 21 CFR 117.	NA	No use of ice
13.1.5	Where defect action levels (DAL) are established for a food, quality control operations must reduce defects to the lowest level possible. Defect levels rendering the food adulterated may not be reduced by mixing the food with another lot.	Y	Tutto il prodotto ottenuto dal grano viene definite in funzione della tipologia di prodotto da ottenere. I sottoporodtti sono destinati ad alimentazione zootecnica.
13.1.6	The hazard analysis must additionally identify and evaluate the following known or reasonably foreseeable hazards, which are associated with the food or facility: • Economic adulterants which affect food safety • Environmental pathogens where ready-to-eat (RTE) food is exposed to the environment prior to packaging and the packaged food does not receive a kill step • Radiological	Y	Food Safety Plan formalizzato nel manual HACCP più punto contenuto all'interno del manuale per i Controlli Preventivi (FSMA FDA-USA) Considerato HACCP Manuale Sicurezza Alimentare aggiornamento del 16.10.21 Campo di applicazione: molitura frumento tenero; produzione di miscele costituite da differenti farine di cereali, semi e leguminose, lievito naturale confezionati; commercializzazione di sfarinati di cereali per uso alimentare confezionati ed alla rinfusa gluten free e lactose and gluten free

	hazards • Unintentional adulterants which affect food safety		
13.1.7	All identified known or reasonably foreseeable hazards must be evaluated to determine “hazards requiring a preventive control” (i.e., significant hazards).	Y	
13.1.8	Establish one or more preventive control(s) for each identified “hazard requiring a preventive control” (i.e., significant hazard) such that the control significantly minimizes or prevents the food manufactured, processed, packed, or held by the facility from being adulterated under section 402 of the Federal Food, Drug, and Cosmetic Act or misbranded under section 403(w) of the Federal Food, Drug and Cosmetic Act.	Y	Described in monitoring CCPs and CPs documents CCPs Molino MAGN 04 insacco integrale (linea 1) MAGN 06 mixer 3 MAGN 07 SL linea oltregrano + con allergeni MAGN 08 rinfusa per silos 11-16 Previsto controllo 1vv/die CPs Molino MAGN 01 1° pulitura Molino A MAGN 02 2° pulitura Molino A MAGN 03 ripasso prodotto MAGN 12 da silos 31 e 323 a silos 50 MAGN 14 sottobilancia pulitura Molino C MAGN 15 bilancia laminatoio B1 Molino C Previsto controllo 1vv/die BURATTI E PLANSICHTER BU1 buratto centrifuge silos 11-16 = nel 3 turno di lavoro BU2 plansichter sicurezza Molino A= ad inizio turno BU3 plansichter sicurezza Mixer 3= nel 3° turno di lavoro BU4 plansichter sicurezza Molino C= ad inizio turno CPs capannone insacco MAGNETI MAGN 11 linea E – Insacco 3 e linea D – Insacco 4 = ogni 8 ore MAGN 13 linea insacco 4= ad inizio uso e ogni 8 ore MAGN 17 linea insacco 5= ad inizio uso e ogni 8 ore (al momento lavora un turno solo) CPs capannone insacco BURATTI BU5 plansichter sicurezza linea insacco 2= ogni 8 ore BU6 buratto linea insacco 5 CCPs capannone insacco MAGNETI - METAL DETECTOR MAGN 09 linea insacco 2 ogni 8 ore Presenti 3 MD: Linea insacco 3: 10 e 25kg = MAGN 10 Linea insacco 4: 5 e 10kg (manuale)= MAGN 05 Linea insacco 5: 1 e 5kg MAGN 16 Controllo ad inizio, ogni ora e fine per ogni lotto confezionato provini test: limite 2,5 mm FE; 3,5 mm No Fe; 3,5 mm SS (AISI 316) insacco 3, 4 limite 1,8 mm FE; 2,0 mm No Fe; 3,0 mm SS (AISI 316) insacco 5 tutti i prodotti scartati vengono fatti ripassare 3 vv prima di

			scartare definitivamente (anche un solo passaggio scarto, il prodotto è scartato). Limiti critici Magneti= pulizia Buratti= presenza di rottura nelle "sete" con registraizone presenza di insetti, grumi di farina, frammenti vari) Plansichter= verifica presenza insetti con registrazione su Modulo 15.01_06 "Scarti plansicheter di sicurezza Il limite critico definito per i magneti è validato con frequenza annuale da azienda esterna
13.1.9	Evaluate and update the recall and withdrawal procedure as necessary to ensure it contains procedures and responsibility for the following: • Notifying consignees of how to return or dispose of recalled product • Conducting effectiveness checks to verify recall is carried out • Appropriate disposal (i.e., destroy, divert, repurpose) of recalled product	Y	Procedura Gestione delle attività di Identificazione e Rintracciabilità, Ritiro/Richiamo (PAQ 08.01 rev. 5)
13.1.10	Establish monitoring activities and a written procedure for each preventive control consistent with the requirements of BRC section 2.10.	Y	Incluso nella gestione dei CCPs e CPs
13.1.11	Establish corrective action procedures when preventive controls are not implemented consistent with the requirements of BRC sections 2.11 and 3.7. Corrective action procedures must be established and implemented when the	Y	Le azioni correttive sono gestite attraverso Procedura 13.01, modulo Richiesta azioni correttive e preventive. Vengono dettagliate e definiti per ogni NC e/o reclamo gestendo tutto direttamente nel file Mod. 13.01_01 Registrazione di NC e/o Mod. 13.02_01 Registrazione Reclami Le NC sono riepilogate in un file che identifica anche I reclami (reclami – NC anno 2020). Per ciascuna deviazione sono sviluppati: Indagini delle cause – correzione – fondato/infondato – AC o AP – eventuale reso – verifica dell'effettiva applicazione della correzione

	presence of a pathogen (or indicator organism) is detected as a part of verification activities (i.e., product testing and/or environmental monitoring).		Rapporto NC mod. 13.01_01 dove vengono formalmente registrati.
13.1.12	Validate all established process controls prior to implementation of the food safety plan, upon changes requiring re-validation or within 90 calendar days of the first food production. Validate allergen, sanitation and supply-chain controls as appropriate to the nature of the hazard, control and facility.	Y	
13.1.13	The PCQI (or authorized designee) reviews monitoring and corrective action records within 7 days. Where an alternate timeframe exceeding 7 days is used, the PCQI must document justification. The PCQI (or authorized designee) reviews verification records for all preventive controls (e.g., calibration records, product testing, supply-chain audits) within a reasonable timeframe after the record is created.	Y	PCQI dott.ssa Maria Grazia De Pascali n. 242AEBC4
13.1.14	Where product testing for a pathogen (or indicator organism) or other hazard is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Sampling procedure to include method, quantity, frequency, and number of	NA	Non sono stati identificati microorganismi patogeni contaminanti tipici delle farine. Le verifiche analitiche includono principalmenti controlli chimico-fisici e reologici per il rispetto delle richieste dei clienti che devono utilizzare i prodotti realizzati da Molino Dallagiovanna per preparazioni alimentari diverse.

	samples • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected		
13.1.15	Where environmental monitoring for a pathogen (or indicator organism) is used as a verification activity, a scientifically valid and written testing procedure must identify the following: • Adequate number and location of sample sites • Timing and frequency of sampling • Analytical method • Laboratory conducting analysis • Corrective action procedure where pathogen is detected	NA	Non vi è monitoraggio ambientale per la ricerca di patogeni data la tipologia di prodotti realizzati
13.1.16	Devices used to verify preventive controls must be calibrated.	Y	Metal detector verifica del 11.2021 con validità 1 anno Linea insacco 3, marca CEIA matricola 21600245104, verifica frequenza annuale da Stad Cert utilizzati i provini in uso (Fe= 2,5mm – Non Fe= 3,5mm – Aisi 316= 3,5mm). Blocco nastro e braccetto espulsore pneumatico (sacco da 25kg) Linea insacco 4, CEIA matricola 21400214091, verifica frequenza annuale da Stad Cert utilizzati i provini in uso (Fe= 2,5mm – Non Fe= 3,5mm – Aisi 316= 3,5mm). Blocco nastro con eliminazione del sacchetto manuale (5kg) Linea insacco 5 (1kg) CEIA matricola 31002250061, utilizzati i provini in uso (Fe= 1,8mm – Non Fe= 2,0mm – Aisi 316= 3,0mm). Braccetto espulsore con cassetta segregazione scarti. Magneti verifica del potere attrattivo annuale ultimo del 27.11.21; magnetica Torri

13.1.17	Identify a Preventive Controls Qualified Individual (PCQI) responsible for developing the food safety plan, validating preventing controls, review of records, and reanalysis of the plan. Document the PCQI's training and qualification via job experience.	Y	Maria Grazia De Pascali (auditor sistemi autocontrollo 12.11.2019 attestato n. 118) Cartella Nominativa Personale aggiornata a 11.2019 PCQI 242aebc4 of 17.09.2016 + BRC convertion issue 7 to 8 of 30.09.2019
13.1.18	All records required by 21 CFR § 117 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable	Y	PAQ 5.01 rev. 3/2019 Controllo dei Documenti e dei Dati che include la gestione dei dati informatici (attivato nuovo fornitore si servizio informatico per le gestione software/hardware compreso antivirus e gestione da remoto + server. Backup settimanale in cloud di tutti I dati registrati nel Sistema interno dell'azienda. Redazione, verifica, distribuzione, elenco documenti distribuiti; archiviazione e conservazione minimo 2 anni (anche per le registrazioni). Identificata e formalizzata anche la gestione dei documenti di origine sterna di proprietà dei clienti
13.1.19	The owner, operator or agent in charge of facility must sign and date the written food safety plan initially and then upon any changes following reanalysis.	Y	
13.1.20	All documents and records relating to the food safety plan (i.e., all records required by 21 CFR § 117) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable	Y	

	within 24 hours with the exception of the food safety plan, which must remain onsite.		
13.1.21	Where a hazard requiring a supply-chain-applied control is identified in the hazard analysis, the receiving facility must establish and implement specific supplier approval and verification activities. Where a hazard requiring a supply-chain-applied control is identified AND the control is applied by an entity other than the receiving facility's supplier, the receiving facility is responsible for verifying implementation of the control.	Y	L'Organizzazione ha definito procedure e modalità di registrazione delle attività di qualifica e monitoraggio dei fornitori e di verifica delle materie prime e dei servizi di cui si approvvigiona. La procedura documentata è la seguente: Approvvigionamento PAQ 06/01 rev 12 del 14.11.2021. Si applica a tutti i fornitori che hanno influenza relativa a sicurezza alimentare e qualità su PF (ingredienti, grano, imballi, impianti ed attrezzature). I fornitori sono classificati in funzione della tipologia di prodotto fornito: MP: origine, rischio frode e/o sostituzione, chimico e tossicologico, microbiologico, CE, OGM, allergeni, importanza strategica della MP nelle ricette Assegnato a ciascun item un punteggio compreso tra 1 e 3, dove 1= rischio basso – 2= rischio medio – 3= rischio elevato Il rischio complessivo della MP è assegnato dalla somma dei singoli punteggi assegnati; in particolare < 10 R Basso; 11 e 20 MEDIO; > 21 Alto, formalizzato nell'Allegato I (aggiornato al 05.11.21) dove viene anche considerata la valutazione annuale del fornitore. MP imballi parametri di rischio sono identificati il rischio chimico e CE. BASSO= 2; MEDIO 3-4; ALTO > 4, anche in qs caso considerate le NC rilevate con sommatoria punteggi che determinano rischio complessivo fornitore Il risultato ottenuto è il seguente: GRANO= BASSO con punteggio di default Semola (f. Mininni) = MEDIO Se rischio fornitore medio o alto audit iniziale se non GFSI
13.1.22	Supplier approval must be documented before receiving and using raw materials and ingredients. Verification activities must be conducted before receiving and using raw materials and ingredients on a temporary basis from unapproved suppliers.	Y	
13.1.23	One or more supplier verification activities (defined in § 117.410(b)) must be conducted for each supplier before using raw materials and ingredients AND periodically thereafter at an adequate frequency.	Y	
13.2.1	Human food by-products held for distribution as animal food must be held under conditions that will protect against contamination, including	Y	Gli scarti di produzione sono identificati come sottoprodotti e vengono destinati ad alimentazione zootecnica: autorizzazione prot. 26224 del 15/06/2006 per uso mangimistico (reg 183/2005). Non vi sono prodotti a marchio del retail. Analisi crusca RdP 21WL0093802 del 06.12.2021:

	the following: - During holding, human food by-products for use as animal food must be accurately identified. * Labeling that identifies the product by the common or usual name must be affixed to or accompany the human food by-products for use as animal food when distributed. * Shipping containers (e.g., totes, drums, and tubs) and bulk vehicles used to distribute human food by-products for use as animal food must be examined prior to use to protect against the contamination of animal food from the container or vehicle when the facility is responsible for transporting the human food by-products for use as animal food itself or arranges with a third party to transport the human food by-products for use as animal food.		CBT, miceti, salmonella, b. cereus, e. coli, stafilococchi coagulasi positivi, L. monocytogenes
13.3.1	A Qualified Individual (QI) is responsible for developing the site's food defense plan, conducting a vulnerability assessment, identifying mitigation strategies, and conducting a reanalysis of the plan. The QI responsible for developing the food defense plan shall be identified on the site's organizational chart. One or more QI's shall be	Y	L'azienda risulta recintata, ad oggi 7 telecamere per gli accessi. Il sito è presidiato 24 su 24. L'azienda risulta registrata presso FDA 10558094792. Silos chiusi con chiave, custodita in sala gestione mulino. Scale di accesso con lucchetto. Aree di scarico chiuse a chiave e protette con allarme e telecamere. Gestione Accessi (PAQ 20.01 rev. 00) reception dedicato, azienda interamente recintata. La fossa ed I silos esterni sono monitorati attraverso Sistema di allarme e telecamere. Richiesta registrazione all'accesso. I visitatori vengono registrati all'arrivo nello stabilimento. Check list mensile include verifica del controllo food

	responsible for implementing mitigation strategies at actionable process steps.		defence Team food defence: Direzione, Resp produzione, Resp logistica, AQ, Direzione confezionamento Risk assessment formalizzato attraverso l'utilizzo del programma FDPB con aggiornamento del 05.11.2021. Presso I siti di stoccaggio esterni sono monitorati gli accessi solo a personale autorizzato, alcuni anche con videosorveglianza (stock PF)
13.3.2	The site shall have a written food defense plan, which includes the following: • A vulnerability assessment identifying significant vulnerabilities and actionable process steps • Mitigation strategies appropriate to reduce the vulnerability • Procedures for food defense monitoring, corrective action and verification	Y	
13.3.3	A written vulnerability assessment shall be prepared for each food type manufactured, processed, packed, or held, which evaluates the following key criteria (at a minimum): • Scale and severity of threat if a contaminant is added to product • Degree of physical access to the product • Ability of an attacker to successfully contaminate product—including consideration of an	Y	

	inside attacker A vulnerability assessment shall be documented for each food type regardless of the outcome and provide justification as to why each point, step or procedure in the operation was or was not identified as an actionable process step.		
13.3.4	Written mitigation strategies shall be established and implemented for each actionable process step identified in the vulnerability assessment. Justification shall be documented explaining how the strategy significantly minimizes or prevents the vulnerability.	Y	
13.3.5	Written monitoring procedures shall be established and implemented to include the activity and frequency for monitoring food defense mitigation strategies. Procedures shall include recordkeeping requirements for all monitoring activities.	Y	
13.3.6	Written corrective action procedures shall be established and implemented when mitigation strategies are not properly implemented. The procedure shall include the following criteria: • Method for identifying and correcting a lack of implementation	Y	

	• Method for reducing the likelihood of recurrence • Recordkeeping requirements for corrective actions		
13.3.7	Written verification procedures shall be established and implemented to ensure that food defense monitoring and corrective action are performed according to procedures. Verification procedures shall describe activities to verify implementation of mitigation strategies. Verification procedures shall include: • A review of monitoring and corrective action records within an appropriate timeframe (e.g., 7 days) • Other verification activities as appropriate (e.g., internal audit) • Method for verifying that reanalysis of the food defense plan was conducted • Frequency for verification activities • Recordkeeping requirements of all verification activities	Y	
13.3.8	Reanalysis of the food defense plan shall be documented and performed	Y	

	every three years or whenever • A change in facility operations which creates a new significant vulnerability • Knowledge about a new threat applicable to the food or facility becomes known • Mitigation strategies are not implemented as intended • FDA requires reanalysis based on new threats or scientific evidence		
13.3.9	All records required by 21 CFR § 121 must include: • Date and time of activity being documented • Signature/ initials of individual performing activity or conducting record review • Information to identify the facility (e.g., name and location) • Identity of the product and lot code where applicable	Y	
13.3.10	The owner, operator or agent in charge of facility must sign and date the written food defense plan initially and then upon any changes following reanalysis.	Y	
13.3.11	All documents and records relating to the food defense	Y	

	plan (i.e., all records required by 21 CFR § 121) must be retained at the facility for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours with the exception of the food defense plan, which must remain onsite.		
13.4.1	Vehicles and transportation equipment must be maintained and stored in a sanitary condition appropriate for the intended use to prevent food from becoming unsafe during transportation. Where inspection reveals that vehicles or containers are not in a clean condition, they shall not be used. A documented procedure shall describe cleaning and storage practices of all vehicles and transportation equipment maintained by the site whether leased or owned and as appropriate for the intended use. The procedures shall be fully implemented. Cleaning activities shall be recorded.	Y	A procedure is in place to maintain product safety and quality during storage, loading and transportation. The procedure contains provisions for the cleaning of transport means, avoidance of cross contamination, storing materials of floor and away of walls, vehicle pre-loading and unloading inspection, vehicle loading or unloading in covered bays, maintaining product security and preventing damage. The control applied by key staff during loading is documented. Loading records contain details that facilitate to the traceability system.
13.4.2	The site shall ensure that contracts with U.S. shippers, receivers, loaders, and carriers specify their responsibility for compliance with FSMA's Sanitary Transportation rule. Where the site acts as the shipper or receiver, it shall ensure compliance with the rule. Responsibilities shall ensure transportation	Y	I container per l'esportazione sono caricati interamente in azienda con distinta di liberalizzazione e verifica dei 7 punti come previsto dalla Food Defence

	operations are conducted in a manner to prevent food from becoming unsafe during transport (i.e., apply controls) and that responsibility for compliance with the regulation is assigned to competent supervisory personnel.		
13.4.3	Where the site arranges transportation, it shall document sanitary design requirements and cleaning procedures of vehicles appropriate for the type of food to be transported. These requirements shall be communicated to the loader and carrier. Where the site does not arrange transportation, the above provision shall be documented in the shipping service contract to ensure the shipper documents sanitary specifications of vehicles for the loader and carrier, which are appropriate for the type of food.	Y	
13.4.4	Contracts with loaders shall specify that the loader is responsible for following sanitary specifications provided by shipper.	Y	
13.4.5	Where the site receives temperature controlled product immediately following transportation, it shall conduct an assessment to determine whether the food was subject to temperature abuse.	NA	Non sono necessari trasporti a temperatura controllata
13.4.6	Contracts with carriers shall specify that the carrier is	Y	

	responsible for the following sanitary activities where agreed to in writing with shipper. • Sanitary condition of vehicles and transportation equipment • Following shipper's sanitary specifications (including pre-cooling requirements where applicable) • Recording compliance with operating temperature where critical to food safety • Procedures for the use of bulk vehicles, which includes recording the previous cargo and most recent cleaning for the shipper		
13.4.7	Contracts with carriers shall specify that the carrier implements a training program for all personnel engaged in transportation activities, which covers • Awareness of potential food safety problems that may occur during food transportation • Basic sanitary transportation practices to address those potential problems • Responsibilities of the carrier	Y	

13.4.8	The site shall keep all records related to U.S. transportation operations and transportation service contracts as original or electronic records for a minimum of 12 months beyond termination of the activity or contract. Offsite records shall be retrievable within 24 hours.	Y	
13.4.9	The recordkeeping policy shall ensure all sanitary design requirements and cleaning procedures for vehicles are maintained onsite and all offsite records are retrievable within 24 hours.	NA	
13.5.1	Personnel (permanent and temporary) who handle produce or food contact surfaces must receive additional training on the following: • Principles of food hygiene and food safety Produce safety standards applicable to an individual's job	NA	
13.5.2	Personnel (permanent and temporary) who conduct harvest activities (including washing and cooling) must receive additional training on the following: • Recognizing produce contaminated with known or reasonably foreseeable hazards • Inspecting harvest containers and	NA	

	equipment to ensure that they are clean, maintained and do not contaminate produce with hazards • Correcting problems with harvest containers or equipment		
13.5.3	One or more supervisors or individuals responsible for the operation must have successfully completed food safety training equivalent to standardized curriculum recognized by the FDA.	NA	
13.5.4	A supervisor shall be identified with responsibility for the operation and ensuring compliance with Produce Safety regulation. This individual shall be identified on the site's organizational chart.	NA	
13.5.5	Personnel (permanent and temporary) shall avoid contact with animals or take measures such as hand washing and protective clothing to prevent contamination of produce and food contact surfaces following contact with worker animals.	NA	
13.5.6	The water distribution system supplying agricultural water used for harvest, packing, holding—and associated equipment—shall be maintained, regularly inspected and equipment properly stored to prevent the system from being a source of contamination to produce and food contact surfaces. The system shall	NA	

	be inspected for conditions, which could introduce known or foreseeable hazards into or onto produce. Where testing of the water source or system inspection reveals contamination, deficiencies shall be corrected such as the repair of well caps or sanitary seals.		
13.5.7	Agricultural water treatment must be delivered and monitored at a frequency that ensures water is safe, of adequate sanitary quality, and meets the microbial quality criteria of no detectable generic Escherichia coli (E. coli) in 100mL.	NA	
13.5.8	Potable water quality standards used shall ensure the microbial quality criterion is met, which is no detectable generic E. coli in 100 mL.	NA	
13.5.9	Where agricultural water does not meet microbial quality criteria or is determined to be unsafe and not of adequate sanitary quality, water use must be discontinued along with treatment or other correction that reestablishes sanitary quality and microbial criteria. Where water treatment is not performed, re-inspection of the entire affected agricultural water system shall be conducted followed by the identification of conditions leading to the introduction of hazards into or onto	NA	

	produce or food contact surfaces, correction, and verification of correction to ensure water meets microbial quality criteria.		
13.5.10	Agricultural water testing may be performed by the site (or site representative) or by a third party provided representative samples of the site's water source is secured. Aseptic water sampling must be performed. The method of analysis for water testing is U.S. Environmental Protection Agency (EPA), ‘‘Method 1603: Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC), EPA–821–R–09–007),’’ December, 2009 or equivalent method.	NA	
13.5.11	During harvest, packing and holding operations (e.g., hydrocooling, washing), manage water to maintain its safety and sanitary quality and prevent contamination of produce to include establishing and following a water-change schedule for recirculated water. Visually monitor the water quality of water used for harvest, packing, and holding activities for organic build-up (e.g., soil, plant debris). Maintain and monitor the temperature of water used for harvest, packing, and holding activities as appropriate to the commodity and operation to	NA	

	minimize infiltration of pathogens into produce.		
13.5.12	Dropped produce (i.e., produce that comes in contact with the ground prior to harvest) where the produce would not normally touch the ground as a part of growing and harvest (e.g., cantaloupe, almonds, etc.) shall not be distributed.	NA	
13.5.13	Sewage disposal and septic systems shall be controlled and appropriate for the site to prevent the contamination of produce and food contact surfaces.	NA	
13.5.14	Plumbing shall not allow backflow or cross-connection between waste and potable water lines.	NA	
13.5.15	All produce safety related records must be reviewed, dated, and signed within a reasonable timeframe after being made by the supervisor or responsible party.	NA	
13.5.16	All produce safety documents and records must be retained at the site for 2 years after the record is created. Where records are stored offsite, they must be retrievable within 24 hours. Records related to equipment or processes used by the site for analyses, sampling, or action plans—including the results of scientific studies, tests, and evaluations—shall be retained at the site for at least 2 years after their use is discontinued.	NA	

13.5.17	Specific additional requirements for the harvesting, packing, and holding of sprouts. Establish and implement a written Environmental Monitoring plan for the testing of Listeria spp or Listeria monocytogenes. The environmental monitoring plan shall include the following criteria: • Target test (i.e., Listeria spp. or L. mono) • Sample frequency (no less monthly) • Sample timing (i.e., when in the process are samples collected) • Sample sites where the number of samples and location are sufficient to determine the efficacy of controls (includes food contact and non-food contact surfaces) The plan shall describe aseptic methods for sample collection and testing according to FDA's "Testing Methodology for Listeria species or L. monocytogenes in Environmental Samples," Version 1, October 2015 (or equivalent).	NA	
13.5.18	Specific additional requirements for the harvesting, packing, and holding of sprouts.	NA	

	The environmental monitoring plan shall include a corrective action plan if any samples are positive for Listeria spp. or L. mono. If Listeria spp. or L mono are identified in the harvesting, packing, holding area, the following activities shall occur as a part of the corrective action process: • Resample positive surfaces and the surrounding area to determine the extent of contamination • Clean and sanitize the affected and surrounding areas • Resample and re-test to confirm the elimination of Listeria spp. or L. mono • Conduct finished product testing as appropriate • Take additional action to prevent recurrence and to prevent adulterated food from entering commerce		

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.

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

GENERAL INFORMATION

Company Name: MOLINO DALLAGIOVANNA G.R.V. SRL Today's Date: 13/04/2022

Factory Address: Località Pilastro, 2

City: Gragnano Trebbiense Province: Piacenza Country: Italy

Office Address: Località Pilastro, 2

City: Gragnano Trebbiense, 2 Province: Piacenza Country: Italy

FDA Registration No.: 10558094792 DUNS No.: 43-289-6892

FDA Establishment Id.: Phone No.: +39 0523 787155

QC/QA's Name: Maria Grazia De Pascali E-mail: mariagrazia@dallagiovanna.it

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: List Product Name(s) Product Code:

No. 02, Product Name: Product Code:

No. 03, Product Name: Product Code:

No. 04, Product Name: Product Code:

No. 05, Product Name: Product Code:

No. 06, Product Name: Product Code:

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

Please list and fully describe each / every Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazard(s):

START: - application of Good Processing Practices,
- monitoring of contact surfaces,
- microbiological analysis on the finished product

_____

NOTE: Please fully describe each Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazards. What "Good Processing Practices"? Time, Temp, etc.?

FREQUENCY *of* VALIDATION

At what frequency are the above control(s) validated? (ex: per shift, month, annually)

START: eight times a year

U.S. FDA HAZARD PROFILE

Category Name: Milled grain products
Category Number: 6
Subcategory Name: Flour
Storage Type: Shelf stable

Resource U.S. FDA Product Category Hazard Profiles – *Appendix 1*

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

Please list and fully describe each / every Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazard(s):

START:
- selection of suppliers
- chemical analyzes on the raw material being accepted
- chemical analysis on the basic flour and the finished product

_____

NOTE: Please fully describe each Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazards. What testing is conducted? Please share results.

FREQUENCY *of* VALIDATION

At what frequency are the above control(s) validated? (ex: per shift, month, annually)

START:
-raw material half yearly for mycotoxins, pesticides, heavy metals (lead, cadmium).
-finished product half yearly for mycotoxins, pesticides, heavy metals (lead, cadmium)

U.S. FDA HAZARD PROFILE

Category Name: Milled grain products
Category Number: 6
Subcategory Name: Flour
Storage Type: Shelf stable

Resource U.S. FDA Product Category Hazard Profiles – *Appendix 1*

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

Please list and fully describe each / every Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazard(s):

START:

- application of Good Processing Practices,
- monitoring of contact surfaces,
- microbiological analysis on the finished product

_____

NOTE: Please fully describe each Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazards. What "Good Processing Practices"? Time, Temp, etc.?

FREQUENCY *of* VALIDATION

At what frequency are the above control(s) validated? (ex: per shift, month, annually)

START: annually

U.S. FDA HAZARD PROFILE

Category Name: Milled grain products
Category Number: 6
Subcategory Name: Flour
Storage Type: Shelf stable

Resource U.S. FDA Product Category Hazard Profiles – *Appendix 1*

FDA-IDENTIFIED PHYSICAL HAZARDS

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

- [x] Metal
- [x] Glass
- [ ] Extraneous Matter
- [x] Plastics
- [x] Stones
- [x] 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.*

- [x] CGMPs
- [ ] Testing
- [x] Raw Material Inspection
- [ ] Filter
- [ ] Screen
- [x] Metal Detector *see below*
- [x] Magnet
- [ ] X-Ray
- [ ] Radar
- [x] Other

DESCRIPTION *of* CRITICAL CONTROLS

Please list and fully describe each / every Supply Chain, Preventative, or Critical Control used to manage each of the above cited FDA-identified hazard(s):

START:

1) CGMPs: the phase of pre-cleaning and cleaning of the grain allows the elimination of light foreign bodies (stones, straw, seeds) which takes place through transport with air, while the heavy foreign bodies are eliminated with separator sieves, clearing machines and optical sorter, etc.
2) Raw material sampling to search for foreign bodies, visual check during grain unloading.
3) Safety tumbler and plansister for the prevention of any foreign bodies (parts of insects, etc.)
4) Metal detector and Magnet used for the prevention of metallic foreign bodies.

FREQUENCY *of* VALIDATION

At what frequency are the above control(s) validated? (ex: per shift, month, annually)
START:
1) At every load
2) At every load
3) once per shift
4) Frequency is described in the IOP13 work instruction. The control frequencies are defined on the basis of the risk assessment. (daily or every 8 hours).

U.S. FDA HAZARD PROFILE

Category Name: Milled grain products
Category Number: 6
Subcategory Name: Flour
Storage Type: Shelf stable

Metal detection standards

Ferrous: 2,5 mm
Non-Ferrous: 3,5 mm
Stainless Steel: 3,5 mm

Resource U.S. FDA
Hazard Profile – *Appendix 1*

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
Sesame	☐ Yes ☒ No	☐ Yes ☒ No	☒ Yes ☐ No
Celery	☐ 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 contaminants indicated in the "same facility" but not declared on the label (peanuts, tree nuts, milk and milk derivatives) are managed through physical separation in a dedicated area away from the other production lines, for which GHP procedures have been defined (dressing, dedicated equipment, etc.

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? BRC, IFS

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:

No chemicals product are used

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: training is made by internal PCQI p

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? 51

PEST CONTROL

Is a pest control contractor employed? ☑ Yes ☐ No

If yes, please provide: Name of contractor used: MB Disinfestazione

Number of yearly visits: 12

If no, by what means is pest prevention carried out?

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: detectable pens

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

Please provide details: food safety document required to suppliers and eventually audit

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

Please provide details: annualy we conducted a product vulnerability assessment relating to raw material

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: ex. S22020F01 S=bag 22= year produc

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:

The qualification criteria for raw material suppliers: samples at the unloading, contract.
GFSI certifications, audit, supplier questionnaire,

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:

CUSTOMER COMPLAINTS

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

Please describe your customer complaint procedure.

Complaints are handled according to our internal procedure, recorded on internal forms and trends analyzed.

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

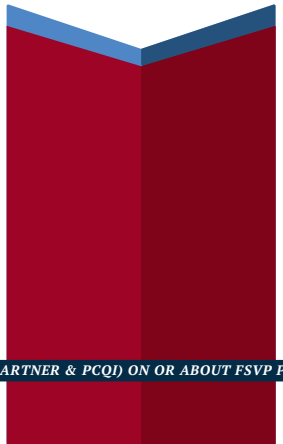
I certify that the information I provided on and in connection with this form is true, accurate and complete. I also understand that any false statements or deliberate omissions on this document or any other document I file with United Safety Agents, LLC may be grounds for disqualification from successful 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.

CONFIRMATION – REQUIRED

Representative's Name: Maria Grazia De Pascali

Title: Quality Manager

Today's Date: 4/13/22



Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **21WL0087696** del **17/11/2021**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 09/11/2021
Data di inizio prove: 10/11/2021
Data di fine prove: 17/11/2021

Dati del campione forniti dal committente

Matrice: Alimenti
Descrizione: Farina base di grano tenero Biscotto in macinazione campione del 08-11-2021 lotto P08-11-2021-03 Molino A

Dati di campionamento forniti dal committente

Prelievo eseguito da: committente
Tecnico: Molino Dallagiovanna

Parametro *Metodo*	**Risultato**	**U.M.**	**LOQ**
Ricerca di Salmonella spp *AFNOR BRD - 07/06 - 07/04*	**assente**	/25 g	
Conta della Carica microbica totale mesofila *UNI EN ISO 4833-1 : 2013*	**1700**	UFC/g	10
Conta di Enterobatteriaceae a 37°C *ISO 21528 - 2 : 2017*	**880**	UFC/g	10
Conta di Escherichia coli beta-glucuronidasi positivo *ISO 16649 - 2 : 2001*	**< 10**	UFC/g	10
Conta di Lieviti *ISO 21527-2 : 2008*	**< 100**	UFC/g	100
Conta di Muffe *ISO 21527-2 : 2008*	**Presenti ma meno di 400**	UFC/g	100
Conta di Stafilococchi coagulasi positivi a 37°C (Staphylococcus aureus e altre specie) *UNI EN ISO 6888-1 : 2018*	**< 10**	UFC/g	10
Conta di Bacillus cereus presunto *UNI EN ISO 7932 : 2020*	**< 10**	UFC/g	10

LOQ: limite di quantificazione; U.M.:Unità di misura

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.
Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.

Il conteggio dei parametri microbiologici è stato eseguito in singola piastra in accordo con la norma UNI EN ISO 7218:2013

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.
Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.
I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.

Water & Life Lab srl
(Groupe Carso) - Società unipersonale

Via Enrico Mattei n°37
24060 - Entratico (BG) - ITALY
+39 035.940665
info@waterlifelab.it
www.waterlifelab.it

Capitale sociale 50.000 € i.v.
C.F. / P.IVA 01855020168
r.e.a. n. 242620

*Laboratorio con sistema di gestione della qualità certificato secondo la norma **UNI EN ISO 9001:2015** da **DNV-GL**. Certificato n°267539-2018-AQ-ITA-ACCREDIA*

ilac-MRA

ACCREDIA L'ENTE ITALIANO DI ACCREDITAMENTO

LAB N° 0081

Claudio Innocenti

segue Rapporto di prova n°: **21WL0087696** del **17/11/2021**

Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio	*Biologo*	*Direzione Scientifica*
P.I. Enio Belotti	*dott. Sergio Festa*	*dott. Angelo Carlessi*
	Ordine nazionale dei biologi Iscrizione n°052114	Ordine dei Chimici e dei Fisici di Bergamo Chimico Sez.A Iscrizione n°146

Fine del rapporto di prova n° **21WL0087696**

Water & Life Lab srl
(Groupe Carso) - Società unipersonale

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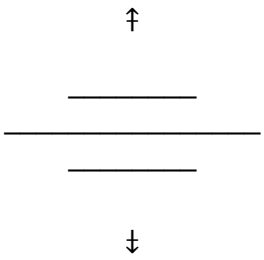
ilac-MRA
ACCREDIA L'ENTE ITALIANO DI ACCREDITAMENTO
LAB N° 0081



Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **21WL0087697** del **25/11/2021**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 09/11/2021
Data di inizio prove: 10/11/2021
Data di fine prove: 24/11/2021

Dati del campione forniti dal committente

Matrice: cereali e derivati
Descrizione: Farina base di grano tenero Biscotto in macinazione campione del 08-11-2021 lotto P08-11-2021-03 Molino A

Dati di campionamento forniti dal committente

Prelievo eseguito da: committente
Tecnico: Molino Dallagiovanna

Parametro *Metodo*	**Risultato**	**Incertezza**	**U.M.**	**LOQ**
Cadmio *POD 181 rev.00 del 30.12.2017*	**0,019**	±0,004	mg/kg	0,005
Piombo *POD 181 rev.00 del 30.12.2017*	**< 0,005**		mg/kg	0,005
Ricerca Organismi geneticamente modificati OGM (determinazione qualitativa):			–	
Promotore 35S (CaMV35) *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B1*	**non rilevato**		–	
Terminatore NOS *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B3*	**non rilevato**		–	
35S terminatore *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013*	**non rilevato**		–	
Npt II *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B4*	**non rilevato**		–	
Aflatossina B1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2
Aflatossina B2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2
Aflatossina G1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2
Aflatossina G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2

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www.waterlifelab.it - Capitale sociale 50.000 € i.v. - C.F. / P.IVA 01855020168 - r.e.a. n. 242620

segue Rapporto di prova n°: **21WL0087697** del **25/11/2021**

Parametro *Metodo*	Risultato	Incertezza	U.M.	LOQ
Aflatossina B1, B2, G1, G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2
DON *Lab 002/036 rev.06 2020*	**< 10**		µg/Kg	10
Ocratossina A *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2
Zearalenone *Lab 002/036 rev.06 2020*	**< 2**		µg/Kg	2

Limiti: Regolamento CEE/UE N. 1881/2006.

LOQ: limite di quantificazione; U.M.:Unità di misura

Il limite di rilevabilità (LOD) del metodo UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013, relativo alla ricerca qualitativa di p35S, t-NOS, 35S-terminatore, NPTII è pari a 0,01 % di DNA target sul totale del DNA estratto.

L'incertezza è espressa nelle unità di misura dei parametri a cui si riferiscono. Il fattore di copertura è pari a k=2 con un intervallo di probabilità del 95%.
Per le prove microbiologiche su tutte le matrici ad esclusione delle acque, l'incertezza tipo combinata, stimata secondo la ISO 19036, è espressa come deviazione standard di riproducibilità intralaboratorio.

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.
Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.

I risultati analitici relativo alle tossine non sono corretti per il recupero. I valori di recupero del metodo sono conformi ai requisiti dettati dal regolamento (CE) n° 401/2006.

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.
Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.
I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.
La riproduzione parziale del presente rapporto di prova non è consentita senza autorizzazione scritta del laboratorio.

Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio
P.I. Enio Belotti

Direzione Scientifica
dott. Battista Nicoli

Ordine dei Chimici e dei Fisici di Bergamo
Chimico Sez.A
Iscrizione n°95

Fine del rapporto di prova n° **21WL0087697**

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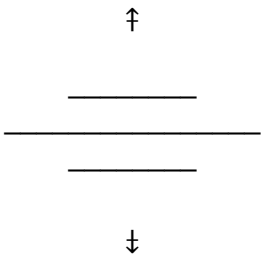


Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **21WL0089934** del **18/11/2021**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 16/11/2021
Data di inizio prove: 16/11/2021
Data di fine prove: 18/11/2021

Dati del campione forniti dal committente

Matrice: cereali e derivati
Descrizione: Grano tenero Manitoba fornitore Gavilon DDT 2340 DDT 2341campione del 15/11/2021

Dati di campionamento forniti dal committente

Prelievo eseguito da: committente
Tecnico: Molino Dallagiovanna

Parametro *Metodo*	**Risultato**	**Incertezza**	**U.M.**	**LOQ**	**Limiti**
Aflatossina B1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina B2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina G1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina B1, B2, G1, G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
DON *Lab 002/036 rev.06 2020*	**63**	±13	µg/Kg	10	1250
Ocratossina A *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Zearalenone *Lab 002/036 rev.06 2020*	**< 2**		µg/Kg	2	

Limiti: Regolamento CEE/UE N. 1881/2006.

LOQ: limite di quantificazione; U.M.:Unità di misura
>lim: i parametri così contrassegnati non rientrano nei limiti applicati.

L'incertezza è espressa nelle unità di misura dei parametri a cui si riferiscono. Il fattore di copertura è pari a k=2 con un intervallo di probabilità del 95%.
Per le prove microbiologiche su tutte le matrici ad esclusione delle acque, l'incertezza tipo combinata, stimata secondo la ISO 19036, è espressa come deviazione standard di riproducibilità intralaboratorio.

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.
Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.
I risultati analitici relativo alle tossine non sono corretti per il recupero. I valori di recupero del metodo sono conformi ai requisiti dettati dal regolamento (CE) n° 401/2006.

segue Rapporto di prova n°: **21WL0089934** del **18/11/2021**

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.
Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.
I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.
La riproduzione parziale del presente rapporto di prova non è consentita senza autorizzazione scritta del laboratorio.

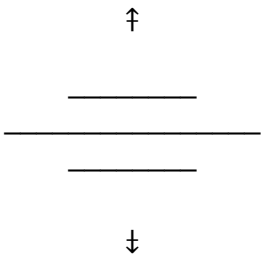
Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio
P.I. Enio Belotti

Direzione Scientifica
dott. Simone Pellegrini

Ordine dei Chimici e dei Fisici di Bergamo
Chimico Sez.A
Iscrizione n°212

Fine del rapporto di prova n° **21WL0089934**



Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **22WL0003022** del **21/01/2022**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 18/01/2022
Data di inizio prove: 18/01/2022
Data di fine prove: 21/01/2022

Dati del campione forniti dal committente

Matrice: cereali e derivati
Descrizione: Grano tenero var. capo lotto 202250 fornitore RWA silos cemento n.2. Campione del 17/01/2022

Dati di campionamento forniti dal committente

Prelievo eseguito da: Committente
Data campionamento: 18/01/2022

Parametro *Metodo*	**Risultato**	**U.M.**	**LOQ**
Aflatossina B1 *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
Aflatossina B2 *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
Aflatossina G1 *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
Aflatossina G2 *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
Aflatossina B1, B2, G1, G2 *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
DON *Lab 002/036 rev.06 2020*	**< 10**	µg/Kg	10
Ocratossina A *Lab 002/036 rev.06 2020*	**< 0,2**	µg/Kg	0,2
Zearalenone *Lab 002/036 rev.06 2020*	**< 2**	µg/Kg	2

Limiti: Regolamento CEE/UE N. 1881/2006.

LOQ: limite di quantificazione; U.M.:Unità di misura

L'incertezza è espressa nelle unità di misura dei parametri a cui si riferiscono. Il fattore di copertura è pari a k=2 con un intervallo di probabilità del 95%.
Per le prove microbiologiche su tutte le matrici ad esclusione delle acque, l'incertezza tipo combinata, stimata secondo la ISO 19036, è espressa come deviazione standard di riproducibilità intralaboratorio.
Per le prove microbiologiche l'*espressione del risultato "presente/assente" per le prove qualitative è da intendersi sinonimo della più corretta dicitura "rilevato/non rilevato".*

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.
Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.
I risultati analitici relativo alle tossine non sono corretti per il recupero. I valori di recupero del metodo sono conformi ai requisiti dettati dal regolamento (CE) n° 401/2006.

segue Rapporto di prova n°: **22WL0003022** del **21/01/2022**

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.
Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.
I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.
La riproduzione parziale del presente rapporto di prova non è consentita senza autorizzazione scritta del laboratorio.

Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio
P.I. Enio Belotti

Direzione Scientifica
dott. Simone Pellegrini

Ordine dei Chimici e dei Fisici di Bergamo
Chimico Sez.A
Iscrizione n°212

Fine del rapporto di prova n° **22WL0003022**

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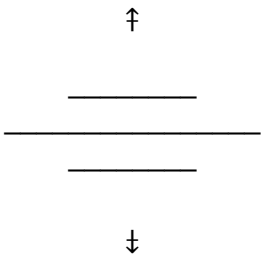

Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **22WL0003026** del **26/01/2022**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 18/01/2022
Data di inizio prove: 19/01/2022
Data di fine prove: 26/01/2022

Dati del campione forniti dal committente

Matrice: Alimenti
Descrizione: Farina base di grano tenero Nazionale lotto ODP P17-01-2022_01 campione del 18/01/2022.
Punto di prelievo: macinazione Molino C

Dati di campionamento forniti dal committente

Prelievo eseguito da: Committente
Data campionamento: 18/01/2022

Parametro *Metodo*	**Risultato**	**U.M.**	**LOQ**
Ricerca di Salmonella spp *AFNOR BRD - 07/06 - 07/04*	**assente**	/25 g	
Conta della Carica microbica totale mesofila *UNI EN ISO 4833-1 : 2013*	**5700**	UFC/g	10
Conta di Enterobatteriaceae a 37°C *ISO 21528 - 2 : 2017*	**Numero stimato 70**	UFC/g	10
Conta di Escherichia coli beta-glucuronidasi positivo *ISO 16649 - 2 : 2001*	**< 10**	UFC/g	10
Conta di Lieviti *ISO 21527-2 : 2008*	**Numero stimato 400**	UFC/g	100
Conta di Muffe *ISO 21527-2 : 2008*	**Numero stimato 900**	UFC/g	100
Conta di Stafilococchi coagulasi positivi a 37°C (Staphylococcus aureus e altre specie) *UNI EN ISO 6888-1 : 2018*	**< 10**	UFC/g	10
Conta di Bacillus cereus presunto *UNI EN ISO 7932:2020/EC1:2020*	**< 10**	UFC/g	10

LOQ: limite di quantificazione; U.M.:Unità di misura

L'incertezza è espressa nelle unità di misura dei parametri a cui si riferiscono. Il fattore di copertura è pari a k=2 con un intervallo di probabilità del 95%.
Per le prove microbiologiche su tutte le matrici ad esclusione delle acque, l'incertezza tipo combinata, stimata secondo la ISO 19036, è espressa come deviazione standard di riproducibilità intralaboratorio.
Per le prove microbiologiche l'*espressione del risultato "presente/assente" per le prove qualitative è da intendersi sinonimo della più corretta dicitura "rilevato/non rilevato".*

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.
Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.

Il conteggio dei parametri microbiologici è stato eseguito in singola piastra in accordo con la norma UNI EN ISO 7218:2013

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.

Water & Life Lab srl
(Groupe Carso) - Società unipersonale

*Laboratorio con sistema di gestione della qualità certificato secondo la norma **UNI EN ISO 9001:2015** da **DNV-GL**. Certificato n°267539-2018-AQ-ITA-ACCREDIA*

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www.waterlifelab.it

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r.e.a. n. 242620

segue Rapporto di prova n°: **22WL0003026** del **26/01/2022**

Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.

I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.
La riproduzione parziale del presente rapporto di prova non è consentita senza autorizzazione scritta del laboratorio.

Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio	*Biologo*	*Direzione Scientifica*
P.I. Enio Belotti	*dott. Sergio Festa*	*dott. Angelo Carlessi*
	Ordine nazionale dei biologi Iscrizione n°052114	Ordine dei Chimici e dei Fisici di Bergamo Chimico Sez.A Iscrizione n°146

Fine del rapporto di prova n° **22WL0003026**

Water & Life Lab srl
(Groupe Carso) - Società unipersonale

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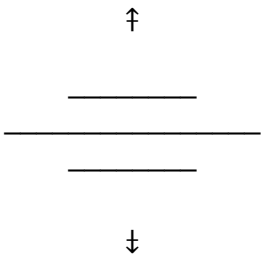
*Laboratorio con sistema di gestione della qualità certificato secondo la norma **UNI EN ISO 9001:2015** da **DNV-GL**. Certificato n°267539-2018-AQ-ITA-ACCREDIA*

ACCREDIA L'ENTE ITALIANO DI ACCREDITAMENTO
LAB N° 0081



Water & Life Lab
ANALYTICAL LABORATORIES

GROUPE CARSO

Rapporto di prova n°: **22WL0003029** del **25/01/2022**

Spett.
MOLINO DALLAGIOVANNA G.R.V. S.r.l.
Via Madonna del Pilastro, 2
29010 GRAGNANO TREBBIANESE PC

Data accettazione: 18/01/2022
Data di inizio prove: 18/01/2022
Data di fine prove: 25/01/2022

Dati del campione forniti dal committente

Matrice: cereali e derivati
Descrizione: Farina base di grano tenero Nazionale lotto ODP P17-01-2022_01 campione del 18/01/2022.
Punto di prelievo: macinazione Molino C

Dati di campionamento forniti dal committente

Prelievo eseguito da: Committente
Data campionamento: 18/01/2022

Parametro *Metodo*	**Risultato**	**Incertezza**	**U.M.**	**LOQ**	**Limiti**
Cadmio *POD 181 rev.00 del 30.12.2017*	**0,022**	±0,005	mg/kg	0,005	
Piombo *POD 181 rev.00 del 30.12.2017*	**0,005**	±0,002	mg/kg	0,005	
Ricerca Organismi geneticamente modificati OGM (determinazione qualitativa):			–		
Promotore 35S (CaMV35) *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B1*	**non rilevato**		–		
Terminatore NOS *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B3*	**non rilevato**		–		
35S terminatore *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013*	**non rilevato**		–		
Npt II *UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013 par.B4*	**non rilevato**		–		
Aflatossina B1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina B2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina G1 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Aflatossina G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	

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segue Rapporto di prova n°: **22WL0003029** del **25/01/2022**

Parametro *Metodo*	Risultato	Incertezza	U.M.	LOQ	Limiti
Aflatossina B1, B2, G1, G2 *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
DON *Lab 002/036 rev.06 2020*	**10**	±3	µg/Kg	10	750
Ocratossina A *Lab 002/036 rev.06 2020*	**< 0,2**		µg/Kg	0,2	
Zearalenone *Lab 002/036 rev.06 2020*	**< 2**		µg/Kg	2	

Limiti: Regolamento CEE/UE N. 1881/2006.

LOQ: limite di quantificazione; U.M.:Unità di misura

>lim: i parametri così contrassegnati non rientrano nei limiti applicati.

Il limite di rilevabilità (LOD) del metodo UNI EN ISO 21571:2013 + UNI EN ISO 21569:2013, relativo alla ricerca qualitativa di p35S, t-NOS, 35S-terminatore, NPTII è pari a 0,01 % di DNA target sul totale del DNA estratto.

L'incertezza è espressa nelle unità di misura dei parametri a cui si riferiscono. Il fattore di copertura è pari a k=2 con un intervallo di probabilità del 95%.

Per le prove microbiologiche su tutte le matrici ad esclusione delle acque, l'incertezza tipo combinata, stimata secondo la ISO 19036, è espressa come deviazione standard di riproducibilità intralaboratorio.

Per le prove microbiologiche l'*espressione del risultato "presente/assente" per le prove qualitative è da intendersi sinonimo della più corretta dicitura "rilevato/non rilevato".*

Il laboratorio Water & Life Lab S.r.l. è iscritto, con Decreto della Direzione Generale della Sanità numero 893 del 2 febbraio 2011, nel Registro della Regione Lombardia dei laboratori autorizzati ad effettuare analisi nell'ambito delle procedure di autocontrollo delle industrie alimentari al numero progressivo 030016301004.

Il Laboratorio non considera l'arrotondamento del dato e l'incertezza di misura nel confronto con i limiti eventualmente applicati nel Rapporto di prova.

I risultati analitici relativo alle tossine non sono corretti per il recupero. I valori di recupero del metodo sono conformi ai requisiti dettati dal regolamento (CE) n° 401/2006.

Qualora il campionamento non sia eseguito da Water & life lab i risultati riportati nel presente rapporto di prova si riferiscono al campione così come ricevuto.

Il laboratorio declina la responsabilità relativa ai dati del campione forniti dal committente.

I risultati analitici si riferiscono esclusivamente al campione sottoposto a prova.

La riproduzione parziale del presente rapporto di prova non è consentita senza autorizzazione scritta del laboratorio.

Questo rapporto di prova è sottoscritto con firma digitale ai sensi della normativa vigente.

Responsabile di Laboratorio
P.I. Enio Belotti

Direzione Scientifica
dott. Battista Nicoli

Ordine dei Chimici e dei Fisici di Bergamo
Chimico Sez.A
Iscrizione n°95

Fine del rapporto di prova n° **22WL0003029**

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CERTIFICATE OF TRAINING

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Maria Grazia De Pascali

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

FSPCA Preventive Controls for Human Food

delivered by Lead Instructor

Mario Sangiorgi

completed on

09/17/2016

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

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

Joseph Corby, Executive Director
Association of Food and Drug Officials

AFDO

Certificate # 242aebc4

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

CSQA

ATTESTATO

MARIA GRAZIA DE PASCALI

ha superato l'esame del corso

Auditor interni di sistemi di autocontrollo (HACCP)

Tenutosi a Parma nei giorni 11, 12 novembre 2019
Durata: 16 ore

12 novembre 2019

Attestato n. 118

Dr. Pietro Bonato
Direttore Generale

CSQA Certificazioni Srl
Via S. Gaetano, 74 - 36016 Thiene (VI)
www.csqa.it

Auditor number

20291

BRC Site Code

1357883

MOLINO DALLAGIOVANNA GRV Srl

Via Pilastro, 2
29010 Gragnano Trebbiense (PC) - ITALY

In conjunction with an audit for

Global Standard Food Safety issue 8

HAS SUCCESSFULLY COMPLETED THE GLOBAL STANDARDS FSMA READY MODULE

Scope:

Milling, blending and packaging of soft wheat flours in several formats paper bags, big bags (1000 kg) and bulk. Packaging of semolina and re-milled semolina in 5 and 10 kg paper bags. Mixing of semi-finished preparations based on different cereal flours and other ingredients. Including external warehouses in via Mottaziana of Borgonovo Valtidone (PC). Outsourced packing of flour in 0,5 and 1 kg format. Trading of other mixes, flours, semolina and yeast.

Audit Dates: 15-16-17/12/2021

Issue Date 26/01/2022

Re-audit Due Date: from 24/11/2022 to 21/12/2022

Expiry Date: 01/02/2023

Issue Number 3146

Authorised by
Ing. P. Baldazzi

Issued by CSI SpA
Viale Lombardia, 20 – 20021 Bollate (MI) - Italy

BRCGS Food Safety CERTIFICATED

Auditor number

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BRC Site Code

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MOLINO DALLAGIOVANNA GRV Srl

Via Pilastro, 2
29010 Gragnano Trebbiense (PC) - ITALY

In conjunction with an audit for

Global Standard Food Safety issue 8

HAS SUCCESSFULLY COMPLETED THE GLOBAL STANDARDS FSMA READY MODULE

Scope:

Milling, blending and packaging of soft wheat flours in several formats paper bags, big bags (1000 kg) and bulk. Packaging of semolina and re-milled semolina in 5 and 10 kg paper bags. Mixing of semi-finished preparations based on different cereal flours and other ingredients. Including external warehouses in via Mottaziana of Borgonovo Valtidone (PC). Outsourced packing of flour in 0,5 and 1 kg format. Trading of other mixes, flours, semolina and yeast.

Audit Dates: 15-16-17/12/2021

Issue Date 26/01/2022

Re-audit Due Date: from 24/11/2022 to 21/12/2022

Expiry Date: 01/02/2023

Issue Number 3146

Authorised by
Ing. P. Baldazzi

Issued by CSI SpA
Viale Lombardia, 20 – 20021 Bollate (MI) - Italy

BRCGS Food Safety CERTIFICATED

BUREAU VERITAS
Certification

MOLINO DALLAGIOVANNA GRV S.R.L.

Sede Legale e Operativa:
Via Madonna del Pilastro, 2 – 29010 GRAGNANO TREBBIESE (PC)

Bureau Veritas Certification Holding SAS certifica che il sistema di gestione dell'organizzazione sopra indicata è stato valutato e giudicato conforme ai requisiti della norma di sistema di gestione seguente

Norma

SA 8000:2014

Campo di applicazione

Produzione di farine attraverso la macinazione di grano tenero.

Data della Certificazione originale:	**18 giugno 2016**
Data di scadenza del ciclo precedente:	**17 giugno 2019**
Data dell'audit di Ricertificazione:	**23 maggio 2019**
Data di inizio del ciclo di Ricertificazione:	**18 giugno 2019**

Soggetto al continuo e soddisfacente mantenimento del Sistema di Gestione questo certificato è valido fino al: **17 giugno 2022**

Certificato N. IT268364 **Revisione N. 1** **Data revisione: 18 giugno 2019**

Firmato a nome di
Bureau Veritas Certification Holding SAS
ANDREA FILIPPI – Local Technical Manager

Indirizzo dell'organismo di certificazione:	*Bureau Veritas Certification Holding SAS* *Le Triangle de l'Arche, 8, cours du Triangle - CS 90096* *92937 Paris la Defense Cedex - France*
Indirizzo Ufficio di zona:	*Bureau Veritas Italia S.p.A., Viale Monza, 347 - 20126 Milano, Italia*
Clausola di esclusione della responsabilità:	***"Social Accountability International e le altre parti interessate nel processo SA8000 riconoscono solo certificati SA8000 emessi da Enti di Certificazione qualificati sotto accreditamento concesso dal SAAS e non riconoscono la validità dei certificati SA8000 rilasciati da organismi accreditati o organizzazioni accreditate da un ente diverso dal SAAS."***

Per verificare la validità del certificate contattare il **+39 02 270911** o visitate il sito del SAAS www.saasaccreditation.org/certification
Ulteriori chiarimenti sul campo di applicazione di questo certificato e sui requisiti applicabili della norma del sistema di gestione possono essere ottenuti consultando l'organizzazione.

BRCGS | Food Safety

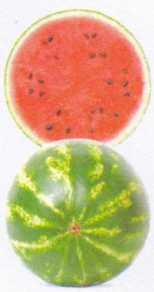
Certificate of Achievement

This is to certify that

Maria Grazia De Pascali

has completed and passed

Global Standard for Food Safety Issue 7 to 8 Conversion for Sites



Mark Proctor
CEO of BRCGS

Course date
30 September 2019

Certificate of Achievement

This is to certify that

Donatella Fraioli

has completed and passed

HACCP

Course date
25 February 2020

Mark Proctor
CEO of BRCGS

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES
CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

290 mm

165 mm

50 mm

210 mm

Datos de Nutrición

33 raciones por envase
Tamaño por ración
1/4 taza (30g)

Cantidad por ración	
Calorías	**100**
	Valor Diario*
Grasa Total 0g	**0%**
Grasa Saturada 0g	**0%**
Grasa *Trans* 0g	
Colesterol 0mg	**0%**
Sodio 0mg	**0%**
Carbohidrato Total 22g	**8%**
Fibra Dietética 0.7g	**2%**
Azúcares Totales 0.3g	
Incluye 0g azúcares añadidos	**0%**
Proteínas 4g	
Vitamina D 0.1mcg	0%
Calcio 0mg	0%
Hierro 1.32mg	7%
Potasio 30mg	0%
Tiamina 0.2mg	17%
Niacin 1.6mg	10%
Riboflavin 0.12mg	9%
Ácido fólico 45mcg DFE	11%

El % Valor Diario (VD) le indica cuánto un nutriente en una porción de alimentos contribuye a una dieta diaria. 2,000 calorías al día se utiliza para asesoramiento de nutrición general.

INGREDIENTES: harina de **TRIGO**, vitaminas e minerales (hierro, niacina, tiamina, riboflavina, ácido fólico). Puede contener trazas de soja.

CAST ALIMENTI

MOLINO DALLAGIOVANNA
FAR FARINA DAL 1832
ITALIA

ENRICHED WHEAT FLOUR TYPE 00
UNBLEACHED
"FOR ALL USE"

HARINA DE TRIGO TIERNO
ENRIQUECIDA - SIN BLANQUEAR

NET WT. 2 lb
3.2 oz (1 kg)

Nutrition Facts

33 servings per container
Serving size 1/4 cup (30g)

Amount per serving	
Calories	**100**
	% Daily Value*
Total Fat 0g	**0%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 0.2mg	**0%**
Total Carbohydrate 22g	**8%**
Dietary Fiber 0.7g	**2%**
Total Sugars 0.3g	
Includes 0g Added Sugars	**0%**
Protein 4g	
Vitamin D 0.1mcg	0%
Calcium 0mg	0%
Iron 1.32mg	7%
Potassium 30mg	0%
Thiamin 0.2mg	17%
Niacin 1.6mg	10%
Riboflavin 0.12mg	9%
Folic acid 45mcg DFE	11%

*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: **WHEAT** flour, vitamin and minerals (iron, niacin, thiamin, riboflavin, folic acid). May contain traces of soy.

MADE IN ITALY BY /
PRODUCIDO EN ITALIA POR:
MOLINO DALLAGIOVANNA G.R.V. SRL
29010 GRAGNANO TREBBIENSE (PC) ITALY
LOCALITÀ PILASTRO, 2
TEL. (+39) 0523 787155 | FAX (+39) 0523 787450
DALLAGIOVANNA.IT

COD. 008

Best Before: / Consumir preferentemente antes de:
Batch: / Lote:

USA

FLOUR 00 "FOR-ALL-USE"

**THE FINEST ITALIAN FLOUR
FROM THE BEST GRAINS,
CLEANED AND WASHED IN WATER,
SLOWLY AND COLD MILLED.
OUR MILLING PROCESS PRESERVES
FLAVOUR, AROMA AND
SENSORY PROPERTIES OF THE GRAINS.
HERE THE FLOUR CREATED
FOR EVERY NEED,
TESTED BY THE BEST MASTERS OF WHITE ARTS,
GREAT EVEN AT HOME.**

HARINA 00 "UNIVERSAL"

**LOS MEJORES GRANOS DE TRIGO
SELECCIONADOS CUIDADOSAMENTE,
LAVADOS CON AGUA,
MOLIDOS LENTAMENTE EN FRÍO
PARA PRESERVAR TODAS LAS PROPRIEDADES
ORGANOLÉPTICAS, EL SABOR Y EL AROMA.
HARINA CONCEBIDA ESPECIALMENTE
PARA TODOS LOS USOS
Y TESTADA POR LOS
MEJORES MAESTROS
DE PANIFICACIÓN Y PASTELERÍA.
PERFECTA TAMBIÉN PARA TU HOGAR.**

CONSERVATION: MAX HUMIDITY 15%. Store in a cool, dry place. Product subject to natural weight loss.
CONSERVACIÓN: HUMEDAD MÁX 15%. Conservar en un lugar fresco y seco. Producto sujeto a diminución de peso natural.

SCOPRI TUTTE LE NOSTRE RICETTE
DISCOVER ALL OUR RECIPES
DESCUBRE TODAS NUESTRAS RECETAS

8 033772 095792

Pantone 4625 C
Pantone 7536 C
Pantone 485 C
Nero
Cyan
Magenta
Giallo
Grigio

MARRONE 4625 C
ROSSO 485 C
GRIGIO 7536 C
NERO
CYAN
MAGENTA
GIALLO
GRIGIO

IMPORTANTE: sulle bozze che inviamo, da restituire firmate per accettazione o corredate di eventuali modifiche, il controllo della correttezza degli elementi grafici, dei testi, delle diciture e della corrispondenza di tutto ciò con eventuali campioni di riferimento è **esclusivamente a carico del cliente.** Pertanto, Cartotecnica Postumia non si assume responsabilità alcuna per eventuali errori od omissioni nella stampa del prodotto finito, derivanti dalla mancanza di tale controllo.

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

17 mm | 60 mm | 100 mm | 60 mm | 100 mm

290 mm

165 mm

210 mm

50 mm

Valori nutrizionali

33 porzioni per contenitore
Misura porzione
1/4 tazza (30g)

Quantità per porzione	Valore Giornaliero*
Calorie 100	
Grassi totali 0g	**0%**
Grassi saturi 0g	**0%**
Grassi *Trans* 0g	
Colesterolo 0mg	**0%**
Sodio 0mg	**0%**
Carboidrati Totali 22g	**8%**
Fibra Alimentare 0.9g	**3%**
Zuccheri Totali 0.3g	
Include 0 g di zuccheri aggiunti	**0%**
Proteine 4g	
Vitamina D 0.1mcg	0%
Calcio 0mg	0%
Ferro 1.32mg	7%
Potassio 30mg	0%
Tiamina 0.2mg	17%
Niacina 1.6mg	10%
Riboflavina 0.12mg	9%
Acido folico 45mcg DFE	11%

Il valore giornaliero% (VG) indica quanto un nutriente in una porzione di cibo contribuisce alla dieta quotidiana. 2.000 calorie al giorno vengono utilizzate per consigli nutrizionali generali.

INGREDIENTI: farina di **GRANO**, vitamine e minerali (ferro, niacina, tiamina, riboflavina, acido folico). Può contenere tracce di soia.

CAST ALIMENTI

MOLINO DALLAGIOVANNA
FAR FARINA DAL 1832
ITALIA

ENRICHED WHEAT FLOUR TYPE 00 UNBLEACHED
FOR PIZZA
Napoletana

APPROVATO VERA PIZZA Napoletana APPROVED

FARINA DI GRANO TENERO
TIPO 00

NET WT. 2 lb
3.2 oz (1 kg)

Nutrition Facts

33 servings per container
Serving size 1/4 cup (30g)

Amount per serving	% Daily Value*
Calories 100	
Total Fat 0g	**0%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 0.2mg	**0%**
Total Carbohydrate 22g	**8%**
Dietary Fiber 0.9g	**3%**
Total Sugars 0.3g	
Includes 0g Added Sugars	**0%**
Protein 4g	
Vitamin D 0.1mcg	0%
Calcium 0mg	0%
Iron 1.32mg	7%
Potassium 30mg	0%
Thiamin 0.2mg	17%
Niacin 1.6mg	10%
Riboflavin 0.12mg	9%
Folic acid 45mcg DFE	11%

*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: **WHEAT** flour, vitamin and minerals (iron, niacin, thiamin, riboflavin, folic acid). May contain traces of soy.

MADE IN ITALY BY /
PRODOTTO IN ITALIA DA:
MOLINO DALLAGIOVANNA G.R.V. SRL
29010 GRAGNANO TREBBIENSE (PC) ITALY
LOCALITÀ PILASTRO, 2
TEL. (+39) 0523 787155 | FAX (+39) 0523 787450
DALLAGIOVANNA.IT

COD. 203

Best Before: /Da consumarsi preferibilmente entro il:
Batch: / Lotto:

USA

FARINA 00 FOR NEAPOLITAN PIZZA

**THE FINEST ITALIAN FLOUR
FROM THE BEST GRAINS,
CLEANED AND WASHED IN WATER,
SLOWLY AND COLD MILLED.
OUR MILLING PROCESS PRESERVES
FLAVOUR, AROMA AND
SENSORY PROPERTIES OF THE GRAINS.
THE PERFECT FLOUR FOR THE TRADITIONAL
NEAPOLITAN STYLE PIZZA.
EVEN AT HOME.**

FARINA 00 PER PIZZA NAPOLETANA

**I MIGLIORI CHICCHI VENGONO
SELEZIONATI ACCURATAMENTE,
LAVATI IN ACQUA E
MACINATI LENTAMENTE E A FREDDO
PER PRESERVARNE TUTTE LE PROPRIETÀ
ORGANOLETTICHE, IL SAPORE ED IL PROFUMO.
NASCE COSÌ LA FARINA STUDIATA APPOSITAMENTE
PER LA VERA PIZZA NAPOLETANA.
PERFETTA ANCHE A CASA TUA.**

CONSERVATION: MAX HUMIDITY 15%. Store in a cool, dry place. Product subject to natural weight loss.
CONSERVAZIONE: UMIDITÀ MAX 15%. Conservare in luogo fresco e asciutto. Prodotto soggetto a calo di peso naturale.

DISCOVER ALL OUR RECIPES
SCOPRI TUTTE LE NOSTRE RICETTE

8 15040 02000 6

MARRONE 4625 C
BLU 298 U
GRIGIO 7536 C
NERO
CYAN
MAGENTA
GIALLO
BLU

Pantone 4625 C
Pantone 7536 C
Pantone 298 U
Nero
Cyan
Magenta
Giallo
BLU

IMPORTANTE: sulle bozze che inviamo, da restituire firmate per approvazione o corredate di eventuali modifiche, il controllo della correttezza degli elementi grafici, dei testi, delle diciture e della corrispondenza di tutto ciò con eventuali campioni di riferimento **è esclusivamente a carico del cliente.** Pertanto, Cartotecnica Postumia non si assume responsabilità alcuna per eventuali errori od omissioni nella stampa del prodotto finito, derivanti dalla mancanza di tale controllo.

17 mm | 60 mm | 100 mm | 60 mm | 100 mm

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

290 mm

170 mm

210 mm

50 mm

Datos de Nutrición

33 raciones por envase

Tamaño por ración
1/4 taza (30g)

Cantidad por ración	
Calorías	**100**
	Valor Diario*
Grasa Total 0g	**0%**
Grasa Saturada 0g	**0%**
Grasa *Trans* 0g	
Colesterol 0mg	**0%**
Sodio 0mg	**0%**
Carbohidrato Total 22g	**8%**
Fibra Dietética 0.7g	**2%**
Azúcares Totales 0.3g	
Incluye 0g azúcares añadidos	**0%**
Proteínas 3g	
Vitamina D 0.1mcg	0%
Calcio 0mg	0%
Hierro 1.32mg	7%
Potasio 30mg	0%
Tiamina 0.2mg	17%
Niacin 1.6mg	10%
Riboflavin 0.12mg	9%
Ácido fólico 45mcg DFE	11%

El % Valor Diario (VD) le indica cuánto un nutriente en una porción de alimentos contribuye a una dieta diaria. 2,000 calorías al día se utiliza para asesoramiento de nutrición general.

INGREDIENTES: harina de **TRIGO**, vitaminas e minerales (hierro, niacina, tiamina, riboflavina, ácido fólico). Puede contener trazas de soja.

CAST ALIMENTI

MOLINO DALLAGIOVANNA
FAR FARINA DAL 1832
ITALIA

ENRICHED WHEAT FLOUR TYPE 00
UNBLEACHED
FOR FRESH PASTA

LATRIPLOZERO ®

HARINA DE TRIGO TIERNO
ENRIQUECIDA - SIN BLANQUEAR

NET WT. 2 lb
3.2 oz (1 kg)

Nutrition Facts

33 servings per container
Serving size 1/4 cup (30g)

Amount per serving	
Calories	**100**
	% Daily Value*
Total Fat 0g	**0%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 0.2mg	**0%**
Total Carbohydrate 22g	**8%**
Dietary Fiber 0.7g	**2%**
Total Sugars 0.3g	
Includes 0g Added Sugars	**0%**
Protein 3g	
Vitamin D 0.1mcg	0%
Calcium 0mg	0%
Iron 1.32mg	7%
Potassium 30mg	0%
Thiamin 0.2mg	17%
Niacin 1.6mg	10%
Riboflavin 0.12mg	9%
Folic acid 45mcg DFE	11%

*The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

INGREDIENTS: **WHEAT** flour, vitamin and minerals (iron, niacin, thiamin, riboflavin, folic acid). May contain traces of soy.

MADE IN ITALY BY /
PRODUCIDO EN ITALIA POR:
MOLINO DALLAGIOVANNA G.R.V. SRL
29010 GRAGNANO TREBBIENSE (PC) ITALY
LOCALITÀ PILASTRO, 2
TEL. (+39) 0523 787155 | FAX (+39) 0523 787450
DALLAGIOVANNA.IT

COD. 204

USA

Best Before: / Consumir preferentemente antes de:
Batch: / Lote:

FLOUR 00 LATRIPLOZERO ®

THE FINEST ITALIAN FLOUR FROM THE BEST GRAINS, CLEANED AND WASHED IN WATER, SLOWLY AND COLD MILLED. OUR MILLING PROCESS PRESERVES FLAVOUR, AROMA AND SENSORY PROPERTIES OF THE GRAINS. A SPECIAL WHITE AND ELASTIC FLOUR SUITABLE FOR FRESH AND FILLED PASTA. TESTED BY THE BEST PASTA MASTERS, GREAT EVEN AT HOME.

HARINA 00 LATRIPLOZERO ®

LOS MEJORES GRANOS DE TRIGO SELECCIONADOS CUIDADOSAMENTE, LAVADOS CON AGUA, MOLIDOS LENTAMENTE EN FRÍO PARA PRESERVAR TODAS LAS PROPRIEDADES ORGANOLÉPTICAS, EL SABOR Y EL AROMA. UNA HARINA MUY BLANCA Y ELASTICA IDEAL PARA PASTA FRESCA Y RELLENA. TESTADA POR LOS MEJORES MAESTROS DE LA PASTA PERFECTA TAMBIÉN PARA TU HOGAR.

CONSERVATION: MAX HUMIDITY 15%. Store in a cool, dry place. Product subject to natural weight loss.
CONSERVACIÓN: HUMEDAD MÁX 15%. Conservar en un lugar fresco y seco. Producto sujeto a diminución de peso natural.

eu k

DISCOVER ALL OUR RECIPES
DESCUBRE TODAS NUESTRAS RECETAS

8 15040 02001 3

Pantone 4625 C
Pantone 7536 C
Giallo fondo
Nero
Cyan
Magenta
Giallo

MARRONE 4625 C
GIALLO FONDO
GRIGIO 7536 C
NERO
CYAN
MAGENTA
GIALLO

IMPORTANTE: sulle bozze che inviamo, da restituire firmate per approvazione o corredate di eventuali modifiche, il controllo della correttezza degli elementi grafici, dei testi, delle diciture e della corrispondenza di tutto ciò con eventuali campioni di riferimento **è esclusivamente a carico del cliente.** Pertanto, Cartotecnica Postumia non si assume responsabilità alcuna per eventuali errori od omissioni nella stampa del prodotto finito, derivanti dalla mancanza di tale controllo.

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

17 mm | 60 mm | 100 mm | 60 mm | 100 mm

290 mm

170 mm

210 mm

50 mm

FARINA 00 "FROLLA"

I MIGLIORI CHICCHI VENGONO
SELEZIONATI ACCURATAMENTE,
LAVATI IN ACQUA E
MACINATI LENTAMENTE E A FREDDO
PER OTTENERE LA FARINA SPECIALE PER
UNA PASTA FROLLA DELICATA E FRIABILE.
IDEALE ANCHE PER:
TORTE DA FORNO, BISCOTTI,
MUFFIN E PANDISPAGNA.

FLOUR 00 "SHORTCRUST"

THE FINEST ITALIAN FLOUR
FROM THE BEST GRAINS,
CLEANED AND WASHED IN WATER,
SLOWLY AND COLD MILLED,
FOR A FINE AND CRUMBLY SHORTCRUST.
ALSO SUITABLE FOR:
CAKES AND COOKIES, PASTRIES,
MUFFIN AND SPONGE CAKE.

RICETTA CONSIGLIATA PER PASTA FROLLA

INGREDIENTI
1000 G DI FARINA FROLLA
700 G DI BURRO
300 G DI ZUCCHERO
120 G DI UOVA
5 G DI SALE SCIOLTO NELLE UOVA
1 BACCA DI VANIGLIA

PROCEDIMENTO
IMPASTARE FARINA E BURRO, AGGIUNGERE GLI ALTRI INGREDIENTI,TERMINARE L'IMPASTO E METTERE A RIPOSARE IN FRIGORIFE-RO PER ALMENO 4 ORE PRIMA DELL'UTILIZZO.

SUGGESTED RECIPE FOR SHORTCRUST

INGREDIENTS
1000 G / 35.27 OZ OF FLOUR SHORTCRUST
700 G / 24.69 OZ OF BUTTER
300 G / 10.58 OZ OF SUGAR
120 G / 4.23 OZ OF EGGS
5 G / 0.17 OZ OF SALT DISSOLVED IN EGGS
1 VANILLA BEAN

PREPARATION
MIX TOGETHER FLOUR AND BUTTER, ADD THE OTHER INGREDIENTS.FINISH THE DOUGH AND LET IT REST FOR 4 HOURS IN THE REFRIGERATOR BEFORE USING.

SCOPRI TUTTE
LE NOSTRE RICETTE
SU DALLAGIOVANNA.IT

DISCOVER ALL
OUR RECIPES
ON DALLAGIOVANNA.IT

SUGGERIMENTO DI PRESENTAZIONE

CAST ALIMENTI

per dolci
ideal for pastry

1kg e
2.2 lb

MOLINO DALLAGIOVANNA
FAR FARINA DAL 1832
ITALIA

Idolcissime

FARINA DI GRANO TENERO TIPO 00 "FROLLA"

SOFT WHEAT FLOUR TYPE 00
FOR SHORTCRUST

RECOMMENDED PRESENTATION

(IT) FARINA DI GRANO TENERO TIPO 00
INGREDIENTI: FARINA DI **GRANO** TENERO. PUÒ CONTENERE TRACCE DI **SOIA**, **SENAPE** E **LUPINI**. UMIDITÀ MAX 15,50%. CONSERVARE IN LUOGO FRESCO ED ASCIUTTO. PRODOTTO SOGGETTO A CALO DI PESO NATURALE. DA CONSUMARSI PREFERIBILMENTE ENTRO IL: VEDI DATA IMPRESSA SUL LATO SUPERIORE DEL SACCO.

(EN) SOFT WHEAT FLOUR TYPE 00
INGREDIENTS: SOFT **WHEAT** FLOUR. MAY CONTAIN TRACES OF **SOY**, **MUSTARD** AND **LUPIN**. MAX HUMIDITY 15,50%. STORE IN A COOL, DRY PLACE. PRODUCT SUBJECT TO NATURAL LOSS OF WEIGHT. BEST BEFORE: SEE DATE PRINTED ON THE UPPER SIDE OF THE BAG.

(ES) HARINA DE TRIGO TIERNO TIPO 00
INGREDIENTES: HARINA DE **TRIGO** TIERNO. PUEDE CONTENER TRAZAS DE **SOJA**, **MOSTAZA** Y **ALTRAMUCES**. HUMEDAD MAX 15,50%. CONSERVAR EN UN LUGAR FRESCO Y SECO. PRODUCTO SUJETO A DIMINUCIÓN DE PESO NATURAL. CONSUMIR PREFERENTE-MENTE ANTES DE: VER FECHA IMPRESA EN LA PARTE SUPERIOR DE LA BOLSA.

(PT) FARINHA DE GRÃO TENRO TIPO 00
INGREDIENTES: FARINHA DE **GRÃO** TENRO. PODE CONTER VESTÍGIOS DE **SOJA**, **MOSTARDA** E **TREMOÇO**. HUMIDADE MAX 15,50%. CONSERVAR EM LOCAL FRESCO E SECO. PRODUTO SUJEITO A PERTA NATURAL DE PESO. CONSUMIR DE PREFERÊNCIA ANTES DE: VER DATA IMPRESSA NA PARTE SUPERIOR DA EMBALAGEM.

(DE) WEICHWEINZENMEHL TYP 00
ZUTATEN: WEICH**WEIZEN**MEHL. KANN SPUREN VON **SOJA**, **SENF** UND **LUPINEN** ENTHALTEN. MAX FEUCHTIGKEIT 15,50%. AN EINEM KÜHLEN UND TROCKENEN ORT AUFBEWAHREN. DAS PRODUKT UNTERLIEGT NATÜRLICHEM GEWICHTSVERLUST. MINDESTENS HALTBAR BIS: SIEHE DATUM AUF DER OBEREN SEITE DES SACKS.

(FR) FARINE DE BLE TENDRE TYPE 00
INGREDIENTS: FARINE DE **BLE** TENDRE. ELLE PEUT CONTENIR DES TRACES DE **SOJA**, **MOUTARDE** ET DE **LUPIN**. HUMIDITE MAX 15,50%. A CONSERVER DANS UN LIEU FRAIS ET SEC. PRODUIT SOUMIS À UNE DIMINUTION NATURELLE DU POIDS. À CONSOMMER DE PRÉFÉRENCE AVANT LE: VOIR LA DATE INDIQUÉE SUR LE CÔTÉ SUPÉRIEUR DU SAC.

(DA) MEL AF BLØD HVEDE TYP 00
INGREDIENSER: MEL AF BLØD **HVEDE**. KAN INDEHOLDE SPOR AF **SOJA**, **SENNEP** OG **LUPIN**. MAKS. FUGTINDHOLD 15,50%. OPBEVARES PÅ ET KØLIGT OG TØRT STED. PRODUKTER ER GENSTAND FOR ET NATURLIGT VÆGTTAB. MINDST HOLDBAR TIL: SE DATO PÅ POSENS ØVERSTE SIDE.

(NL) BLOEM VAN ZACHTE TARWE TYPE 00
INGREDIËNTEN: BLOEM VAN ZACHTE **TARWE**. KAN SPOREN VAN **SOJA**, **MOSTERD** EN **LUPINE**. MAX. VOCHTIGHEID 15,50%. BEWAREN OP EEN KOELE EN DROGE PLAATS. PRODUCT ONDERHE-VIG AAN NATUURLIJK GEWICHTSVERLIES. TEN MINSTE HOUDBAAR TOT: ZIE DATUM OP DE BOVENKANT VAN DE ZAK.

(SV) MJUKT VETEMJÖL AV TYPEN 00
INGREDIENSER: MJUKT **VETE**MJÖL. KAN INNEHÅLLA SPÅR AV **SOJA**, **SENAP** OCH **LUPIN**. MAX FUKTIGHET 15,50 %. FÖRVARAS SVALT OCH TORRT. INNEHÅLLET I FÖRPACKNINGEN KAN AV NATURLIGA ORSAKER MINSKA I VIKT. BÄST FÖRE: SE DATUM TRYCKT PÅ PÅSENS ÖVERSIDA.

(EL) ΜΑΛΑΚΟ ΑΛΕΥΡΙ ΣΙΤΟΥ 00
ΣΥΣΤΑΤΙΚΑ: ΜΑΛΑΚΟ ΑΛΕΥΡΙ *ΣΙΤΟΥ*. ΕΝΔΕΧΕΤΑΙ ΝΑ ΠΕΡΙΕΧΕΙ ΙΧΝΗ *ΣΟΓΙΑ*, *ΣΙΝΑΠΙ* ΚΑΙ *ΛΟΥΠΙΝΟ*. ΜΕΓ. ΥΓΡΑΣΙΑ 15,50% ΑΠΟΘΗΚΕΥΕΤΕ ΣΕ ΞΗΡΟ ΜΕΡΟΣ. ΤΟ ΠΡΟΪΟΝ ΥΠΟΚΕΙΤΑΙ ΣΕ ΦΥΣΙΚΗ ΑΠΩΛΕΙΑ ΒΑΡΟΥΣ. ΑΝΑΛΩΣΗ ΚΑΤΑ ΠΡΟΤ ΙΜΗΣΗ ΠΡΙΝ ΑΠΟ: ΒΛΕΠΕ ΗΜΕΡΟΜΗΝΙΑ ΠΟΥ ΑΠΟΤΥΠΩΝΕΤΑΙ ΣΤΗΝ ΕΠΑΝΩ ΠΛΕΥΡΑ ΤΗΣ ΣΑΚΟΥΛΑΣ.

(CS) PŠENIČNÁ MOUKA TYPU 00
INGREDIENCE: **PŠENIČNÁ** MOUKA. MŮŽE OBSAHOVAT STOPY **SOJI**, **HOŘČICE** A **LUPINY**. MAX VLHKOST 15,50 %. SKLADUJTE NA CHLADNÉM A SUCHÉM MÍSTĚ. U VÝROBKU DOCHÁZÍ K PŘIROZENÉMU ÚBYTKU HMOTNOSTI. SPOTŘEBUJTE DO DATA UVEDENÉHO NA HORNÍ STRANĚ PYTLE.

(RO) FĂINĂ DE GRÂU MOALE TIP 00
INGREDIENTE: FĂINĂ DE **GRÂU** MOALE. POATE CONTINE URME DE **SOIA**, **MUȘTAR** ȘI **LUPIN**. UMIDITATE MAXIMĂ 15,50%. A SE PĂSTRA ÎN LOC USCAT ȘI RĂCOROS. PRODUSUL POATE PIERDE ÎN GREUTATE ÎN MOD NATURAL. A SE CONSUMA DE PREFERINȚĂ ÎNAINTE DE: VEZI DATA ÎNSCRIPȚIONATĂ PE PARTEA SUPERIOARĂ A SACULUI.

Da consumarsi preferibilmente entro il: / Best Before:
Lotto: / Batch:

VALORI NUTRIZIONALI MEDI PER 100 g
AVERAGE NUTRITIONAL VALUES PER 100 g/INFORMACIÓN NUTRICTIONAL POR 100 g /VALOR NUTRICIONAL MÉDIO POR 100 g/NÄHRWERTINFORMAT-ION PRO 100 g/ VALEURS NUTRITIONELLES MOYENNES POUR 100 g/GENNEMSNITLING NÆRINGSVÆRDI FOR 100 g/GEMIDDELDE VOEDINGSWAARDE PER 100 g/ NÄRINGSVÄRDE PER 100 g/ ΤΥΠΙΚΗ ΔΙΑΤΡΟΦΙΚΗ ΑΞΙΑ ΑΝΑ 100 ΓΡ/ PRÚMERNÉ VÝŽIVOVÉ HODNOTY VE 100 g/ VALORI NUTRIȚIONALE MEDII PENTRU 100 g

		RI% **
ENERGIA	**1479 kJ / 348 kcal**	**17%**
ENERGY/VALOR ENERGÉTICO/VALOR ENERGÉTICO/ENERGIE/ VALEUR ÉNÉRGETIQUE/ENERGI/ENERGI/ENERGIE/ENERGETISCHE WAARDE/ENEPTEIA/ENERGETICKÁ HODNOTA/VALOAREA ENERGETICĂ		
GRASSI	**0,9 g**	**1%**
FAT/GRASAS/GORDURAS/FETT/GRAISSES/FEDT/VETTEN/FET-T/MÍHITUKY/GRASIME		
DI CUI ACIDI GRASSI SATURI	**0,1 g**	**0,5%**
OF WHICH SATURATES/DE LAS CUALES ÁCIDOS GRASOS SATURADOS/SENDO SATURADAS/DAVON GESÄTTIGTE FETTSÄUREN/DONT ACIDES GRAS SATURÉS/HERAF MÆTTET FEDTSYRER/WAARVAN VERZADIGDE VETZUREN/VARAV MÄTTAT FETT/ΑΠΟ ΤΑ ΟΠΟΙΑ ΚΟΡΕΣΜΕΝΑ/NASYCENÉ MASTNÉ KYSELINY/ACI-ZI GRAȘI SATURAȚI		
CARBOIDRATI	**73 g**	**28%**
CARBOHYDRATE/HIDRATOS DE CARBONO/CARBOIDRATOS /KOLHENHYDRATE/GLUCIDES/KULHYDRAT/KOOLHYDRA-TEN/KOLHYDRAT/ΥΔΡΟΓΟΝΑΝΘΡΑΚΕΣ/SACHARIDY/GLUCIDE		
DI CUI ZUCCHERI	**1,0 g**	**1%**
OF WHICH SUGARS/DE LOS CUALES AZÚCARES/SENDO DE AÇÚCARES/DAVON ZUCKER/DONT SUCRES/HERAF SUKKER/WAARVAN SUIKER/VARAV SOCKERARTER/ΑΠΟ ΤΟΥΣ ΟΠΟΙΟΥΣ ΣΑΚΧΑΡΑ/Z TOHO CUKRY/DIN CARE ZAHARURI		
FIBRE	**2,2 g**	
FIBRE/FIBRA ALIMENTARIA/FIBRAS/BALLASTSTOFFE/FIBRES/FIBER/ VEZELS / FIBER/INEZ/VLÄKNINY/FIBRE		
PROTEINE	**11,0 g**	**22%**
PROTEIN/PROTEÍNAS/PROTEÍNAS/EIWEIß/PROTÉINES/ PROTEIN/EIWITTEN/PROTEIN/ΠΡΩΤΕΙΝΗ/BÍLKOVINY/PROTEINE		
SALE*	**0,002 g**	**0%**
SALT/SAL/SAL/SALZ/SEL/SALT/ZOUT/SALT/AΛΑΤΙ/SÓL/SARE		

* IL CONTENUTO DI SALE È DOVUTO ESCLUSIVAMENTE AL SODIO NATURALMENTE PRESENTE.
* THE SALT CONTENT IS EXCLUSIVELY DUE TO SODIUM NATURALLY PRESENT.
**RI%: ASSUNZIONI DI RIFERIMENTO DI UN ADULTO MEDIO (8400 KJ/2000 KCAL)
**RI%: REFERENCE INTAKE OF AN AVERAGE ADULT (8 400 KJ/ 2 000 KCAL)

FROLLA 00

8 033772 090247

PRODOTTO E CONFEZIONATO DA:
PRODUCED AND PACKED BY :
ΠΑΡΑΓΕΤΑΙ ΚΑΙ ΣΥΣΚΕΥΑΖΕΤΑΙ ΑΠΟ:
MOLINO DALLAGIOVANNA G.R.V. SRL
29010 GRAGNANO TREBBIENSE (PC) ITALY
LOCALITÀ PIASTRO, 2
TEL. (+39) 0523 787155 | FAX (+39) 0523 787450
DALLAGIOVANNA.IT | SHOPDALLAGIOVANNA.IT

1kg e (2.2 lb / 1 KG)
PESO NETTO / NET WEIGHT / PESO NETO / PESO LÍQUIDO / NETTOGEWICHT / POIDS NET NETTOVÆGT / NETTO GEWICHT / NETTOVIKT / ΚΑΘΑΡΟ ΒΑΡΟΣ / ČISTÁ HMOTNOST / GREUTATE NETĂ

PAP 22 SACCHETTO CARTA Raccolta CARTA | PAPER BAG PAPER Recycling

COD. 005

MARRONE 4625 C
VERDE 356 C
GRIGIO 7536 C
NERO
CYAN
MAGENTA
GIALLO

Pantone 4625 C
Pantone 7536 C
Pantone 213 U
Nero
Cyan
Magenta
Giallo

IMPORTANTE: sulle bozze che inviamo, da restituire firmate per accettazione o corredate di eventuali modifiche, il controllo della correttezza degli elementi grafici, dei testi, delle diciture e della corrispondenza di tutto ciò con eventuali campioni di riferimento **è esclusivamente a carico del cliente.** Pertanto, Cartotecnica Postumia non si assume responsabilità alcuna per eventuali errori od omissioni nella stampa del prodotto finito, derivanti dalla mancanza di tale controllo.

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

17 mm | 60 mm | 100 mm | 60 mm | 100 mm

Data: / Date: / Datum:
22.05.2020

SACCO VALVO S.p.A.

Ordine Nr.: / Purchase Nr.: / Bestellung Nr.: **2020/1215**

Codice Cliente Nr. / Articolo Nr.: / Customer Code Nr: / Kunden Nr.: **1001802/ Art.0109**

Tipo di stampa: / Printing type: / Druck Typ: **SINGOLA**

Cliente: / Customer: / Kunde: **MOLINO DALLAGIOVANNA**

Soggetto: / Product: / Produkt: **25KG LA TRIPLOZERO PASTA FRESCA GIALLO**

Revisione: / Revision: **00 /13**

Formato - cm: / Dimension (Size) - cm: / Format - cm: **50x57+13 - VALVOLA - Riporto SX cm. 11**

Taglio / Passo stampa cm: / Cut cm: **74**

Spessore cliché - Sacco: / Cliché thickness - Bag: / Dicke des Klischees - Sack: **2,84 mm**

Spessore cliché - Fondelli: / Cliché thickness - Bottoms: / Dicke des Klischees - Boden: **5,50 mm**

Versione Lavoro: / Job Versione: **03**

Lineatura fotopolimero - Sacco: / Fotopolimer screen - Bag: / Rasterweite - Sack: **00#**

Lineatura fotopolimero - Fondelli: / Fotopolimer screen - Bottoms: / Rasterweite - Boden: **00#**

Scala: / Scale: **1 : 1**

☐ Approvato / Approved / Bestatiget

☐ Approvato con modifiche / Approved with amendments / Bestatiget mit Änderungen

☐ Rifare bozza / Make another proof / Zu machen ein anden Druckbild

☐ Modifica Pantoni Colori / Amendments Colours / Änderungen des Faben

ULTIMA MODIFICA

Data: / Date: / Datum: **22.05.2020**

Conferma del cliente: / Confirmed by the Customer: / Bestätigung aus der Kunden:

Data Conferma: / Date Confirmed: / Datum Bestätigung: **__ / __ / 2020**

Colori stampa: / Print colors: / Druckfarben: **Sacco / Bag / Sack:**

- CIANO/U
- MAGENTA/U
- GIALLO/U
- NEROU
- MARRONE 4625/U
- GIALLO 108/U
- VERDE 356/U
- Colore Pantone/U

Colori stampa: / Print colors: / Druckfarben: **Fondello / Bottom / Boden:**

- MARRONE 4625/U
- GIALLO 108/U
- Colore Pantone/U
- Colore Pantone/U

Colori stampa: / Print colors: / Druckfarben: **Fondello / Bottom / Boden:**

- MARRONE 4625/U
- GIALLO 108/U
- Colore Pantone/U
- Colore Pantone/U

IMPORTANTE:
IMPORTANT:
WICHTIGER HINWEIS:

Le tonalità rappresentate nel bozzetto sono puramente indicative, fa fede il numero di pantone indicato.

The cotours in this printinstruction are not completely the same as the real printing cotours, therefore they must be considered as purely indicative ones.

Die Farben in dieser Druckinstruktion ist nicht die selbe, wie in Produktionsfarben ververwendt werden, daher müssen diese Farben nur als Indikatoren angesehen werden.

Valvosacco declina ogni responsabilità causata da errori di impostazione dopo l'approvazione della bozza stampa a colori. Risponde solo di eventuali difetti di cliché.

Valvosacco declines all responsibility due to any mistakes found out after the cotor proof has been approved.

The Valvosacco Company will be held responsible only for defects of the printing plate.

far pasta

MOLINO DALLAGIOVANNA

far pasta

far pasta

LA TRIPLOZERO®

FARINA DI GRANO TENERO TIPO 00

LA TRIPLOZERO®

SPECIALE PER PASTA FRESCA*

PER USO PROFESSIONALE

UMIDITÀ MAX 15,50%.

Conservare in luogo fresco ed asciutto. Prodotto soggetto a calo di peso naturale.
Da consumarsi preferibilmente entro il: vedi data impressa sul lato del sacco.

EN SOFT WHEAT FLOUR TYPE 00 SPECIAL FOR FRESH PASTA* FOR PROFESSIONAL USE

HUMIDITY MAX 15,50%. Store in a cool and dry place. Product subject to natural loss of weight. Best before: see date printed on a side of the bag.

ES HARINA DE TRIGO TIERNO TIPO 00 ESPECIAL PARA PASTA FRESCA* PARA USO PROFESIONAL

HUMEDAD MÁX 15,50%. Conservar en un lugar fresco y seco. Producto sujeto a diminución de peso natural. Debe consumirse pre-ferentemente antes de la fecha impresa en el lado del saco.

FR FARINE DE BLE TENDRE TYPE 00 SPÉCIALE POUR LA PATE FRAICHE* POUR USAGE PROFESSIONNEL

HUMIDITE MAX 15,50%. A conserver dans un lieu frais et sec. Produit soumis à une diminution naturelle du poids. A consommer de préférence avant le: voir date imprimée sur le côté du sac.

DE WEICHWEIZENMEHL TYP 00 SPEZIELL FÜR FREISCHE TEIGWAREN* FÜR DEN PROFESSIONELLENGEBRAUCH

MAX. FEUCHTIGKEIT 15,50%. An einem kühlen und trockenen Ort aufbewahren. Das Produkt unterliegt natürlichem Gewichtsverlust. Mindestens haltbar bis: siehe Datumsstem-pel auf der Seite der Tasche.

PT FARINHA DE GRÃO TENRO TIPO 00 ESPECIAL PARA MASSA FRESCA* PARA USO PROFESSIONAL

HUMIDADE MAX 15,50%. Conservar em local fresco e seco. Produto sujeito a reduçao natural de peso. Valido até: ver data impressa na lateral do saco.

DA MEL AF BLØD HVEDE TYPE 00 SPECIELT TIL FRESK PASTA* TIL PROFESSIONEL BRUG

MAX FUGTIGHEDSINDHOLD 15,50% Opbevaring tØrt ikke for varmt. Produktets vægt reduceres naturligt. Mindts holdbar til: se datomærkningen på pakkens side.

***RICETTA ORIGINALE MOLINO DALLAGIOVANNA**
ORIGINAL MOLINO DALLAGIOVANNA RECIPE - RECETA ORIGINAL MOLINO DALLAGIOVANNA
RECETTE ORIGINALE MOLINO DALLAGIOVANNA - ORIGINALREZEPET MOLINO DALLAGIOVANNA
RECEITA ORIGINAL MOLINO DALLAGIOVANNA - OPRINDELIG OPSKRIFT MOLINO DALLAGIOVANNA

Prodotto e confezionato da:
PRODUCED AND PACKED BY/ FABRICADO Y ACONDICIONADO POR/ PRODUIT ET CONDITIONNE PAR/ HERGESTELLT UNDVERPACKT VON/ PRODUZIDO E CONFECCIONADO POR/ FREMSTILLET OG PAKKET AF:

MOLINO DALLAGIOVANNA G.R.V. srl
29010 GRAGNANO TREBBIENSE (PC) - ITALY
LOCALITÀ PILASTRO, 2
Tel: (+39) 0523-787155 Fax: (+39) 0523-787450
DALLAGIOVANNA.IT

25kg (55lb)

PESO NETTO / NET WEIGHT / PESO NETO / POIDS NET / NETTOGEWICHT / PESO LÍQUIDO / NETTOVÆGT

Sacco di pura cellulosa, esente da fibre riciclate, perfettamente rispondente al D.M. del 21-3-73 e successivi, per cui particolarmente idoneo all'imballaggio di FARINE per ALIMENTAZIONE UMANA.

VALVOSACCO S.p.A. Via Sabino, 2 - 60035 JESI (AN) Tel. 0731/2451 Fax 0731/58704

Comieco Codice Ateco C 17.1

IL SACCO DI CARTA RISPETTA L'AMBIENTE

IMP.22 SACCHETTO CARTA Raccolta CARTA PAPIER BAG Recycling PAPIER

LOTTO

FARINA TIPO 00

Suggerimento di presentazione•Recommended presentation

LOTTO

FARINA TIPO 00

MOLINO DALLAGIOVANNA

far pasta

IT INGREDIENTI: farina di **GRANO** tenero. Può contenere tracce di **SOIA**, **SENAPE** e **LUPINI.**
La tipologia di farina confezionata è impressa sul lato del sacco.Istruzioni per l'uso: richiedere la scheda tecnica prima dell'utilizzo del prodotto.
EN INGREDIENTS: soft **WHEAT** flour. May contain traces of **SOY**, **MUSTARD** and **LUPIN.**
The flour type packaged is printed on a bag side.Instructions for use: request the technical data sheet before using the product.
ES INGREDIENTES: harina de **TRIGO** tierno. Puede contener trazas de **SOJA, MOSTAZA** y **ALTRAMUCES.**
La tipologia de harina envasada esta imprimida sobre el lado del saco.Modo de empleo: solicitar la ficha técnica antes de utilizar el producto.
FR INGREDIENTS: farine de **BLE** tendre. Elle peut contenir des traces de **SOJA**, **MOUTARDE** et de **LUPIN.**
La typologie de farine conditionnée est imprimée sur le côté du sac.Mode d'emploi: demander la fiche technique avant d'utiliser le produit.
DE ZUTATEN: Weich**WEIZEN**mehl. Kann Spuren von **SOJA**, **SENF** und **LUPINEN** enthalten.
Der verpackte Mehltyp ist auf der Seite des Sackes eingeprägt.Gebrauchsanleitung: Anfragen das Technisches Datenblatt, bevor das Produkt verwendet.
PT INGREDIENTES: farinha de **GRÃO** tenro. Pode conter vestígios de **SOJA**, **MOSTARDA** e **TREMOÇO**.
O tipo de farinha embalado está impresso no lado do pacote.Modo de emprego: solicitar la ficha técnica antes de utilizar o producto.
DA INGREDIENSER: **HVEDE**mel. Kan indeholde spor af **SOJA**, **SENNEP** og **LUPIN.**
Den emballerede type mel er anført på siden af posen.Brugsanvisning: anmode databladet, før du bruger produktet.

VALORI NUTRIZIONALI MEDI PER 100 g
Average nutritional values per 100 g / Información nutricional por 100 g / Valeurs nutritionnelles moyennes pour 100 g / Nährwertinformation pro 100 g / Valores nutricionais médios por 100 g / Gennemsnitlig næringsværdi for 100 g

Energia ..... Energy / Valor energético / Valeur énérgetique / Energie / Valor energético / Energi	**1479 kJ / 348 kcal**
Grassi ..... Fat / Grasas / Graisses / Fett / Gorduras / Fedt	**0,9 g**
di cui saturi ..... of which saturates / de las cuales ácidos grasos saturados / dont acides gras saturés / davon gesättigte Fettsäuren / sendo saturadas / heraf mættet	**0,1 g**
Carboidrati ..... Carbohydrate / Hidratos de carbono / Glucides / Kohlenhydrate / Carboidratos / Kulhydrater	**73,0 g**
di cui zuccheri ..... of which sugars / de los cuales azúcares / dont sucres / davon Zucker / sendo de açúcares / heraf sukker	**1,0 g**
Fibre ..... Fibre / Fibra alimentaria / Fibres / Ballaststoffe / Fibras / Fiber	**2,2 g**
Proteine ..... Protein / Proteínas / Protéines / Eiweiß / Proteínas / Protein	**11,0 g**
Sale* ..... Salt / Sal / Sel / Salz / Sal / Salt	**0,002 g**

*Il contenuto di sale è dovuto esclusivamente al sodio naturalmente presente.
*El contenido de sal corresponde exclusivamente al sodio naturalmente presente.
*El contenido de sal corresponde exclusivamente al sodio naturalmente presente.
*Le teneur en sel est exclusivement due au sodium naturellement présent.
*Der Salzgehalt entspricht ausschließlich dem natürlich vorhandenen Natrium.
* O conteúdo de sal é devido exclusivamente ao sódio naturalmente presente
*Saltindholdet skyldes udelukkende det naturlige natr.

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

Data: / Date: / Datum:
15.05.2020

Ordine Nr.: / *Purchase Nr.:* / *Bestellung Nr.:* **2020/1175**

Codice Cliente Nr. / Articolo Nr.: / *Customer Code Nr:* / *Kunden Nr.:* **1001802/ Art.0140**

Tipo di stampa: / *Printing type:* / *Druck Typ:* **SINGOLA**

Cliente: / *Customer:* / *Kunde:* **MOLINO DALLAGIOVANNA G.R.V. S.R.L.**

Soggetto: / *Product:* / *Produkt:* **25KG FAR PIZZA LA NAPOLETANA**

Revisione: / *Revision:* **00 /19**

Formato - cm: / *Dimension (Size)* - cm: / *Format* - cm: **50x57+13 - Valvola - Riporto SX cm. 11**

Taglio / *Passo stampa cm:* / *Cut cm:* **74**

Spessore cliché - Sacco: / *Cliché thickness - Bag:* / *Dicke des Klischeés - Sack:* **2,84 mm**

Spessore cliché - Fondelli: / *Cliché thickness - Bottoms:* / *Dicke des Klischeés - Boden:* **5,00 mm**

Versione Lavoro: / *Job Versione:* **01**

Lineatura fotopolimero - Sacco: / *Fotopolimer screen - Bag:* / *Rasterweite - Sack:* **28/32#**

Lineatura fotopolimero - Fondelli: / *Fotopolimer screen - Bottoms:* / *Rasterweite - Boden:* **00#**

Scala: / *Scale:* **1 : 1**

☐ Approvato / *Approved* / *Bestatiget*

☐ Approvato con modifiche / *Approved with amendments* / *Bestatiget mit Änderungen*

☐ Rifare bozza / *Make another proof* / *Zu machen ein anden Druckbild*

☐ Modifica Pantoni Colori / *Amendments Colours* / *Änderungen des Faben*

ULTIMA MODIFICA

Data: / Date: / Datum: **18.05.2020**

Conferma del cliente: / *Confirmed by the Customer:* / *Bestätigung aus der Kunden:*

Data Conferma: / Date *Confirmed:* / Datum *Bestätigung:* **__ / __ / 2020**

Colori stampa: / *Print colors:* / *Druckfarben:*
Sacco / *Bag* / *Sack:*

- CYAN
- MAGENTA
- GIALLO
- NERO
- BLU Reflex/U
- AZZURRO 298/U
- MARRONE 4625/U
- ORO 871/U

Colori stampa: / *Print colors:* / *Druckfarben:*
Fondello / *Bottom* / *Boden:*

- AZZURRO 298/U
- BLU Reflex/U
- Colore Pantone/U
- Colore Pantone/U

Colori stampa: / *Print colors:* / *Druckfarben:*
Fondello / *Bottom* / *Boden:*

- AZZURRO 298/U
- BLU Reflex/U
- Colore Pantone/U
- Colore Pantone/U

IMPORTANTE:
IMPORTANT:
WICHTIGER HINWEIS:

Le tonalità rappresentate nel bozzetto sono puramente indicative, fa fede il numero di pantone indicato.

The cotours in this printinstruction are not completely the same as the real printing cotours, therefore they must be considered as purely indicative ones.

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Valvosacco declines all responsibility due to any mistakes found out after the cotor proof has been approved.

The Valvosacco Company will be held responsible only for defects of the printing plate.

PER PIZZA
Napoletana
MOLINO DALLAGIOVANNA

FARINA DI GRANO TENERO TIPO 00 SPECIALE PER PIZZA*

Napoletana

Da quasi duecento anni di arte, mestiere e passione, ecco la farina perfetta per esaltare le eccellenze della Pizza Napoletana: il cornicione puntinato e il sapore dei migliori ingredienti al mondo.

PER USO PROFESSIONALE
UMIDITÀ MAX 15,50%. Conservare in luogo fresco ed asciutto. Prodotto soggetto a calo di peso naturale. Da consumarsi preferibilmente entro il: vedi data impressa sul lato del sacco.

EN SPECIAL SOFT WHEAT FLOUR TYPE 00 FOR NEAPOLITAN PIZZA*

A result of almost two hundred years of art, expertise and passion, this is the perfect flour to bring out excellent characteristics of Neapolitan Pizza: the charred, bubbly outer crust and the finest ingredients in the world.

FOR PROFESSIONAL USE
HUMIDITY MAX 15,50%. Store in a cool and dry place. P roduct subject to natural loss of weight. Best before: see date printed on a side of the bag.

ES HARINA DE TRIGO TIERNO TIPO 00 ESPECIAL PARA PIZZA NAPOLITAN*

Con casi doscientos años de arte, oficio y pasión, esta es la harina perfecta para destacar las excelencias de la Pizza Napolitana: la corteza moteada y el sabor de los mejores ingredientes del mundo.

PARA USO PROFESIONAL
HUMEDAD MAX 15,50%. Conservar em local fresco e seco. Produito sujeito a diminución de peso natural. Consumir preferentemente antes de: ver fecha impresa en el lateral de la bolsa:

FR FARINE DE BLE TENDRE TYPE 00 SPÉCIAL POUR PIZZA NEAPOLITAINE*

Depuis presque deux cents ans d'art, de métier et de passion, voilà la farine parfaite pour valoriser les excellentes qualités de la Pizza Napolitaine: le bord surélevé et le goût des meilleurs ingrédients du monde.

POUR USAGE PROFESSIONNEL
HUMIDITE MAX 15,50%. Conserver dans un endroit frais et sec. Produit soumis à une diminution naturelle du poids. A consommer de préférence avant le: voir date imprimée sur le côté du sac.

DE WEICHWEIZENMEHL TYP 00 SPEZIELL FÜR PIZZA AUF NEAPOLITANISCHE ART*

Seit fast zweihundert Jahren Kunst, handwerk und Leidenschaft entsteht das perfekte Mehl, das die Vorzüglichkeit der Pizza auf neapolitanische Art hervorhebt: der gepunktete Pizzarand und der Geshmack der besten Zutaten der Welt.

FÜR DEN PROFESSIONELLEN GEBRAUCH
MAX FEUCHTIGKEIT 15,50%. An einen kühlen und trockenen Ort aufbewahren. Das Produkt unterliegt natürlichem Gewichtsverlust. Mindestens haltbar bis: siehe Datumsstempel auf der Seite der Tasche.

PT FARINHA DE GRÃO TENRO TIPO 00 ESPECIAL PARA PIZZA NAPOLITANA*

Quase duzentos anos de arte, profissão e paixão, e eis aqui a farinha perfeita para exaltar a excelência da Pizza Napolitana: borda alta e o sabor dos melhores ingredientes do mundo.

PARA USO PROFISSIONAL
UMIDADE MAX 15,50%. Conserver em local fresco e seco. Produto sujeito a perta natural de peso. Consumir de preferência antes de: veja a data impressa na parte lateral da embalagem.

DA MEL AF BLØD HVEDE TYP 00 SPECIELT TIL NAPOLETANSK PIZZA*

I næsten 200 år har vi med kundskab, håndværk og passion skabt det perfekte mel til at fremhæve den napolitanske pizzas skønne smag: den sprøde skorpe og smagen af de bedste råvarer i verden.

TIL PROFESSIONEL BRUG
MAKS. FUGTINDHOLD15,50%. Opbevares på et køligt og tørt sted. Produktet er genstand for et naturligt vægttab. Mindst holdbar til: se dato på posens side.

***RICETTA ORIGINALE MOLINO DALLAGIOVANNA**
ORIGINAL MOLINO DALLAGIOVANNA RECIPE - RECETA ORIGINAL MOLINO DALLAGIOVANNA
RECETTE ORIGINALE MOLINO DALLAGIOVANNA - ORIGINALREZEPET MOLINO DALLAGIOVANNA
RECEITA ORIGINAL MOLINO DALLAGIOVANNA - OPRINDELIG OPSKRIFT MOLINO DALLAGIOVANNA

CAST ALIMENTI

APPROVATO VERA PIZZA Napoletana APPROVED

Prodotto e confezionato da:
PRODUCED AND PACKED BY/ FABRICADO Y ACONDICIONADO POR/ PRODUIT ET CONDITIONNE PAR/ HERGESTELLT UNDVERPACKT VON/ PRODUZIDO E CONFECCIONADO POR/ FREMSTILLET OG PAKKET AF:

MOLINO DALLAGIOVANNA G.R.V. SRL
29010 GRAGNANO TREBBIENSE (PC) - ITALY
LOCALITÀ PILASTRO, 2
Tel: (+39) 0523-787155 Fax: (+39) 0523-787450
DALLAGIOVANNA.IT

25kg (55lb)

PESO NETTO / NET WEIGHT / PESO NETO / POIDS NET / NETTOGEWICHT / PESO LIQUIDO / NETTOVÆGT

PER PIZZA
Napoletana

BATCH

WHEAT FLOUR TYPE

per pizza
ideal for pizza

MOLINO DALLAGIOVANNA
FAR FARINA DAL 1832
ITALIA

FARINA DI GRANO TENERO TIPO 00 PER PIZZA

APPROVATO VERA PIZZA Napoletana APPROVED

Napoletana

FARINA DI GRANO TENERO TIPO

LOTTO

8 033772 090650

DALLAGIOVANNA ONITICH

PER PIZZA
Napoletana

MOLINO DALLAGIOVANNA
PER PIZZA
Napoletana

IT INGREDIENTI: farina di **GRANO** tenero. Può contenere tracce di **SOIA, SENAPE** e **LUPINO**.
La tipologia di farina confezionata è impressa sul lato del sacco. Istruzioni per l'uso: richiedere la scheda tecnica prima dell'utilizzo del prodotto.
EN INGREDIENTS: **soft WHEAT** flour. May contain traces of **SOY, MUSTARD** and **LUPIN**.
The flour type packaged is printed on a bag side. Instructions for use: request the technical data sheet before using the product.
ES INGREDIENTES: harina de **TRIGO** tierno. Puede contener trazas de **SOJA, MOSTAZA** y **ALTRAMUZ**.
El tipo de harina empaquetada está impreso en lado de paquete. Modo de empleo: solicitar la ficha técnica antes de usar el producto.
DA INGREDIENSER: **HVEDE**mel. Kan indeholde spor af **SOJA, SENNEP** og **LUPIN**.
Den emballerede type mel er anført på sidon af posen.Brugsanvisning: anmoda datablad, før du bruger produktet.
PT INGREDIENTES: farinha de **GRÃO** tenro. Pode conter vestígios de **SOJA, MOSTARDA** e **TREMOÇO**.
O tipo de farinha embalado está impresso no lado do pacote. Modo de emprego: solicitar a ficha técnica antes de usar o produto.
Der verpackte Mehltyp ist auf der Seite des Sackes eingedruckt. Gebrauchsanleitung: Anfragen das Technisches Datenblatt, bevor dich Produkt verwenden.

VALORI NUTRIZIONALI MEDI PER 100 g Average nutritional values per 100 g / Información nutricional por 100 g / Valeurs nutritionelles moyennes pour 100 g / Nährwertinformation pro 100 g / Valor nutricional médio por 100 g / Gennemsnitling næringsvaerdi for 100 g	
Energia / Energy / Valor energético / Valor energético / Energie / Valeur énérgetique / Energi	**1436 kJ / 343 kcal**
Grassi / Fat / Grasas / Gorduras / Fett / Graisses / Fedt	**0,8 g**
di cui saturi / of which saturates / de las cuales ácidos grasos saturados / sendo saturadas / cavon gesättigte Fettsäuren / dont acides gras saturés / heraf mættet	**0,1 g**
Carboidrati / Carbohydrate / Hidratos de carbono / Carboidratos / Kohlenhydrate / Glucides / Kulhydrater	**73,0 g**
di cui zuccheri / of which sugars / de los cuales azúcares / sendo de açúcares / cavon Zucker / dont sucres / heraf sukker	**1,0 g**
Proteine / Proteínas / Proteínas / Eiweiß / Protéines / Protein	**11,0 g**
Sali / Sal / Sal / Salz / Sel / Salt	**0,02 g**

*"Il contenuto reale può differire leggermente dai valori medi nutrizionali presenti.
"The real content may differ slightly from the average nutritional values present.
"El contenido de la mezcla puede corresponder exclusivamente al sodio naturalmente presente.
"Der tatsächliche Inhalt kann geringfügig von den durchschnittlichen Nährwerten abweichen.
Ce contenu réel peut légèrement différer des valeurs nutritionnelles moyennes présentes.
"Det faktiske indhold kan afvige lidt fra de gennemsnitlige næringsværdier der er til stede.
"Le contenu réel peut légèrement différer des valeurs nutritionnelles moyennes présentes.
"Det faktiske indhold kan afvige lidt fra de gennemsnitlige næringsværdier der er til stede.*

DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED

Claudio Innocenti

Imported by

SOFT WHEAT FLOUR
Type 00 LA TRIPLOZERO

PRODUCED IN ITALY

Ingredients: soft WHEAT flour type 00.
May contain trace of SOY.

Best Before: see the date printed on the bag side.

Net Weight
25 kg/lb 55,10

Nutrition Facts

833 servings per container
Serving size 1/4 cup (30g)

Amount per Serving	
Calories	**100**
	% Daily Value *
Total Fat 0g	**0%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 0,2mg	**0%**
Total Carbohydrate 22g	**8%**
Dietary Fibre 0,7 g	**2,5%**
Total Sugars 0,3 g	
Includes 0 g Added Sugars	**0%**
Protein 3 g	
Vitamin D 0,1 mcg	0 %
Calcium 0 mg	0 %
Iron 0,3 mg	2 %
Potassium 30 mg	0 %

* The Daily value (DV) tells you how much a nutrient in a serving of food
contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.

Plain Wheat Flour

FINAL RESULTS

Industry	Product	Code
Whole Grain/Milled Grain Prod/Starch	Wheat Flour / Paper / NEC / Wheat Flour, Plain	02 E F Y 15

Start Over | Previous | Print

Enriched All Purpose Wheat Flour

FINAL RESULTS

Industry	Product	Code
Whole Grain/Milled Grain Prod/Starch	Wheat Flour / Paper / NEC / Wheat Flour, Enriched (All Purpose)	02 E F Y 05

Start Over Previous Print

Durum Wheat Flour

FINAL RESULTS

Industry	Product	Code
Whole Grain/Milled Grain Prod/Starch	Wheat Flour / Paper / NEC / Wheat Flour, Durum	02 E F Y 04

Start Over Previous Print

Whole Wheat Flour

FINAL RESULTS

Industry	Product	Code
Whole Grain/Milled Grain Prod/Starch	Wheat Flour / Paper / NEC / Wheat Flour, Whole	02 E F Y 13

Start Over | Previous | Print

Gluten Free Option

FINAL RESULTS

Industry	Product	Code
Whole Grain/Milled Grain Prod/Starch	Other Flour/Milled Products / Plastic, Synth / NEC / Flours and Meals N.E.C.	02 G G Y 99

Start Over Previous Print

Search Results

FEI Number	Firm Name	Physical Address	Mailing Address
3012959860	MOLINO DALLA GIOVANNA GRV SRL	Localita Pilastro 2, Gragnano Trebbiense, Piacenza, 29010, IT	Localita Pilastro 2, Gragnano Trebbiense, Piacenza, 29010, IT

U.S. FOOD & DRUG ADMINISTRATION
CENTER FOR FOOD SAFETY & APPLIED NUTRITION

Date:11/12/2020 18:46:53

Created Date
2013-06-16 18:45:15.0

Created by
mol15940

Registration Expiration Date
2022-12-31

Registration Renewed Date
2020-11-12

Last Updated
2020-11-12

Registration Status Reason
Biennial Registration Renewal - 2018

Registration Status
VALID

Is this facility engaged in the manufacturing/processing, packing, or holding of food for human or animal consumption in the United States?

(●) Yes ( ) No

Section 1: Type of Registration

Facility Location: **Foreign Registration**

UPDATE OF REGISTRATION INFORMATION:

Registration Number: **10558094792** Pin No **FCD02cB7**

Are you the new owner of a previously registered facility?

( ) Yes (●) No

Previous Owner's Title:

Previous Owner's Name:

Previous Owner's Registration Number:

Section 2: Facility Name/Address Information

Facility Name
MOLINO DALLAGIOVANNA G.R.V. SRL

Telephone Number
039 0523 787155

Facility Name Suffix
Company

Fax Number
039 0523 787450

Facility Street Address, Line 1
VIA MADONNA DEL PILASTRO 2

E-Mail Address
costanza@dallagiovanna.it

Facility Street Address, Line 2

Unique Facility Identifier (UFI)
432896892

City
GRAGNANO TREBBIENSE

State/Province/Territory
Piacenza

Zip Code (Postal Code)
29010

Country/Area
ITALY

FDA U.S. FOOD & DRUG ADMINISTRATION
CENTER FOR FOOD SAFETY & APPLIED NUTRITION

Section 3: Preferred Mailing Address Information

Complete this section if different from Section 2 Facility Name/Address Information (OPTIONAL)

Is the preferred mailing address the same as the facility address (Section 2)? Yes

Name

MOLINO DALLAGIOVANNA G.R.V. SRL

Address, Line 1

VIA MADONNA DEL PILASTRO 2

Address, Line 2

City

GRAGNANO TREBBIENSE

State/Province/Territory

Piacenza

Zip Code (Postal Code)

29010

Country/Area

ITALY

Telephone Number

039 0523 787155

Fax Number

039 0523 787450

E-Mail Address

costanza@dallagiovanna.it

Section 4: Parent Company Name/Address Information

(If applicable and if different from Sections 2 and 3). If information is the same as another section, check which section:

◉ Same as Facility Address (Section 2)

○ Same as Preferred Mailing Address (Section 3)

○ None of the above

Company Name

MOLINO DALLAGIOVANNA G.R.V. SRL

Company Name Suffix

Company

Address, Line 1

VIA MADONNA DEL PILASTRO 2

Address, Line 2

City

GRAGNANO TREBBIENSE

State/Province/Territory

Piacenza

Zip Code (Postal Code)

29010

Country/Area

ITALY

Telephone Number

039 0523 787155

Fax Number

039 0523 787450

E-Mail Address

costanza@dallagiovanna.it

Section 5: Facility Emergency Contact Information

If information is the same as another section, check which section:

○ Same as Facility Address (Section 2)

◉ Same as U.S. Agent Information (Section 7)

○ None of the above

Individual's Title (Optional)

Emergency Contact Phone
001 718 7070606

Individual's Name (Optional)
PARAGONTAX

E-Mail Address
paragontax@hotmail.com

Individual's Middle Name (Optional)

Job Title (Optional)

Individual's Last Name (Optional)

Section 6: Trade Names

(If this facility uses trade names other than that listed in Section 2 above, list them below (e.g., "Also doing business as," "Facility also known as"))

Are there alternate trade names used by your facility in addition to the name provided in **Section 2: Facility Name/Address Information?**

◉ Yes

○ No

Alternate Trade Name #1: **MULINI S. GIORGIO**

Section 7: United States Agent

(To be completed by facilities located outside any state or territory of the United States, District of Columbia, or The Commonwealth of Puerto Rico)

Name
PARAGONTAX

Telephone Number
718 7070606

Address, Line 1
4612 Queens Blvd Ste 205

Emergency Contact Phone
718 7070606

Address, Line 2

Fax Number
718 7070166

City
Long Island City

E-Mail Address
paragontax@hotmail.com

State/Province/Territory
New York

Zip Code (Postal Code)
11104

Country/Area
UNITED STATES

Section 8: Seasonal Facility Dates of Operation (Optional)

Give the approximate dates that your facility is open for business, if its operations are on a seasonal basis (Optional).

Harvest 1

Start Month

End Month

Harvest 2

Start Month	End Month

Section 9: General Product Categories - Human/Animal/Both

☑ Food for Human Consumption	☐ Food for Animal Consumption

Section 9a: General Product Categories - Food for Human Consumption; and Type of Activity Conducted at the Facility

To be completed by all food facilities. Please see instructions for further examples. IF NONE OF THE MANDATORY CATEGORIES BELOW APPLY, SELECT BOX 37	Ambient Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks, grain elevators)	Refrigerated Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks)	Frozen Food Storage Warehouse / Holding Facility (e.g., storage facilities)	Acidified Food Processor	Low-Acid Food Processor	Interstate Conveyance Caterer / Catering Point	Contract Sterilizer	Labeler / Relabeler	Manufacturer / Processor	Packer / Repacker	Salvage Operator (Reconditioner)	Farm Mixed-Type Facility	Other Activity Conducted (Please Specify)
3.BAKERY PRODUCTS, DOUGH MIXES, OR ICINGS[21 CFR 170.3 (n) (1), (9)]	☐	☐	☐	☐	☐	☐	☐	☑	☑	☑	☐	☐	☑
6.CEREAL PREPARATIONS, BREAKFAST FOODS, QUICK COOKING / INSTANT CEREALS[21 CFR 170.3 (n) (4)]	☐	☐	☐	☐	☐	☐	☐	☑	☑	☑	☐	☐	☑
36.WHOLE GRAINS, MILLER GRAIN PRODUCTS (FLOURS), OR STARCH[21 CFR 170.3 (n) (1), (23)]	☐	☐	☐	☐	☐	☐	☐	☑	☑	☑	☐	☐	☑

To be completed by all food facilities. Please see instructions for further examples. IF NONE OF THE MANDATORY CATEGORIES BELOW APPLY, SELECT BOX 37	Ambient Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks, grain elevators)	Refrigerated Food Storage Warehouse / Holding Facility (e.g., storage facilities, including storage tanks)	Frozen Food Storage Warehouse / Holding Facility (e.g., storage facilities)	Acidified Food Processor	Low-Acid Food Processor	Interstate Conveyance Caterer / Catering Point	Contract Sterilizer	Labeler / Relabeler	Manufacturer / Processor	Packer / Repacker	Salvage Operator (Reconditioner)	Farm Mixed-Type Facility	Other Activity Conducted (Please Specify)
37.IF NONE OF THE ABOVE FOOD CATEGORIES APPLY, THEN PRINT THE APPLICABLE FOOD CATEGORY OR CATEGORIES (THAT DOES NOT OR DO NOT APPEAR ABOVE)	☐	☐	☐	☐	☐	☐	☐	☑	☑	☑	☐	☐	☑

If the food categories listed above do not apply, then print the applicable food category or categories.

GLUTEN-FREE FLOURS AND CEREAL PRODUCTS

Other Activity Conducted

DISTRIBUTION AND SALES OF THE PRODUCTS

Section 10: Owner, Operator, or Agent-in-Charge Information

Provide the following information, if different from all other sections on the form. If information is the same as another section of the form, check which section:

If information is the same as Section 2, check the box:

- ○ Section 2 - Facility Address Information
- ○ Section 3 - Preferred Mailing Address Information
- ○ Section 4 - Parent Company Address Information
- ◉ Section 7 - US Agent Address Information
- ○ None of the above

Name of Entity or Individual Who is the Owner, Operator, or Agent-in-Charge: PARAGONTAX

Address, Line 1

4612 Queens Blvd Ste 205

Address, Line 2

Telephone Number

001 718 7070606

Fax Number

001 718 7070166

City
Long Island City

E-Mail Address
paragontax@hotmail.com

State/Province/Territory
New York

Zip Code (Postal Code)
11104

Country/Area
UNITED STATES

Section 11: Inspection Statement

☑FDA will be permitted to inspect the facility at the time and in the manner permitted by the Federal Food, Drug, and Cosmetic Act.

Section 12: Certification Statement

The owner, operator, or agent-in-charge of the facility, or an individual authorized by the owner, operator, or agent-in-charge of the facility, must submit this form. By submitting this form to FDA, or by authorizing an individual to submit this form to FDA, the owner, operator, or agent-in-charge of the facility certifies that the above information is true and accurate. An individual (other than the owner, operator or agent-in-charge of the facility) who submits the form to the FDA also certifies that the above information submitted is true and accurate and that he/she is authorized to submit the registration on the facility's behalf. An individual authorized by the owner, operator, or agent-in-charge must below identify by name the individual who authorized submission of the registration. Under 18 U.S.C 1001, anyone who makes a materially false, fictitious, or fraudulent statement to the U.S. Government is subject to criminal penalties.

NAME OF PERSON SUBMITTING THIS REGISTRATION RENEWAL: Dan Pantor

CHECK ONE BOX

⊙A. INDIVIDUAL ASSOCIATED WITH THE INFORMATION IN SECTION 10 (STOP HERE, FORM IS COMPLETED)

○B. ANOTHER AUTHORIZED INDIVIDUAL

Address Information for the Authorizing Individual:

Individual's Name
-N/A-

Telephone Number
-N/A-

Address, Line 1
-N/A-

Fax Number
-N/A-

Address, Line 2
-N/A-

E-Mail Address
-N/A-

City
-N/A-

State/Province/Territory
-N/A-

Zip Code (Postal Code)
-N/A-

Country/Area
-N/A-

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

3012959860

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)

(../cd/imprefusals.htm)

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

Language Assistance Available: Español
(https://www.fda.gov/about-fda/about-website/language-assistance-services#spanish) | 繁體中文
(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
(https://www.fda.gov/about-fda/about-website/language-assistance-services#korean) | Tagalog
(https://www.fda.gov/about-fda/about-website/language-assistance-services#tagalog) | Русский
(https://www.fda.gov/about-fda/about-website/language-assistance-services#russian) | العربية
(https://www.fda.gov/about-fda/about-website/language-assistance-services#arabic) | Kreyòl Ayisyen
(https://www.fda.gov/about-fda/about-website/language-assistance-services#creole) | Français
(https://www.fda.gov/about-fda/about-website/language-assistance-services#french) | Polski
(https://www.fda.gov/about-fda/about-website/language-assistance-services#polish) | Português
(https://www.fda.gov/about-fda/about-website/language-assistance-services#portuguese) | Italiano
(https://www.fda.gov/about-fda/about-website/language-assistance-services#italian) | Deutsch
(https://www.fda.gov/about-fda/about-website/language-assistance-services#german) | 日本語
(https://www.fda.gov/about-fda/about-website/language-assistance-services#japanese) | فارسی
(https://www.fda.gov/about-fda/about-website/language-assistance-services#farsi) | English
(https://www.fda.gov/about-fda/about-website/language-assistance-services#english)
