UNITED SAFETY AGENTS

# FSVP

## COMPLIANCE PLAN

ECCO UN POCO LLC

*Name of FSVP Importer*

'A RICCHIGIA SRL

*Name of Foreign Supplier*

GREEN PISTACHIO PASTE | 100% PURE | FOR COMMERCIAL USE

*Name of Product*

JUNE 26, 2019 / JULY 06, 2021

*Date of Initial Verification / Reverification*

JUNE 27, 2022

*Date of FSVP Plan Expiration*

VERIFICAITON COMPLETE | APPROVED FOR IMPORT* | CLOSE MONITORING REQUIRED

*Status of Review*

NUMBER 03

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

## TERMS & DEFINITIONS

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

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

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

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

## RULES *of* USE

# FOREIGN SUPPLIER VERIFICATION PROCEDURES

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

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

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

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

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

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# FOREIGN SUPPLIER VERIFICATION PROCEDURES

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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.

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## FOREIGN SUPPLIER VERIFICATION PROCEDURES

*Continued from previous page.*


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

## FREQUENCY *of* VERIFICATION PROCEDURES

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

## USE *of* APPROVED SUPPLIERS ONLY

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

## CORRECTIVE ACTIONS

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

## IDENTIFICATION *of* FSVP IMPORTER

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

Supplier: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## UNITED STATES CODE *of* FEDERAL REGULATIONS

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

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

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

Supplier: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## 21 C.F.R. §1.500–§1.514

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

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

## NOTES & COMMENTS

FSVP 21 CFR §1.500–§1.514

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

Product is intended for commercial use only and will be used by FSVP Importer's commercial operation.

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## 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: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## DESIGNATION *of* ROLES & SUMMARY *of* REVIEW

### FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: Ecco un Poco LLC FDA FEI: 3015449317

Physical Address: 8318 West 3rd Street DUNS No.: 09 933 6780

City: Los Angeles State: California, 90048-4311 Country: United States

Mailing Address: 531 S Kenmore Avenue, Apt 300

City: Los Angeles State: California, 90020-2546 Country: United States

Phone Number: +1 (310) 595-0466 Email Address: eccounpoco@gmail.com

Name *of* Representative*(s)*: Mr. Alessandro Restelli Title: Commercial Rep.

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

Company Name: 'A Ricchigia, S.r.l. FDA FFR: 11424943650

Manufacturing Address: Via Cardinale de Luca 115 FDA FEI: 3012462846

City: Bronte Province/Territory: Catania, 95034 Country: Italy

Office Address: Via Cardinale de Luca 115

City: Bronte Province/Territory: Catania, 95034 Country: Italy

Phone Number: +39 095772326 Email Address: aricchigia@gmail.com

Name *of* Representative*(s)*: Mr. Simone Hidriuo Title: QA / QC

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

Agent/QI Name: Claudio Innocenti Signature: Claudio Innocenti

Title: Partner & Preventive Controls Qualified Individual. Date: July 06, 2021

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

Title: Preventive Controls Qualified Individual. Date: July 06, 2021

### SUMMARY *of* REVIEW

| **Details *of* Product**(s) | *Is foreign supplier expected to implement controls for* | | | **Comments** |
|---|---|---|---|---|
| | **Biological Hazards** | **Chemical Hazards** | **Physical Hazards** | |
| Pistacchio Verde Di Bronte (Pistachio Paste)<br><br>Bulk, Intended for Commercial Use. | ☑ Yes ☐ No<br>☐ *Undetermined* | ☑ Yes ☐ No<br>☐ *Undetermined* | ☑ Yes ☐ No<br>☐ *Undetermined* | Verified & Approved<br>- under -<br>Close Monitoring Procedures.<br><br>—<br>See Addendum. |
| | ☑ FSVP Importer | ☐ FSVP Importer | ☐ FSVP Importer | |
| | ☐ Disclosure | ☐ Disclosure | ☐ Disclosure | |
| | ☐ Customer | ☐ Customer | ☐ Customer | |

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

Supplier: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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Review Start: June 04, 2021 Review End: July 06, 2021

## REGISTER *of* SUBSTANTIATING DOCUMENTS

### HAZARD ANALYSIS

☑ *Requested* ☑ *Required* ☑ *Received* ☑ *Reviewed*

NOTES A Ricchigia, S.r.l.'s General Food Safety / HACCP plan received.
Version: No. 02. Version Dated: March 13, 2017.
Plan is entitled "Management System for Self-Control and the Food Safety" and contains information for the following: Purpose and Scope, Regulatory References, Terms and Definitions, General Requirements, Responsibility of The Management, Resources Management, Planning and Realization of Safe Products, HACCP Plan, Tree of Decisions, Validation, and Verification and Improvement Of The System Management For Food Safety.
Note: We respectfully request that an unabridged copy of the supplier's HACCP/HARPC Plan be provided for evaluation.

### ON-SITE AUDIT

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

NOTES 'A Ricchigia, S.r.l.'s Audit Report Summary received.
Dated: Sept. 19, 2019

Note: We respectfully request that a full copy of the supplier's annual on-site audit report be provided.

Note: On-site audit report was not relied upon to approve this foreign supplier.

### SAMPLING OR TESTING RESULTS

☑ *Requested* ☑ *Required* ☑ *Received* ☑ *Reviewed*

NOTES Certificate of Analysis received from supplier.
Dated: Sept. 29, 20120 Tested for: Biological and Chemical hazards Laboratory: EDP.
Laboratory testing results for Aflotoxins received.
Dated: April 28, 2019. Tested for: Aflatoxin B1, B2, G1, and G2.
Laboratory: Lab&Co. (Laboratorio Agroalimentare Lab&co Sas Di Schiliro' Alfina & C).
Accreditation: Lab&Co. holds ISO 17025:2005 accreditation. Certificate obtained and included.
Note: We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory).

### OTHER FOOD SAFETY RECORDS

☑ *Requested* ☑ *Required* ☑ *Received* ☑ *Reviewed*

NOTES Completed Foreign Supplier FSVP Questionnaire received.
Dated: April 28, 2021.
Completed by: Ms. Laura Lupo

A Ricchigia, S.r.l.'s certification of compliance with HACCP and other regulations received.
A Ricchigia, S.r.l.'s Food Health Quality Environment Safety plan received.
Food Personnel Training Certificate received (Certificate is not written in English).

### 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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## VERIFICATION FREQUENCY *for* UPDATED DOCUMENTS

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

### FACILITY FOOD SAFETY PLAN

- ☑ 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

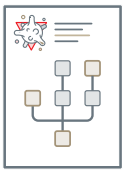
- ☑ if positive results are returned
- ☑ if recall or import refusal occurs
- ☑ if inspection occurs
- ☐ on an annual basis
- ☑ on a per-batch/shipment basis
- ☑ Chemical ☑ Biological
- ☐ *other:*


### 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: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## FDA COMPLIANCE ACTIONS & REGULATORY HISTORY

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

## RESULTS *of* EVALUATION

| Date *of* Action | Description *of* Action |
|---|---|
| March 06, 2019. | IMPORT REFUSAL<br>Product Code: 21NYT02, CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY,<br>Refusal Charges: 256,321,482<br>Shipment ID: 799-9153595-3<br><br>NOTE: Recent Import Refusal contained 25 individual products. We recommend that close supplier monitoring be put in place. Correct actions requested. |
| | 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: 'A Ricchigia, S.r.l. FEI: 3012462846 Date: July 06, 2021

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

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## REVISION LOG *for* FSVP PLAN

| Version No. | Date *of* Change | Description *of* Revision |
|---|---|---|
| No. 01 | June 26, 2019 | Initial verification resulted in denial due to absent allergen disclosure. |
| No. 02 | July 02, 2019 | Product and supplier underwent initial FSVP verification. |
| | | FSVP Importer placed FSVP re-verification on hold for roughly one year. |
| No. 03 | July 06, 2021 | Foreign Supplier and product underwent annual verification. Additional and/or updated food safety documents were requested, received, and added to FSVP. FSVP content and format was updated to reflect recent FDA Guidance document(s) and/or regulatory statues that became applicable since initial verification, or previous reverification. |

Supplier: 'A Ricchigia, S.r.l.  Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC)  Review Start: June 04, 2021  Review End: July 06, 2021

## ANALYSIS & DETERMINATION *of* BIOLOGICAL HAZARDS

| FDA Identified Hazard(s) | P. | S. | Control Measure(s) | Hazard(s) Controlled |
|---|---|---|---|---|
| ☐ ***Bacillus cereus***<br>☐ ***Clostridium botulinum***<br>☐ ***C. perfringens***<br>☐ ***Brucella spp.***<br>☐ ***Campylobacter spp.***<br>☐ ***Pathogenic E. coli***<br>☒ ***Salmonella spp.***<br>☐ ***S. aureus***<br>☐ ***L. monocytogenes***<br>☐ ***Trichinella spiralis***<br>☐ ***Giardia lamblia***<br>☐ ***Shigella spp.***<br>☐ ***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.<br><br>——— SUPPLIER CONTROL MEASURES ———<br><br>01. Supplier utilizes Heat Application (thermal kill step) to control hazards posed by biological agents.<br>Details: Temperature no less than 117° C.<br>Verification is performed after cooking.<br><br>02. Supplier utilizes laboratory testing of finished product to verify that biological hazards have been effectively controlled.<br>Details: Certificate of Analysis received.<br>Dated: Sept. 29, 20120<br>Tested for: Biological and Chemical hazards<br>Laboratory: EDP.<br>Dated: April 28, 2019.<br>Tested for: Aflatoxin B1, B2, G1, and G2.<br>Laboratory: Lab&Co.<br>Accreditation: Lab&Co. holds ISO 17025:2005 accreditation. Certificate obtained and included.<br>NOTE: Aflatoxin B2, Aflatoxin G1, and Aflatoxin G2 do not fall within Lab&Co.'s accreditation.<br><br>03. All staff undergoes formal food hygiene training.<br><br>04. All staff issued protective clothing.<br><br>05. Adequate toilet and hand washing facilities provided.<br><br>06. Product is positively released.<br><br>———————NOTE———————<br>We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards. | 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.<br><br>USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified biological hazards.<br><br>———————<br>----- HAZARD PROFILE -----<br>---------- SOURCE ----------<br><br>Appendix 1 (Hazards Tables)<br>Category: Other Nut and Seed.<br>Category No.: 20.<br>Subcategory:Single component Pastes.<br>Storage: Shelf-Stable.<br>——————————<br>—————————— |

### 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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## ANALYSIS & DETERMINATION *of* CHEMICAL HAZARDS

| FDA Identified Hazard(s) | P. | S. | Control Measure(s) | Hazard(s) Controlled |
|---|---|---|---|---|
| ☐ ***Drug residues***<br>☐ ***Heavy metals***<br>☐ ***Industrial chemicals***<br>☐ ***Pesticides***<br>☒ ***Mycotoxins/Toxins***<br>☐ ***Radiological***<br>☐ ***Unapproved colors & additives***<br>☒ ***Chemical hazards due to mis-formulation***<br>☐ ***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.<br><br>——— SUPPLIER CONTROL MEASURES ———<br>01. Supplier utilizes raw material inspection and approval procedures to control for hazards posed by chemical agents prior to production.<br><br>02. Supplier utilizes laboratory testing to verify that product is free from chemical hazards prior to release.<br>Details: Supplier submits finished product to laboratory for analysis. See provided CoA.<br>Details: Certificate of Analysis received.<br>Dated: April 28, 2019.<br>Tested for: Aflatoxin B1, B2, G1, and G2.<br>Laboratory: Lab&Co.<br>Accreditation: Lab&Co. holds ISO 17025:2005 accreditation. Certificate obtained and included.<br>NOTE: Aflatoxin B2, Aflatoxin G1, and Aflatoxin G2 do not fall within Lab&Co.'s accreditation.<br>03. Product's formulation is closely monitored by PCQI.<br><br>——————————NOTE——————————<br>We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory).<br><br>USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified chemical hazards. | 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.<br><br>USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified chemical hazards.<br><br>———————————<br>----- HAZARD PROFILE -----<br>---------- SOURCE ----------<br><br>Appendix 1 (Hazards Tables)<br>Category: Other Nut and Seed.<br>Category No.: 20.<br>Subcategory:Single component Pastes.<br>Storage: Shelf-Stable.<br>———————————<br>——————————— |

### 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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## ANALYSIS & DETERMINATION *of* ALLERGENIC HAZARDS

| FDA Identified Hazard(s) | P. | S. | Control Measure(s) | Hazard(s) Controlled |
|---|---|---|---|---|
| ☒ ***Undeclared allergens - Incorrect label***<br>☒ ***Undeclared allergens - Cross-contact***<br><br>**ALLERGENS**<br>☐ ***Milk***<br>☐ ***Eggs***<br>☐ ***Fish***<br>☐ ***Shellfish*** *(Crustacean)*<br>☒ ***Tree nuts***<br>☐ ***Peanuts***<br>☐ ***Wheat***<br>☐ ***Soybeans***<br>☐ ***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.<br><br>——— SUPPLIER CONTROL MEASURES ———<br>01. Supplier certifies that:<br>A) there is one (1) allergen handled on site and present in product - Pistachio, which is disclosed on label.<br>B) a documented allergen control program is in use.<br>C) a dedicated process line and a documented cleaning procedure are in place to prevent contamination.<br>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.<br><br>———NOTE———<br>---------- Labeling Requirements ----------<br>- Food Allergen Labeling and Consumer Protection Act -<br>----------<br>- Nutritional information (not appliance to bulk).<br>- Name and place of business of the manufacturer, packer, or distributor (21 CFR 101.5).<br>- Quantity of contents (21 CFR 101.7).<br>- Statement of identity (21 CFR 101.3).<br>- Presence of artificial flavoring, artificial coloring, or chemical preservative ( 21 CFR 101.22).<br>- Ingredient statement if the product has two or more ingredients (21 CFR 101.4).<br>- Presence of major food allergens (21 U.S.C. 343(w)).<br>- 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.<br><br>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.<br><br>_____<br>----- HAZARD PROFILE -----<br>---------- SOURCE ----------<br><br>Appendix 1 (Hazards Tables)<br>Category: Other Nut and Seed.<br>Category No.: 20.<br>Subcategory:Single component Pastes.<br>Storage: Shelf-Stable.<br>_____<br>_____ |

### 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

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*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: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## ANALYSIS & DETERMINATION *of* ENVIRONMENTAL HAZARDS

| FDA Identified Hazard(s) | P. | S. | Control Measure(s) | Hazard(s) Controlled |
|---|---|---|---|---|
| ☒ ***Recontamination with environmental pathogens.***<br>☒ ***Bacterial pathogen survival of a lethal treatment.***<br>☐ ***Bacterial growth and/or toxin formation due to lack of time / temperature control.***<br>☐ ***Recontamination due to lack of container integrity.***<br>☐ ***Bacterial growth and/or toxin formation due to poor formulation control.***<br>☐ ***Bacterial growth and/or toxin formation due to reduced oxygen packaging.***<br>☐ ***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.<br><br>——— SUPPLIER CONTROL MEASURES ———<br>01. Hazard posed by recontamination with environmental pathogens is controlled through Current Good Manufacturing Practices.<br>02. Supplier has implemented a cleaning program and environmental monitoring for microbiological and biological hazards.<br>03. All product is positively released and hermetically sealed within plastic.<br>04. Supplier reports to use laboratory testing analysis to control for biological hazards in finished product on a monthly basis.<br><br>———————NOTE———————<br>We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory). | 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.<br><br>Due to the long time-tables associated with international freight shipping, USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified environmental hazards.<br><br>_____<br>----- HAZARD PROFILE -----<br>---------- SOURCE ----------<br><br>Appendix 1 (Hazards Tables)<br>Category: Other Nut and Seed.<br>Category No.: 20.<br>Subcategory:Single component Pastes.<br>Storage: Shelf-Stable.<br>_____<br>_____ |

### 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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## ANALYSIS & DETERMINATION *of* PHYSICAL HAZARDS

| FDA Identified Hazard(s) | P. | S. | Control Measure(s) | Hazard(s) Controlled |
|---|---|---|---|---|
| ☒ ***Metal***<br>☒ ***Glass***<br>☐ ***Extraneous Matter***<br>☐ ***Plastics***<br>☐ ***Stones***<br>☐ ***Wood***<br>☐ ***Natural Component of Food***<br>☐ ***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.<br><br>——— SUPPLIER CONTROL MEASURES ———<br><br>01. Supplier utilizes an operational and calibrated metal detector to control hazards posed by physical agents.<br>Critical Limits: In-line Metal Detector.<br>Ferrous: 2 mm.<br>Non Ferrous: 3 mm.<br>Stainless Steel: 3 mm.<br><br>02. Glass and Breakable Plastic Program in use.<br><br>03. Supplier sieves incoming ingredients.<br><br>04. All product flows through a screen-strainer and a filter. Note: No substantiation provided.<br><br>05. Product is not packaged in glass. | 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.<br><br>----- HAZARD PROFILE -----<br>---------- SOURCE ----------<br><br>Appendix 1 (Hazards Tables)<br>Category: Other Nut and Seed.<br>Category No.: 20.<br>Subcategory:Single component Pastes.<br>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: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## ASSESSMENT *of* FOREIGN SUPPLIER

### 1.0 FOREIGN SUPPLIER INFORMATION

1.1. Supplier name: 'A Ricchigia, S.r.l.

1.2. Supplier address: Via Cardinale de Luca 115, Bronte, CT, Italy.

1.3. Products manufactured/supplied: Pistachio Paste

1.4. Is the supplier certified to a food safety standard and audited regularly? ☑ Yes ☐ No ☐ N/A

*GFSI Standard:* ISO 22000

1.5. Is the standard GFSI benchmarked/recognized? ☐ Yes ☐ No ☑ Other *(see Addendum)*

1.6. Has the supplier provided specifications? ☑ Yes ☐ No

1.7. Has the supplier completed a Supplier Assessment and an Allergen Questionnaire? ☑ Yes ☐ No

1.8. Have the supplier's specifications and/or completed questionnaires been evaluated by USA's PCQI(s)?

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

### 2.0 SUPPLIER PROCEDURES, PROCESSES & PRACTICES

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

2.2. Does the supplier have SOP in place for each procedure in the production & release of product? ☑ Yes ☐ No ☐ N/A

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

### 3.0 SUPPLIER PERFORMANCE HISTORY

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

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

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

3.3. 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.*

3.4. Has the supplier supplied a product that needed to be recalled for a food safety reason? ☐ Yes ☑ No ☐ N/A

*Description:* *No, as of this FSVP Plan's Review End date, USA has no knowledge of any recall undertaken by supplier.*

*Continued onto next page.*

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## ASSESSMENT *of* FOREIGN SUPPLIER

### 3.0 SUPPLIER PERFORMANCE HISTORY *(Continued)*

3.5. Has the supplier supplied out of specification product excluding quality issues? ☐Yes ☒No ☐N/A

3.6. Has importer conducted microbiological testing for all lots imported from the supplier? ☐Yes ☐No ☒N/A

3.7. Has any lot tested positive for chemical, physical or biological hazards? ☐Yes ☒No ☐N/A

*Description of the incident and the corrective actions taken by the supplier:* *No, as of this FSVP Plan's Review End date, USA has no knowledge of any lot/batch testing positive for any FDA-identified hazard(s).*

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

☒Yes ☐No *Description:* *Yes, supplier (either directly, or through the FSVP Importer) has provided timely and adequate responses to our inquiries and requests.*

### 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 activities 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 this FSVP plan?** ☒Yes ☐No

*Comments:* *Supplier has been verified and their products have been approved for importation under close monitoring.*

Additional Recommendations:

USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified hazards.

Supplier follows CGMPs and utilizes an established food safety program. Products supplied by this supplier have been verified and are approved for import. IMPORTANT NOTE: Supplier's recent import refusals raise concerns and must be addressed. We recommend that FSVP Importer implement close supplier/product monitoring procedures for the foreseeable future. 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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## 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

Unknown.

### Testing Program & Accreditation

Certificate of Analysis received from supplier.
Dated: Sept. 29, 20120 Tested for: Biological and Chemical hazards Laboratory: EDP.
Laboratory testing results for Aflotoxins received.
Dated: April 28, 2019. Tested for: Aflatoxin B1, B2, G1, and G2.
Laboratory: Lab&Co. (Laboratorio Agroalimentare Lab&co Sas Di Schiliro' Alfina & C).
Accreditation: Lab&Co. holds ISO 17025:2005 accreditation. Certificate obtained and included.
Note: We respectfully request that recent certificate(s) of analysis be provided for testing conducted to determine that product has been effectively processed to control for all FDA identified biological and chemical hazards (preferably by an ISO 17025-accredited laboratory).

### Supplier & Product Allergen Information

Supplier certifies that: A) there are TREE NUTS are present in product, 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. Refrigeration: perishable food storage system at the lower temperature at 4 ° C.

Stating: All packaging in direct contact conforms to food contact purchased after careful qualification and evaluation of the suppliers, which only after providing guarantees (Certificates, analyzes, etc.) to the suitability of the products, are included in the Suppliers list Qualify. For the glass the presence of any broken pots is also checked both at delivery and during processing. In the event that a break occurs during the processing cycle, all the production that at that moment it is at risk of physical contamination, it will be eliminated from any type of subsequent process and / or sale. Subsequently, all production facilities, instruments and equipment must be submitted reclamation to avoid possible presence of glass.

Supplier: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## 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.

IMPORTANT NOTE: Supplier's recent import refusals raise concerns and must be addressed. We recommend that FSVP Importer implement close supplier/product monitoring procedures for the foreseeable future.

### Close Supplier Monitoring

YES. We recommend that FSVP Importer implement close supplier/product monitoring procedures for the foreseeable future due to supplier's poor recent import refusal history.

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: 'A Ricchigia, S.r.l.

Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

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

Review Start: June 04, 2021 Review End: July 06, 2021

## ADDENDUM

NOTE

Labeling Requirements

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

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

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

Food Allergen Labeling and Consumer Protection Act

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

CLOSE MONITORING PROCEDURES

IMPORTANT NOTE: Supplier's recent import refusals raise concerns and must be addressed. We recommend that FSVP Importer implement close supplier/product monitoring procedures for the foreseeable future.

USA recommends that FSVP Importer conduct independent laboratory testing on product samples (preferably by an ISO 17025-accredited laboratory) on a regular basis to confirm that supplier has effectively controlled (and continues to control) all FDA identified hazards.

## ADDENDUM

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Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

### CERTIFICATE OF TRAINING

is awarded to

Claudio Innocenti

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

Foreign Supplier Verification Programs

delivered by Lead Instructor

Bob Bauer

completed on
05/13/2021

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Steve Mandernach, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti

AFDO

Certificate # 31d8ad94

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:

FSPCA Preventive Controls for Animal Food

delivered by Lead Instructor

Charles Nolan

completed on
07/09/2020

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

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

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AAFCO
Association of American Feed Control Officials

Certificate # 223faa17

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

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FSPCA

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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

09/14/2018

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

Gerald Wojtala, Executive Director
International Food Protection Training Institute

Joseph Corby, Executive Director
Association of Food and Drug Officials

IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY

ifpti INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE

AFDO

Certificate # d2e9c287

Produce Safety ALLIANCE

AFDO
ASSOCIATION OF FOOD & DRUG OFFICIALS
SINCE 1896

Certificate of Training

is awarded to

**Claudio Innocent**

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

**PSA Grower Training Course**

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

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

Joseph Corby
*Executive Director, AFDO*

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

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

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FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

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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

05/31/2018

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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Certificate # d2e9c287

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Bob Bauer

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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: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

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FSPCA
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CLAUDIO INNOCENTI

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

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

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ILLINOIS INSTITUTE OF TECHNOLOGY

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Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

WILLIAM BARBER

in recognition for having successfully completed
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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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FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

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William Barber

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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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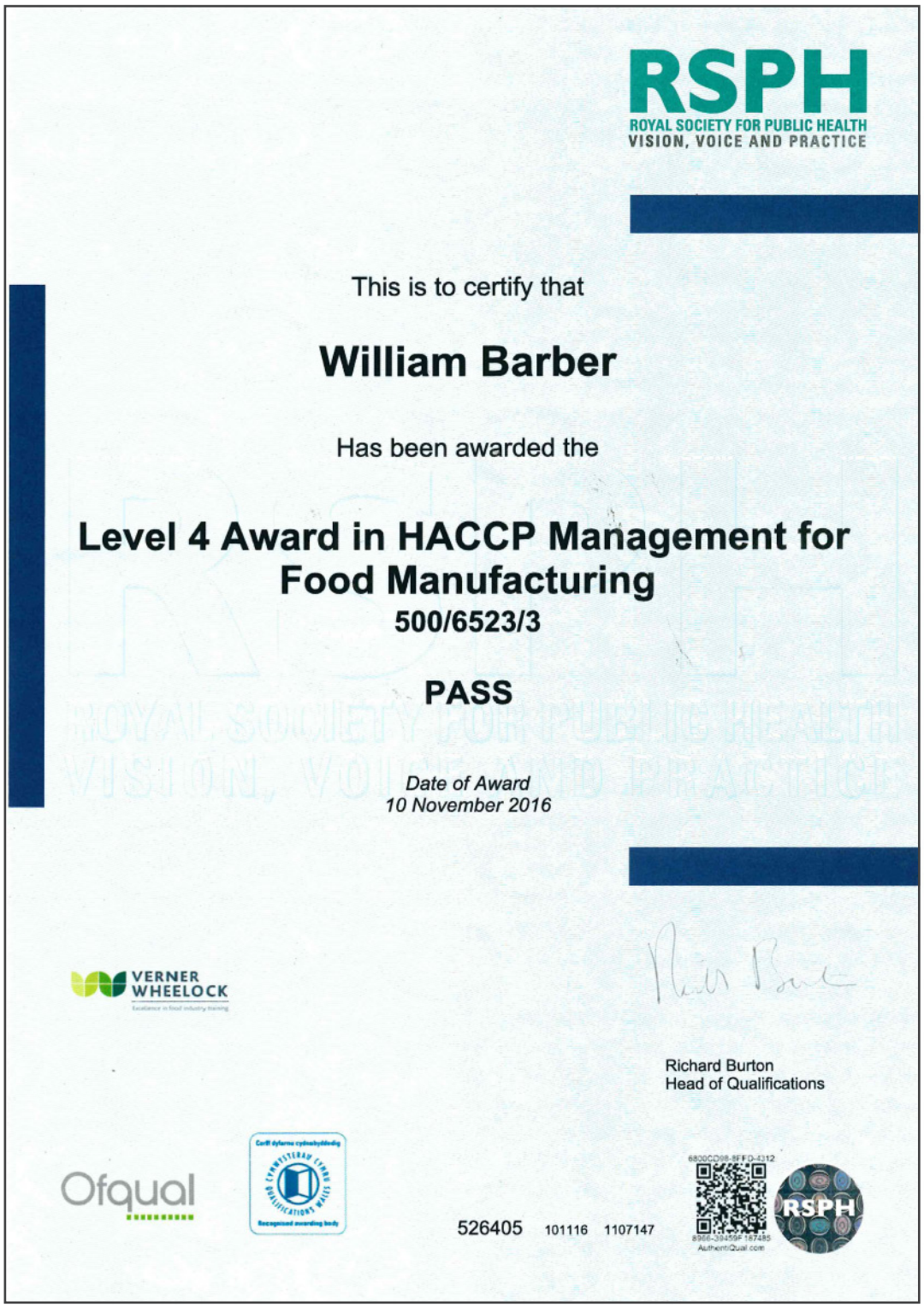


RSPH
ROYAL SOCIETY FOR PUBLIC HEALTH
VISION, VOICE AND PRACTICE

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

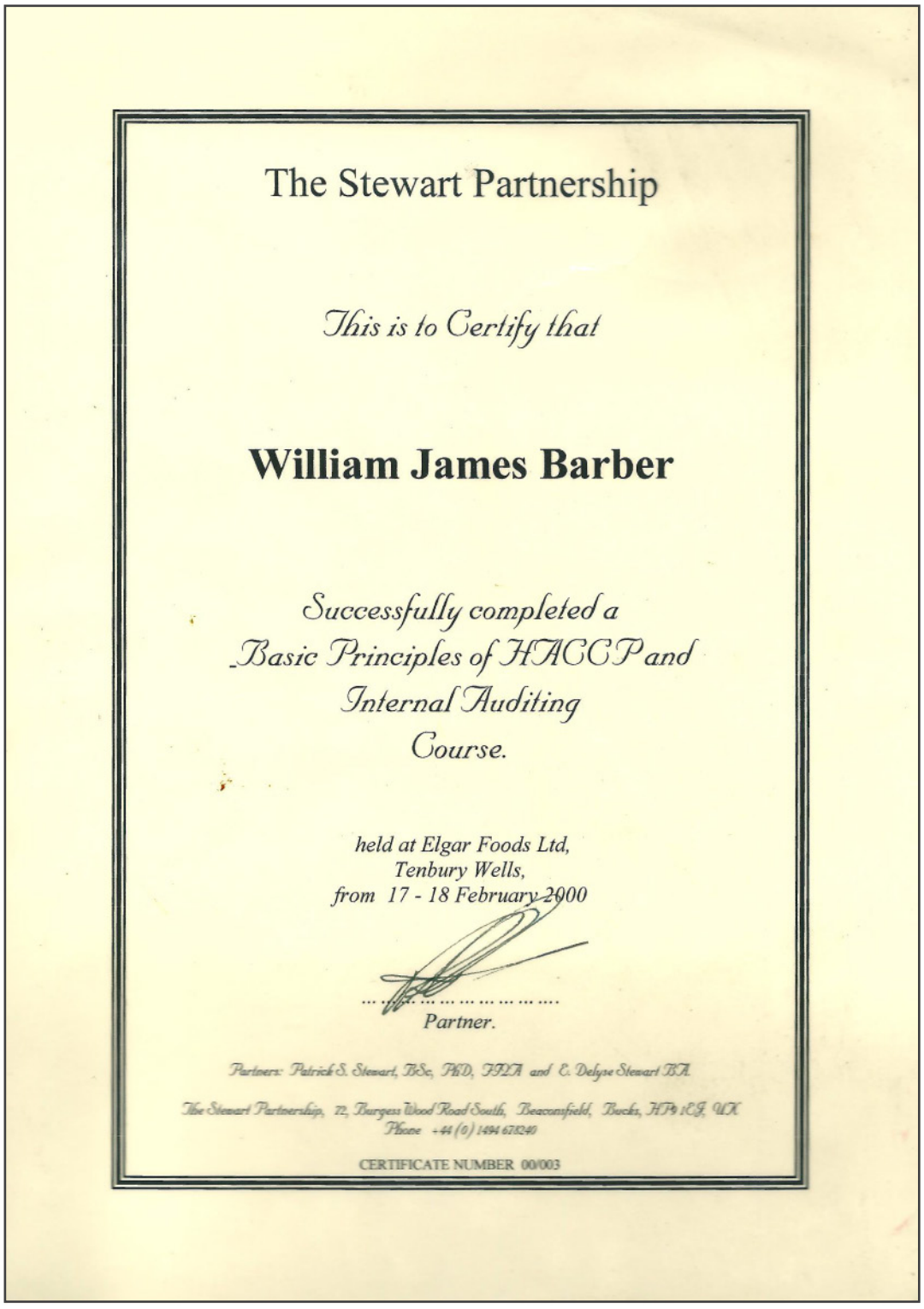
Richard Burton
Head of Qualifications

Ofqual

526405 101116 1107147

RSPH

## CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT



The Stewart Partnership

*This is to Certify that*

**William James Barber**

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

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

..... *Partner.*

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

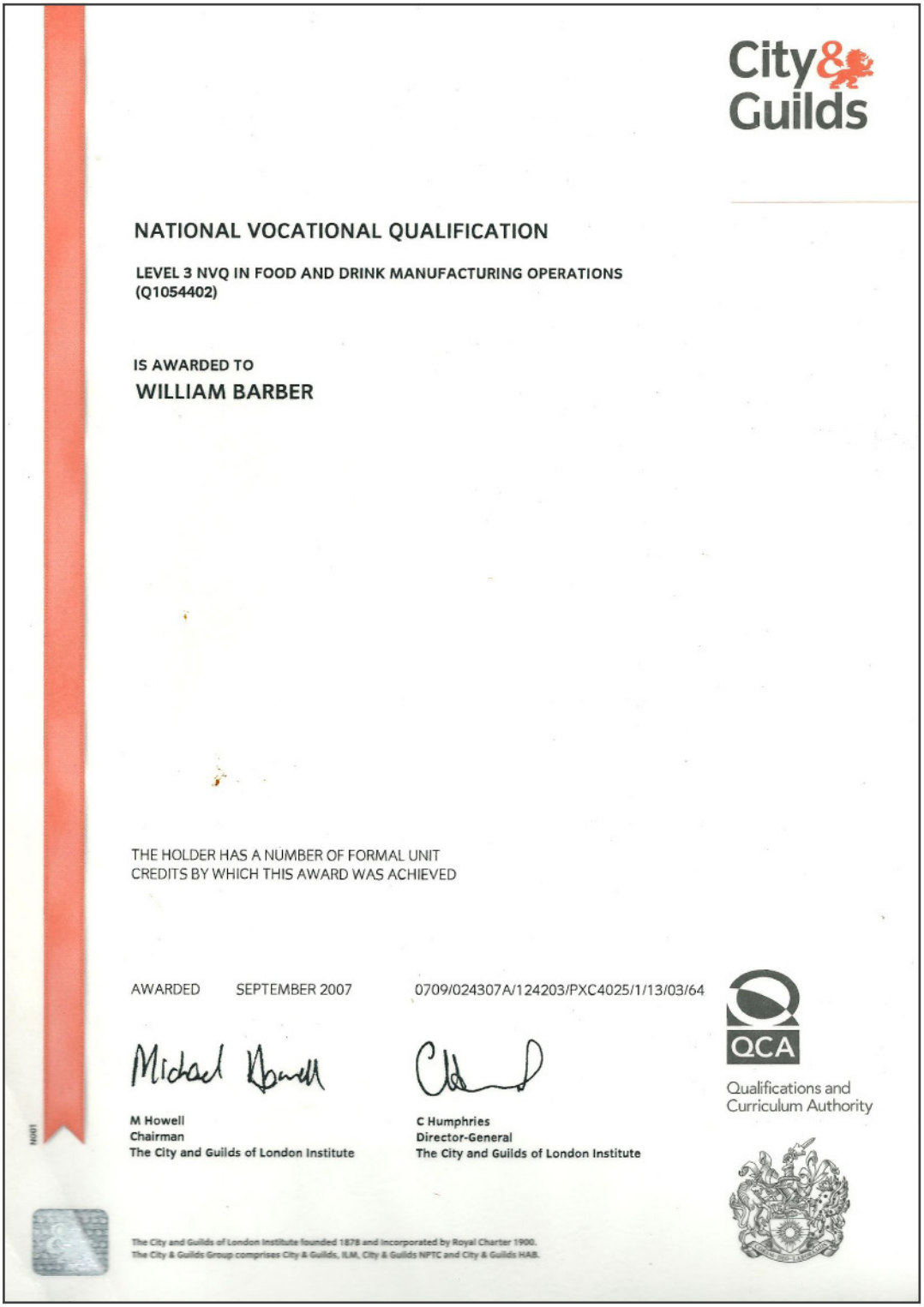
*The Stewart Partnership, 72, Burgess Wood Road South, Beaconsfield, Bucks, HP9 1EJ, UK*
*Phone +44 (0) 1494 678240*

CERTIFICATE NUMBER 00/003

Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT



City & Guilds

NATIONAL VOCATIONAL QUALIFICATION

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

IS AWARDED TO

WILLIAM BARBER

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

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

M Howell
Chairman
The City and Guilds of London Institute

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

QCA
Qualifications and Curriculum Authority

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

## CERTIFICATIONS & QUALIFICATIONS *of* FSVP AGENT

City & Guilds

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

**IS AWARDED TO**
**WILLIAM BARBER**

**WHO ATTENDED PERSHORE GROUP OF COLLEGES**

AND WAS SUCCESSFUL IN THE
FOLLOWING TEN UNITS

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

**CONTINUED**

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

**M Howell**
**Chairman**
**The City and Guilds of London Institute**

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

R01

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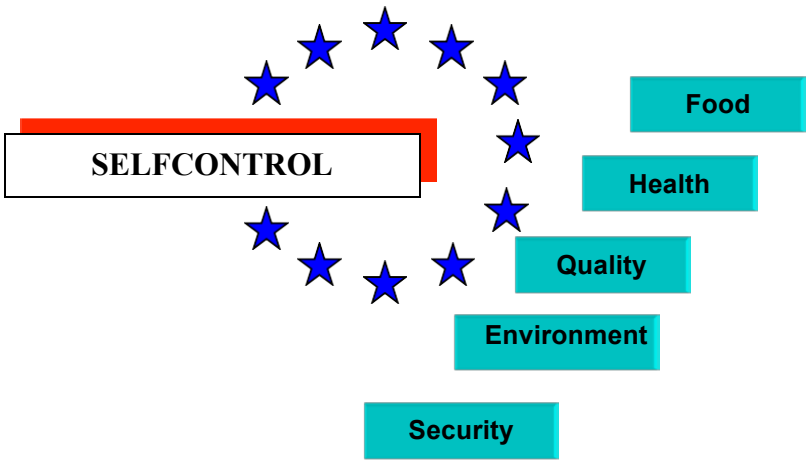
Supplier: 'A Ricchigia, S.r.l. Product: Pistacchio Verde Di Bronte DOP (Pistachio Paste)

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: June 04, 2021 Review End: July 06, 2021

## SUBSTANTIATING DOCUMENTS


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

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




| MANAGEMENT SYSTEM FOR SELF-CONTROL AND FOOD SAFETY | | |
|---|---|---|
| **MANUAL** | VERIFIED COPY | |
| | YES | NO |
| | SECTION 0 | |
| **COMPANY DESCRIPTION** | | |

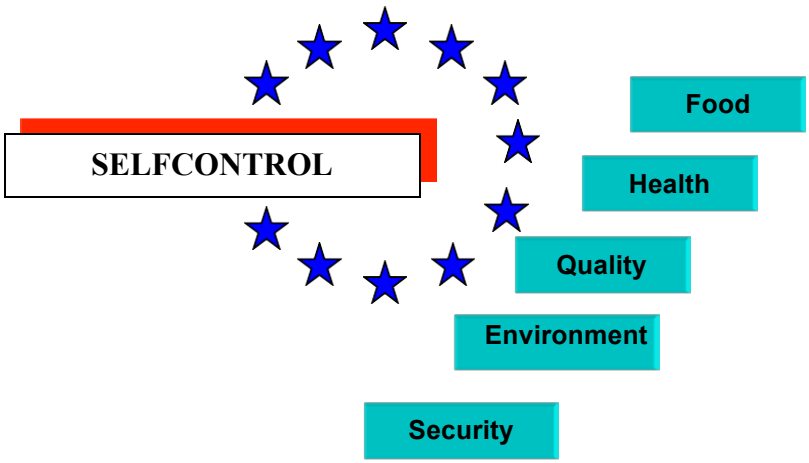
## 0.1 COMPANY DESCRIPTION

'A RICCHIGIA S.r.l. is a company that manages a PRODUCTION and PACKAGING of VEGETABLE PRESERVES, CREAMS and BAKERY PRODUCTS.

SELECTION AND PACKAGING OF DRIED FRUIT, located in Via Cardinale De Luca No. 115, Bronte (CT).

SELFCONTROL
by
S. C. Advance S.r.l.
Via Alberto Mario n° 67
95129 - Catania
e-mail: selfcontrol.it@gmail.com

| REV. | DATE | DESCRIPTION OF THE MODIFICATION | Issued CONSULTANT | Approved: OSA |
|---|---|---|---|---|
| 00 | 11/01/2016 | FIRST ISSUE | S. C. Advance S.r.l. | |
| 01 | 13/03/2017 | CHANGE IN OPERATING SEAT | S. C. Advance S.r.l. | |

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| 01 | 13/03/2017 | CHANGE IN OPERATING SEAT | S. C. Advance S.r.l. | |

| MANAGEMENT SYSTEM FOR SELF-CONTROL AND FOOD SAFETY | | |
|---|---|---|
| MANUAL | VERIFIED COPY | |
| | YES | NO |
| | SECTION 1 | |
| PURPOSE AND FIELD OF APPLICATION | | |

## INTRODUCTION

This Manual for Self-control and Food Safety defines the hygiene specifications and the necessary controls in order to guarantee active and passive safety, by means of rules of correct hygiene practice that are implemented through the practice of the SELF-CONTROL. The Manual complies with the requirements of the following regulations:

- REGULATION (EC) n. 852/2004 e s.m.i., which introduces the H.A.C.C.P. system as a hazard analysis tool. which is applied in the production, processing, manufacture, packaging, storage, transport, distribution, sale or supply, including the administration to the consumer;
- UNI EN ISO 22000:2005 – Food Safety Management Systems
- ISO/TS 22002-1 : 2009 - Prerequisite programs on food safety - Part 1: Food manufacturing;
- Codex Alimentarius - 7 July 2006;
- UNI EN ISO 22005:2008 – Traceability in agri-food chains;
- ISO 22004:2005 – Food safety management system – Guidance on the application of ISO 22000.

| MANAGEMENT SYSTEM FOR SELF-CONTROL AND FOOD SAFETY | | |
|---|---|---|
| MANUAL | CHECKED COPY | |
| | YES | NO |
| | SECTION 1 | |
| PURPOSE AND FIELD OF APPLICATION | | |

## 1. PURPOSE AND SCOPE

The purpose of this Self-Control and Food Safety Manual is to:

Provide the tools, information and methodologies for correct self-monitoring based on the H.A.C.C.P system, in order to guarantee the healthiness and quality of the products.

Plan, implement, make operational, maintain active and update a Food Safety Management System aimed at providing products that are safe according to their intended use.

Demonstrate compliance with applicable legislative and regulatory requirements for food safety.

Estimate and assess the customer's requirements and demonstrate compliance with them, mutually agreed on food safety, in order to increase customer satisfaction. Effectively communicate food safety issues to its suppliers, customers and related stakeholders in the food chain.

Ensure that the organization complies with its policy of self-control and food security.

Demonstrate such compliance with relevant stakeholders.

This Manual is applied to all phases and operations of the process.

## 2. REGULATORY REFERENCES

For the development of the Management System for Self-Control and Food Safety, reference was made to the following voluntary standards:

- **Norm UNI EN ISO 22000:2005:**

Food safety management systems - Requirements for any organization in the food supply chain

- **ISO/TS 22002-1:2009:**

Prerequisite programs on food safety - Part 1: Food manufacturing

- **UNI EN ISO 22005:2007:**

Traceability in agri-food chains

- **ISO 22004:2005:**

Food safety management system – Guidance on the application of ISO 22000

- **Codex Alimentarius - 7 July 2006**

Set of rules and regulations developed by the Codex Alimentarius Commission

- **Norm UNI EN ISO 9001:2015:**

Quality management systems - Requirements

- **Norm UNI EN ISO 9000:2008:**

Quality management systems - Fundamentals and vocabula

**In addition, the following mandatory rules are to be considered for the activity:**

- Law 30 April 1962, n° 283 "Hygienic regulation of the production and sale of food substances".
- Law 26 February 1963, n° 441 " Changes and additions to the law of 30 April 1962, n°283".
- D.P.R. 26 March 1980, n° 327 " Regulations for the execution of the law 283/62' ".
- D. Lgs. 25 January 1992, n° 108 "Implementation of Directive 76/893 / EEC relating to materials and objects intended to come into contact with food products"
- D. Lgs. 27 January 1992 n.109 “Implementation of the 89/395 / CEE and 89/396 / CEE Directives concerning the labeling, presentation and advertising of food products”
- Law 25 January 1994, n° 82 "regulates cleaning and disinfection, disinfestation, rodent control and sanitation".
- D.M. 27 February 1996, n° 206 "Additives and dyes".
- D.P.R. 14 July 1995, n° 376 "Address documents for the preparation of official food and drink control programs".
- Circulars of the Ministry of Health 28 July 1995, n°21 and 26 January 1998, n° 1 "Guidelines for the development of the manuals of correct hygiene practices".
- L. Sicily Region n° 28 del 22 December 1999 "Reform of the discipline of trade".
- D. Lgs. 2 February 2001, n° 31 "Implementation of Directive 98/83 / EC relating to the quality of water intended for human consumption"
- EC Regulation No. 178/2002 of the European Parliament and of the Council of January 28, 2002 which establishes the principles and general requirements of food legislation, establishes the European Food Safety Authority and establishes procedures in the field of food safety.
- D. Lgs. n. 181/2003 “Implementation of Directive 2000/13 / EC concerning the labeling and presentation of food products, as well as the related advertising”.
- L. 31 October 2003 n. 306 “Protection of the health of non-smokers”.
- Ministry Circular P.A.F. 10 November 2003 “Labeling, presentation and advertising of food products”.

- Correction of the regulation (EC) n.852 / 2004 of the European Parliament and of the Council, of 29 April 2004, on the hygiene of food products.
- Correction of the regulation (EC) n.853 / 2004 of the European Parliament and of the Council, of 29 April 2004, which establishes specific rules on hygiene for food of animal origin.
- Correction of the regulation (CE) n.854 / 2004 of the European Parliament and of the Council, of 29 April 2004, which establishes specific rules for the organization of official controls on products of animal origin intended for human consumption.
- EC Regulation No. 2073/2005 of the Commission of November 15, 2005 “on microbiological criteria applicable to food products”.
- D. A. 19 February 2007 Department of Health of the Sicilian Region "Guidelines and procedures relating to the training paths of food companies" and subsequent amendments and additions.
- D. Lgs. 6 November 2007, n. 193 “Implementation of Directive 2004/41 / EC relating to controls on food safety and application of EU regulations in the same sector”.
- EC Regulation No. 1441/2007 of the Commission of 05 December 2007 "containing the amendments to the EC Regulation n ° 2073/2005 of the Commission of 15 November 2005 on the microbiological criteria applicable to food products”.
- EC Regulation No. 834/2007 of the Council of June 28, 2007 concerning organic production and labeling of organic products and repealing Regulation (EEC) No. 2092/91.

  EU Regulation No. 1169/2011 of the European Parliament and of the Council "concerning the supply of food information to consumers, which amends the regulations (EC) n. 1924/2006 and (EC) no. 1925/2006 of the European Parliament and of the Council and repealing Commission Directive 87/250 / EEC, Council Directive 90/496 / EEC, Commission Directive 1999/10 / EC, Parliament Directive 2000/13 / EC and of the Council, Commission Directives 2002/67 / EC and 2008/5 / EC and Regulation (EC) No. 608/2004 of the Commission”.

## 3. TERMS AND DEFINITIONS

The manual uses abbreviations in its presentation whose meaning is explained in the following table:

| Company Function | ABBREVIATION |
|---|---|
| Food industry operator (Operatore settore alimentare) | OSA |
| Food safety group manager (Responsabile gruppo sicurezza alimentare) | RGSA |
| Food safety group (Gruppo sicurezza alimentare) | GSA |
| Food self-control plan manager (Responsabile piano autocontrollo alimentare) | RHACCP |
| Responsibility for traceability and traceability (Responsabile tracciabilità e rintracciabilità) | RTBT |
| Company name owner of this manual and connected (Denominazione sociale proprietaria del presente manuale e connessi) | DITTA |

| Documents | ABBREVIATION |
|---|---|
| Food safety management system (Sistema di gestione per la sicurezza alimentare) | SGSA |
| Food Safety Manual (Manuale Sicurezza Alimentare) | MSA |
| Operating Procedure (Procedura Operativa) | PO |
| Process Control Procedure (Procedura Controllo di Processo) | PCP |
| Work Instruction (Istruzione di Lavoro) | IL |
| Attachments (flow-charts, tables, etc.) (Allegati (flow - chart, tabelle, ecc.)) | ALL |
| Registration forms (Moduli di registrazione) | M |
| Documents (Documenti) | DOC |
| Non-compliance (Non conformità) | NC |
| Non-compliance Report (Rapporto di Non Conformità) | RNC |
| Corrective action (Azione Correttiva) | AC |
| Preventive Action (Azione Preventiva) | AP |
| Improvement Action (Azione Migliorativa) | AM |
| Report Management Review (Verbale Riesame della Direzione) | VRD |
| Report on Internal Audit (Verbale Verifica Ispettiva Interna) | VVII |

In this manual the terminology was used in compliance with the definitions indicated by the UNI EN ISO 9000: 2008 standard "Quality Management Systems - Fundamentals and Terminology" or according to the needs of the DITTA, with the meaning indicated below:

***Protective clothing:*** gowns, overalls, hats, shoes.

***Drinking water:*** water that meets the requirements of the legislation for its consumption.

***High-risk foods:*** ready-to-eat foods. Foods that have undergone all the treatments foreseen for their preparation and there are no further phases that allow to control their dangers.

***Potentially dangerous food:*** Foods susceptible to contamination and / or likely to allow rapid growth of infectious or toxicant microorganisms.

***Whole food:*** food suitable for consumption and free from defects.

***Frozen food:*** product of which all parts are kept at a temperature equal to or less than −18 ° C.

***Hazard analysis:*** a system that identifies hazards and where they can develop and identifies surveillance measures for their control.

***Self-control:*** the set of measures that the tenant or manager, under his own responsibility, exercises on the activity of the DITTA to guarantee hygiene requirements and product safety;

***Corrective action:*** the action to be taken when the results of CCP surveillance (monitoring) indicate a loss of control.

***Preventive action:*** an action or activity that can be used to prevent a food safety hazard.

***Action required:*** an action or activity that can be used to eliminate or reduce a food safety hazard to an acceptable level.

***Bacteria:*** single living cell. Some live on food and feed, others cause illness.

***Freezing:*** food storage system at a temperature below 0 ° C.

***Cross-contamination:*** transfer of microorganisms (usually microbes) from contaminated foods to other foods.

***Particle contamination:*** pollution of a food product due to foreign material of various nature and origin (glass, metals, wood, etc.)

***Contamination:*** introduction of microbiological and / or chemical and / or physical agents in foods that can alter their safety and integrity.

***Detergent:*** substance that acts by removing fat and residues.

***Cleansing****:* operation that allows the removal of dirt such as grease and processing residues.

***Flowchart:*** the detailed sequence of operations for the product / process under study.

***Pest Control:*** complex of procedures and operations aimed at destroying small animals, in particular arthropods, both because parasites, vectors or reserve of infectious agents, both because harassment and unwanted plant species.

***Disinfectant:*** substance that works by killing microbes on the skin or surfaces.

***Disinfection:*** operation that destroys the microbes present on the surfaces.

***Food supply chain:*** Sequence of phases and operations involved in the production, processing, distribution, storage and management of a food and its ingredients, from primary production to consumption.

***Staff training:*** staff indoctrination in addition to hygiene rules regarding basic microbiology, food preservation and the importance of temperature control, food handling safety, personal hygiene, cleaning procedures, disposal of food waste and pest control.

***GMP:*** good processing practices in terms of health and hygiene.

***Celsius Degree ° C:*** temperature measurement unit.

***Severity:*** importance of the danger and the consequences that can derive from it.

***H.A.C.C.P.:*** the system that allows to identify the specific dangers, to evaluate them and to establish preventive measures (actions) to control them.

***Hygiene of food products:*** the set of measures necessary to guarantee the safety and integrity of food products at all levels, from primary production to consumption.

***Hygiene:*** all necessary measures to ensure the integrity and safety of food.

***Pests:*** insects, birds, rodents and any other animals that can directly or indirectly contaminate food.

***Infestation:*** intrusion and survival of pests (rats, cockroaches, ants) in environments, equipment, and food.

***Food processing:*** all operations of preparation, processing, cooking, packaging, storage, transport, distribution and sale of food.

***Critical limit:*** a value that separates acceptability from unacceptability.

***Lot:*** determined quantity of cooked or pre-cooked foods, produced simultaneously and under the same conditions.

***Food handling:*** any person who handles food, materials or tools used for processing unpackaged foods, or who comes into contact with them.

***Pathogenic microorganisms:*** disease-causing microorganisms.

***Microorganisms:*** organisms invisible to the naked eye such as microbes, molds, yeasts and viruses.

***Control measure:*** an action or activity that can be used to prevent, eliminate or reduce to an acceptable level a food safety hazard.

***Monitoring:*** the act of conducting a planned sequence of observations or measurements of the control parameters to ascertain that a Critical Control Point (CCP) is under control.

***Mold:*** microorganism that can reproduce in extreme conditions of temperature and salt and sugar concentration. The forms that transform the substances contained in foods are often visible to the naked eye as layers of color from gray to green.

***Non-compliance (NC):*** a deviation from the critical limits.

***Pasteurization:*** Pasteurization (or pasteurization) is a process of thermal recovery applied to certain foods in order to minimize health risks due to pathogenic microorganisms sensitive to heat, such as bacteria in vegetative form, fungi and yeasts, with minimal alteration of the characteristics chemical, physical and organoleptic characteristics of the food.

***Danger to food safety:*** biological, chemical and physical food agent, or food condition, which can potentially cause harmful health effects.

***Danger:*** a biological, chemical or physical agent potentially harmful to health if present at an unacceptable level.

***Self-control plan:*** a document prepared in accordance with the HACCP methodology aimed at ensuring the control of significant hazards for the safety of products in the segment of the food chain taken into consideration.

***Food safety policy:*** intentions and general guidelines of an organization in relation to food safety formally expressed by top management.

***Procedure:*** defined ways to perform a task.

***Products:*** raw materials, semi-finished products, finished products and ingredients.

***Operational PRPs; operating prerequisite program:*** PRP identified by hazard analysis as essential to control the likelihood of introducing food safety hazards and / or contamination or proliferation of food safety hazards in the product (s) in the acceptable environment.

***PRP, prerequisite program:*** basic conditions and activities (of food safety) necessary to maintain a hygienic environment throughout the food chain suitable for the production, management and supply of safe finished products safe food for human consumption Cleaning: detachment, removal and removal of dirt.

***Critical Control Point (CCP):*** a point, a phase or a procedure in which it is necessary and possible to exercise a control action, in order to eliminate (CCP) a danger related to the safety and hygienic integrity of the food product, or to prevent it or reduce it to an acceptable level.

***Critical point:*** point or phase or procedure, in which a danger may occur, increase or persist.

***Refrigeration:*** storage system for perishable foods at a temperature below 4 ° C.

***Recordings:*** collection of data and conservation of the relative written or in any case recorded documentation of all the information regarding the self-controls and their verification.

***Processing residue:*** residual substance or material deriving from a production or consumption cycle.

***Waste:*** any product, packaging or unwanted material that must be removed from the production area.

***Risk:*** probability that a hazard will occur, increase or persist.

***Rotation:*** procedure that ensures the sale of food by their due date.

**Food safety:** Concept aimed at excluding the possibility that food products may cause harm to the consumer if prepared and / or consumed in accordance with the intended use.

***Sterilization:*** treatment with heat or chemicals that destroys all bacteria including spores and viruses.

***Freezing:*** rapid cooling of foods up to –18 ° C or more.

***Heart temperature:*** the temperature measured at the geometric center of the food.

***Room temperature:*** the temperature of the working environment.

***Thermometer:*** appliance used for measuring the temperature of equipment and / or food.

***TMC:*** (Maximum shelf life) term within which a food can be stored without undergoing alterations and maintaining its integrity. This definition must be indicated by writing "to be consumed preferably within" followed by the date or indication of the point of the package where this date is found.

***Toxin:*** poisonous substance formed by microorganisms in development.

***Treatments:*** the chemical or physical process intended to prolong the preservation of the products or the combination of said processes.

***Validation:*** to obtain evidence for food safety purposes that the control measures managed by the HACCP plan and by the operational PRPs are able to be effective.

***Verification:*** the use of methods, procedures or tests in addition to those used for monitoring, to determine the effectiveness of the Self-Control Plan (HACCP) and / or if this requires changes to increase food safety.

## 4.0 General requirements

The Organization has defined, applies, maintains and submits an FSMS to continuous improvement activities.

## 4.1 Documentation Requirements

### 4.1.1 Generality

The SGSA documentation consists of:

- Self-control and food safety policy.
- Improvement Plan (objectives).
- Food Safety Manual (the HACCP plan is an integral part of the manual).
- Procedures and Work Instructions.
- Recordings.

The ***Food Safety and Auto control Manual*** describes the system to demonstrate compliance with the health and hygiene requirements required by the mandatory standards and the capacity of the food safety insurance and allow its evaluation to external bodies.

The Manual is organized in mobile chapters; each chapter can be replaced independently of the others.

At the beginning of the Manual the revisions matrix relating to each section of the same is reported.

Each page has the name "Manual" in the header.

The page numbering is shown at the right margin of each page at the bottom.

This Manual has been prepared by Consultants with the support of the RGSA, verified and approved by the OSA and / or its Legal Representative.

Distribution to external parties is authorized by the OSA and / or its Legal Representative.

Copies not initialed on the first page are to be considered unusable.

All internal copies are subject to the update service, guaranteed by the RGSA.

In the event of changes to the Manual, copy assignees are notified of any updates.

The content of the revisions is highlighted in specific paragraphs.

It can also be distributed in uncontrolled copies and therefore not subject to updating, for reasons of image and / or for commercial negotiations, at the request of the interested party or an internal promoter.

The **management procedures** are company rules that detail the points in the manual and establish them:

- "WHAT "must be done
- "WHO (function) must do it
- "To WHO" such information must be sent (interconnection of functions).

The procedures, referred to in the sections of this Manual, are issued by RGSA, verified and approved by the OSA and / or its Legal Representative.

The ***Work Instructions*** establish in a detailed way "HOW" a specific activity must be performed; these documents are generally used to standardize working methods.

These documents are issued by the RGSA, verified and approved by the OSA and / or its Legal Representative.

The ***Modules*** are operational documents referred to in the Procedures.

The ***Registrations*** are documents (internal or of external origin) that provide objective evidence of performed activities or results obtained for the validity of the monitoring performed.

### 4.2.2 Documentation Management

Documentation management methods consist of storing all system documentation for a period of not less than three years in boxes on office premises and / or in computer mode.

### 4.1.2 Registration Management

Documentation management methods consist of storing all system documentation for a period of not less than three years in boxes on office premises and / or in computer mode.

# 5. RESPONSIBILITY OF THE MANAGEMENT

## 5.1 Management commitment

The Management provides evidence of its commitment to the development and implementation of the FSMS and to the continuous improvement of its effectiveness:
Illustrating that food security is supported by the organization's business objectives.
Communicating to the organization the importance of meeting the requirements of the UNI EN ISO 22000 standard, all legislative and regulatory requirements:

- As well as the customer's food safety requirements;
- Establishing food safety policy;
- Carrying out reviews by the Management;
- Ensuring the availability of resources.

## 5.2 Food Safety Policy

The Policy, establishing the general objectives to be pursued and the commitments to achieve them, both in relation to external needs (performance improvement in service delivery, customer satisfaction, socio-economic needs) and in relation to internal needs (satisfaction of the internal Customer, reduction of non-conformities) both as regards the adequate role of the organization in the food chain.
The **objectives**, explicitly defined, are:
**Fulfillment of the requirements** (required by the Customer and necessary to comply with the requirements of the services to be carried out, including the applicable mandatory ones);
**Continuous improvement** of SGSA effectiveness; **Reduce costs**, in terms of eliminating internal non-conformities and those induced by external suppliers;
**Individual empowerment**.
In view of the aforementioned objectives, the DITTA has identified and defined the **commitments** to achieve them in terms of tools, methods, resources and anything else necessary to ensure the achievement of the set objectives.

The **tools** to achieve these **goals** are:

**- Maintenance of appropriate procedures of "Inspections"** obtained by working to prevent, or in any case promptly remove, causes of non-compliance both with respect to the characteristics of the service to be provided and to ensure that the dangers to food safety that can reasonably be expected to occur in in relation to products included in the scope of application of the System, they do not directly or indirectly damage the consumer;

**- Training / Education:** carried out by introducing to the voluntary and mandatory disciplines all the company departments at all levels and in particular those in positions of responsibility linked both to the management of the organization and to that relating to the GSA;

**- Organization:** defines the organization chart and the organizational objectives of all the Functions. The **tools** identified as necessary to achieve their objectives involve the entire organization in an integrated corporate vision in which the aspect of Food Safety is combined, in a correct balance, with all the aspects that combine to outline the corporate strategies.

This Policy is reviewed at the Management Review and disseminated to all those who need to be informed.

## 5.3 SYSTEM planning

The Management ensures that:

The planning of the System is carried out in such a way as to comply with the requirements set forth in § 4.1 of this Manual and achieve the objectives of the organization that support food safety and guarantee the maintenance of the integrity of the SYSTEM even when changes are planned and implemented to the System.

## 5.4 Responsibility and authority

In order to ensure that the responsibilities and authorities are defined and made known within the Organization, the Management defines the Company Organization Chart, formalized by functions and appointments.

The attribution of responsibilities takes into account, among other things, the degree of education and / or the proven experience acquired by each function.
It should be noted that with regards to food safety, all personnel have the responsibility to report the problems of the System to the RGSA, which, in collaboration with the members of the Food Safety Group, has the responsibility and authority to start and record the actions.

### 5.5 Head of the Food Safety Group.

The OSA and the RGSA, which have the following responsibilities regarding this task:
Managing the GSA (Ref. § 7.3.2) and organizing the work;

Ensure training and relevant training of GSA members;

Ensure that the FSMS is prepared, implemented and maintained and report to the Management on the effectiveness and suitability of the SGSA.

### 5.6 Communication

#### *5.6.1 External Communication*

The Management has activated suitable external communication processes, in order to ensure the effectiveness of the SGSA.
In particular, the designated personnel (RGSA), through continuous training activities, assumed the responsibility and authority to communicate with suppliers and customers (also through the use of instructions on Customer Satisfaction and Complaint Management), legislative and regulatory authorities, and with any other organizations that have an impact on the effectiveness or updating of the System or are influenced by them.
The communication in question, on the part of the RGSA to the outside, provides information on aspects of food safety of products that may be relevant to other organizations within the food chain and in particular to the known food safety hazards that must be controlled by other organizations, always in the supply chain.

### *5.6.2 Internal Communication*

The OSA has activated suitable processes of communication with the staff on matters having an impact on food safety.

The RGSA, in collaboration with the other members of the Group, organizes meetings to address any changes and / or changes, but also to receive comments or suggestions from the same.

The RGSA communicates this to staff through verbal and / or written communications, indicating the date, the subject and the participants. The topics covered and the conclusions are analyzed during the System Review.

The changes and / or changes in question to any meetings may concern the following aspects:

- Products or new products;
- Raw materials, ingredients and services;
- Production systems and equipment;
- Production rooms, location of equipment, surrounding environment;
- Cleaning and sanitizing programs;
- Packaging, storage and distribution systems;
- Qualification levels of personnel and / or assignment of responsibilities and authorizations;
- Regulatory and legislative requirements;
- Knowledge related to food safety hazards and control measures;
- Customer, sector and other requirements that the organization observes;
- Relevant inquiries from the external parties involved;
- Complaints about food safety hazards associated with the product;
- Other conditions that have an impact on food safety.

## 5.7 Preparation and response to emergencies

For the type of activity carried out, it is believed that the only emergency that could occur, and to which a prompt response is given, concerns a possible lack of electricity. In the event that such an emergency occurs for a period of time such as to make the products subjected to controlled temperature dangerous, the OSA will be activated for their immediate elimination, by controlled disposal.

## 5.8 Management review

***Input elements for review***

The Management reviews the System annually to ensure its continued suitability, adequacy and effectiveness, by assessing opportunities for improvement and any need to change the System.

***Input elements of the SYSTEM***

- The results of internal, external and / or inspection audits;
- Actions following the previous reviews carried out by the Management;
- Changes in circumstances that may affect food safety;
- Emergency situations, accidents and withdrawals (including the recall);
- Reviews of any communication activities including return information from the Customer;
- Status and effectiveness of the training performed.

***Output items of the review***

Following the analysis of the input elements, the Management defines actions related to:

- Ensuring food safety;
- Improve the effectiveness of the SYSTEM;
- Necessary resources and review of the organization's food safety policy and related objectives.

# 6 RESOURCES MANAGEMENT

## 6.1 Making resources available

The Management identifies and makes available the resources necessary to implement and update the FSMS and continuously improve its effectiveness.

## 6.2 Human Resources

*Definitions Skills and Tasks*

The DITTA has identified the necessary competences for the personnel whose activities have an impact on food safety, and through "training", both mandatory and specific for tasks and functions, has identified the following:

**Food Safety Group Manager**

§ 5.5 of this document for the duties and responsibilities assumed by the RGSA.

**Management**

Plan and coordinate the production process ensuring that the product meets the production standards set by the DITTA.

It manages and develops resources by optimizing the activities of each individual department: it programs production, plans times and methods, defines and forecasts production costs and coordinates the different departments; ensures the efficient operation of plants and machines and the procurement of raw materials; analyzes procedures and production techniques proposing improvements that increase productivity; guarantees compliance with safety regulations; has the responsibility to manage and develop human resources by identifying the right people for the various departmental activities, preparing suitable training courses.

**HACCP manager:**

Is responsible for:

- Ensure the full application of the HACCP Plan;
- Update the legal and regulatory provisions on self-control of Food;
- Always keep the records referred to in the Self-Control Plan updated;
- Control of working and hygienic environments.

**Responsibility for traceability and traceability:**

Is responsible for:

- ensure that the food produced meets the provisions of the food legislation applicable to the activity;
- develop a traceability system applied to the phases of production, processing and / or distribution of food;
- implement the procedures for the withdrawal from the market of products deemed to be non-compliant with the safety requirements and proceed with the relative communications to the competent authorities if there were the need;

He is responsible for the assignment of the roles foreseen for the implementation of the traceability system, for the verification of the application of the company procedures, for the training of the employees also on the basis of the skills required for the roles assigned.

*Awareness of their activities*

To ensure that human resources are aware of the relevance of activities that have an impact on food safety, meetings are held during which the aforementioned issues are addressed.

### 6.3 Infrastructure

In order to guarantee compliance with the requirements of the service to be provided, the DITTA has prepared and maintains the necessary infrastructures and working environment in particular:

- Equipment and process equipment;
- Equipment and technical equipment;
- Offices and related services.

### 6.4 Work Environment

Access to the work areas of personnel not directly concerned is prevented. Whoever enters the working areas wears suitable protective, disposable and / or clean overcoats.

The cleaning of working clothes for operating personnel is for the use and discretion of the personnel themselves, who are required to wash clothes.

The staff in charge of processing is constantly aware of maintaining high levels of personal cleanliness.

In the case of diseases transmissible through food (eg gastrointestinal disorders, septic conditions, respiratory disorders, potentially infectious diseases, etc.), the operator must promptly notify the OSA, which will prevent carrier personnel from operating in the processing areas and storage.

Suspected cases of infectious and contagious diseases will be promptly reported to the competent Health Authority for the adoption of appropriate measures.

There is a training plan for the staff, on the principles of personnel hygiene and on the procedures established by this manual as well as on the dangers and methods of contamination of food due to inadequate personal hygiene.

**Behavioral rules**

Personnel assigned to direct contact with the product (from the raw material to storage) adopt the following behavior for personal hygiene purposes:

- It keeps the nails of the hands very short and without nail varnish;
- Does not wear watches, rings or trinkets and lays personal effects outside the processing areas. It adequately covers all non-removable personal effects.
- Performs the hand washing operation frequently during work and always at the entrance to the processing areas, before starting their shift, after breaks and using the toilets and after handling products, objects or materials possible sources of contamination, after coughing and / or sneezing, sheltering your mouth with your hands.

  Products that comply with current regulations are used for disinfection.
- Holds glasses securely behind the neck (e.g. with elastic bands);
- Dries hands with disposable paper;
- In the presence of wounds and / or abrasions, they are suitably protected with waterproof dressings that guarantee absolute isolation from the external environment;
- Do not roll up the sleeves;
- Do not smoke / drink / eat in processing rooms.

# 7 PLANNING AND REALIZATION OF SAFE PRODUCTS

## 7.1 GENERALITY

The DITTA drew up this manual taking into account the EN UNI ISO 22000: 2005, ISO / TS 22002-1: 2009 and FSSC 22000 standards, identified and planned the main processes necessary for the realization of safe products, in all production phases, transformation, manufacture, packaging, storage, transport, distribution, sale or final supply through the definition of Prerequisite Programs (PRP) and Operational Programs (PRP-O).

This manual defines the hygiene and control specifications necessary to ensure active and passive safety, which are implemented through the practice of SELF-CONTROL, taking into account the horizontal regulations given by REGULATION (EC) n. 852/2004 and subsequent amendments which establishes the requirements of food hygiene law and all other vertical regulations concerning the field of applications.

This manual provides the tools, information and methods for correct self-monitoring based on the H.A.C.C.P system, in order to guarantee the health and quality of the products of this establishment.

## 7.2 Prerequisite programs (PRP)

The DITTA has established, implements and maintains the prerequisite programs in order to control:

- Probability of introducing food safety hazards into the product through the work environment;
- Biological, chemical and physical contamination of the product, including cross-product contamination;
- Levels of danger for food safety in the product and in the processing environment of the product.

The PRPs are:

- Construction and layout of buildings;
- Structure of the premises and work areas;
- Services: air-water-energy;
- Waste disposal;
- Suitability of equipment, cleaning and maintenance;
- Cleaning and sanitizing;
- Measures for the prevention of cross-contamination;
- Pest control;
- Personal hygiene and staff facilities;
- Management and control of purchased materials;
- Management and control of raw materials;
- Product recall procedures.

The PRPs that were previously listed resulted from a careful analysis of the information held by the group for food safety.

This information includes: the mandatory regulation, national and sector-specific regulations (see regulatory references, reported in section 3 of this manual).

In order to keep the choice of PRPs always efficient, checks will be planned in order to provide, if necessary, for possible modifications.

## 7.3 PRELIMINARY PHASES TO ALLOW ANALYSIS OF HAZARDS

### *7.3.1 Overview*

The DITTA collects, maintains updated and documented all relevant information necessary to conduct the hazard analysis.

The storage of this information takes place for a time not less than three years and by the RHACCP.

### *7.3.2 Food Safety Group*

For the application of the 7 principles on which the H.A.C.C.P. system is based. the establishment of a food safety group is essential. In this case the group met to determine the PRP, PRP-O and C.C.P., the relative limits and the monitoring systems to make the relative changes in the production process. The group's success is achieved through the knowledge of all the information available to the manager of the same group and its collaborators.

In fact, this plan has been drawn up by putting in place different professionalisms and skills.

| NAME | TASK |
|---|---|
| Attorney | OSA |
| See organization chart | RSGSA |

### *7.3.3. Product features*

#### *7.3.3.1. Raw materials, ingredients and materials in contact with food*

Below is the procedure for managing the raw materials and materials in contact with the product, necessary to perform the hazard analysis.

- **PACKAGING**

All packaging in direct contact conform to the contact with food are purchased after careful qualification and evaluation of the suppliers, which only after providing guarantees (Certificates, analyzes, etc.) to the suitability of the products, fall within the list of Qualified Suppliers.

For the glass, the presence of any broken pots is also checked both on delivery and during processing.

In the event that a break occurs during the processing cycle, all the production that at that moment is at risk of physical contamination will be eliminated by any type of subsequent process and / or sale.

Subsequently, all production rooms, instruments and equipment must be subjected to reclamation to avoid possible presence of glass.

To this end, all possible concave containers will be turned in the opposite direction to the surface in order to favor the fall of any glass splinters, the same will happen for any jars not the same caps not used yet; subsequently they will be, in any case subjected to further rinsing, and finally a blow by microbiologically controlled compressed air.

- **RAW MATERIALS**

All the raw materials used comply with the legal requirements, in fact, they are purchased after careful qualification and evaluation of the suppliers, who only after providing guarantees (Certificates, analyzes, etc.) to the suitability of the products, are included in the Suppliers list Qualify.

### *7.3.3.2. Characteristics of finished products*

The characteristics of the finished products comply with the provisions of the mandatory regulations and the limits set by the implemented system

### *7.3.4. Intended use*

The DITTA produces finished and / or semi-finished products, the end user is the customer (consumer).

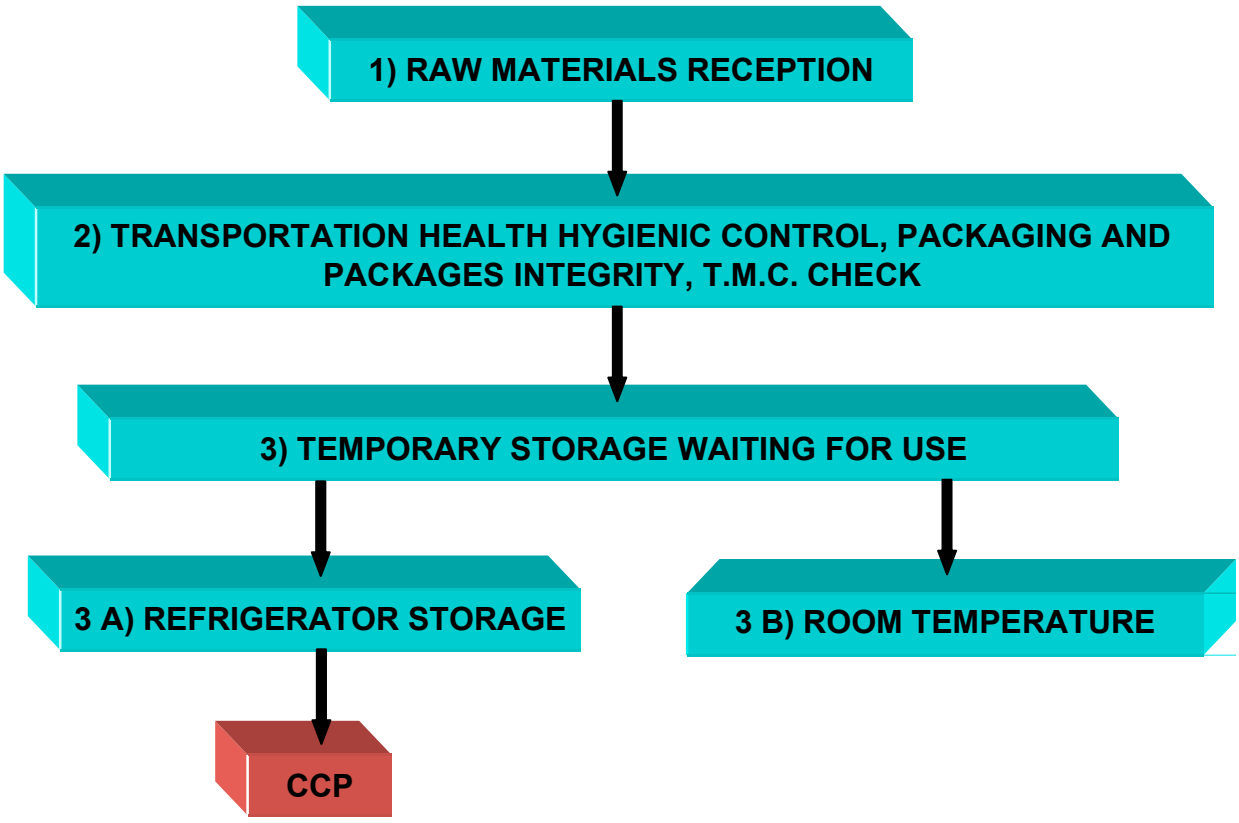
### *7.3.5. Flow diagrams, process steps and control measures*

### *7.3.5.1 Flow Diagrams*

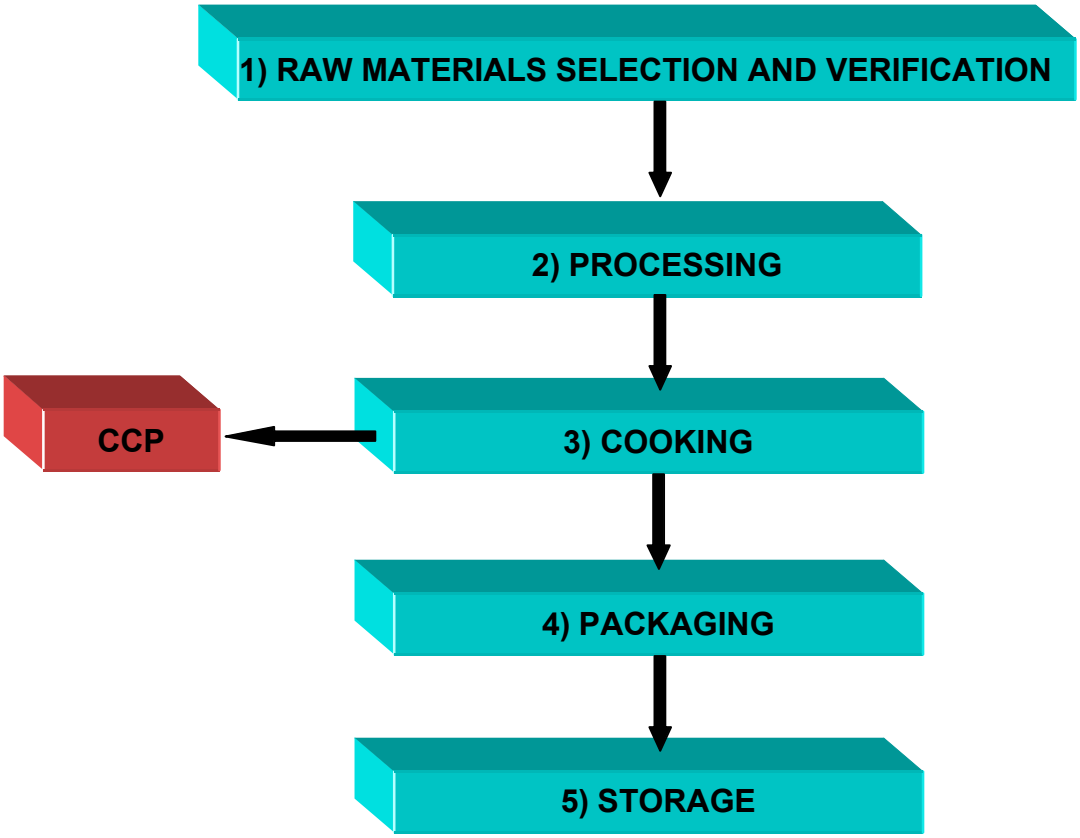
The flow diagram describes, based on the information acquired, the production flow of the various production lines present within the DITTA, starting from the arrival of the goods to the finished product.

Through the use of this diagram it was possible to carry out a study that included the identification of the dangers in each phase of the process, their categorization, the probability, the risk, the limits for acceptability and any corrective actions that must be taken

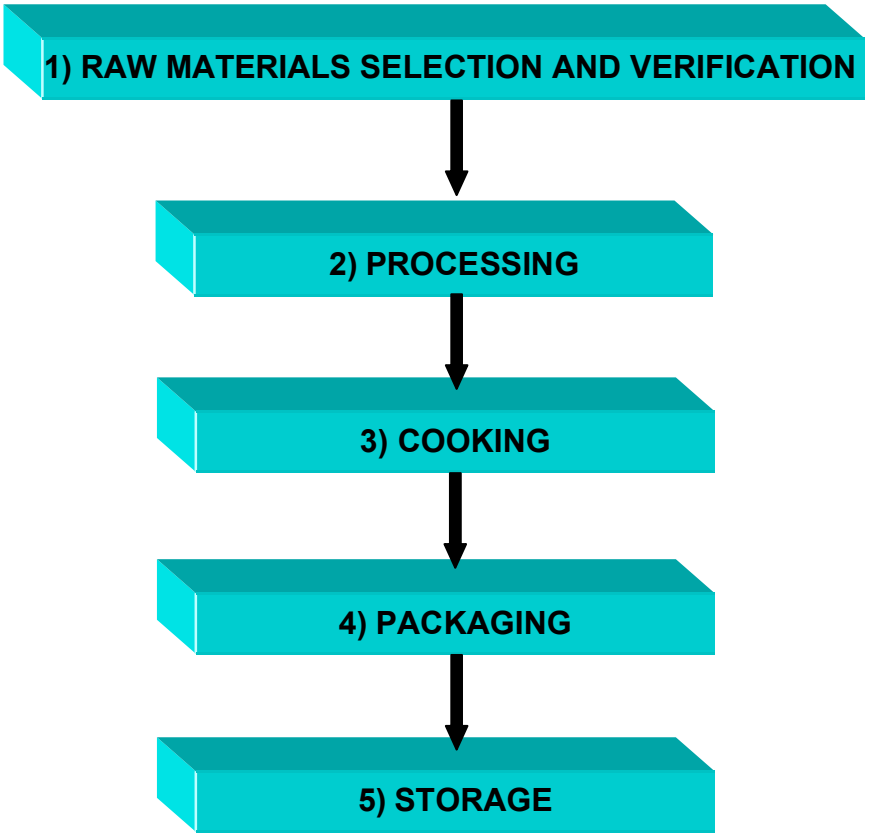
## RAW MATERIALS RECEPTION AND STORAGE



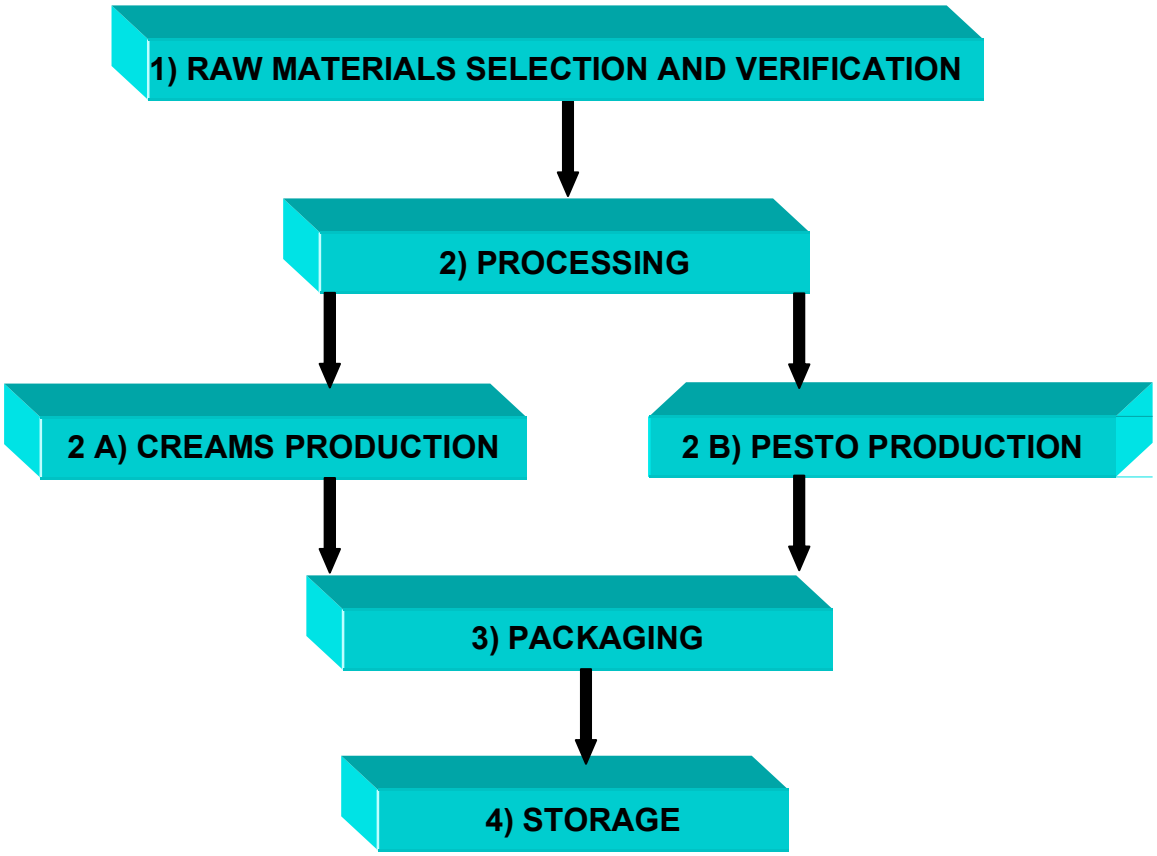
## PRODUCTION OF LEAVENED BAKERY PRODUCTS



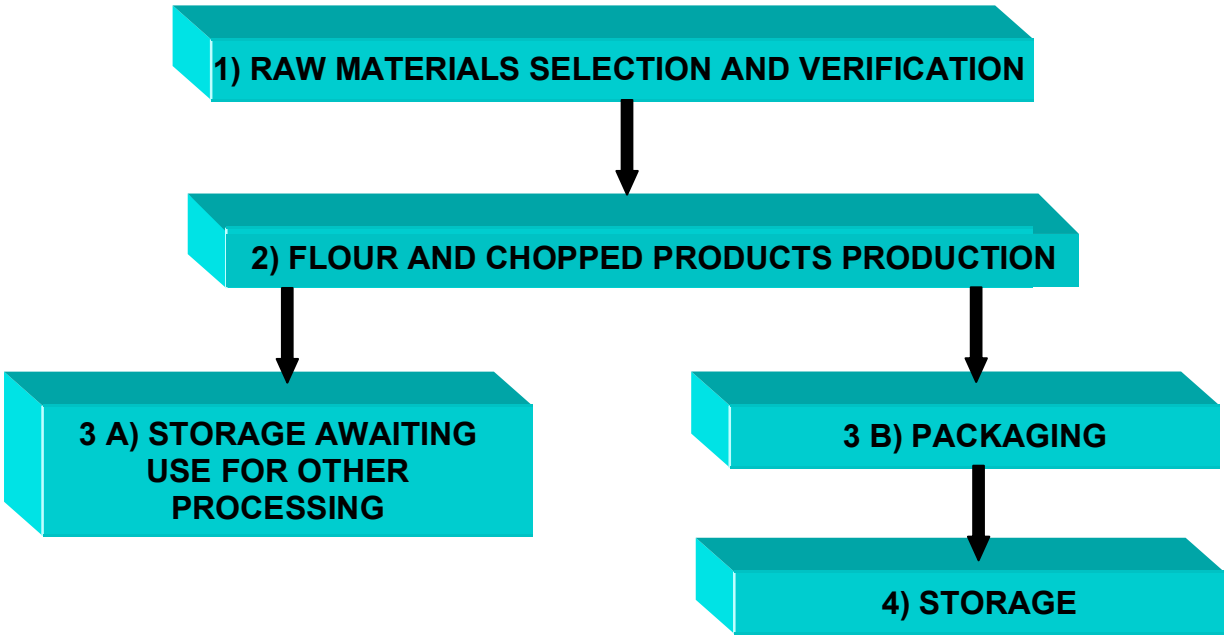
## PRODUCTION OF NON-LEAVENED BAKED PRODUCTS



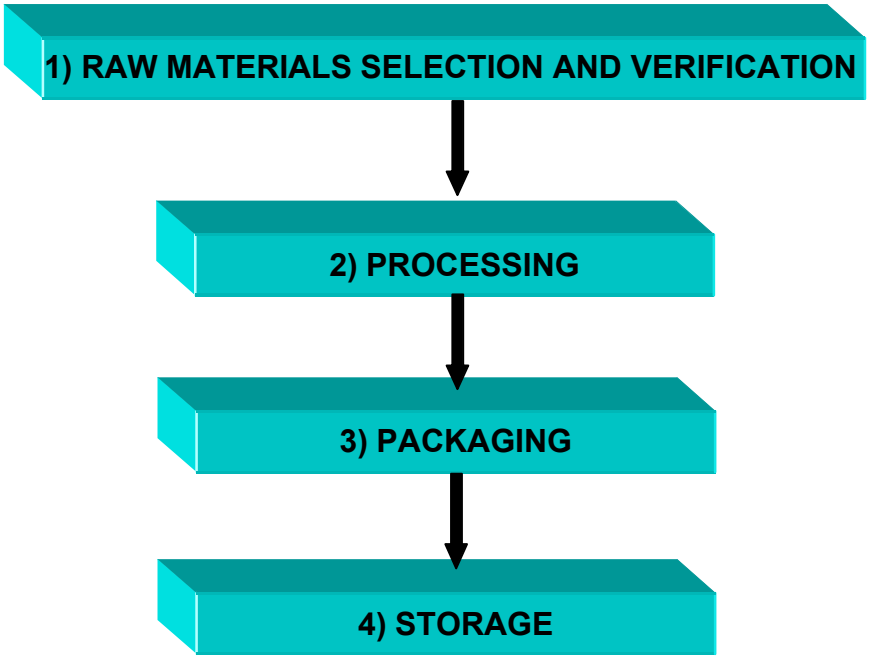
## CREAMS AND PESTO PRODUCTION



## PRODUCTION OF FLOURS AND CHOPPED PRODUCTS DERIVING FROM DRIED NUTS



## PRODUCTION OF PASTE DERIVING FROM NUTS



### 7.3.5.2 Production cycle

**Cycle description**

Production is based on the transformation of raw materials of both animal and vegetable origin into finished products ready for final consumption and / or semi-finished products to be used for the production of other types of finished products and / or intended for sale as they are.

The flow charts are:

- **RECEPTION AND STORAGE OF RAW MATERIALS**
- **PRODUCTION OF LEAVENED BAKERY PRODUCTS**
- **PRODUCTION OF NON-LEAVENED BAKERY PRODUCTS**
- **CREAMS AND PASTES PRODUCTION**
- **PRODUCTION OF FLOURS AND CHOPPED PRODUCTS DERIVING FROM DRIED NUTS**
- **PRODUCTION OF PASTE DERIVING FROM NUTS**

The process takes place on the basis of the hypothesized request and prior to it and / or carried out according to customer’s orders and therefore immediately after the customer's order and only for the intended use.

## 7.4 HAZARDS ANALYSYS

### 7.4.1 *Overview*

The flowcharts previously treated have allowed an analysis of the hazards that can reasonably be congruent with the type of product and process.

### 7.4.2 *Hazards identification and determination of acceptability levels*

In the activity, considered in this manual, characteristic dangers and their acceptability have been identified through a careful study of the legislative framework concerning the type of product and establishment, the applicable rules, the information already present given by the production history of the DITTA.
The determined dangers are:

**BIOLOGICAL HAZARDS**

Among the biological hazards the following risks have been identified:
- Contamination and / or growth of pathogenic microorganisms
- Presence of weeds

**CHEMICAL HAZARDS**

Among the chemical hazards the following risks have been identified:
- Presence of chemical residues from sanitizers used in the plant
- Presence of allergens from potential cross-contamination
- Presence of any pesticide and / or pesticide residues
- Presence of any antibiotic residues
- Presence of any residues of Acrylamide

**PHYSICAL HAZARDS**

The following risks have been identified among the physical hazards:
- The accidental introduction of foreign bodies from personnel, environment, equipment, tools and raw materials.

For organic production the certain dangers are:

**BIOLOGICAL HAZARDS**

Among the biological hazards the following risks have been identified:

- Contamination and / or growth of pathogenic microorganisms
- Presence of weeds

**CHEMICAL HAZARDS**

Among the chemical hazards the following risks have been identified:

- Presence of chemical residues from sanitizers used in the plant
- Presence of allergens from potential cross-contamination
- Presence of any pesticide and / or pesticide residues
- Presence of any antibiotic residues
- Presence of any residues of Acrylamide

**PHYSICAL HAZARDS**

The following risks have been identified among the physical hazards:

- The accidental introduction of foreign bodies from personnel, environment, equipment, tools and raw materials.

**CROSSED CONTAMINATION**

The following risks have been identified among the dangers of cross-contamination:

- The introduction of non-organic raw materials and / or the use of equipment and / or tools not intended for use for the aforementioned production.

### 7.4.3 *Evaluation of hazards*

The risk analysis was conducted taking into account the type of product that is, stored and distributed without any manipulation other than that which is processed. Through a careful study of all the flow diagrams reported above, which made it possible to identify the risks. For the purposes of the hazard assessment, the following definitions were used:

| DEFINITIONS | |
|---|---|
| **DAMAGE** | Health damage, including damage that may be caused by loss of product quality or availability |
| **HAZARD** | Potential source of damage |
| **SEVERITY** | The measure of the possible consequences of a hazard |
| **PROBABILITY** | The extent to which the damage is likely to occur |
| **RISK** | Combination of the probability of the occurrence of the damage and the severity of the damage itself |
| **RISK ANALYSIS** | Use of available information to identify hazards and estimate risk |

In fact, by definition the danger is serious, when the consumer's health can be considered permanently compromised and lead to death itself. An average danger, on the other hand, is defined as such when the damage, despite being severe, never leads to death.

Finally, a low danger is defined as such only when the damage caused is reversible until complete recovery.

The probability is defined as high when the presence of the hazard is safe, medium when the presence of the hazard is possible in some circumstances, and finally low when the presence of the hazard is unlikely or could be possible in unusual circumstances..

## QUANTITATIVE ASSESSMENT OF THE RISK ASSOCIATED WITH THE HAZARD

## RISK INDEX

**R = P x G = Probability x Gravity**

| PROBABILITY | |
|---|---|
| High | 3 |
| Medium | 2 |
| Low | 1 |
| No risk | 0 |

| GRAVITY | |
|---|---|
| High | 3 |
| Medium | 2 |
| Low | 1 |
| No risk | 0 |

| 0 < R < 9 | |
|---|---|
| 0 | RISK: NO RISK |
| 1 to 3 | RISK: LOW |
| 4 to 6 | RISK: MEDIUM |
| 7 to 9 | RISK: HIGH |

After this premise, we are able to assess both quantitatively and qualitatively every single risk contained within each previously identified danger. At this point, the team has chosen to submit to the decision tree, attached hereafter, all the dangers and related risks associated with each phase previously identified in the flow charts.

# FOOD SAFETY MANAGEMENT SYSTEM

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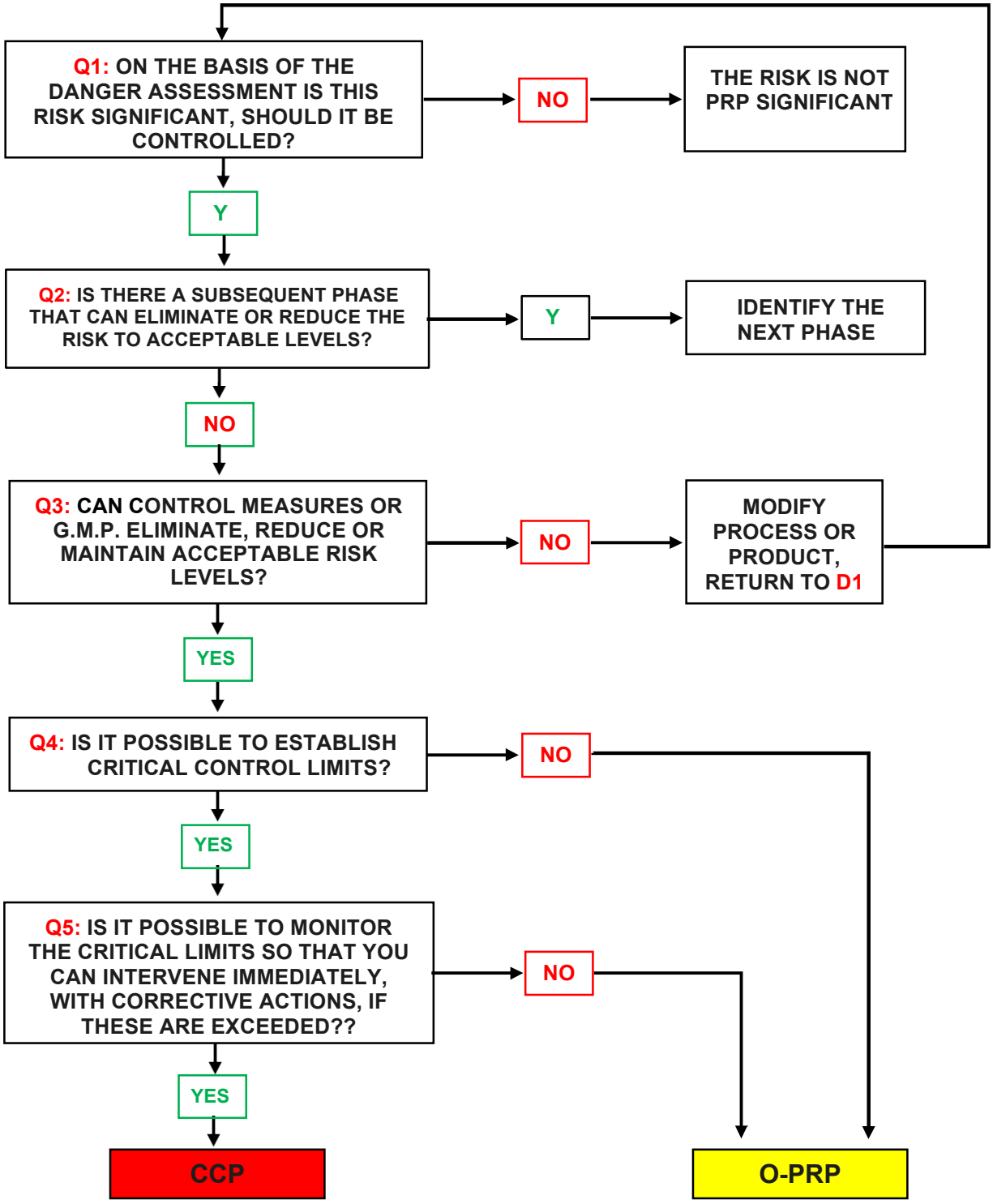
|---|---|---|
| | YES | NO |
| | SECTION 7 | |

## PLANNING AND ACCOMPLISHMENT OF SAFE PRODUCTS

### DECISIONS SCHEME



## RAW MATERIALS RECEPTION AND STORAGE

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS RECEPTION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF ANY RESIDUALS OF PESTICIDES AND / OR PHYTO-DRUGS PRESENCE OF ANY RESIDUALS OF ANTIBIOTICS PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2 | TRANSPORTATION HEALTH HYGIENIC CONTROL, PACKAGING AND PACKAGES INTEGRITY, T.M.C. CHECK | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | POSSIBLE | PRP-O | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 3 | STORAGE AWAITING USE FOR OTHER PROCESSING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

## RAW MATERIALS RECEPTION AND STORAGE

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 3A | REFRIGERATION STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | YES | YES | CCP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 3B | ROOM TEMPERATURE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |

# FOOD SAFETY MANAGEMENT SYSTEM

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|---|---|---|
| | YES | NO |
| | SECTION 7 | |

## PLANNING AND ACCOMPLISHMENT OF SAFE PRODUCTS

### PRODUCTION OF LEAVENED BAKED PRODUCTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS SELECTION AND VERIFICATION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2 | PROCESSING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 3 | COOKING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | YES | YES | CCP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION PRESENCE OF ANY ACRYLAMIDE RESIDUAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |

## PRODUCTION OF LEAVEN BAKED PRODUCTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 4 | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 5 | STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

# FOOD SAFETY MANAGEMENT SYSTEM

| MANUAL | CHECKED COPY | |
|---|---|---|
| | YES | NO |
| | SECTION 7 | |

## PLANNING AND ACCOMPLISHMENT OF SAFE PRODUCTS

### PRODUCTION OF NON-LEAVEN BAKED PRODUCTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS SELECTION AND VERIFICATION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2 | PROCESSING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 3 | COOKING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION PRESENCE OF ANY ACRYLAMIDE RESIDUAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |

## PRODUCTION OF NON-LEAVEN BAKED PRODUCTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 4 | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 5 | STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

## CREAMS AND PESTO PRODUCTION

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS SELECTION AND VERIFICATION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2A | CREAMS PRODUCTION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 2B | PESTO PRODUCTION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |

## CREAMS AND PESTO PRODUCTION

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 4 | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 5 | STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

## PRODUCTION OF FLOURS AND CHOPPED PRODUCTS DERIVING FROM DRIED NUTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS SELECTION AND VERIFICATION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2 | PRODUCTION OF FLOURS AND CHOPPED PRODUCTS | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 3A | STORAGE AWAITING USE FOR OTHER PROCESSING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

## PRODUCTION OF FLOURS AND CHOPPED PRODUCTS DERIVING FROM DRIED NUTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 3B | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 4 | STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

## PRODUCTION OF PASTE DERIVING FROM NUTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | RAW MATERIALS SELECTION AND VERIFICATION | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 0 GRAVITY = 0 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 2 | PROCESSING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 3 | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |

## PRODUCTION OF PASTE DERIVING FROM NUTS

| N | PHASE | HAZARD | RISK | RISK CALCULATION P x G | R | RISK LEVEL | D1 | D2 | D3 | D4 | D5 | PRP/ O-PRP/CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 4 | STORAGE | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CHEMICAL | PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |

### 7.4.4. Selection and evaluation of control measures

Based on the hazard assessment performed, an appropriate combination of control measures was selected in order to prevent, eliminate or reduce the hazards assessed for food safety. The selected control measures have been divided into categories (CCP or PRP) depending on the management mode.

## 7.5. Establishment of Operational Prerequisite Programs (PRP)

From the analysis of the flow diagrams and through the use of the decision tree the operational prerequisites for food safety have been identified. The analysis showed that the Operational PRPs can be monitored. The application of good processing practices and correct hygienic practices, in addition to the correct functioning of the machinery allow, through appropriate control measures, the correct execution of the O-PRPs.
The following Operational PRPs have been identified:

## Operational PRPs

## RAW MATERIALS RECEPTION AND STORAGE

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **ROOM TEMPERATURE**<br>**Operational PRP** | **PHYSICAL**<br>ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |

| FOOD SAFETY MANAGEMENT SYSTEM | | |
|---|---|---|
| MANUAL | CHECKED COPY | |
| | YES | NO |
| | SECTION 7 | |
| PLANNING AND ACCOMPLISHMENT OF SAFE PRODUCTS | | |

## Operational PRPs

## PRODUCTION OF LEAVENED BAKED PRODUCTS

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **PROCESSING** Operational PRP | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **COOKING** Operational PRP | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION PRESENCE OF ANY ACRYLAMIDE RESIDUAL | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES NEGATIVE OUTCOME NEGATIVE OUTCOME | VISUAL INSPECTION ANALYTICS ANALYTICS | EVERY PROCESS RANDOMLY RANDOMLY |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **PACKAGING** Operational PRP | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE** Operational PRP | **BIOLOGICAL** (CONTAMINAZIONE E/O CRESCITA DI MICRORGANISMI PATOGENI PRESENZA DI INFESTANTI) | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |

| FOOD SAFETY MANAGEMENT SYSTEM | | |
|---|---|---|
| MANUAL | CHECKED COPY | |
| | YES | NO |
| | SECTION 7 | |
| PLANNING AND ACCOMPLISHMENT OF SAFE PRODUCTS | | |

## Operational PRPs

## PRODUCTION OF NON-LEAVEN BAKED PRODUCTS

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **PROCESSING** Operational PRP | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **COOKING** Operational PRP | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION PRESENCE OF ANY ACRYLAMIDE RESIDUAL | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES NEGATIVE OUTCOME NEGATIVE OUTCOME | VISUAL INSPECTION ANALYTICS ANALYTICS | EVERY PROCESS RANDOMLY RANDOMLY |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **PACKAGING** Operational PRP | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | QUARTERLY |

## Operational PRPs

## CREAMS AND PESTO PRODUCTION

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **PROCESSING** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |
| | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **PACKAGING** Operational PRP | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |

## Operational PRPs

## PRODUCTION OF FLOURS AND CHOPPED PRODUCTS DERIVING FROM DRIED NUTS

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **PROCESSING** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |
| | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE AWAITING USE FOR OTHER PROCESSING** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |
| **PACKAGING** Operational PRP | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | QUARTERLY |

## Operational PRPs

## PRODUCTION OF PASTE DERIVING FROM NUTS

| PHASE | HAZARD | ACTION REQUIRED | COMPLIANCE | MONITORING PROCEDURE | |
|---|---|---|---|---|---|
| | | | | METHODOLOGY | FREQUENCY |
| **PROCESSING** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |
| | **CHEMICAL** PRESENCE OF CHEMICAL RESIDUES FROM SANITIZERS USED IN THE PLANT PRESENCE OF ALLERGENS FROM POTENTIAL CROSS CONTAMINATION | PROPER CLEANING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **PACKAGING** Operational PRP | **PHYSICAL** ACCIDENTAL INTRODUCTION OF FOREIGN BODIES COMING FROM PERSONNEL, ENVIRONMENT AND RAW MATERIALS | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESS |
| **STORAGE** Operational PRP | **BIOLOGICAL** CONTAMINATION AND / OR GROWTH OF PATHOGENIC MICROORGANISMS PRESENCE OF WEEDS | CORRECT WAREHOUSE ROTATION | T.M.C. | VISUAL INSPECTION | EVERY PROCESS |

### 7.6.5. Actions when monitoring results exceed critical limits

Corrective actions have already been indicated in the previous self-control plans.

## 7.7 Updating of information and preliminary documents specifically for PRPs and the H.A.C.C.P.

Following the preparation of the PRP and the H.A.C.C.P. Plan, the DITTA undertakes to modify the H.A.C.C.P. and the Operating Prerequisite Programs, if necessary, if there are updates and / or changes in relation to:

- Product features;
- Flow Diagrams;
- Process phases;
- Control measures.

## 7.8. Verification planning

The procedures for verifying the limits established previously are different depending on the type of feedback required, in fact there are those of an instrumental type (microbiological, chemical-physical analyzes, etc.), those of a documentary type and those of a visual type that are entrusted to the experience and training of the personnel in charge, through the pre-operational checks carried out daily. All this is essential to verify if the self-control system is efficient and effective to avoid possible risks linked to the finished product, as required by the aforementioned self-control plans. Microbiological type analyzes on surfaces, equipment, tools and personnel are carried out by an accredited third laboratory at least once a year, in order to guarantee correct monitoring of the plant's general hygiene conditions and to verify and validate the procedures in place.

## 7.9 TRACKING

The Company has implemented within the System, a Traceability System in compliance with the legal and regulatory provisions on the subject (Reg. 178/03 and UNI 22005: 2008), which allows the identification of products and their relationship with material lots first used.
All this is done through D.D.T. and / or invoices and / or IT and / or paper instruments, which are archived as long as there is the presence of this raw material within the DITTA.

### 7.9.1 Coding of company product lots

The lot is assigned using a progressive alpha-numeric code from the beginning of the year until the end of the same year.
The production lot derives from the M21 module, which shows the production date composed of 6 digits the cod. product and batch ingredients characterized by a progressive letter (A, B, C, ...etc.), which will change as the ingredients used change and therefore in the case of products that have the same production date, the same product code but even a single different ingredient the letter will have to vary in a sequential manner ensuring the uniqueness of the ingredients used. The list of supplier and product identification codes is contained in the "FACILE" software for billing and warehouse management.

## 7.10 HOLD UNDER NON-CONFORMITY CHECK

### 7.10.1 Corrections

The product is classified as ***non-compliant (for food safety purposes)*** when it has exceeded the critical limits for the CCP or there has been a loss of control of the operational PRPs, in this case the products involved are identified and controlled in relation to their use and release.
If the necessary corrections are made, in order to eliminate the non-compliance found, they are approved by the manager and recorded on the NC management module including all the information necessary for the traceability of the non-compliant lots.

The procedures for keeping non-compliant products under control are explained in the procedure “PO02 - Non-Conformity Check Complaints Corrective Actions Preventive Actions - 00”.

### 7.10.2 Corrective Actions.

The data derived from the monitoring of operational PRPs are evaluated by the RSGSA, which has adequate knowledge and authority to activate the corrective actions.
The A.C. are implemented when there is a lack of compliance with the operational/s PRP.
The DITTA established and maintains the PO02 procedure "Corrective Actions" of the SGSA, where the actions necessary to identify and eliminate the cause (s) of the non-conformities detected are specified, to prevent their occurrence and to report the process or the system under control.
The procedures for keeping non-compliant products under control are explained in the procedure “PO02 - Non-Conformity Check Complaints Corrective Actions Preventive Actions - 00”.

### 7.10.3 Management of potentially unsafe products

Each product batch covered by the NC is released as safe only when the DITTA evidences (through the results of sampling, analysis and / or other verification activities) that the product batch concerned complies with the acceptable levels identified in the previous pages.
In the event that, after the evaluation, the product batch is not acceptable for release, the DITTA decides for one of the following activities:

- Rework or further processing in-house to ensure that the food safety hazard is eliminated or reduced to acceptable levels;
- Destruction and disposal as waste.

The management of non-compliant products takes place according to the procedures specified in the procedure “PO02 - Non-Conformity Check Complaints Corrective Actions Preventive Actions - 00”.

### 7.10.4 Withdrawals and recalls

The withdrawal phase is not applicable, as opposed to the recall that is applied by direct contact with the customer in possession of the lot in question. In fact, by fax and / or email the lot that is the object of the recall is immediately reported, and therefore must be excluded from the sale and / or any form of direct and / or indirect use.

At this point the DITTA will be waiting to receive a confirmation from the customer of successful management of the recall, by written communication, which will confirm that it has complied with this request.

If no response is received from the customer, a further direct contact will be attempted by telephone in order to solicit the management of the recall.

## 8.1 GENERALITIES

The RSGSA has planned and implemented the processes necessary to validate the control measures and / or combinations of control measures, in order to verify and improve the SGSA.

## 8.2 Validation of combinations of control measures

The methods and the control measures, defined in the PRP and in the HACCP plan, will be validated before their application, as well as at the time of any significant variation of the processes.

The System will be considered valid when:

- The established control methods are able to keep the hazards at the defined levels;
- The control measures are effective and their combination / synergy guarantees the realization of safe products.

When the validation highlights, instead, the inability to reach the pre-established objectives, the PRP and the HACCP plan will be opportunely modified and redefined.

The validation of the control measures will take place by the RSGSA, through the analysis of data relating to emergencies, non-conformities, and statistical progress in overcoming the critical limits and reported in the management review report “Report Management Review”.

## 8.3 Monitoring of monitoring and measurement

The DITTA has identified the monitoring and measurements that must be carried out to provide evidence of the conformity of the products to the determined requirements.
The measuring equipment will be:

- Calibrated at intervals and / or before their use, based on reference measurements attributable to international or national standards;
- Adjust or adjust again when needed;
- Protected against adjustments that could invalidate the measurement results;
- Protected from damage and deterioration.

In the event that the measurement equipment is not compliant with the requirements, the DITTA will evaluate and record the validity of the results of the previous measurements, taking appropriate actions for the instrument and the products involved.

Actions for the instrument and products:

- If it is found that the equipment is not compliant, it will immediately proceed to verify whether the previous measurements are invalidated by the non-conformity found on the equipment.
- If the previous measurements are not invalidated, only the equipment will be re-calibrated or verified.
- If, on the other hand, the previous results have also been invalidated, it will be necessary, in addition to recalibration or verification of the equipment, to be non-compliant, to check the lots previously produced and still deposited in the Plant.

Record keeping

Calibration and verification records are kept by the OSA.

## 8.4 Verification of the Food Safety Management System

### 8.4.1 Internal Inspections

The DITTA performs at scheduled intervals Internal Inspections, to determine whether the SGSA:

- It complies with the planned requirements, the requirements of the SGSA established by the organization and the requirements of the UNI EN ISO 22000 standard and of the mandatory regulations;
- It has been effectively implemented and updated.

### 8.4.2 Evaluation of individual verification results

The RSGSA systematically evaluates the results of internal audit activities. If the system is, in whole or in part, ineffective with respect to the set objectives, the RSGSA must:

- Review and update existing procedures and communication channels;
- Review the conclusions of the hazard analysis, the defined operational PRPs, and the HACCP Plan;

- Review the PRPs;
- Assess the adequacy of human resources and training activities.

### 8.4.3 Analysis of the results of the verification activities

The RSGSA analyzes the overall results of internal and external audits in order to:
- Confirm the effectiveness of the system;
- Identify the need for updating and / or improvement;
- Identify the (maximum) risks arising from the use of a potentially unsafe product;
- Define the information necessary for the scheduling of the audits;
- Demonstrate the effectiveness of the corrective actions implemented.

The results of this analysis are recorded by the RSGSA in the M16 "Internal Audit Report" of the SGSA and made available to the Top Management as input information for the review or as input information for the SGSA update.

## 8.5 Improvement

### 8.5.1 Continuous Improvement

The Organization ensures the continuous improvement of the effectiveness of the SGSA through the use of communication, the management's review, the internal audits, the evaluation of the individual verification results, the analysis of the results of the verification activities, the validation of combinations of control measures, corrective and preventive actions and updating of the FSMS.

### 8.5.2 Update of the Food Safety Management System

The Company Management of the DITTA ensures that the SGSA is constantly updated. This is done through the annual assessment of the SGSA, the review of the hazard analysis, the defined, established operational PRPs and the HACCP plan.
Evaluation and updating activities are based on information:
- Input, deriving from communication, both internal and external;

- Input, deriving from other information regarding the suitability, adequacy and effectiveness of the SGSA;
- Output, deriving from the analysis of the results of the verification activities;
- Output, resulting from the management's review.

The reasons that may have determined the updating of the system and the changes made are recorded and communicated to the Top Management in view of the Review.

**AUDIT REPORT 20 AG 15588 MF**

**ORGANIZATION**

Organization name A RICCHIGIA SRL

Registered office address:
VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

Name and address of the sites subject to certification 1 VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

**ACTIVITIES, PRODUCTS AND / OR SERVICES SUBJECT TO AUDIT**

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS.

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, SPREAD CREAMS AND BAKERY. SELECTION AND PACKAGING OF DRIED FRUIT.

IAF sector: CIV, CII

**AUDIT OBJECTIVE: VERIFICATION OF COMPLIANCE OF THE MANAGEMENT SYSTEM WITH THE ISO 22000: 2005 STANDARD**

Audit criteria used as a reference: requirements of the audited standard, policies, procedures and documented information of the Organization.

Other reference standards / documents: NA

The audit team has assessed and accepted the justification provided by the Organization relating to the requirements of the standard not applicable:
NA

**AUDIT** ! Typology: Maintenance audit
Start date: 07/10/2020 End date: 07/10/2020 Man / days: 1

Extension Activity Description (if applicable): NA

| AUDIT GROUP | POSITION |
|---|---|
| GIULIANA GENCO | Team Leader |

| COMPANY REPRESENTATIVES | MEETING INITIAL | MEETING THE FINAL | LOCATION |
|---|---|---|---|
| LAURA LUPO | X | X | SOLE DIRECTOR - RESP. COMMERCIAL |
| SIMONE HIDRIUO | X | X | RESP. SGSA |
| ROSANNA DAQUINO | X | X | ADMINISTRATION |
| STEFANIA LONGHITANO | X | X | PACKAGING |
| FABIO SCALA | X | X | RESP. PRODUCTION |

| REFERENCE DOCUMENTS OF THE ORGANIZATION | Rev. | of the |
|---|---|---|
| Food Safety Management System Manual | 03 | 01-09-2020 |

| PREVIOUS AUDIT REPORTS | N. | of the |
|---|---|---|
| | 19 AG 13498 MF | 19/09/2019 |

1 Repeat, the sites subject to audit which are reported on the certificate, identifying the type for each (e.g. factory in, warehouse, offices in ...)

RI R AGROQ

**AUDIT REPORT NO• 20 AG 15588 MF**

| CHANGES IN RESPECT OF THE PREVIOUS AUDIT | UNCHANGED | MODIFIED | | NOTE |
|---|---|---|---|---|
| | | IS | NC | |
| BUSINESS NAME | X | | | |
| FIELD OF APPLICATION | X | | | |
| ORGANIZATIONAL STRUCTURE | X | | | |
| OPERATING SITES | X | | | |
| LIST OF COMPLIANCE LAWS / RULES AP_PLICABLE | X | | | |
| DOCUMENTATION OF THE ORGANIC MANAGEMENT | | X | | MSGSA rev. 03 of 01-09-2020 |
| SYSTEM / EMPLOYEES (*) [Current figure: 8 | X | | | NA |

(*) In case of fluctuation in the number of employees, enter the average number of employees on an annual basis declared by the Organization

Have the corrective actions implemented by the Organization on the basis of the findings (type A and / or B) reported below in the previous Report been verified with a positive outcome? (Indicate):

No.•1

Has the Organization taken on board the Recommendations (Type C Findings) listed below in the previous Report? (indicate):

No.•2

Permanent sites verified during this audit

| Address | Performed activity | Date |
|---|---|---|
| VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY | PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS. | 07-10-2020 |

Temporary sites verified during this audit

| Address . ! Activities and / or service performed | T Date |
|---|---|

Description of other external activities verified by inspection

NA

Any activities documentally verified

NA

**RESULTS OF THE AUDIT**

| | | | |
|---|---|---|---|
| Were major non-conformities (type A) detected? Have | D yes. | i, Zj NO | or |
| minor non-conformities (type B) been detected? Were any | 0 S1 | i, Zj NO | or |
| recommendations found. (Type C)? | i, Zj SI | 0 NO | - L |

**AUDIT REPORT NO° 20 AG 15588 MF**

Identification of the audit findings (evidence, strengths, positive elemeriti, comments on any NC found during the audit):

During the inspection at the production site, the following activities were in progress: production and packaging of JAM OF PEARS AND GINGER, lot n°07102020, deadline 10/2022₁ vases. A traceability, traceability and mass balance test was also carried out with positive results on PISTACHIO PESTO of 190 g (292 pcs), lot 290920010A, expiry 03/2022, production of 09-29-2020.

Management of complaints received by the Organization and complaints received by the Ode (to be filled in in the presence of complaints): The organization declares that it has not received complaints. Furthermore, the Ode has not received any complaints against the organization.

SPECIFIC INFORMATION RELATING TO THE SCHEME

Preliminary analysis of the HACCP study: I₁activity was performed and adequately described in the system documents and was set up in accordance with the principles of food safety and HACCP. The analysis is based on a knowledge of one's own product, its uses and the reference markets. Identification, management and monitoring of PRPs: the PRPs managed by the organization in accordance with all the references that the standard proposes, concern: construction and layout of buildings, structure of premises and work areas, services: air-water-energy, disposal of waste, suitability of equipment, cleaning and maintenance, cleaning and sanitizing, measures for the prevention of cross-contamination, pest control (Pest contrai), personal hygiene and structures, for personnel, management and control10.dei.mç1teriali, ; j_ ' Purchased, management and control of raw materials, recall procedures., of the product. Sampling was carried out as foreseen by the plan. They are described by adequate operational documentation and monitored in their application through constant verification by the SGSA group.

OPERATIONAL PRP distinguished by type of production: - cold production: processing (physical danger, risk of the presence of foreign bodies from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooling {biological danger, contamination of pathogenic and non-pathogenic microorganisms); packaging {physical danger, risk of foreign bodies coming from personnel, environment and raw materials). - hot production: processing {physical danger, risk of the presence of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooking (physical danger, risk of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); packaging (physical danger, risk of foreign bodies coming from personnel, environment and raw materials); storage {biological hazard, microorganism contamination. pathogenic and non-pathogenic). Identification, management and monitoring of CCPs: based on the₁risk analysis and assessment two CCPs have been identified: -T storage₀ controlled: risk of contamination and / or growth of microorganisms, T limit₀ <4°C, daily monitoring frequency, check T₀ storage cell {for refrigerator calibration see instrument calibration point).

-T cooking₀ controlled: risk of contamination and / or growth of microorganisms, T₀ at the core of the product not lower than 85 ° C, daily monitoring frequency (start and end of processing), T check₀ core of the product with probe thermometer {inserted with sample cap, one jar for each production). Evaluation of the validation of control measures: carried out through the evaluation of the results of the chemical and microbiological analysis activities performed on the raw material and on the finished product; l complaints received; the NC relating to the product and the results of internal monitoring and audits,

**AUDIT REPORT N '20 AG 15588 MF**

**CONCLUSIONS OF THE AUDIT TEAM**

During the initial meeting, the management was reminded of the importance of the expected results by an organization with a management system in possession of an accredited certification.

The audit was carried out based on a sampling process of the available information, verifying the processes / aspects defined by the organization and the requirements of the reference standards; the possible absence of findings does not guarantee the total absence of anomalies in the areas tested and / or in other areas

Has the audit team verified all processes / aspects, organizational units and functions indicated in the audit plan?

YES IZJ NO ☐

Justification for any deviations from the audit plan and any significant issues impacting the audit program:

NA

Evidence relating to the management system's ability to meet applicable requirements and achieve expected outcomes and evidence relating to the internal audit and management review process

During today's audit, the internal audit activity was verified in accordance with the reference procedures of the competent and independent staff (audit of 09.28.2020); the management review report of 29.09.2020 was also assessed.

In the opinion of the Audit Team, the Organization effectively monitors the use of the logo and the publication of the management?

YES IZJ NO ☐

Does the audit team confirm that the audit objectives have been achieved?

YES IZJ NO ☐

In the opinion of the Audit Team, is the scope of the certification adequate?

YES IZJ NO ☐

In the opinion of the Audit Team, the Organization's Management System, as a whole, was found to be effective compliant with the requirements of the standard and the reference certification regulation?

YES IZJ NO ☐

Does the audit team recommend the organization for certification / recertification or does it confirm the validity of the certification?

YES IZJ NO ☐

**AUDIT REPORT NO• 20 AG 15588 MF**

The audit team deems it appropriate to carry out the next maintenance audit by .. / .. / .... or by ..,. months from this visit for the following reasons (to be filled in only if the proposed date is less than 12 months)

The Organization undertakes to communicate the corrective actions decided and the dates for their implementation _ within .... days from this audit.

The Organization can propose corrective actions and the dates for their implementation immediately after the delivery of the report by the Audit Team, but it must keep in mind that the report and the attached non-conformities and / or recommendations could be modified at the OdiC. following the control activity carried out. In this case, the Organization may be required to propose again the corrective actions and the dates for their implementation.

The Organization can propose corrective actions and dates for their implementation also through the Member Area.

Additional information and notes

The company declares to be aware of the fact that the ISO 22000: 2005 certificate will expire on 21-06-2021 (earlier than the regular expiry date) due to the mandatory entry into force of the new version of the standard. ISO 22000: 2018.

**SPACE FOR THE ORGANIZATION**

L'OrQahi'zzaz'ione àci ::: éfta · The contents' dèl'pres'erite comprehensive report "d" elle nOn corlforll "lil: ae / o racC (iniaridazi'oiii attached (if present).

RESERVES AND COMMENTS

ARICCHIGIA SRL
Via Card. De Luca 115
95024 Bronte (CT)
P.IVA 05637220877

SIGNATURE FOR ACCEPTANCE OF THE REPRESENTATIVE OF THE ORGANIZATION

FIRMA DEL TEAM LEADER

GIULIANA GENCO

RINA AGROQ

**ORGANIZATION**
TO RICCHIGIA SRL

**AUDIT REPORT N 20 AG 15588 MF**

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 1 | Para 7.2<br>Improve the formalization of the monitoring carried out on pest-control. | |

**RESULTS OF PREVIOUS AUDIT REPORT**
**. No.◦ 19 AG 13498 MF**

**NON-CONFORMITY VERIFICATION OUTCOME**

IZ] CORRECT OR NOT CORRECT

**ORGANIZATION:**
TO RICCHIGIA SRL

**AUDIT REPORT NO◦ 20 AG 15588 MF**

**RELIEF N◦ 1**

| Organization documents | Affected area | Classification |
|---|---|---|
| FSMS Manual | Production | B. |

**Paragraph of reference standard 8.3**

Relief description

The calibration certificates of all the scales present in production are not always available (e.g. Waage Sri scale, serial number W1001058)

| Signature of the Team Leader | Signature for acceptance of the representative of the Organization |
|---|---|
| GIULIANA GENCO | LAURA LUPO |

***To be completed by the Organization***

**Cause's analysis**

**Treatment**

**Corrective action proposed**

| Date of implementation alleged | Signature of the representative of the Organization | Signature of the Team Leader |
|---|---|---|
| | | |

***To be completed by the audit team***

**Acknowledgment Corrective Action / Correction**

Saw metrological booklet with Waage scale calibration serial number W1001058 carried out on 17-10-2019. Training view extraordinary carried out on 19-10-2019.

| Verification outcome | Date | firm of TeamJ-eader |
|---|---|---|
| POSITIVE | 07/10/2020 | GIULIANA GENCO |

RINA AGROQ

**RESULTS OF PREVIOUS AUDIT REPORT**
**No. 19 AG 13498 MF AUDIT REPORT NO 20 AG**

**15588 MF**

**ORGANIZATION**
TO RICCHIGIA SRL

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 2 | Para 7.2<br>Improve the way in which technical and safety data sheets of products are archived · per cleaning used in production.<br>**WELCOME?** GZJ **YES** ☐ **NO** | Tab views of security of complete and updated products, eg: technical and safety data sheet, rev. 2 dated 05-11-2019 by Pro Sanity Plus. |

**Firma del Team Leader**
GIULIANA GENCO

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**REQUIRED** 21 CFR, §1.503 requires that all documents be written in a language understandable to the FSVP QI. The original document(s) were written in a language other than English but have since been translated in an effort to meet FDA requirements. An individual that is fluent in both English and the document's original language must confirm that the translation has been accurately performed.

**Translated text accurately reflects original message**

☐ Agree ☐ Disagree

☒ Agree – *with suggested edits*

**Name** Alessandro Restelli

**Date** 06/02/2021



Claudio Innocenti

**AUDIT REPORT 20 AG 15588 MF**

**ORGANIZATION**

Organization name A RICCHIGIA

SRL

Registered office address:

VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

Name and address of the sites subject to certification 1 VIA

CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

**ACTIVITIES, PRODUCTS AND / OR SERVICES SUBJECT TO AUDIT**

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS.

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, SPREAD CREAMS AND BAKERY. SELECTION AND PACKAGING OF DRIED FRUIT.

IAF sector: CIV, CII

**AUDIT OBJECTIVE: VERIFICATION OF COMPLIANCE OF THE MANAGEMENT SYSTEM WITH THE ISO 22000: 2005 STANDARD**

Audit criteria used as a reference: requirements of the audited standard, policies, procedures and documented information of the Organization.

Other reference standards / documents: NA

The audit team has assessed and accepted the justification provided by the Organization relating to the requirements of the standard not applicable:

NA

**AUDIT** ! Typology: Maintenance audit

Start date: 07/10/2020 End date: 07/10/2020 Man / days: 1

Extension Activity Description (if applicable): NA

| AUDIT GROUP | POSITION |
|---|---|
| GIULIANA GENCO | Team Leader |

| COMPANY REPRESENTATIVES | MEETING INITIAL | MEETING THE FINAL | LOCATION |
|---|---|---|---|
| LAURA LUPO | X | X | SOLE DIRECTOR - RESP. COMMERCIAL |
| SIMONE HIDRIUO | X | X | RESP. SGSA |
| ROSANNA DAQUINO | X | X | ADMINISTRATION |
| STEFANIA LONGHITANO | X | X | PACKAGING |
| FABIO SCALA | X | X | RESP. PRODUCTION |

| REFERENCE DOCUMENTS OF THE ORGANIZATION | Rev. | of the |
|---|---|---|
| Food Safety Management System Manual | 03 | 01-09-2020 |

| PREVIOUS AUDIT REPORTS | N. | of the |
|---|---|---|
| | 19 AG 13498 MF | 19/09/2019 |

1 Repeat, the sites subject to audit which are reported on the certificate, identifying the type for each (e.g. factory in, warehouse, offices in ...)

RI R AGROQ

**AUDIT REPORT NO• 20 AG 15588 MF**

| CHANGES IN RESPECT OF THE PREVIOUS AUDIT | UNCHANGED | MODIFIED | | NOTE |
|---|---|---|---|---|
| | | is | NC | |
| BUSINESS NAME | X | | | |
| FIELD OF APPLICATION | X | | | |
| ORGANIZATIONAL STRUCTURE | X | | | |
| OPERATING SITES | X | | | |
| LIST OF COMPLIANCE LAWS / RULES AP_PLICABLE | X | | | |
| DOCUMENTATION OF THE ORGANIC MANAGEMENT | | X | | MSGSA rev. 03 of 01-09-2020 |
| SYSTEM / EMPLOYEES (*) [Current figure: 8 | X | | | NA |

(*) In case of fluctuation in the number of employees, enter the average number of employees on an annual basis declared by the Organization

Have the corrective actions implemented by the Organization on the basis of the findings (type A and / or B) reported below in the previous Report been verified with a positive outcome? (Indicate):

No.•1

Has the Organization taken on board the Recommendations (Type C Findings) listed below in the previous Report? (indicate):

No.•2

Permanent sites verified during this audit

| Address | Performed activity | Date |
|---|---|---|
| VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY | PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS. | 07-10-2020 |

Temporary sites verified during this audit

| Address . ! Activities and / or service performed | T Date |
|---|---|

Description of other external activities verified by inspection

NA

Any activities documentally verified

NA

**RESULTS OF THE AUDIT**

| | | | |
|---|---|---|---|
| Were major non-conformities (type A) detected? Have | D yes. | i, Zj NO | or |
| minor non-conformities (type B) been detected? Were any | 0 S1 | i, Zj NO | or |
| recommendations found. (Type C)? | i, Zj SI | 0 NO | - L |

**AUDIT REPORT NO◦ 20 AG 15588 MF**

Identification of the audit findings (evidence, strengths, positive elemeriti, comments on any NC found during the audit):

During the inspection at the production site, the following activities were in progress: production and packaging of JAM OF PEARS AND GINGER, lot n◦07102020, deadline 10/2022₁ vases. A traceability, traceability and mass balance test was also carried out with positive results on PISTACHIO PESTO of 190 g (292 pcs), lot 290920010A, expiry 03/2022, production of 09-29-2020.

Management of complaints received by the Organization and complaints received by the Ode (to be filled in in the presence of complaints): The organization declares that it has not received complaints. Furthermore, the Ode has not received any complaints against the organization.

SPECIFIC INFORMATION RELATING TO THE SCHEME

Preliminary analysis of the HACCP study: l₁activity was performed and adequately described in the system documents and was set up in accordance with the principles of food safety and HACCP. The analysis is based on a knowledge of one's own product, its uses and the reference markets. Identification, management and monitoring of PRPs: the PRPs managed by the organization in accordance with all the references that the standard proposes, concern: construction and layout of buildings, structure of premises and work areas, services: air-water-energy, disposal of waste, suitability of equipment, cleaning and maintenance, cleaning and sanitizing, measures for the prevention of cross-contamination, pest control (Pest contrai), personal hygiene and structures, for personnel, management and control10.dei.mç1teriali, ; j_ ' Purchased, management and control of raw materials, recall procedures., of the product. Sampling was carried out as foreseen by the plan. They are described by adequate operational documentation and monitored in their application through constant verification by the SGSA group.

OPERATIONAL PRP distinguished by type of production: - cold production: processing (physical danger, risk of the presence of foreign bodies from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooling {biological danger, contamination of pathogenic and non-pathogenic microorganisms); packaging {physical danger, risk of foreign bodies coming from personnel, environment and raw materials). - hot production: processing {physical danger, risk of the presence of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooking (physical danger, risk of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); packaging (physical danger, risk of foreign bodies coming from personnel, environment and raw materials); storage {biological hazard, microorganism contamination. pathogenic and non-pathogenic). Identification, management and monitoring of CCPs: based on the₁risk analysis and assessment two CCPs have been identified: - T storage₀ controlled: risk of contamination and / or growth of microorganisms, T limit₀ <4◦C, daily monitoring frequency, check T₀ storage cell {for refrigerator calibration see instrument calibration point).

- T-cooking₀ controlled: risk of contamination and / or growth of microorganisms, T₀ at the core of the product not lower than 85 ° C, daily monitoring frequency (start and end of processing), T check₀ core of the product with probe thermometer {inserted with sample cap, one jar for each production). Evaluation of the validation of control measures: carried out through the evaluation of the results of the chemical and microbiological analysis activities performed on the raw material and on the finished product; l complaints received; the NC relating to the product and the results of internal monitoring and audits,

**AUDIT REPORT N '20 AG 15588 MF**

**CONCLUSIONS OF THE AUDIT TEAM**

During the initial meeting, the management was reminded of the importance of the expected results by an organization with a management system in possession of an accredited certification.

The audit was carried out based on a sampling process of the available information, verifying the processes / aspects defined by the organization and the requirements of the reference standards; the possible absence of findings does not guarantee the total absence of anomalies in the areas tested and / or in other areas

Has the audit team verified all processes / aspects, organizational units and functions indicated in the audit plan?

YES IZJ NO ☐

Justification for any deviations from the audit plan and any significant issues impacting the audit program:

NA

Evidence relating to the management system's ability to meet applicable requirements and achieve expected outcomes and evidence relating to the internal audit and management review process

During today's audit, the internal audit activity was verified in accordance with the reference procedures of the competent and independent staff (audit of 09.28.2020); the management review report of 29.09.2020 was also assessed.

In the opinion of the Audit Team, the Organization effectively monitors the use of the logo and the publication of the management?

YES IZJ NO ☐

Does the audit team confirm that the audit objectives have been achieved?

YES IZJ NO ☐

In the opinion of the Audit Team, is the scope of the certification adequate?

YES IZJ NO ☐

In the opinion of the Audit Team, the Organization's Management System, as a whole, was found to be effective compliant with the requirements of the standard and the reference certification regulation?

YES IZJ NO ☐

Does the audit team recommend the organization for certification / recertification or does it confirm the validity of the certification?

YES IZJ NO ☐





Claudio Innocenti

**AUDIT REPORT NO◦ 20 AG 15588 MF**

The audit team deems it appropriate to carry out the next maintenance audit by .. / .. / .... or by ..,. months from this visit for the following reasons (to be filled in only if the proposed date is less than 12 months)

The Organization undertakes to communicate the corrective actions decided and the dates for their implementation _ within .... days from this audit.

The Organization can propose corrective actions and the dates for their implementation immediately after the delivery of the report by the Audit Team, but it must keep in mind that the report and the attached non-conformities and / or recommendations could be modified at the OdiC. following the control activity carried out. In this case, the Organization may be required to propose again the corrective actions and the dates for their implementation.

The Organization can propose corrective actions and dates for their implementation also through the Member Area.

Additional information and notes

The company declares to be aware of the fact that the ISO 22000: 2005 certificate will expire on 21-06-2021 (earlier than the regular expiry date) due to the mandatory entry into force of the new version of the standard. ISO 22000: 2018.

**SPACE FOR THE ORGANIZATION**

L'OrQahi'zzaz'ione àci ::: éfta · The contents' dèl'pres'erite comprehensive report "d" elle nOn corlforll "lil: ae / o racC (iniaridazi'oiii attached (if present).

RESERVES AND COMMENTS

ARICCHIGIA SRL
Via Card. De Lucca 115
95034 Bronte (CT)
P.IVA 00037400877

SIGNATURE FOR ACCEPTANCE OF THE REPRESENTATIVE OF THE ORGANIZATION

FIRMA DEL TEAM LEADER

GIULIANA GENCO

**ORGANIZATION**
TO RICCHIGIA SRL

**AUDIT REPORT N 20 AG 15588 MF**

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 1 | Para 7.2<br>Improve the formalization of the monitoring carried out on pest-control. | |

RINA AGROQ

**RESULTS OF PREVIOUS AUDIT REPORT**
**. No.◦ 19 AG 13498 MF**

**NON-CONFORMITY VERIFICATION OUTCOME**

IZ] CORRECT OR NOT CORRECT

**ORGANIZATION:**
TO RICCHIGIA SRL

**AUDIT REPORT NO◦ 20 AG 15588 MF**

**RELIEF N◦ 1**

| Organization documents | Affected area | Classification |
|---|---|---|
| FSMS Manual | Production | B. |

**Paragraph of reference standard 8.3**

Relief description

The calibration certificates of all the scales present in production are not always available (e.g. Waage Sri scale, serial number W1001058)

| Signature of the Team Leader | Signature for acceptance of the representative of the Organization |
|---|---|
| GIULIANA GENCO | LAURA LUPO |

***To be completed by the Organization***

**Cause's analysis**

**Treatment**

**Corrective action proposed**

| Date of implementation alleged | Signature of the representative of the Organization | Signature of the Team Leader |
|---|---|---|
| | | |

***To be completed by the audit team***

**Acknowledgment Corrective Action / Correction**

Saw metrological booklet with Waage scale calibration serial number W1001058 carried out on 17-10-2019. Training view extraordinary carried out on 19-10-2019.

| Verification outcome | Date | firm of TeamJ-eader |
|---|---|---|
| POSITIVE | 07/10/2020 | GIULIANA GENCO |

RINA AGROQ

**RESULTS OF PREVIOUS AUDIT REPORT**
**No.◦ 19 AG 13498 MF AUDIT REPORT NO◦ 20 AG**
**15588 MF**

**ORGANIZATION**
TO RICCHIGIA SRL

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 2 | Para 7.2 **WELCOME?** **GZJ YES** ☐ **NO**<br>Improve the way in which technical and safety data sheets of products are archived · per cleaning used in production. | Tab views of security of complete and updated products, eg: technical and safety data sheet, rev. 2 dated 05-11-2019 by Pro Sanity Plus. |

**Firma del Team Leader**
GIULIANA GENCO

**AUDIT REPORT 20 AG 15588 MF**

**ORGANIZATION**

Organization name A RICCHIGIA

SRL

Registered office address:

VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

Name and address of the sites subject to certification 1 VIA

CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY

**ACTIVITIES, PRODUCTS AND / OR SERVICES SUBJECT TO AUDIT**

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS.

PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, SPREAD CREAMS AND BAKERY. SELECTION AND PACKAGING OF DRIED FRUIT.

IAF sector: CIV, CII

**AUDIT OBJECTIVE: VERIFICATION OF COMPLIANCE OF THE MANAGEMENT SYSTEM WITH THE ISO 22000: 2005 STANDARD**

Audit criteria used as a reference: requirements of the audited standard, policies, procedures and documented information of the Organization.

Other reference standards / documents: NA

The audit team has assessed and accepted the justification provided by the Organization relating to the requirements of the standard not applicable:

NA

**AUDIT** ! Typology: Maintenance audit

Start date: 07/10/2020 End date: 07/10/2020 Man / days: 1

Extension Activity Description (if applicable): NA

| AUDIT GROUP | POSITION |
|---|---|
| GIULIANA GENCO | Team Leader |

| COMPANY REPRESENTATIVES | MEETING INITIAL | MEETING THE FINAL | LOCATION |
|---|---|---|---|
| LAURA LUPO | X | X | SOLE DIRECTOR - RESP. COMMERCIAL |
| SIMONE HIDRIUO | X | X | RESP. SGSA |
| ROSANNA DAQUINO | X | X | ADMINISTRATION |
| STEFANIA LONGHITANO | X | X | PACKAGING |
| FABIO SCALA | X | X | RESP. PRODUCTION |

| REFERENCE DOCUMENTS OF THE ORGANIZATION | Rev. | of the |
|---|---|---|
| Food Safety Management System Manual | 03 | 01-09-2020 |

| PREVIOUS AUDIT REPORTS | N. | of the |
|---|---|---|
| | 19 AG 13498 MF | 19/09/2019 |

1 Repeat, the sites subject to audit which are reported on the certificate, identifying the type for each (e.g. factory in, warehouse, offices in ...)

RI R AGROQ

**AUDIT REPORT NO• 20 AG 15588 MF**

| CHANGES IN RESPECT OF THE PREVIOUS AUDIT | UNCHANGED | MODIFIED | | NOTE |
|---|---|---|---|---|
| | | is | NC | |
| BUSINESS NAME | X | | | |
| FIELD OF APPLICATION | X | | | |
| ORGANIZATIONAL STRUCTURE | X | | | |
| OPERATING SITES | X | | | |
| LIST OF COMPLIANCE LAWS / RULES AP_PLICABLE | X | | | |
| DOCUMENTATION OF THE ORGANIC MANAGEMENT | | X | | MSGSA rev. 03 of 01-09-2020 |
| SYSTEM / EMPLOYEES (*) [Current figure: 8 | X | | | NA |

(*) In case of fluctuation in the number of employees, enter the average number of employees on an annual basis declared by the Organization

Have the corrective actions implemented by the Organization on the basis of the findings (type A and / or B) reported below in the previous Report been verified with a positive outcome? (Indicate):

No.•1

Has the Organization taken on board the Recommendations (Type C Findings) listed below in the previous Report? (indicate):

No.•2

Permanent sites verified during this audit

| Address | Performed activity | Date |
|---|---|---|
| VIA CARDINALE DE LUCA, 115 - 95034 BRONTE (CT), ITALY | PRODUCTION AND PACKAGING OF VEGETABLE PRESERVES, CREAMS AND BAKERY PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUITS. | 07-10-2020 |

Temporary sites verified during this audit

| Address . ! Activities and / or service performed | T Date |
|---|---|

Description of other external activities verified by inspection

NA

Any activities documentally verified

NA

**RESULTS OF THE AUDIT**

| | | | |
|---|---|---|---|
| Were major non-conformities (type A) detected? Have | D yes. | i, Zj NO | or |
| minor non-conformities (type B) been detected? Were any | 0 S1 | i, Zj NO | or |
| recommendations found. (Type C)? | i, Zj SI | 0 NO | - L |

**AUDIT REPORT NO◦ 20 AG 15588 MF**

Identification of the audit findings (evidence, strengths, positive elemeriti, comments on any NC found during the audit):

During the inspection at the production site, the following activities were in progress: production and packaging of JAM OF PEARS AND GINGER, lot n◦07102020, deadline 10/2022₁ vases. A traceability, traceability and mass balance test was also carried out with positive results on PISTACHIO PESTO of 190 g (292 pcs), lot 290920010A, expiry 03/2022, production of 09-29-2020.

Management of complaints received by the Organization and complaints received by the Ode (to be filled in in the presence of complaints): The organization declares that it has not received complaints. Furthermore, the Ode has not received any complaints against the organization.

SPECIFIC INFORMATION RELATING TO THE SCHEME

Preliminary analysis of the HACCP study: l₁activity was performed and adequately described in the system documents and was set up in accordance with the principles of food safety and HACCP. The analysis is based on a knowledge of one's own product, its uses and the reference markets. Identification, management and monitoring of PRPs: the PRPs managed by the organization in accordance with all the references that the standard proposes, concern: construction and layout of buildings, structure of premises and work areas, services: air-water-energy, disposal of waste, suitability of equipment, cleaning and maintenance, cleaning and sanitizing, measures for the prevention of cross-contamination, pest control (Pest contrai), personal hygiene and structures, for personnel, management and control10.dei.mç1teriali, ; j_ ' Purchased, management and control of raw materials, recall procedures., of the product. Sampling was carried out as foreseen by the plan. They are described by adequate operational documentation and monitored in their application through constant verification by the SGSA group.

OPERATIONAL PRP distinguished by type of production: - cold production: processing (physical danger, risk of the presence of foreign bodies from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooling {biological danger, contamination of pathogenic and non-pathogenic microorganisms); packaging {physical danger, risk of foreign bodies coming from personnel, environment and raw materials). - hot production: processing {physical danger, risk of the presence of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); cooking (physical danger, risk of foreign bodies coming from personnel, environment and raw materials and chemicals, presence of residues of sanitizers and / or detergents); packaging (physical danger, risk of foreign bodies coming from personnel, environment and raw materials); storage {biological hazard, microorganism contamination. pathogenic and non-pathogenic). Identification, management and monitoring of CCPs: based on the₁risk analysis and assessment two CCPs have been identified: - T storage₀ controlled: risk of contamination and / or growth of microorganisms, T limit₀ <4◦C, daily monitoring frequency, check T₀ storage cell {for refrigerator calibration see instrument calibration point).

- T-cooking₀ controlled: risk of contamination and / or growth of microorganisms, T₀ at the core of the product not lower than 85 ° C, daily monitoring frequency (start and end of processing), T check₀ core of the product with probe thermometer {inserted with sample cap, one jar for each production). Evaluation of the validation of control measures: carried out through the evaluation of the results of the chemical and microbiological analysis activities performed on the raw material and on the finished product; l complaints received; the NC relating to the product and the results of internal monitoring and audits,

**AUDIT REPORT N '20 AG 15588 MF**

**CONCLUSIONS OF THE AUDIT TEAM**

During the initial meeting, the management was reminded of the importance of the expected results by an organization with a management system in possession of an accredited certification.

The audit was carried out based on a sampling process of the available information, verifying the processes / aspects defined by the organization and the requirements of the reference standards; the possible absence of findings does not guarantee the total absence of anomalies in the areas tested and / or in other areas

Has the audit team verified all processes / aspects, organizational units and functions indicated in the audit plan?

YES IZJ NO ☐

Justification for any deviations from the audit plan and any significant issues impacting the audit program:

NA

Evidence relating to the management system's ability to meet applicable requirements and achieve expected outcomes and evidence relating to the internal audit and management review process

During today's audit, the internal audit activity was verified in accordance with the reference procedures of the competent and independent staff (audit of 09.28.2020); the management review report of 29.09.2020 was also assessed.

In the opinion of the Audit Team, the Organization effectively monitors the use of the logo and the publication of the management?

YES IZJ NO ☐

Does the audit team confirm that the audit objectives have been achieved?

YES IZJ NO ☐

In the opinion of the Audit Team, is the scope of the certification adequate?

YES IZJ NO ☐

In the opinion of the Audit Team, the Organization's Management System, as a whole, was found to be effective compliant with the requirements of the standard and the reference certification regulation?

YES IZJ NO ☐

Does the audit team recommend the organization for certification / recertification or does it confirm the validity of the certification?

YES IZJ NO ☐





Claudio Innocenti

**AUDIT REPORT NO◦ 20 AG 15588 MF**

The audit team deems it appropriate to carry out the next maintenance audit by .. / .. / .... or by ..,. months from this visit for the following reasons (to be filled in only if the proposed date is less than 12 months)

The Organization undertakes to communicate the corrective actions decided and the dates for their implementation _ within .... days from this audit.

The Organization can propose corrective actions and the dates for their implementation immediately after the delivery of the report by the Audit Team, but it must keep in mind that the report and the attached non-conformities and / or recommendations could be modified at the OdiC. following the control activity carried out. In this case, the Organization may be required to propose again the corrective actions and the dates for their implementation.

The Organization can propose corrective actions and dates for their implementation also through the Member Area.

Additional information and notes

The company declares to be aware of the fact that the ISO 22000: 2005 certificate will expire on 21-06-2021 (earlier than the regular expiry date) due to the mandatory entry into force of the new version of the standard. ISO 22000: 2018.

**SPACE FOR THE ORGANIZATION**

L'OrQahi'zzaz'ione àci ::: éfta · The contents' dèl'pres'erite comprehensive report "d" elle nOn corlforll "lil: ae / o racC (iniaridazi'oiii attached (if present).

RESERVES AND COMMENTS

ARICCHIGIA SRL
Via Card. De Lucca 115
95034 Bronte (CT)
P.IVA 00037400877

SIGNATURE FOR ACCEPTANCE OF THE REPRESENTATIVE OF THE ORGANIZATION

FIRMA DEL TEAM LEADER

GIULIANA GENCO

**ORGANIZATION**
TO RICCHIGIA SRL

**AUDIT REPORT N 20 AG 15588 MF**

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 1 | Para 7.2<br>Improve the formalization of the monitoring carried out on pest-control. | |

RINA AGROQ

**RESULTS OF PREVIOUS AUDIT REPORT**
**. No.◦ 19 AG 13498 MF**

**NON-CONFORMITY VERIFICATION OUTCOME**

IZ] CORRECT OR NOT CORRECT

**ORGANIZATION:**
TO RICCHIGIA SRL

**AUDIT REPORT NO◦ 20 AG 15588 MF**

**RELIEF N◦ 1**

| Organization documents | Affected area | Classification |
|---|---|---|
| FSMS Manual | Production | B. |

**Paragraph of reference standard 8.3**

Relief description

The calibration certificates of all the scales present in production are not always available (e.g. Waage Sri scale, serial number W1001058)

| Signature of the Team Leader | Signature for acceptance of the representative of the Organization |
|---|---|
| GIULIANA GENCO | LAURA LUPO |

***To be completed by the Organization***

**Cause's analysis**

**Treatment**

**Corrective action proposed**

| Date of implementation alleged | Signature of the representative of the Organization | Signature of the Team Leader |
|---|---|---|
| | | |

***To be completed by the audit team***

**Acknowledgment Corrective Action / Correction**

Saw metrological booklet with Waage scale calibration serial number W1001058 carried out on 17-10-2019. Training view extraordinary carried out on 19-10-2019.

| Verification outcome | Date | firm of TeamJ-eader |
|---|---|---|
| POSITIVE | 07/10/2020 | GIULIANA GENCO |

RINA AGROQ

**RESULTS OF PREVIOUS AUDIT REPORT**
**No.◦ 19 AG 13498 MF AUDIT REPORT NO◦ 20 AG**
**15588 MF**

**ORGANIZATION**
TO RICCHIGIA SRL

| N •. | RECOMMENDATIONS | ACTIONS ORGANIZATION |
|---|---|---|
| 2 | Para 7.2 **WELCOME?** **GZJ YES** ☐ **NO**<br>Improve the way in which technical and safety data sheets of products are archived · per cleaning used in production. | Tab views of security of complete and updated products, eg: technical and safety data sheet, rev. 2 dated 05-11-2019 by Pro Sanity Plus. |

**Firma del Team Leader**
GIULIANA GENCO

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**REQUIRED** 21 CFR, §1.503 requires that all documents be written in a language understandable to the FSVP QI. The original document(s) were written in a language other than English but have since been translated in an effort to meet FDA requirements. An individual that is fluent in both English and the document's original language must confirm that the translation has been accurately performed.

**Translated text accurately reflects original message**

☐ Agree ☐ Disagree

☐ Agree – *with suggested edits*

**Name**

**Date**



Claudio Innocenti

EDP Soc. Coop.

ACCREDIA THE ACCREDITATION BODY

LAB N ° 0971 L



Catania, 07 / l 0/2020

# TEST REPORT No.◦ 201130.07

***CLIENT*** SC Advance sr1.-Via Marchese, Casalotto, 101 -95131 Catania

***SAMPLE*** 20I 130.07 ***RECEIPT*** 29/09/2020

***WITHDRAWAL MADE AT:*** A Ricchigia srl - Via Cardinale De Luca, 115 - Bronte (CT)

Foods
COLLECTION DATE: 29/09/2020 SAMPLING
MADE BY: Client
TIME OF COLLECTION: Pear and ginger jam batch 230920721A
CONTAINER USED: Original packaging

I - DATE fNfZfO ***TEST*** 29/09/2020 ***DATE END TEST*** 05/10/2020

| DESCRIZIONE ANALISI | UNITÀ DI MISURA | RÌSil.LTNO | Mc1'6Qo | UMITt | INCERTEZZA ESTESA | NOTE |
|---|---|---|---|---|---|---|
| Count of microorganisms at 30 "C | UFC / g | <10 | ISO 4833--1: 2013 | | | |
| Count of Molds (*) | UFC / g | <I. | ISO 21527-1: 2008 | | | |
| Count of Yeasts (*) | UFC / g | <10 | ISO21527-1; 2008 | | | |
| Count of reducing sulphite clostridia (*) | UFC / g | <I. | ! SO 15213: 2003 | | | |
| Count of Enterobacteriaceae | UFC / g | <10 | ISO21528-2: 2017 | | | |
| pH (*) | PH unit | 4.62 | AOAC98l.12 | | | |

***END OF TRIAL REPORT***

Notes: CFU / g: Colony Forming Units / gram
there Test not accredited by ACCREDIA

The Respon sabile del Laboratorio
Dr. d.M.G. Macchiarello

ORDINE NAZIONALE BIOLOGI Dott.ssa M.G. Macchiarello N. 35256

This Pçovo Report is referred only to the so-called sample examined, _ :(.. ,,, The present Report of Pro \ la cannot be _ re'riProdotloP partially without the, outoriZ?: action sqitta çlel laboratory.
Tulte_ liii info in? Tions re'.9 / iy ?| _ \ :::? {fil?. lçi - s? li. '? been treat'il. J rpoc, Ju) .o i samples (! M _ e t ; in_case of ç: arppiQfj.? l; () -! = llilf9-dg part <de / customer the sample comes· . analyzed _so c9rne n '- _ceceived.land.information not cllspon1b1h on the test report are reported on the module of the sample. . . , , the uncertaintyZ?, d st.esaè e YES) r: éssa Come confine fiduc _ iàri at 9 % probability is to fail by _coverage'Kp2,. · '

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**Translated text accurately reflects original message**

☐ Agree ☐ Disagree

☒ Agree – *with suggested edits*

**Name** Alessandro Restelli

**Date** 06/02/2021



Claudio Innocenti

Catania, 07 / l 0/2020

# TEST REPORT No.◦ 201130.07

***CLIENT*** SC Advance sr1.-Via Marchese, Casalotto, 101 -95131 Catania

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I - DATE fNfZfO ***TEST*** -29/09/2020 | ***DATE END TEST*** 05/10/2020 THE

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| Count of Enterobacteriaceae | UFC / g | <10 | ISO21528-2: 2017 | | | |
| pH (*) | PH unit | 4.62 | AOAC98l.12 | | | |

***END OF TRIAL REPORT***

Notes: CFU / g: Colony Forming Units / gram
there Test not accredited by ACCREDIA

The Respon sabile del laboratorio
Dr. a M.G. Maccarrone

ORDINE NAZIONALE BIOLOGI Dott.ssa M.G. Maccarrone N. 35298

This Pçovo Report is referred only to the so-called sample examined, _ :(.. ,,, The present Report of Pro \ la cannot be _ re'riProdotloP partially without the, outoriZ?: action sqitta çlel laboratory.
Tulte_ liii info in? Tions re'.9 / iy ?| _ \ :::? {flf? lçi - _s? li. '? been treat'il. J rpoc, Ju) .o i samples (! M _ e t ; in_case of ç: arppiQfJ.? l; () _! = llilf9-dg part <de / customer the sample comes· . analyzed _so c9rne n '- _ceceived.land.information not cllspon1b1h on the test report are reported on the module of the sample. . . , , the uncertaintyZ?, d st.esaè e YES) r: éssa Come confine fiduc _ iàri at 9 % probability is to fail by _coverage'Kp2,. · '

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**Translated text accurately reflects original message**

☐ Agree ☐ Disagree

☐ Agree – *with suggested edits*

**Name**

**Date**



Claudio Innocenti

# SUPPLIER QUESTIONNAIRE

*for*

U.S. IMPORT ENTRY

UNDER FSVP

## OVERVIEW *of* REGULATIONS

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

## INSTRUCTIONS

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

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

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

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

## CONFIDENTIALITY

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

## CONTACT

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

## GENERAL INFORMATION

Company Name: 'A Ricchigia SRL  Today's Date: 04/28/2021

Factory Address: Via Cardinale de Luca 115

City: Bronte  Province: CT  Country: Italy

Office Address: Via Cardinale de Luca 115

City: Bronte  Province: CT  Country: Italy

FDA Registration No.: 11424943650  DUNS No.: 433941318

FDA Establishment Id.:  Phone No.: +39 095772326

QC/QA's Name: Mr. SIMONE HIDRIUO  E-mail: aricchigia@gmail.com

## SUPPLIER CLASS

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

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

## RESPONSIBILIE *for* HAZARD CONTROLS

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

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

## PRODUCTS SUPPLIED

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

No. 01, Product Name: 100% PURE BRONTE D.O.P. GREEN PISTACHIO  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

THE SAMPLE ARE TAKEN FROM PRODUCTION AND SEND TO ACCREDITED LABORATORY OF ANALYSIS

### FREQUENCY *of* VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

### U.S. FDA HAZARD PROFILE

Category Name:
Category Number:
Subcategory Name:
Storage Type:

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

To all suppliers are required to analysis on the raw material supplied. in any case, additional analysis are carried out on suppliers for comparison

### FREQUENCY *of* VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

### U.S. FDA HAZARD PROFILE

Category Name:
Category Number:
Subcategory Name:
Storage Type:

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

-The Good Manufacturing Practice (GMP)
- The Good Hygienic Practices (GHP)

### FREQUENCY *of* VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

### U.S. FDA HAZARD PROFILE

Category Name:
Category Number:
Subcategory Name:
Storage Type:

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.*

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

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

## CRITICAL CONTROLS *for* PHYSICAL HAZARDS

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

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

### DESCRIPTION *of* CRITICAL CONTROLS

Accurate visual inspection of the product and control using metal detector.

### FREQUENCY *of* VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

### U.S. FDA HAZARD PROFILE

Category Name:
Category Number:
Subcategory Name:
Storage Type:

**Metal detection standards**

Ferrous: _____ mm
Non-Ferrous: 2-3 mm
Stainless Steel: _____ 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 |
| Celery | ☐ Yes ☒ No | ☐ Yes ☒ No | ☒ Yes ☐ No |
| Sesame | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Mustard | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Sulfates | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Monosodium Glutamate | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Colorings | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| Aflatoxins | ☐ Yes ☒ No | ☐ Yes ☒ No | ☐ Yes ☒ No |
| **ALL ALLERGENS** | ☐ **Absent** | ☐ **Absent** | ☐ **Absent** |

## DESCRIPTION *of* ALLERGENIC CONTROLS

Products intended for gluten-free and lactose-free production are prepared, stored and baked in a laboratory dedicated to it with different instruments and specifically used for these products.





*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

## ONSITE AUDITING INFORMATION

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

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

What standard is the GFSI certification? _____

**If No**;

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

## CLEANING INFORMATION

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

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

Are all cleaning staff formally trained? ☒ Yes ☐ No

Do the cleaning schedules include:

- Chemicals used? ☐ Yes ☒ No
- Concentration levels? ☐ Yes ☒ No
- Dilution method? ☐ Yes ☒ No

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

## STAFF HYGIENE INFORMATION

Have all staff undergone formal food hygiene training? ☒ Yes ☐ No

- In-house hygiene training? ☒ Yes ☐ No
- Accredited hygiene training? ☒ Yes ☐ No

*Training level certification obtained:* _____

Are staff issued protective clothing? ☒ Yes ☐ No

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

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

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

What is the total number of staff employed on site? 5

## PEST CONTROL

Is a pest control contractor employed? ☒ Yes ☐ No

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

Number of yearly visits: ONCE AT MONTH

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:* _____

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

*Please provide details:* Procurement information are specified and verified the requirements for product approval,

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

*Please provide details:* Inspections or other activities are carried out to ensure that the products purchased comply

## 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: The products are identified with a batch





## 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:

Receipt by the suppliers of certified raw materials compliance and any analyzes carried out.

## 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.

Following the customer's complaint, we proceed with the evaluation of the actual problem encountered and proceed with the collection of the wrong product and replacement with goods in accordance with its requests.

## 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

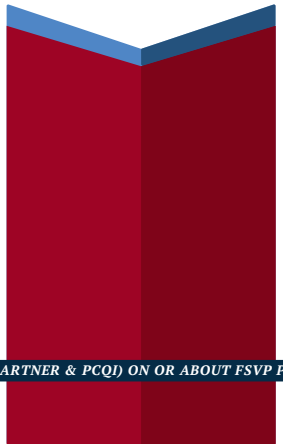
I certify that the information I provided on and in connection with this form is true, accurate and complete. I also understand that any false statements or deliberate omissions on this document or any other document I file with United Safety Agents, LLC may be grounds for disqualification from successful 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:** Laura Lupo

**Title:** CEO (Amministratore Delegato)

**Today's Date:** 04/28/2021



FSPCA

FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

# CERTIFICATE OF TRAINING

**is awarded to**

## Chiara Saitta

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

## FSPCA Preventive Controls for Human Food

**delivered by Lead Instructor**

Andrea Giomo

**completed on**
11/24/2018

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

Steve Mandernach, Executive Director
Association of Food and Drug Officials

AFDO

Certificate # d627c469

*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

FSPCA

FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

# CERTIFICATE OF TRAINING

**is awarded to**

## Laura Lupo

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

## FSPCA Preventive Controls for Human Food

**delivered by Lead Instructor**

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11/24/2018

Robert Brackett, VP and Director
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ILLINOIS INSTITUTE OF TECHNOLOGY

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International Food Protection Training Institute

ifpti

Steve Mandernach, Executive Director
Association of Food and Drug Officials

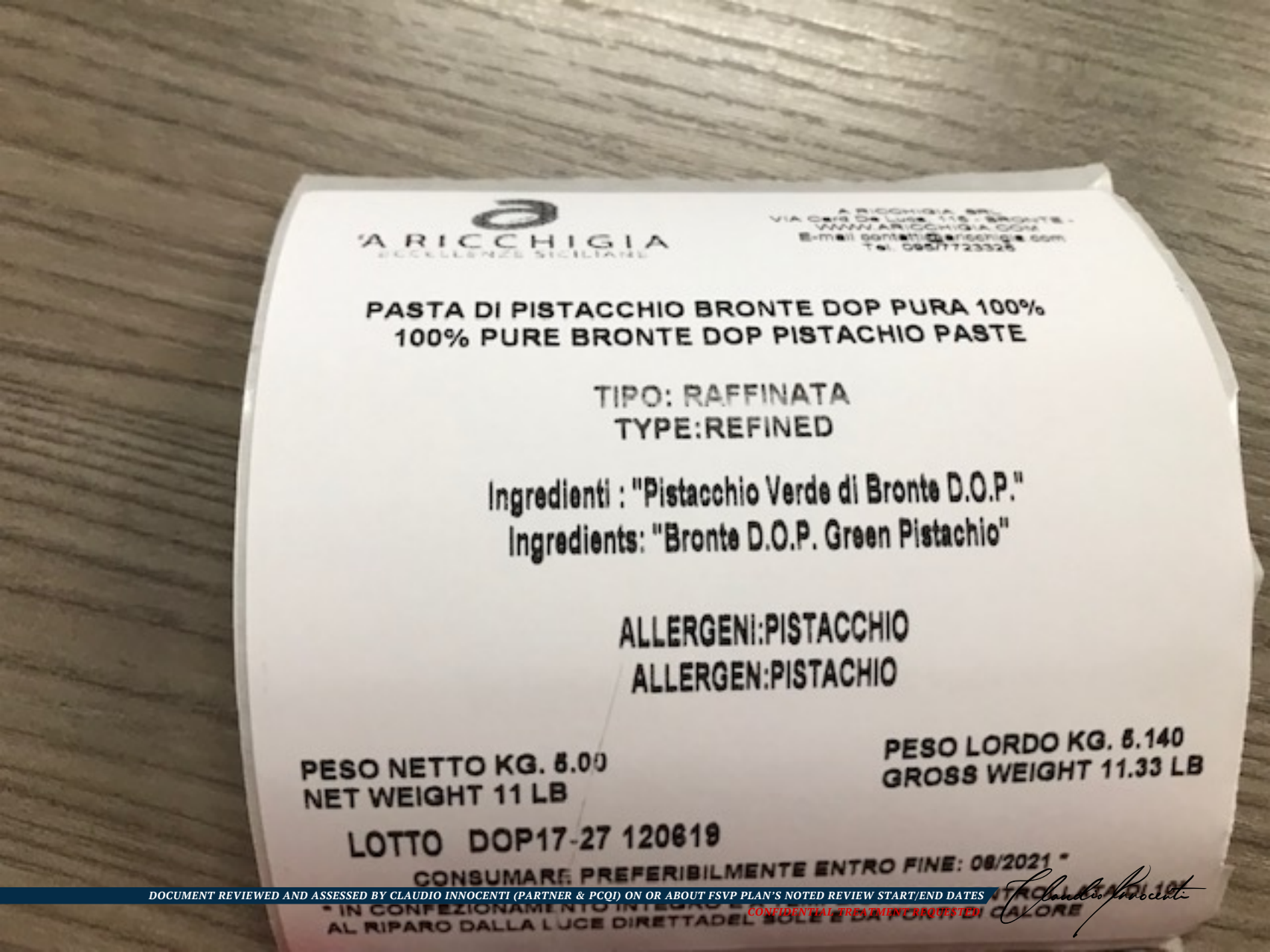
AFDO

Certificate # 96b5f717

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



**From:** **ecco un poco** eccounpoco@gmail.com
**Subject:** Re: Ecco un Poco - Pistachio documents
**Date:** June 2, 2021 at 3:36 PM
**To:** Claudio Innocenti claudio@unitedsafetyagents.com

EP

Ciao Claudio,

I checked the documents, there are a few changes to make, I made a list for each document and also, to make it easier and quicker for you, as an attachment you can find the documents with red marks around the changes I'm mentioning in this email.

**Changes for document titled "0T_Audit Report 2020 (ita).it. - REVISED en_Translation.pdf"**

First of all please take into consideration that all the dates are with the DD/MM/YYYY format, I see that in the translated documents they're in the same format, I don't know if it's ok or if it's better to change to the MM/DD/YYYY format.

**Page 1 of 6**, Company Representatives section: "Resp" stand for "responsabile" (in Italian), kind of manager position so I'd change to:
- Laura Lupo: Sole Director - Executive Sales Manager
- Simone HidriouSGSA Manager
- Fabio Scala: Production Manager

**Page 2 of 6**, in the table there are 2 columns below "MODIFIED, in the Italian version C and NC stand for "compliant" and "non compliant", I see you replaced the C with "IS", I don't know what that means

**Page 2 of 6**, at the bottom, Results of the Audit: the questions and the answers are not properly displayed (question 1 must be checked as "No"; question 2 must be checked as "No"; question 3 must be checked as "Yes")

**Page 3 of 6**, Audit Report No 20, I'd change to "A traceability, retraceable, and mass balance test", in English doesn't exist a proper adjective for "retraceable", otherwise there is a double traceability

**Page 3 of 6**, "OdC" has been replaced twice with "Ode", must be changed back to "OdC" and eventually, within parenthesis the acronym translation, which is "Certification Authority"

**Page 3 of 6**, there are weird letters in the phrase that is supposed to be "control of purchased materials"

**Page 3 of 6**, at the bottom, inside the frame: all the "T°" stand for "Temperature"

**Page 4 of 6**, all the "Yes" boxes have been replaced by "IZJ", it must be removed and replaced by a checked box (all six boxes must be checked as "Yes")

**Page 5 of 6**, the whole "Space of the Organization" paragraph is full of weird characters, correct text should be: "The Organization accepts the contents of this report including any non-conformities and / or recommendations attached (if any)."

**Page 1 of 2**, right top corner, the boxes have been replaced by "IZJ" and "OR" ("Correct" must be checked)

**Page 2 of 2**, the "Yes" box has been replaced by GZJ ("Yes" must be checked)

— — —  — — —  — — —

**Changes for document titled "0T_Pistachio Test Report 2020 (ita).it. - REVISED en_Translation.pdf"**

**1)** Sample number has a "I" instead of number 1

**2)** There is some random text in capital letters in the page: THE, THE and I, they must be removed (marked in green)

**3)** The Italian text "Data Inizio Prova" is not properly translated, it should be "TEST START DATE", and also "Date End Test" should be changed to "TEST END DATE"

**4)** All the test titles haven't been translated, they are:
- ANALYSIS DESCRIPTION
- UNIT OF MEASURE

- RESULT
- METHOD
- LIMITS
- EXTENDED UNCERTAINTY
- NOTES

**5)** The **(*)** has been changed to “there”, must be changed back to **(*)**

**6)** All the text in the left bottom corner must be changed as follows:
This Test Report refers exclusively to the sample examined
This Test Report cannot be partially reproduced without the written authorization of the Laboratory
All information relating to the sample has been taken from the customer’s sampling form, the sample is analyzed as received. Information not available on the Test Report is reported on the sampling form.
The expanded uncertainty is expressed as confidence limits of 95% probability and coverage factor K=2

— — —  — — —  — — —

In case there is something that is not clear and/or you need further details just let me know, thanks!

Regards
Alessandro

On Tue, Jun 1, 2021 at 2:35 PM Claudio Innocenti <claudio@unitedsafetyagents.com> wrote:

> Dear Alessandro,
>
> Thank you again for your message, documents, and patience.
>
> Upon initial review, a number of the provided documents appear to have been written in a language other than English. In an effort to meet the FDA requirements found under 21 C.F.R. §1.500-§1.510, we have taken the liberty of translating all files into English. Whenever convenient, we respectfully request that a member of your team review and confirm that our translation has been accurately performed by filling the brief form on the last page. Once confirmed, we will add all documents to the list of substantiating information and begin the FSVP re-verification process.
>
> Per your direction, you can expect to receive an invoice within the next several days (there is no rush).
>
> Sincerely,
> Claudio Innocenti
> —
> Managing Partner
> United Safety Agents LLC
> FDA FSVP Importer & Agent
> Office: +1 (888) 551-7403
> Direct: +1 (732) 618-0337
> UnitedSafetyAgents.com
>
> Attachment (2)

'A RICCHIGIA
ECCELLENZE SICILIANE

**A RICCHIGIA SRL**
Via Card. De Luca, 115 - BRONTE
WWW. ARICCHIGIA.COM
E-mail: contatti@aricchigia.com
Tel. 095/7723326

PASTA PURA
100% DI PISTACCHIO VERDE DI BRONTE DOP

TIPO: RAFFINATA

**Ingredienti : Pistacchio Verde di Bronte DOP**

SENZA GLUTINE E SENZA LATTOSIO

PESO NETTO Kg 1 LOTTO: AND7 180521SR

CONSUMARE PREFERIBILMENTE ENTRO FINE: 05/2023

CONSERVARE IN UN LUOGO FRESCO E ASCIUTTO AL RIPARO DALLA LUCE DIRETTA DEL SOLE E DA FONTI DI CALORE

"POTREBBE CONTENERE TRACCE DI ALTRA FRUTTA A GUSCIO."

---

'A RICCHIGIA
ECCELLENZE SICILIANE

**A RICCHIGIA SRL**
Via Card. De Luca, 115 - BRONTE
WWW. ARICCHIGIA.COM
E-mail: contatti@aricchigia.com
Tel. 095/7723326

PASTA PURA
100% " PISTACCHIO VERDE DI BRONTE DOP"
PURE PASTE
100% "GREEN PISTACHIO FROM BRONTE DOP"

TIPO: RAFFINATA
TYPE: RAFINED

**Ingredienti : Pistacchio Verde di Bronte DOP**
**Ingredients: Green Pistachio from Bronte DOP**

SENZA GLUTINE (GLUTEN FREE) E SENZA LATTOSIO (LACTOSE FREE)
PESO NETTO Kg 1
NET WEIGHT Kg 1 LOTTO/LOT N°: AND7 180521SR

CONSUMARE PREFER. ENTRO FINE/ BEST BEFORE: 05/2023

CONSERVARE IN UN LUOGO FRESCO E ASCIUTTO AL RIPARO DALLA LUCE DIRETTA DEL SOLE E DA FONTI DI CALORE
STORE IN A COOL AND DRY PLACE, AWAY FROM HEAT SOURCE

"POTREBBE CONTENERE TRACCE DI ALTRA FRUTTA A GUSCIO."
"MAY CONTAINS OTHER NUTS"

**Search Results**

| FEI Number | Firm Name | Physical Address | Mailing Address |
|---|---|---|---|
| 3015449317 | Ecco un Poco | 8318 W 3rd St, Los Angeles, CA, 90048-4311, US | 531 S Kenmore Ave, Apt 300, Los Angeles, CA, 90020-2546, US |

**Search Results**

| FEI Number | Firm Name | Physical Address | Mailing Address |
|---|---|---|---|
| 3012462846 | A Ricchigia S.R.L | Via Cardinale de Luca 115, Bronte, Catania, 95034, IT | Via Cardinale de Luca 115, Bronte, Catania, 95034, IT |

FEI Number
**3012462846**

Firm Name
**A Ricchigia S.R.L**

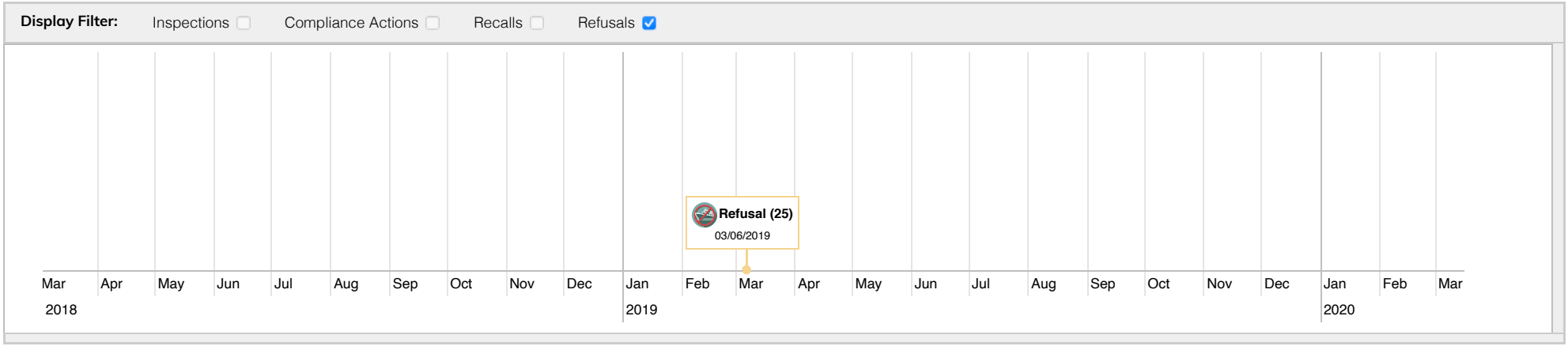
Firm Address

**Via Cardinale de Luca 115**

**Bronte, Catania 95034**

**Italy**

## FDA Actions Timeline




## 3012462846 – A Ricchigia S.R.L

### Inspections

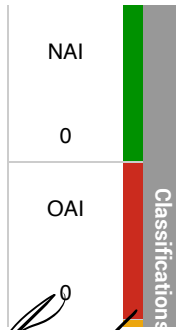
| Inspections | Classifications |
|---|---|
| 0 | 0 |

**Inspection Classifications by Fiscal Year**

Fiscal Years: 2009 - 2021

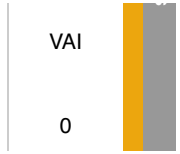
**Inspection Classifications by Type**

Fiscal Years: 2009 - 2021



No data found for the selected firm

No data found for the selected firm




### Inspections Details

No data found for the selected firm

## 3012462846 – A Ricchigia S.R.L

### Inspections Citations Details

No data found for the selected firm

## 3012462846 – A Ricchigia S.R.L

## Compliance Actions

| Warning Letters | Injunctions | Seizures |
|---|---|---|
| 0 | 0 | 0 |

**Actions by Percentage**

Fiscal Years: 2009 - 2021

No data found for the selected firm

**Compliance Actions Details**

No data found for the selected firm

## 3012462846 – A Ricchigia S.R.L

## Recalls

**Recalled Products by Classification**

Fiscal Years: 2012 - 2021

**Recall Events by Status**

Fiscal Years: 2012 - 2021

No data found for the selected firm

No data found for the selected firm

**Recalls Details**

No data found for the selected firm

## 3012462846 – A Ricchigia S.R.L

# Import Refusals

**Refusals by Product Category**

Fiscal Years: 2019 - 2019


## Import Refusals Details

| Product Code and Description | Refused Date | Refusal Charges | Shipment ID |
|---|---|---|---|
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/1/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/2/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/3/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/4/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/5/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/6/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/7/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/8/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/9/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/10/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION | 03/06/2019 | 256,321,482 | 799-9153595-3/11/11/ |

| | | | |
|---|---|---|---|
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/12/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/13/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/14/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/15/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/16/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/17/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/18/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/19/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/20/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/21/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/22/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/23/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/24/ |
| 21NYT02 \ CITRUS FLAVORED IMITATION FRUIT, JAM, JELLY, | 03/06/2019 | 256,321,482 | 799-9153595-3/11/25/ |

## 3012462846 – A Ricchigia S.R.L

### Import Alerts

- The search results below should be reviewed to determine whether the firm's products are allowed into the country.
- Only current/active Import Alerts are displayed. For more information see Import Alerts.

No Import Alerts data found for the selected firm.

## 3012462846 – A Ricchigia S.R.L

# Warning Letters

- The search results below should be reviewed to determine whether the firm is directly or indirectly referenced in the Warning Letter.
- Only Warning Letters issued in the last 5 years are displayed. For more information see Warning Letters.

No Warning Letters data found for the selected firm.

## Caveats:

- Certain information in these datasets may not be presented or may have changed since the posting. The datasets are updated weekly and only include final actions. If you need to present more recent or more complete data for official purposes or have questions about obtaining other data, please contact the Division of Freedom of Information about what materials may be available in electronic reading rooms or inquire about other datasets that would satisfy your needs.
- Compliance data provide information on a subset of the actions used by the FDA to bring firms into compliance, specifically data pertaining to Warning Letters, Seizures, and Injunctions. The compliance actions disclosed include only finalized and completed actions and are primarily used in the domestic arena.
- More than one establishment may be associated with one compliance action. The counts provided in this section reflect the number of establishments linked to the compliance action.
- For more information regarding the Center for Tobacco Products (CTP) issued warning letters click here.


**Food**

**selfcontrol**

**Health**

**Quality**

**Environment**

**Safety**

# MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY

**CONTROLLED COPY**

**MANUAL**

**YES NO**

**SECTION 0**

## COMPANY DESCRIPTION

### 0.1 COMPANY DESCRIPTION

'A RICCHIGIA Srl is a Company that manages a PRODUCTION E activity PACKAGING OF VEGETABLE PRESERVES, CREAMS AND OVEN PRODUCTS. SELECTION AND PACKAGING OF DRIED FRUIT, located in Via Cardinale De Luca n ° 115, Bronte (CT).

selfcontrol

by

SC Advance Srl

Via Alberto Mario No. 67

95129 - Catania

e-mail: selfcontrol.it@gmail.com

| REV. | DATE | DESCRIPTION OF THE MODIFICATION | Issued / Issued CONSULTANT | Approved: OSA |
|---|---|---|---|---|
| 00 | 01/11/2016 | FIRST ISSUE | SC Advance Srl | |
| 01 | 03/13/2017 | CHANGE IN OPERATING SEAT | SC Advance Srl | |





**Food**

**selfcontrol**

**Health**

**Quality**

**Environment**

**Safety**

| REV. | DATE | DESCRIPTION OF THE MODIFICATION | Issued / Issued CONSULTANT | Approved: OSA |
|---|---|---|---|---|
| 00 | 01/11/2016 | FIRST ISSUE | SC Advance Srl | |
| 01 | 03/13/2017 | CHANGE IN OPERATING SEAT | SC Advance Srl | |

# UNITED SAFETY AGENTS

# FSVP

## DOCUMENT TRANSLATION

To proceed with FSVP verification, we respectfully request that you: **01)** provide answers to the following four questions and **02)** confirm that the enclosed food safety document has been accurately translated and correctly describes its original content.

**01)** What is this document's title? _____

**02)** When will this document expire? _____

**03)** Does this document contain information for any of the following? - check all that apply

Hazard Control for: ☐ Biological ☐ Chemical ☐ Physical ☐ Environmental

☐ Laboratory Testing Results ☐ Onsite Audit Results ☐ Preventive Controls

**04)** Has this document been accurately translated? ☐ Yes ☐ No

☐ < *CONFIRM TRANSLATION'S ACCURACY*

**Representative's Name:** _____

**Job Title:** _____

**Today's Date:** _____

---

## INTENIONALLY LEFT BLANK

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*Page separates individual foreign supplier-provided food safety documents.*


**Food**

**selfcontrol**

**Health**

**Quality**

**Environment**

**Safety**

**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

**CONTROLLED COPY**

**MANUAL**

**YES NO**

**SECTION 0**

**COMPANY DESCRIPTION**

## 0.1 COMPANY DESCRIPTION

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selfcontrol

by

SC Advance Srl

Via Alberto Mario No. 67

95129 - Catania

e-mail: selfcontrol.it@gmail.com

| REV. | DATE | DESCRIPTION OF THE MODIFICATION | Issued / Issued CONSULTANT | Approved: OSA |
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**Food**

**selfcontrol**

**Health**

**Quality**

**Environment**

**Safety**

| REV. | DATE | DESCRIPTION OF THE MODIFICATION | Issued/Issued CONSULTANT | Approved: OSA |
|---|---|---|---|---|
| **00** | **01/11/2016** | **FIRST ISSUE** | SC Advance Srl | |
| **01** | **03/13/2017** | **CHANGE IN OPERATING SEAT** | SC Advance Srl | |





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

**CONTROLLED COPY**

**MANUAL** **YES** **NO**

**SECTION 1**
**PURPOSE AND FIELD OF APPLICATION**

**INTRODUCTION**

This Manual for Self-Control and Food Safety defines the specifications of hygiene and the necessary controls in order to guarantee active and passive safety, by means of rules of correct hygiene practice that are implemented through the practice of SELF-CONTROL.

The Manual complies with the requirements of the following regulations:

- REGULATION (EC) n. 852/2004 and subsequent amendments, which introduces an analysis tool of the dangers the HACCP system that is applied in production, processing, manufacture, packaging, storage, transport, distribution, sale or supply, including administration to the consumer;
- UNI EN ISO 22000: 2005 - Food Safety Management Systems
- ISO / TS 22002-1: 2009 - Prerequisite programs on food safety - Part 1: Food manufacturing
- The Codex Alimentarius - 7 July 2006
- UNI EN ISO 22005: 2008 - Traceability in agri-food chains
- ISO 22004: 2005 - Food safety management system - Guidance on the application of ISO 22000







**1. PURPOSE AND SCOPE**

This manual for self-control and food safety aims to:

Provide the tools, information and methodologies for correct execution
self-control based on the HACCP system, in order to guarantee healthiness and quality
of the products.
Plan, implement, make operational, keep active and update a
Food Safety Management aimed at providing products that, according to their use
expected, be safe.
Demonstrate compliance with applicable legislative and regulatory requirements for safety
food.
Estimate and evaluate customer requirements and demonstrate compliance with them, mutually
food safety agreements, in order to increase customer satisfaction.
Effectively communicate food safety issues to its suppliers,
customers and related stakeholders in the food chain.
Ensure that the organization complies with its policy of self-control and security
food.
Demonstrate such compliance with relevant stakeholders.
This Manual is applied to all phases and operations of the process.





**2. REGULATORY REFERENCES**

For the development of the Management System for Self-Control and Food Safety, we are
referred to the following voluntary standards:

**• UNI EN ISO 22000: 2005 standard:**

Food Safety Management Systems - Requirements for any organization in the
food chain

**• ISO / TS 22002-1: 2009:**

Prerequisite programs on food safety - Part 1: Food manufacturing

**• UNI EN ISO 22005: 2007:**

Traceability in agri-food chains

**• ISO 22004: 2005:**

Food safety management system - Guidance on the application of ISO 22000

**• The Codex Alimentarius - 7 July 2006**

Set of rules and regulations developed by the Codex Alimentarius Commission.

**• UNI EN ISO 9001: 2015 standard:**

Quality management systems - Requirements

**• UNI EN ISO 9000: 2008 standard:**

Quality management systems - Fundamentals and vocabulary





**Furthermore, the following mandatory rules are to be considered for the activity:**

• Law 30 April 1962, No. 283 "Hygienic regulation of production and sale of food substances ".

• Law 26 February 1963, No. 441 "Changes and additions to the law of 30 April 1962, No. 283 ".

• Presidential Decree March 26, 1980, No. 327 "Regulations for the implementation of law 283/62".

• D. Lgs. 25 January 1992, No. 108 "Implementation of the Directive 76/893 / CEE relative to the materials and objects intended to come into contact with foodstuffs "

• D. Lgs. 27 January 1992 n.109 "Implementation of the Directives 89/395 / CEE and 89/396 / CEE concerning the labeling, presentation and advertising of foodstuffs "

• Law 25 January 1994, No. 82 "discipline of cleaning and disinfection activity, of disinfestation, deratization and sanitation ".

• DM February 27, 1996, No. 206 "Additives and colorings".

• Presidential Decree 14 July 1995, No. 376 "Addresses for the preparation of the programs of

official control of food and drink ".

- Circulars of the Ministry of Health 28 July 1995, No. 21 and 26 January 1998, No. 1 "Lines guide for the development of the manuals of correct hygiene practices ".
- L. Sicily Region No. 28 of 22 December 1999 "Reform of the discipline of commerce".
- Legislative Decree February 2, 2001, No. 31 "Implementation of Directive 98/83 / EC relating to quality of water intended for human consumption "
- EC Regulation No. 178/2002 of the European parliament and council of January 28th 2002 which establishes the general principles and requirements of food legislation, establishes the European Food Safety Authority and establishes procedures in the field of food safety.
- Legislative Decree no. 181/2003 “Implementation of Directive 2000/13 / CE concerning labeling and the presentation of food products, as well as the related advertising ".
- Law October 31st 2003 n. 306 "Protection of the health of non-smokers".
- PAF Ministry Circular 10 November 2003 “Labeling, presentation and advertising of food products ”.





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

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**SECTION 2**

**NORMATIVE REQUIREMENTS**

- Correction of the regulation (EC) n.852 / 2004 of the European Parliament and of the Council, of April 29, 2004, on the hygiene of food products.
- Correction of the regulation (EC) n.853 / 2004 of the European Parliament and of the Council, of April 29, 2004, which establishes specific rules on the hygiene of foodstuffs animal origin.
- Correction of the regulation (EC) n.854 / 2004 of the European Parliament and of the Council, of April 29, 2004, which establishes specific rules for the organization of official controls on products of animal origin intended for human consumption.
- EC Regulation No. 2073/2005 of the Commission of November 15, 2005 “on the criteria microbiological standards applicable to food products ".
- FROM 19 February 2007 Department of Health of the Sicily Region "Guidelines and procedural issues related to the training of food workers "and subsequent amendments and integrations.
- Legislative Decree of 6 November 2007, n. 193 “Implementation of Directive 2004/41 / EC relating to controls on food safety and the application of community regulations in same sector "
- EC Regulation No. 1441/2007 of the Commission of December 05, 2007 "bearing the amendments to the EC Regulation No. 2073/2005 of the Commission of November 15, 2005 on microbiological criteria applicable to food products ".

• EC Regulation No. 834/2007 of the Council of June 28, 2007 relating to production organic and labeling of organic products and repealing Regulation (EEC) n.2092 / 91

• EU Regulation No. 1169/2011 of the European Parliament and of the Council "relative to the provision of food information to consumers, amending regulations (EC) n. 1924/2006 and (EC) no. 1925/2006 of the European Parliament and of the Council and repealing the Commission Directive 87/250 / EEC, Council Directive 90/496 / EEC, the Commission Directive 1999/10 / EC, Directive 2000/13 / EC of the Parliament and of the Council, Directives 2002/67 / EC and 2008/5 / EC of the Commission and the Regulation (EC) No 608/2004 of the Commission ".





## 3. TERMS AND DEFINITIONS

The Manual uses in its presentation abbreviations whose meaning is explained in following table:

| Company Function | ABBREVIATION |
|---|---|
| Food industry operator | OSA |
| Food safety group manager | RGSA |
| Food safety group | GSA |
| Food self-control plan manager | RHACCP |
| Responsibility for traceability and traceability | RTBT |
| Company name, proprietary of this manual and connected | COMPANY |

| Documents | ABBREVIATION |
|---|---|
| Food safety management system | FSMS |
| Food Safety Manual | MSA |
| Operating Procedure | LITTLE |
| Process Control Procedure | CFP |
| Work Instruction | THE |
| Attachments (flow-charts, tables, etc.) | ALL |
| Registration forms | M |
| Documents | DOC |
| Non-compliance | NC |
| Non-compliance Report | RNC |

| | |
|---|---|
| Corrective action | B.C |
| Preventive Action | AP |
| Improvement Action | AM |
| Report Management Review | VRD |
| Report on Internal Audit | VVII |





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

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**YES** **NO**

**SECTION 3**

## TERMS AND DEFINITIONS

In this manual the terminology has been used in compliance with the indicated definitions by the UNI EN ISO 9000: 2008 standard "Quality Management Systems - Fundamentals e Terminology "or according to the needs of the COMPANY, with the following meaning:

***Protective clothing:*** gowns, overalls, hats, shoes.

***Drinking water:*** water that meets the requirements of the legislation for its consumption.

***High-risk*** foods ***:*** ready-to-eat foods. Foods that have suffered all the treatments planned for their preparation and there are no further phases that allow to check the dangers.

***Potentially dangerous*** foods ***:*** foods susceptible to contamination and / or such from allow rapid growth of infectious or infectious microorganisms.

***Whole*** food ***:*** food suitable for consumption and free from defects.

***Frozen food:*** product of which all parts are kept at a temperature equal to or less than −18 ° C.

***Hazard analysis:*** a system that identifies hazards and where they can develop e identifies the surveillance measures for their control.

***Self-control:*** the set of measures that the conductor or manager, under his own responsibility, exercises on the activity of the COMPANY to guarantee hygienic requirements and safety of products;

***Corrective*** action ***:*** the action to be taken when the results of CCP surveillance (monitoring) indicate a loss of control

***Preventive*** action ***:*** an action or activity that can be used to prevent a danger to food safety.

***Action required:*** an action or activity that can be used to delete or reduce to an acceptable level a food safety hazard.

***Bacteria:*** single living cell. Some live on food by feeding, others are the cause of illnesses.

***Freezing:*** food storage system at a temperature below 0 ° C.

***Cross contamination:*** transfer of microorganisms (usually microbes) from foods contaminated with other foods

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**SECTION 3**

**TERMS AND DEFINITIONS**

***Particle contamination:*** pollution of a food product due to material foreign of various nature and origin (glass, metals, wood, etc.)

***Contamination:*** introduction into foods of microbiological and / or chemical and / or physical agents that they can alter their safety and integrity

***Detergent:*** substance that acts by removing grease and residues

***Cleansing :*** operation that allows the removal of dirt such as grease and residues of the workings

***Flow chart:*** the detailed sequence of operations for the product / process object of the study

***Disinfestation:*** complex of procedures and operations aimed at destroying small animals, in particular arthropods, both because parasites, vectors or reserve of infectious agents, and because harassment and unwanted plant species

***Disinfectant: a*** substance that works by killing microbes on the skin or surfaces

***Disinfection:*** operation that allows to destroy the microbes present on the surfaces

***Food Chain:*** Sequence of phases and operations involved in production, processing, distribution, storage and management of a food and its ingredients, from primary production for consumption

***Personnel training: staff*** indoctrination in addition to hygiene rules about basic microbiology, food preservation and the importance of temperature control, food handling safety, hygiene of personnel, cleaning procedures, waste disposal and pest control

***GMP:*** good processing practices in terms of hygiene and health

***Degree Celsius ° C:*** temperature measurement unit

***Severity:*** importance of the danger and the consequences that can derive from it

***HACCP:*** the system that allows identifying specific hazards, evaluating them and establishing them preventive measures (actions) to control them

***Hygiene of food products:*** the set of measures necessary to guarantee safety and the integrity of food products at all levels, from primary production to consumption

***Hygiene:*** all the necessary measures to ensure the integrity and safety of food





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE**

***Weeds:*** insects, birds, rodents and any other animal that can contaminate directly or indirectly foods

***Infestation:*** intrusion and survival of animal pests (rats, cockroaches, ants) in the environments, equipment, food

***Food processing:*** every preparation, transformation, cooking operation, packaging, storage, transport, distribution and sale of food

***Critical limit:*** a value that separates acceptability from unacceptability

***Lot:*** determined quantity of cooked or pre-cooked foods, produced simultaneously and in the same conditions

***Food handling:*** every person who handles food, materials or tools used for the processing of unpackaged foods, or that comes into contact with them

***Pathogenic*** microorganisms ***:*** disease-causing microorganisms

***Microorganisms:*** organisms invisible to the naked eye such as microbes, molds, yeasts and viruses

***Control measure:*** an action or activity that can be used to prevent, eliminate or reduce a food safety hazard to an acceptable level

***Monitoring:*** the act of conducting a planned sequence of observations or measurements of the control parameters to ascertain that a Critical Control Point (CCP) is below control

***Mold:*** microorganism that can reproduce in extreme conditions of temperature and salt and sugar concentration. The forms that transform the substances contained in the foods are often visible to the naked eye as layers of color from gray to green

***Non Conformity (NC):*** a deviation from critical limits

***Pasteurization:*** Pasteurization (or pasteurization) is a rehabilitation process thermal applied to some foods in order to minimize health risks due to pathogenic microorganisms sensitive to heat, such as bacteria in vegetative form, fungi and yeasts, with a minimal alteration of the chemical, physical and organoleptic characteristics of the food

***Food safety hazard:*** biological, chemical and physical agent in the food, or food condition, which can potentially cause a harmful effect on health

***Danger:*** a biological, chemical or physical agent potentially harmful to health if present at an unacceptable level





***Self-control plan:*** a document prepared in accordance with the HACCP methodology

aimed at ensuring the control of significant hazards to product safety in the segment of the food supply chain considered

***Food security policy:*** intentions and general guidelines of an organization related to food safety formally expressed by the high direction

***Procedure:*** defined ways to perform a task

***Products:*** raw materials, semi-finished products, finished products and ingredients

***Operational PRPs; program of operational prerequisites:*** PRP identified by the analysis of hazards as essential to control the likelihood of introducing safety hazards food and / or contamination or proliferation of food safety hazards in / i product / s in the acceptable environment

***PRP, prerequisite program:*** basic conditions and activities (food safety) necessary to maintain a hygienic environment throughout the food chain suitable for production, management and supply of safe finished products safe food for human consumption

***Cleaning:*** removal, removal and removal of dirt

***Critical Control Point (CCP):*** a point, phase or procedure where it is necessary it is possible to exercise a control action, in order to eliminate (CCP) a relative danger to the safety and hygienic integrity of the food product, or to prevent or reduce it to a acceptable level

***Critical*** point ***:*** point or phase or procedure, in which it is possible that it occurs, increases or persists a danger

***Refrigeration:*** perishable food storage system at the lower temperature at 4 ° C

***Recordings:*** data collection and storage of related written documentation or in any case recorded all the information regarding the self-controls and their verification

***Processing residue:*** substance or residual material deriving from a production cycle or consumption

***Refusal:*** any product, packaging or unwanted material that must be removed from the production area

***Risk:*** probability that a hazard will occur, increase or persist





***Rotation:*** procedure that ensures the sale of food by their due date

**Food Safety:** Concept aimed at excluding the possibility that products food can cause harm to the consumer if prepared and / or consumed in conformity to the intended use

***Sterilization:*** treatment with heat or chemicals that destroys all bacteria including spores and viruses

***Freezing:*** rapid cooling of foods up to –18 ° C or more

***Heart*** temperature ***:*** the temperature measured at the geometric center of the food

***Ambient temperature:*** the temperature of the working environment

***Thermometer:*** device used to measure the temperature of the equipment and / or equipment alimony

***TMC:*** (Maximum storage term) term within which a food can be preserved without undergoing alterations and maintaining integrity. This definition must be indicated with writing "to be consumed preferably within" followed by the date or indication of point of the package where this date is located

***Toxin:*** poisonous substance formed by microorganisms in development

***Treatments:*** the chemical or physical process intended to prolong the preservation of products or the combination of said processes

***Validation:*** obtaining evidence for food safety purposes that control measures managed by the HACCP plan and the operational PRPs are able to be effective

***Verification:*** the use of methods, procedures or examinations in addition to those used for monitoring, to determine the effectiveness of the Self-Control Plan (HACCP) and / or if this requires changes to increase food safety





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

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**SECTION 4**

**GENERAL REQUIREMENTS**

**4.0 General requirements**

The Organization has defined, applies, maintains and submits to improvement activities I continue an SGSA.

**4.1 Documentation Requirements**

**4.1.1 General information**

The SGSA documentation consists of:

- Self-control and food safety policy
- Improvement Plan (objectives)
- Food Safety Manual (the plan is an integral part of the manual

HACCP)

• Procedures and Work Instructions

• Recordings

The ***Food Safety*** and ***Self-Control Manual*** describes the system for

demonstrate compliance with the health and hygiene requirements required by the mandatory standards and the

capacity of the food safety insurance and allow its evaluation to Entities

External.

The Manual is organized in mobile chapters; each chapter can be replaced

independently of the others.

At the beginning of the Manual the revisions matrix relating to each section of the

same.

Each page has the name "Manual" in the header.

The page numbering is shown at the right margin of each page at the bottom.

This Manual has been prepared by Consultants with the support of the RGSA, verified and

approved by the OSA and / or its Legal Representative.

Distribution to external parties is authorized by the OSA and / or its Representative

Legal.

Copies not initialed on the first page are to be considered unusable.

All internal copies are subject to the update service, guaranteed by the RGSA.





In the event of changes to the Manual, copy assignees are advised of the aforementioned

updates.

The content of the revisions is highlighted in specific paragraphs.

It can also be distributed in uncontrolled copies and therefore not subject to

update, for reasons of image and / or for commercial negotiations, on request

the interested party or an internal promoter.

The **management procedures** are company rules that explain the points in detail

of the manual and establish:

▪ "WHAT" must be done

▪ "WHO" (function) must do it

▪ "TO WHO" this information must be sent (interconnection of functions).

The procedures, referred to in the sections of this manual, are issued by

RGSA, verified and approved by the OSA and / or its Legal Representative.

The **Work Instructions** set out in detail "HOW" one must be performed

certain activity; these documents are generally used to standardize

working methods.

These documents are issued by the RGSA, verified and approved by the OAS and / or its own

Attorney.

The ***Modules*** are operational documents referred to in the Procedures.

The ***recordings*** are documents (internal or external origin) that provide evidence objective of performed activities or results obtained for the validity of the monitoring performed.

**4.2.2 Documentation Management**

The procedures for managing the documentation consists in storing in boxes in the local offices and / or in IT mode all system documentation for a period not less than three years.





**MANAGEMENT SYSTEM FOR SELF-CONTROL AND THE FOOD SAFETY**

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**SECTION 4**

**GENERAL REQUIREMENTS**

**4.1.2 Recording Management**

The procedures for managing the documentation consists in storing in boxes in the local offices and / or in IT mode all system documentation for a period not less than three years.

## 5. RESPONSIBILITY OF THE MANAGEMENT

### 5.1 Management commitment

The Management provides evidence of its commitment to the development and implementation of the SGSA and in the continuous improvement of its effectiveness:

Illustrating that food safety is supported by commercial goals organization.

Communicating to the organization the importance of meeting the requirements of the UNI EN standard ISO 22000, all legislative and regulatory requirements:

- as well as the customer's food safety requirements
- Establishing food safety policy;
- Carrying out reviews by the Management;
- Ensuring the availability of resources.

### 5.2 Food Safety Policy

The Policy, establishing the general objectives to aim for and the commitments to achieve them, both in relationship to external needs (performance improvement in service delivery, Customer satisfaction, socio-economic requirements) in relation to needs internal (internal customer satisfaction, reduction of non-conformities) both for what regards the adequate role of the organization in the food supply chain.

The **objectives** , explicitly defined, are:

**Meeting the requirements** (required by the Customer and necessary to comply with the requirements of the services to be implemented, including the applicable mandatory ones);

**Continuous improvement** of the effectiveness of the SGSA; **Reduce costs** in terms of elimination of internal non-conformities and those induced by external Suppliers;

**Individual empowerment.**

In light of the aforementioned objectives, the COMPANY has identified and defined the **commitments** to achieve them in terms of tools, methods, resources and anything else necessary to ensure the achievement of the set objectives.





The **tools** to achieve these **goals** are:

**Maintenance of appropriate procedures of "Inspections"** obtained by working for prevent, or in any case promptly remove, causes of non-compliance with both characteristics of the service to be provided, both to ensure that safety hazards food that can reasonably be expected to occur in relation to the products included in the scope of application of the System do not damage, directly or indirectly, the consumer;

**Training / Training:** carried out by introducing all the disciplines to voluntary and mandatory subjects the corporate functions at all levels and in particular those in positions of responsibility linked both to the management of the organization and to that relating to the GSA

**Organization:** defines the organization chart and the organizational objectives of all the Functions.

The **instruments** identified as necessary for the achievement of their objectives are of interest the entire organization in an integrated corporate vision in which the appearance of the Food Safety is combined, in a correct balance, with all aspects that concur to outline the business strategies.

This Policy is reviewed at the Management Review and disseminated to all those who need to be informed.

**5.3 SYSTEM planning**

The Management ensures that:

the planning of the System is carried out in such a way as to comply with the requirements set forth in § 4.1 of this Manual and achieve the objectives of the organization that support the food safety and guarantee the maintenance of the integrity of the SYSTEM even when changes to the System are planned and implemented.

**5.4 Responsibility and authority**

In order to ensure that responsibilities and authorities are defined and disclosed in the area of the Organization, the Direction defines the Corporate Organization Chart, formalized for functions and appointments.

The assignment of responsibilities takes into account, among other things, the level of education and / or the proven experience gained from each function.

It should be noted that with regards to food safety, all personnel are responsible for to report the problems of the System to the RGSA, which in collaboration with the members of the Food Safety Group, has the responsibility and authority to start and register actions.

**5.5 Head of the Food Safety Group**

The OAS and the RGSA, which have the following responsibilities regarding this task:

Manage the GSA (Ref. § 7.3.2) and organize the work;

Ensure training and relevant training of GSA members;

Ensure that the FSMS is prepared, implemented and maintained and reported to the Management of the effectiveness and suitability of the FSMS.

**5.6 Communication**

***5.6.1 External Communication***

The Management has activated suitable external communication processes, in order to ensure the effectiveness of the SGSA.

In particular the designated personnel (RGSA), through continuous training activities has assumed the responsibility and authority to communicate with suppliers and customers (through also the use of instructions on Customer Satisfaction and Complaint Management), legislative authorities and regulations, and with any other organizations that have an impact on effectiveness or updating of the System or are affected by them.

The communication in question, by the RGSA to the outside, provides information on aspects of food safety of products that may be relevant to others organizations within the food supply chain and in particular to safety hazards food note that must be controlled by other organizations, always in the supply chain.

***5.6.2 Internal Communication***

The OAS has activated suitable processes of communication with the staff on matters having a impact on food safety.
The RGSA, in collaboration with the other members of the Group, organizes meetings for face any changes and / or changes, but also to receive comments or suggestions from them.
The RGSA communicates this to staff through verbal and / or written communications, indicating the date, the object and the participants. The topics covered and the conclusions come analyzed during the System Review.
The changes and / or changes in question to any meetings may concern the following aspects:
Products or new products;
Raw materials, ingredients and services;
Production systems and equipment;
Production rooms, location of equipment, surrounding environment;
Cleaning and sanitizing programs;
Packaging, storage and distribution systems;
Qualification levels of personnel and / or attribution of responsibilities and authorizations;
Regulatory and legislative requirements;
Knowledge related to food safety hazards and control measures;
Customer, sector and other requirements that the organization observes;
Relevant inquiries from the external parties involved;
Complaints about food safety hazards associated with the product;
Other conditions that have an impact on food safety.





**5.7 Preparation and response to emergencies**

For the type of activity carried out, it is considered that the only emergency that could occur, and

to which to give a timely response, concerns a possible lack of electricity.
In the event that this emergency occurs for a period of time such as to make it dangerous products subjected to controlled temperature, the OSA will be activated for them immediately elimination by controlled disposal.

**5.8 Management review**

***Input elements for review***

The Management reviews the System annually to ensure its continued suitability, adequacy and effectiveness, through the evaluation of opportunities for improvement and any need to change the System.

***Input elements of the SYSTEM***

- the results of internal, external and / or inspection audits;
- actions following the previous reviews carried out by the Management;
- changes in circumstances that may affect food safety;
- emergency situations, accidents and withdrawals (including also the recall);
- reviews of any communication activities including return information of the Customer;
- status and effectiveness of the training performed.

***Items coming out of the review***

Following the analysis of the input elements, the Management defines actions related to:

- ensuring food safety;
- improve the effectiveness of the SYSTEM;
- necessary resources and review of the food safety policy of the organization and its objectives.





**6 RESOURCES MANAGEMENT**

**6.1 Making resources available**

The Management identifies and makes available the necessary resources to implement and hold updated the SGSA and continuously improve its effectiveness.

**6.2 Human Resources**

*Definitions Skills and Tasks*

The COMPANY has identified the necessary competences for the personnel whose activities they have a impact on food safety, and through "training" both binding and voluntary specific to tasks and functions has identified the following:

**Food Safety Group Manager**

§ 5.5 of this document for the duties and responsibilities assumed by the RGSA.

**Direction**

Plan and coordinate the production process ensuring that the product meets the standards production companies established by the COMPANY.

It manages and develops resources by optimizing the activities of each individual department: the program production, planning times and methods, defines and forecasts production costs and coordinates i different departments; ensures the efficient operation of plants and machines e procurement of raw materials; analyzes production procedures and techniques proposing improvements that increase productivity; guarantees the fulfillment of safety standards; has the responsibility to manage and develop human resources identifying the right people for the different departmental activities by preparing appropriate training courses.

**HACCP Manager:**

Is responsible for:

Ensure the full application of the HACCP Plan;

Update the legal and regulatory provisions on self-control of Food;

Always keep the records referred to in the Self-Control Plan updated;

Control of working and hygienic environments.





**Responsibility for traceability and traceability:**

Is responsible for:

- ensure that the food produced meets the provisions of food legislation applicable to the activity;
- develop a traceability system applied to the production and transformation phases and / or food distribution;
- implement the procedures for the withdrawal from the market of products deemed not to comply with the requirements of safety and proceed with the relevant communications to the competent authorities if there are any was the need;

It is responsible for assigning the roles envisaged for the implementation of the system traceability, verification of the application of company procedures, training employees also based on the skills required for the roles assigned.

*Awareness of their activities*

To ensure that human resources are aware of the relevance of the activities they are

have an impact on food security, meetings are held during which
the above themes are dealt with.

**6.3 Infrastructures**

The COMPANY in order to ensure compliance with the requirements of the service to be provided, has prepared and maintains the necessary infrastructures and working environment in detail:

Equipment and process equipment;

Equipment and technical equipment;

Offices and related services.

**6.4 Work Environment**

Access to the work areas of personnel not directly concerned is prevented.

Anyone who enters the working areas wears suitable protective overalls, disposable and / or clean.





The cleaning of working clothes for operating personnel is for the use and discretion of the personnel themselves, who must wash clothes.

The personnel in charge of the works is constantly sensitized to keep high personal cleanliness levels.

In the case of diseases transmissible through food (eg gastrointestinal disorders, conditions septic, respiratory disorders, potentially infectious diseases, etc.), the operator must communicate them promptly to the OAS, which will prevent the bearer from operating in processing and storage areas.

Suspected cases of infectious and contagious diseases will be reported promptly to the competent health authority for the adoption of appropriate measures.

There is a training plan for the staff in charge of personnel hygiene principles and on the procedures established by this manual as well as on the dangers and methods of food contamination due to inadequate personal hygiene.

**Behavioral rules**

The personnel in charge of the direct contact with the product (from the raw material to the storage) adopt the following behavior for personal hygiene purposes:

- It keeps the nails of the hands very short and without enamel;
- Does not wear watches, rings or trinkets and lays personal effects outside the zones of processing. It adequately covers all non-removable personal effects.
- Performs hand washing operation frequently during work and in any case

always at the entrance to the processing areas, before starting their turn, afterwards
breaks and use of toilets and after handling products, objects or
materials possible sources of contamination, after coughing and / or sneezing while repairing the
mouth with hands.
Products that comply with current regulations are used for disinfection.

- Holds the glasses firmly behind the neck (eg with rubber bands);
- Dries hands with disposable paper;
- In the presence of wounds and / or abrasions they are suitably protected with
waterproof dressings such as to guarantee absolute isolation from the external environment;
- Do not roll up your sleeves;
- Do not smoke / drink / eat in processing rooms.





## 7 PLANNING AND REALIZATION OF SAFE PRODUCTS

### 7.1 GENERAL

The COMPANY has drawn up this manual taking into account the EN UNI ISO 22000: 2005 standards, ISO / TS 22002-1: 2009 and FSSC 22000, has identified and planned the main processes necessary for the realization of safe products, in all phases of production, transformation, manufacture, packaging, storage, transport, distribution, sale or final supply by defining Prerequisite Programs (PRP) and Operational Programs (PRP-O).
This manual defines the hygiene and control specifications necessary to guarantee active and passive safety, which are implemented through the practice of SELF-CONTROL; taking into account the horizontal legislation given by REGULATION (EC) n. 852/2004 e which establishes the legal requirements for the hygiene of foodstuffs and all others vertical regulations concerning the field of applications.
This manual provides the tools, information and methodologies for correct use execution of self-monitoring based on the HACCP system, in order to guarantee healthiness and the quality of the products of this establishment.

### 7.2 Prerequisite programs (PRP)

The COMPANY established, implements and maintains the prerequisite programs in order to control:
- Probability of introducing food safety hazards into the product through the work environment;
- Biological, chemical and physical contamination of the product, including contamination product crusade;
- Danger levels for food safety in the product and in the processing environment

of the product.







The PRPs are:

- Construction and layout of buildings;
- Structure of the premises and work areas;
- Services: air-water-energy;
- Waste disposal;
- Suitability of equipment, cleaning and maintenance;
- Cleaning and sanitizing;
- Measures for the prevention of cross-contamination;
- Pest control (Pest control);
- Personal hygiene and staff facilities;
- Management and control of purchased materials;
- Management and control of raw materials;
- Product recall procedures.

The PRPs that have been previously listed, are the result of a careful analysis of the information held by the food safety group.

This information includes: the mandatory regulation, national and sector-specific regulations (see normative references, shown in section 3 of this manual).

In order to always keep efficient the choice of PRPs will be planned checks, in order to provide, if necessary, for possible modifications.

## 7.3 PRELIMINARY PHASES TO ALLOW ANALYSIS OF HAZARDS

### *7.3.1 General information*

The COMPANY collects, keeps all relevant information up to date and documented necessary to conduct hazard analysis.

Such information is stored for a period of time not less than three years and a care of the RHACCP.

*7.3.2 Food Safety Group*

The application of the 7 principles on which the HACCP system is based is essential
establishment of a food safety group. In this case the group met
to determine the PRP, PRP-O and CCP, the relative limits and the monitoring systems for
make the related changes in the production process. The group's success is achieved
through the knowledge of all the information available to the manager of the same
group and its collaborators.
In fact, this plan has been drawn up by putting in place different professionalisms and skills.

| NAME | TASK |
|---|---|
| Attorney | OSA |
| See organization chart | RSGSA |

**7.3.3.** ***Product features***

**7.3.3.1.** ***Raw materials, ingredients and materials in contact with food***

Below is the procedure for managing raw materials and materials a
contact with the product, necessary to perform the hazard analysis.

➢ **PACKING**

All packaging in direct contact conforms to food contact
purchased after careful qualification and evaluation of the suppliers, which only after providing
guarantees (Certificates, analyzes, etc.) to the suitability of the products, are included in the Suppliers list
Qualify.
For the glass the presence of any broken pots is also checked both at delivery and
during processing.
In the event that a break occurs during the processing cycle, all the production that
at that moment it is at risk of physical contamination, it will be eliminated from any type
of subsequent process and / or sale.
Subsequently, all production facilities, instruments and equipment must be submitted
reclamation to avoid possible presence of glass.

To this end, all possible concave containers will be turned in the opposite direction to the surface in order to facilitate the fall of any glass splinters, the same will happen for any jars not that the same caps still not used; later they will come, however subjected to further rinsing, and finally blowing with compressed air microbiologically controlled.

➢ **RAW MATERIAL**

All the raw materials used comply with the legal requirements, in fact, they come purchased after careful qualification and evaluation of the suppliers, which only after providing guarantees (Certificates, analyzes, etc.) to the suitability of the products, are included in the Suppliers list Qualify.

**7.3.3.2.** ***Characteristics of finished products***

The characteristics of the finished products comply with the provisions of the mandatory regulations and the limits set by the implemented system.

**7.3.4.** ***Intended use***

The COMPANY produces finished and / or semi-finished products, the end user is the customer (consumer).

**7.3.5.** ***Flow diagrams, process steps and control measures***

**7.3.5.1** ***Flow Diagrams***

The flow diagram describes, based on the information acquired, the production flow of the various production lines present within the COMPANY, starting from the arrival of the goods until the finished product.
Using this diagram it was possible to carry out a study that included the identification of hazards at each stage of the process, their categorization, the probability, the risk, the limits for acceptability and any corrective action that must be taken.





**HOT PRODUCTION**

**1) INGREDIENTS SELECTION**

**2) TMC VERIFICATION, PACKAGING INTEGRITY**

**3) PROCESSING**

**CCP** **4) COOKING**

**5) PACKAGING**

**6) STORAGE**





**COLD PRODUCTION**

**1) INGREDIENTS SELECTION**

**2) TMC VERIFICATION, PACKAGING INTEGRITY**

**3) PROCESSING**

**4) COOLING**

**5) PACKAGING**

**CCP** **6) AT-CONTROLLED STORAGE**





**7.3.5.2 Production cycle**

**Cycle description**

The production is based on the transformation of raw materials both of animal origin and vegetable in finished products ready for final consumption and / or to be used for the preparation of other types of food.

The main processing lines are four:

- **HOT PRODUCTION**
- **COLD PRODUCTION**
- **BIOLOGICAL PRODUCTION**

The processing takes place based on the hypothesized request and previously to it and / or executed according to the orders and therefore immediately after the customer's order e for the intended use only.

In both cases the product obtained complies with all the requirements already mentioned.

## 7.4 HAZARDS ANALYSIS

### 7.4.1 *General information*

The previously treated flow charts have allowed an analysis of the dangers that can reasonably be consistent with the type of product and process.

### 7.4.2 *Hazards identification and determination of acceptability levels*

In the activity, considered in this manual, characteristic dangers and their acceptability have been identified through a careful study of the legislative framework concerning the typology of product and establishment, applicable rules, information already present given by production history of the Company.
The determined dangers are:

**BIOLOGICAL DANGERS**

Among the biological hazards the following risks have been identified:
- Contamination and / or growth of pathogenic and non-microorganisms

**CHEMICAL DANGERS**

Among the chemical hazards the following risks have been identified:

- Presence of non-compliant chemical residues and / or (gluten only for those identified products as "gluten-free") in raw materials.

**PHYSICAL DANGERS**

Among the physical hazards the following risks have been identified:

- Accidental introduction of foreign bodies from personnel, environment and the raw material.





For organic production the determined dangers are:

**CHEMICAL DANGERS**

Among the chemical hazards the following risks have been identified:

- Presence of sanitizing residues and / or other types of detergents.

**CROSSED CONTAMINATION**

Among the dangers of cross-contamination the following risks have been identified:

- The introduction of non-organic raw materials and / or the use of equipment and / or tools not intended for use for the aforementioned production.

### 7.4.3 *Evaluation of hazards*

The risk analysis was conducted taking into account the type of product that comes, stored and distributed without any manipulation. Through a careful study of all flowcharts previously reported that allowed to identify the risks.

For the purposes of hazard assessment, the following definitions were used:

| | DEFINITIONS |
|---|---|
| **DAMAGE** | Damage to health, including damage that may be caused by loss of product or product quality availability |
| **DANGER** | Potential source of damage |
| **SEVERITY** | The measure of the possible consequences of a hazard |
| **CHANCE** | The extent to which the damage is likely to occur |

| | |
|---|---|
| **RISK** | Combination of the probability of the occurrence of the damage e the severity of the damage itself |
| **ANALYSIS OF RISK** | Use of available information to identify hazards and to estimate the risk |

In fact, by definition the danger is serious, when the health of the consumer can be considered permanently compromised and lead to death itself. A medium danger, instead, it is defined as such when the damages despite being severe never lead to death.





Finally, a low danger is defined as such only when the damage caused is reversible up to to complete healing.
The probability is defined as high when the presence of danger is safe, average when the danger is present the presence of danger is possible in some circumstances, and finally low when the the presence of danger is unlikely or could be possible in unusual circumstances.

**QUANTITATIVE EVALUATION OF THE ASSOCIATED AL RISK**

**DANGER**

**RISK INDEX**

**R = P x G = Probability x Gravity**

| **CHANCE** | | **SEVERITY** | |
|---|---|---|---|
| **High** | **3** | **High** | **3** |
| **Average** | **2** | **Average** | **2** |
| **Low** | **1** | **Low** | **1** |
| **Nothing** | **0** | **Nothing** | **0** |

**0 <R <9**

| | |
|---|---|
| **0** | **NO RISK** |
| **From 1 to 3** | **LOW RISK** |
| **4 to 6** | **AVERAGE RISK** |
| **7 to 9** | **HIGH RISK** |

After this premise we are able to evaluate both quantitatively and qualitatively every single risk contained within each hazard previously identified. At this point the team chose to submit to the tree of the decisions, attached below, all the dangers and related risks associated with each phase previously identified in the flow charts.

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**YES** **NO**

**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

## TREE OF DECISIONS

**D1: ON THE BASIS OF ASSESSMENT OF HAZARDS THIS RISK IS SIGNIFICANT, MUST IT BE CONTROLLED?**

**NO** → **THE RISK IS NOT SIGNIFICANT PRP**

**YES**

**D2: THERE IS A NEXT PHASE WHO CAN ELIMINATE OR REDUCE THE RISK ACCEPTS THE RISK?**

**YES** → **IDENTIFY THE NEXT PHASE**

**NO**

**D3: CONTROL OR MEASUREMENTS GMP MAY REMOVE, REDUCE OR KEEP LEVELS ACCEPT THE RISK?**

**NO** → **MODIFY THE PROCESS O THE PRODUCT, BACK D1**

**YES**

**D4: THE LIMITS CAN BE DETERMINED CRITICISM OF CONTROL?**

**NO**

**YES**

**D5: IT IS POSSIBLE TO MONITOR I CRITICAL LIMITS IN THE WAY OF POWER INTERVIEW IMMEDIATELY, WITH CORRECTIVE ACTIONS IN THE CASE THESE ARE EXCEEDED?**

**NO**

**YES**

**CCP** **O-PRP**

HOT PRODUCTION

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 1 | SELECTION INGREDIENTS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 0 GRAVITY = 0 | 0 | NULL | NO | | | | | |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF CORPI FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 2 | VERIFICATION TMC, INTEGRITY PACKAGING | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 0 GRAVITY = 0 | 0 | NULL | NO | | | | | |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF CORPI FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 3 | WORKINGS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF CORPI FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | YES | YES | CCP |
| 4 | COOKING | CHEMIST | P PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF CORPI FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |





HOT PRODUCTION

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI E NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| 5 | PACKAGING | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NON-COMPLIANT AND / OR OF GLUTEN IN THE RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM RAW RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI E NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 6 | STORAGE | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NON-COMPLIANT AND / OR OF GLUTEN IN THE RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |
| | | | THE ACCIDENTAL INTRODUCTION OF | | | | | | | | | |

| | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | PHYSICAL | FOREIGN BODIES FROM STAFF, ENVIRONMENT AND RAW MATERIAL FROM | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | NO | | | | | PRP |





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**COLD PRODUCTION**

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 1 | SELECTION INGREDIENTS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 0 GRAVITY = 0 | 0 | NULL | NO | | | | | |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 2 | VERIFICATION TMC, INTEGRITY PACKAGING | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 0 GRAVITY = 0 | 0 | NULL | NO | | | | | |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 3 | WORKINGS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGNERS COMING FROM STAFF, ENVIRONMENT AND RAW MATERIALS | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**COLD PRODUCTION**

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 4 | COOLING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOCI | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | YES | YES | O-PRP |
| | | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| 5 | PACKAGING | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOCI | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | NO | | O-PRP |
| 6 | STORAGE AT ° CONTROLLED | BIOLOGICAL | CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOCI | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | YES | NO | YES | YES | YES | CCP |
| | | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |
| | | PHYSICAL | THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | BASS | NO | | | | | PRP |







**BIOLOGICAL PRODUCTION**

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 1 | SELECTION INGREDIENTS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CONTAMINATION CRUSADE | THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 2 | VERIFICATION TMC, INTEGRITY PACKAGING | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |
| | | CONTAMINATION CRUSADE | THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |
| 3 | WORKINGS | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | CONTAMINATION CRUSADE | THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| 4 | COOKING | CHEMIST | PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | PROBABILITY = 1 GRAVITY = 3 | 3 | LOW | YES | NO | YES | NO | | O-PRP |
| | | | THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF | | | | | | | | | |

| | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | CONTAMINATION CRUSADE | EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**BIOLOGICAL PRODUCTION**

| N | PHASE | DANGER | RISK | CALCULATION OF RISK P x G | R | LEVEL RISK | D1 | D2 | D3 | D4 | D5 | PRP / O-PRP / CCP |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | CHEMIST | PRESENCE OF RESIDUES CHEMICALS NOT COMPLIANT OR OF GLUTEN IN MATERIALS PRIME | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |
| 5 | PACKAGING | CONTAMINATION CRUSADE | THE INTRODUCTION OF MATERIALS NON-BIOLOGICAL FIRST E / O USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |
| | | CHEMIST | PRESENCE OF RESIDUES CHEMICALS NOT COMPLIANT OR OF GLUTEN IN MATERIALS PRIME | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |
| 6 | STORAGE | CONTAMINATION CRUSADE | THE INTRODUCTION OF MATERIALS NON-BIOLOGICAL FIRST E / O USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | PROBABILITY = 0 GRAVITY = 0 | 0 | NOTHING | NO | | | | | |





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**7.4.4. Selection and evaluation of control measures**

Based on the hazard assessment performed, a combination was selected appropriate control measures in order to prevent, eliminate or reduce the assessed hazards for food safety. The selected control measures have been divided into categories (CCP or PRP) depending on the management mode.

**7.5. Establishment of Operational Prerequisite Programs (PRP)**

From the analysis of the flow diagrams and through the use of the decision tree have been identified operational prerequisites for food safety. From the analysis it emerged that i PRP Operational can be monitored. The application of good processing practices e of correct hygiene practice, in addition to the correct functioning of the machinery, through appropriate control measures, the correct execution of the O-PRPs.

The following Operational PRPs have been identified:





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**PRP Operational**

**HOT PRODUCTION**

| PHASE | DANGER | ACTION REQUIRED | CONFORMITY ' | MONITORING PROCEDURE METHODOLOGY | FREQUENCY |
|---|---|---|---|---|---|
| **PROCESSING PRP Operational** | **CHEMIST** PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIALS I | CORRECT WASHING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| | **PHYSICAL** THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| | **CHEMIST** PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE | CORRECT WASHING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |

| | | | | | | |
|---|---|---|---|---|---|---|
| **COOKING**<br>**PRP Operational** | RAW MATERIALS I<br>**PHYSICAL**<br>THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| **PACKAGING**<br>**PRP Operational** | **PHYSICAL**<br>THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| **STORAGE**<br>**PRP Operational** | **BIOLOGICAL**<br>(CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT) | CORRECT ROTATION WAREHOUSE | TMC | VISUAL INSPECTION | QUARTERLY |







**PRP Operational**

**COLD PRODUCTION**

| PHASE | DANGER | ACTION REQUIRED | CONFORMITY ' | MONITORING PROCEDURE METHODOLOGY | FREQUENCY |
|---|---|---|---|---|---|
| **PROCESSING**<br>**PRP Operational** | **CHEMIST**<br>PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | CORRECT WASHING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| | **PHYSICAL**<br>THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |
| **COOLING DOWN**<br>**PRP Operational** | **BIOLOGICAL**<br>CONTAMINATION AND / OR GROWTH OF MICROORGANISMS PATOGENI AND NOT | CONTROL t / ° T | TEMPERATURE AT THE HEART OF THE PRODUCT NOT MORE THAN 7 ° C | INSTRUMENTAL | EVERY PROCESSING |
| **PACKAGING**<br>**PRP Operational** | **PHYSICAL**<br>THE ACCIDENTAL INTRODUCTION OF FOREIGN BODIES FROM STAFF, ENVIRONMENT AND FROM THE RAW MATERIAL | PROPER HANDLING | ABSENCE OF VISIBLE RESIDUES | VISUAL INSPECTION | EVERY PROCESSING |

**PRP Operational**

**BIOLOGICAL PRODUCTION**

| PHASE | DANGER | ACTION REQUIRED | CONFORMITY ' | MONITORING PROCEDURE METHODOLOGY | FREQUENCY |
|---|---|---|---|---|---|
| **SELECTION INGREDIENTII PRP Operational** | **CROSSED CONTAMINATION** THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | CORRECT MANIPULATION | EXCLUSIVE USE OF RAW MATERIALS BIOLOGICAL (CARDS CHECK TECHNICAL) EXCLUSIVE USE OF EQUIPMENT AND / OR INSTRUMENTS AIMED A USE OR OTHERWISE SLICERS LA BIOLOGICAL PROCESSING BEFORE ANY OTHER PROCESSING | DOCUMENT VISUAL INSPECTION | EVERY PROCESSING |
| | **CHEMIST** PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | CORRECT WASHING CHOICE OF DETERGENTS ADEQUATE | ABSENCE OF VISIBLE RESIDUES VERIFICATION OF TECHNICAL SHEETS | DOCUMENT VISUAL INSPECTION | EVERY PROCESSING |
| **PROCESSING PRP Operational** | **CROSSED CONTAMINATION** THE INTRODUCTION OF RAW MATERIALS NON-BIOLOGICAL AND / OR USE OF EQUIPMENT AND / OR INSTRUMENTS NOT INTENDED FOR USE FOR THE ABOVE PRODUCTION | CORRECT MANIPULATION | EXCLUSIVE USE OF RAW MATERIALS BIOLOGICAL (CARDS CHECK TECHNICAL) EXCLUSIVE USE OF EQUIPMENT AND / OR INSTRUMENTS AIMED A USE OR OTHERWISE SLICERS LA BIOLOGICAL PROCESSING BEFORE ANY OTHER PROCESSING | DOCUMENT VISUAL INSPECTION | EVERY PROCESSING |
| **COOKING PRP Operational** | **CHEMIST** PRESENCE OF CHEMICAL RESIDUES NOT COMPLETE AND / OR OF GLUTEN IN THE RAW MATERIAL | CORRECT WASHING CHOICE OF DETERGENTS ADEQUATE | ABSENCE OF VISIBLE RESIDUES VERIFICATION OF TECHNICAL SHEETS | DOCUMENT VISUAL INSPECTION | EVERY PROCESSING |





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**7.6 CONSTITUTION OF THE HACCP PLAN**

**7.6.1 HACCP plan**

**7.6.2 Identification of critical control points (CCP)**

**7.6.3 Determination of critical limits for critical control points**

**7.6.4 System for monitoring Critical Control Points**

The **CCPs** (Critical Control Points) that have been identified represent points in which it is It is possible to exercise control over one or more factors in order to prevent, minimize, eliminate the risk. The procedure used to determine the Critical Control Points, has allowed the identification of a phase and / or a process procedure in which it was possible, make partial or definitive corrective actions at a specific point in order to reduce to acceptable levels or eliminate the risk completely. The identification study of CCP was carried out using the "decision tree" that allowed, after identifying a CCP, to verify if this point was really such and therefore through its control a risk could be monitored in order to minimize it and / or delete it. Furthermore, everything was also supported by a given quali-quantitative process by Risk Management to assign the probability and severity of a risk associated with

danger. The abbreviation: **CCP identifies a point or phase of the process in which it is possible eliminate the danger or reduce it to acceptable levels.**

Furthermore, critical limits have been established for each critical control point identified, these limits are given both by those provided for by the relevant regulations on the subject and by internal limits, originated from a careful analysis of the company history in addition to the already mentioned guidelines. How much already mentioned, was used for drawing up the synoptic tables, shown below, where they are described all the critical points, the limits and all the actions that are performed.





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**SECTION 7**

**PLANNING AND REALIZATION OF SAFE PRODUCTS**

**CCP**

| PHASE | RISK | ACTION REQUIRED | LIMITS | MONITORING PROCEDURE METHODOLOGY | FREQUENCY | ACTION CORRECTIVE | VERIFICATION | REG. |
|---|---|---|---|---|---|---|---|---|
| **CCP STORAGE AT ° CONTROLLED** | CONTAMINATION AND / OR GROWTH OF Microorganisms PATOGENI AND NOT | MAINTENANCE OF THE PRODUCT A SUITABLE T | TEMPERATURE OF STORAGE NOT GREATER THAN 4 ° C | INSTRUMENTAL | DAILY | TRANSFER PRODUCT IN OTHER CELL E RESTORE T ° CELL | VERIFICATION T ° STORAGE | M20 |
| **CCP COOKING AT CONTROLLED** | CONTAMINATION AND / OR GROWTH OF Microorganisms PATOGENI AND NOT | MAINTENANCE OF THE PRODUCT A SUITABLE T | TEMPERATURE OF HEART NOT COOKED LESS THAN 117 ° C | INSTRUMENTAL | EVERY PRODUCTION | REWORK | VERIFICATION T ° COOKING | M22 |

**7.6.5. Actions when monitoring results exceed critical limits**

Corrective actions have already been indicated in the previous self-control plans.

**7.7 Updating of preliminary information and documents specifically to PRPs and the HACCP plan**

After the preparation of the PRP and the HACCP Plan, the COMPANY yes undertakes to modify the HACCP Plan and the Operational Prerequisite Programs, if necessary, if there are updates and / or changes in relation to:

- Product features;
- Flowcharts;
- Process phases;
- Control measures.

**7.8. Verification planning**

The procedures for checking the previously established limits are different depending on the type required feedback, in fact there are those of instrumental type (microbiological analysis, chemical-physical, etc.), those of a documentary type and those of a visual type that are entrusted to the experience and the training of the assigned personnel, through the pre-operative controls carried out daily. All this is essential to check if the system Self-control is efficient and effective to avoid possible risks linked to the product finished, as required by the aforementioned self-control plans. They are executed by a third accredited laboratory, at least once a year, microbiological analysis a sample on surfaces, equipment, tools and personnel, in order to guarantee a correct monitoring of the plant's general hygiene conditions and verifying and validate existing procedures.

**7.9 TRACEABILITY**

The company has implemented a compliant traceability system within the system
to the legal and regulatory provisions on the subject (Reg. 178/03 and UNI 22005: 2008), which
allows you to identify the products and their relationship with the lots of raw materials used.
All this is done through DDT and / or invoices and / or IT and / or paper tools,
that are stored until there is the presence of this raw material inside
of the COMPANY.

**7.9.1 Coding of company product lots**

The lot is assigned using a progressive alpha numeric code from the beginning
of the year until the end of the same year.
The production lot comes from the module M21 , in which the production date is indicated
composed of 6 digits the cod. product and batch ingredients characterized by a letter
progressive (A, B, C, ... .. etc.), which will change as the ingredients used change
therefore in the case of products that have the same production date, the same code
product but also a single different ingredient the letter will have to vary in a way
sequentially guaranteeing the uniqueness of the ingredients used. The list of codes
identification of suppliers and products are contained in the "FACILE" software for the
billing and warehouse management.

**7.10 HOLD UNDER NON-CONFORMITY CHECK**

**7.10.1 Corrections**

The product is classified as ***non-compliant (for food safety purposes)*** when
has exceeded the critical limits for the CCP or a loss of control of the PRP has occurred
operational, in this case the products concerned are identified and controlled in relation to the
their use and release.
If the necessary corrections are made, in order to eliminate the non-compliance
found, are approved by the manager and recorded on the NC management module
including all the information necessary for the traceability of non-compliant lots.





The procedures for keeping non-compliant products under control are set out in
procedure " PO02 - Non-Conformance Check Complaints Corrective Actions Preventive Actions -
00 ".

**7.10.2 Corrective Actions**

The data derived from the monitoring of operational PRPs are evaluated by the RSGSA, which has adequate knowledge and authority to activate corrective actions.
The CAs are implemented when there is a lack of compliance with the PRPs
Operating / s.
The COMPANY has established and maintains the PO02 procedure "Corrective Actions" of the SGSA, where the actions necessary to identify and eliminate the cause / s of the are specified non-conformities detected, to prevent their occurrence and to report the process or system under control.
The procedures for keeping non-compliant products under control are set out in procedure " PO02 - Non-Conformance Check Complaints Corrective Actions Preventive Actions - 00 ".

**7.10.3 Management of potentially unsafe products**

Each product batch covered by the NC is released as safe only when the COMPANY from evidence (through the results of sampling, analysis and / or other activities of verification) that the product batch concerned complies with the acceptable levels identified in the previous pages.
In the event that, after the evaluation, the product batch is not acceptable for release, the DITTA decides on one of the following activities:

- Rework or further processing inside to ensure that the danger to the food safety is eliminated or reduced to acceptable levels;
- Destruction and disposal as waste.

The management of non-compliant products takes place according to the methods specified in procedure " PO02 - Non-Conformance Check Complaints Corrective Actions Preventive Actions - 00 ".





**7.10.4 Withdrawals and reminders**

The withdrawal phase is not applicable, as opposed to the reference that is applied through direct contact with the customer in possession of the lot in question. Indeed by fax and / or email is immediately reported the lot that is the object of the recall, and that of consequently it must be excluded from the sale and / or any form of direct use and / or indirect.
At this point the COMPANY will remain waiting to receive a confirmation from the customer of management of the recall, by written communication, which will confirm to have complied with this request.

If no response is received from the customer, a further direct contact will be attempted by telephone in order to solicit the management of the recall.







## SECTION 8

## VALIDATION, VERIFICATION AND IMPROVEMENT OF THE SYSTEM MANAGEMENT FOR FOOD SAFETY

### 8.1 GENERAL INFORMATION

The RSGSA has planned and implemented the processes necessary to validate the control measures and / or the combinations of control measures, in order to verify and improve the FSMS.

### 8.2 Validation of combinations of control measures

The methods and the control measures, defined in the PRP and in the HACCP plan, will be validated before their application, as well as at the time of any significant variation of the process.

The System will be considered valid when:

- The established control methods are able to keep the hazards at the defined levels;
- The control measures are effective and their combination / synergy guarantees the realization of safe products.

When the validation highlights, instead, the inability to reach the set objectives, i

PRP and the HACCP plan will be modified and redefined accordingly.
The validation of the control measures will take place by the RSGSA, through the analysis of the data relating to emergencies, non-conformities, statistical progression of the critical limits and reported in the management review report “Minutes Review of Direction".

**8.3 Monitoring of monitoring and measurement**

The COMPANY has identified the monitoring and measurements that must be carried out to provide evidence of the conformity of the products to the determined requirements.
The measuring equipment will be:

- Calibrated at intervals and / or before use, based on reference measurements attributable to international or national standards;
- Adjust or adjust again when needed;
- Protected against adjustments that could invalidate the measurement results;
- Protected from damage and deterioration.





In the event that the measuring equipment does not comply with the requirements, the DITTA will evaluate and record the validity of the results of previous measurements, taking appropriate actions for the instrument and the products involved.
Actions for the instrument and products:
If it is found that the equipment is not compliant, we will proceed to immediately check whether the previous measurements are invalidated by non-conformity found on the equipment.
In the event that the previous measurements are not invalidated, we will proceed only to re-calibration or verification of the equipment.
If, however, the previous results have also been invalidated, it will be necessary, in addition to recalibration or verification of the equipment, which was found to be non-compliant, the control of the lots previously produced and still deposited in the Plant.
Record keeping
Calibration and verification records are kept by the OAS.

**8.4 Verification of the Food Safety Management System**

**8.4.1 Internal Inspections**

The COMPANY carries out at periodic intervals Internal Inspections, to determine if the FSMS:

- complies with the planned, the requirements of the SGSA established by the organization and the requirements of the UNI EN ISO 22000 standard and mandatory regulations;

- has been effectively implemented and updated.

**8.4.2 Evaluation of individual verification results**

The RSGSA systematically evaluates the results of internal audit activities.

If the system is, in whole or in part, ineffective with respect to the set objectives, the

RSGSA must:

review and update existing procedures and communication channels;

review the conclusions of the hazard analysis, the defined operational PRPs, and the HACCP Plan;





review the PRPs;

assess the adequacy of human resources and training activities.

**8.4.3 Analysis of the results of the verification activities**

The RSGSA analyzes the overall results of internal and external audits in order to:

confirm the effectiveness of the system;

identify the need for updating and / or improvement;

identify the (maximum) risks deriving from the use of a potentially unsafe product;

define the information necessary for the scheduling of the audits;

demonstrate the effectiveness of the corrective actions implemented.

The results of this analysis are recorded by the RSGSA in the M16 "Inspection Report

internal "of the SGSA and made available to the Senior Management as incoming information for the

review or as input information for the update of the FSMS.

**8.5 Improvement**

**8.5.1 Continuous Improvement**

The Organization ensures the continuous improvement of the effectiveness of the SGSA through

the use of the communication, the management's review, the inspections

internal, the assessment of the individual results of the verification, the analysis of the results of the activities of

verification, validation of combinations of control measures, corrective actions and

preventive measures and the update of the SGSA.

**8.5.2 Update of the Food Safety Management System**

The Company Management of the COMPANY ensures that the SGSA is constantly updated.
This is done through the annual assessment of the FSMS, the review of the hazard analysis,
the defined, established operational PRPs and the HACCP plan.
Evaluation and updating activities are based on information:
in input, deriving from communication, both internal and external;





inbound, arising from other information regarding suitability, adequacy and effectiveness
of the SGSA;
outgoing, deriving from the analysis of the results of the verification activities;
outgoing, resulting from the management's review.
The reasons that eventually led to the system update and changes
made, are registered and communicated to the Top Management in view of the Review.

UNITED SAFETY AGENTS

# FSVP

## DOCUMENT TRANSLATION

To proceed with FSVP verification, we respectfully request that you: **01)** provide answers to the following four questions and **02)** confirm that the enclosed food safety document has been accurately translated and correctly describes its original content.

**01)** What is this document's title? _____

**02)** When will this document expire? _____

**03)** Does this document contain information for any of the following? - check all that apply

Hazard Control for: ☐ Biological ☐ Chemical ☐ Physical ☐ Environmental

☐ Laboratory Testing Results ☐ Onsite Audit Results ☐ Preventive Controls

**04)** Has this document been accurately translated? ☐ Yes ☐ No

☐ < *CONFIRM TRANSLATION'S ACCURACY*

**Representative's Name:** _____

**Job Title:** _____

**Today's Date:** _____

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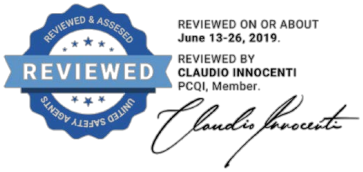


**Food**

**selfcontrol**

**Health**

**Quality**

**Environment**

**Safety**

Technical report on food production, processing cycle, treatment methods food and systems chosen to ensure their health and conservation; c / o 'A RICCHIGIA Srl located in Bronte in via Cardinale De Luca, 115.

Following your request to comply with the DA of 10/20/2011 it can be said that the productions within your structures, entrusted to a team of experts, are in compliance with the EC Regulation 852/2004 and subsequent amendments and additions.

It can also be said that your work is: products from fresh and dry ovens, cream spreads and salted pests; these productions are performed using both raw materials and animal origin (milk, eggs, butter, etc.), and is of vegetable origin.

Furthermore, the same processes are performed to create gluten-free products they take place in places where there is a physical separation, in order to avoid cross-contamination.

All foods are processed using techniques that allow production, storage and finally packaging, in full safety through maintenance and constant monitoring

of all the shelf-life parameters, using preparation and cooking methods appropriate to the type of processing, monitoring the T ° in order to guarantee maximum healthiness.

The above is managed and monitored using the HACCP method which allows, through the control of the CCPs, to carry out a self-check to ensure that there is the certainty of correct management of the implemented system and any emergencies in the productions, in fact such method from a complete, effective and efficient overview.

Therefore in the light of what was said above I can assume that it is from the point of view formal, than a real one; this structure is absolutely suitable for the type of activity carried out, which results identical to that previously located in via Scibilia. n ° 18, Bronte.

Catania, 09/06/2017

The administrator

Dario Mangiameli

Doctor in Food Science and Technology

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E-mail: selfcontrol.it@gmail.com

UNITED SAFETY AGENTS

# FSVP

## DOCUMENT TRANSLATION

To proceed with FSVP verification, we respectfully request that you: **01)** provide answers to the following four questions and **02)** confirm that the enclosed food safety document has been accurately translated and correctly describes its original content.

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☐ Laboratory Testing Results ☐ Onsite Audit Results ☐ Preventive Controls

**04)** Has this document been accurately translated? ☐ Yes ☐ No

☐ < *CONFIRM TRANSLATION'S ACCURACY*

**Representative's Name:** _____

**Job Title:** _____

**Today's Date:** _____

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FOREIGN SUPPLIER

# FSVP

QUESTIONNAIRE

PRIVILEGED & CONFIDENTIAL

## BACKGROUND

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 in a manner that provides at least the same level of public health protection as the FDA's domestic standards (Preventive Controls Rule or Produce Safety Rule). In order to accomplish this goal, documentation of your company's processes, procedures and control methods will be required.

## CONFIDENTIALITY

All information shared will remain strictly privileged and confidential and will only be used during FSVP verification activities. An accurate and truthful response is required to successfully complete your company's FSVP verification.

## INSTRUCTIONS

We respectfully request that you complete the following sections to the best of your ability and with as much detail as possible. All sections are required, unless explicitly noted otherwise. **Complete via computer, do not print.**

Upon completion: Please return Questionnaire and accompanying documents via:

**Method One**: email completed questionnaire to **info@unitedsafetyagents.com**

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

## 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 W. Park Avenue, No. 222, Oakhurst, New Jersey 07755-9998, United States of America.

## GENERAL INFORMATION

Company Name: Ecco un Poco LLC  Today's Date: _____

Factory Address: Via Cardinale de Luca 115

City: Los Angeles  Province: CT  Country: United States

Office Address: Via Cardinale de Luca 115

City: Los Angeles  Province: CT  Country: United States

FDA Registration No.: _____  Website: www.aricchigia.com

QC/QA's Name: _____  Title: Commercial Rep.

Phone No.: +39 095772326  Email: aricchigia@gmail.com

TraceGains' Account Name: _____

## 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* _____ |

## PRODUCT CATAGORY

***Please select a category or categories of product(s) that your facility/operation handles.***

| | | | |
|---|---|---|---|
| ■ Bakery | ■ Beverage | ■ Chocolate/Candy | ☐ Dairy |
| ■ Dressings/Condiments | ☐ Egg | ☐ Food Additives | ☐ Game Meat |
| ☐ Fruits | ☐ Vegetables | ☐ Grains | ■ Nuts |
| ■ Oil | ☐ Snack Foods | ☐ Spice | ☐ *Other* _____ |

## PRODUCTS SUPPLIED

***Please list the name** (and variation) **of each product that your company supplies to Customer.***

Product No. 01: 100% PURE BRONTE D.O.P. GREEN I  Product No. 06: _____

Product No. 02: _____  Product No. 07: _____

Product No. 03: _____  Product No. 08: _____

Product No. 04: _____  Product No. 09: _____

Product No. 05: _____  Product No. 10: _____

## 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. |

## 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

We proceed with the preparation of our sample using serial dilution solutions.
From the lowest dilution, take 1 ml of the cxampione which will then be inoculated by spatulation on PETRI plates containing selective media for the searched microorganisms such as: VRBGA, PCA, SAB.
The soils are then incubated at suitable temperatures for the proliferation of microorganisms, such as 25 ° C for SAB and 35 ° C for other soils.
After 48 hours, the growth of the microorganisms under examination occurs through colony counts.

### FREQUENCY *of* CONTROL VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

## 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.

## CRITICAL CONTROLS *for* ENVIROMENTAL/PROCESS

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

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

### DESCRIPTION *of* CRITICAL CONTROLS

- MOCA analysis on packaging to ensure its integrity;
- Use of the ATM;
- Storage and storage of the products at correct temperatures;
- Consumption of the products within and not beyond the shelf-life,
- Correct sanitary hygienic practice.

### FREQUENCY *of* CONTROL VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

## 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 |

## 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

If Testing: Certificate(s) of Analysis are required.

Research aflatoxins (B1, B2, G1, G2) using HPLC.

### FREQUENCY *of* CONTROL VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

## FDA IDENTIFIED PHYSICAL HAZARDS

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

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

## CRITICAL CONTROLS *for* PHYSICAL HAZARDS

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

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

### DESCRIPTION *of* CRITICAL CONTROLS

Accurate visual inspection of the product and control using mertal detector.

### FREQUENCY *of* CONTROL VALIDATION

The frequency of the analysis is monthly, however analyzes can also be carried out in a shorter period of time following a specific request from customers.

**Metal detection standards**

Ferrous: _____ mm

Non Ferrous: 2-3 mm

Stainless Steel: _____ mm

## ALLERGEN & CROSS CONTAMINATION CONTROLS

| Component *or* Ingredient | Present in *product?* | Present on *same equipment?* | Present in *same facility?* |
|---|---|---|---|
| **Product Name:** _____ | | | **Product code:** _____ |
| **Peanuts** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Tree Nuts** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Milk or Milk Derivatives** | ■ Yes ☐ No | ☐ Yes ■ No | ☐ Yes ■ No |
| **Egg or Egg Products** | ■ Yes ☐ No | ☐ Yes ■ No | ☐ Yes ■ No |
| **Fish** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Shellfish** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Soy** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Gluten** | ■ Yes ☐ No | ☐ Yes ■ No | ☐ Yes ■ No |
| **Wheat** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Celery** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Sesame** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Mustard** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Sulfates** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Lupin** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Seeds** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Monosodium Glutamate** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Grains** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Colorings** | ☐ Yes ☐ No | ☐ Yes ☐ No | ☐ Yes ☐ No |
| **Aflatoxins** | ■ Yes ☐ No | ☐ Yes ■ No | ☐ Yes ■ No |

Please write product's allergen statement *(e.x. product is processed in a facility that..)*

Products intended for gluten-free and lactose-free production are prepared, stored and baked in a laboratory dedicated to it with different instruments and specifically used for these products.

## ONSITE AUDITING INFORMATION

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

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

What standard is the GFSI certification? _____

**If No**; 1. Does the site have documented quality manual? ■ Yes ☐ No

2. Does the site have documented internal hygiene audits? ■ Yes ☐ No

3. Does the site have documented quality system audits? ■ Yes ☐ No

4. Does the site have documented 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:

## STAFF HYGIENE INFORMATION

Have all staff undergone formal food hygiene training? ■ Yes ☐ No

In-house hygiene training? ■ Yes ☐ No

Accredited hygiene training? ■ Yes ☐ No

*Training level certification obtained:* _____

Are staff issued protective clothing? ■ Yes ☐ No

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

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

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

What is the total number of staff employed on site? 5

## PEST CONTROL

Is a pest control contractor employed? ☐ Yes ■ No

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

Number of yearly visits: _____

If no, by what means is pest prevention carried out? _____

## HACCP & TACCP & VACCP

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

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

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

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

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

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

Are records maintained for all CCPs? ■ Yes ☐ No

Does the HACCP system include the following:

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

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

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

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

*Please provide details:* Procurement information are specified and verified the requirements for product approval,

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

*Please provide details:* nspections or other activities are carried out to ensure that the products purchased comply

## 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: The products are identified with a batch

## 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:

Receipt by the suppliers of certified raw materials compliance and any analyzes carried out.

## FINISHED / PACKED PRODUCT

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

Are reference samples from finished packed product retained? ■ Yes ☐ No

Are finished product 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.

Following the customer's complaint, we proceed with the evaluation of the actual problem encountered and proceed with the collection of the wrong product and replacement with goods in accordance with its requests.

## 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 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 shipment being rejected from entry into the United States. I confirm that all products that my company trades are in compliance with the Food Safety Modernization Act and all other U.S & FDA Food Safety legislation.

☐ < ***CONFIRM CERTIFICATION*** *- Required*

**Representative's Name:**

**Title:** QA / QC

**Today's Date:** 15/06/19

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ACCREDIA
L'ENTE ITALIANO DI ACCREDITAMENTO
Membro degli Accordi di Mutuo Riconoscimento EA, IAF e ILAC
Signatory of EA, IAF and ILAC Mutual Recognition Agreements

ilac-MRA

REVIEWED & ASSESSED
REVIEWED
UNITED SAFETY AGENTS
REVIEWED ON OR ABOUT
June 13-26, 2019.
REVIEWED BY
CLAUDIO INNOCENTI
PCQI, Member.
Claudio Innocenti

# CERTIFICATO DI ACCREDITAMENTO
## *Accreditation Certificate*

Accreditamento n°
*Accreditation n°*
**1454** Rev. **0**

Si dichiara che
*We declare that*
**LAB&CO sas DI SCHILIRO' ALFINA & C.**
Sede:
Via Palermo, 27 - 95034 Bronte CT

è conforme ai requisiti della norma
*meets the reqirements of the standard*
UNI CEI EN ISO/IEC 17025:2005 "Requisiti generali per la competenza dei Laboratori di prova e taratura"
*EN ISO/IEC 17025:2005 "General Requirements for the Competence of Testing and Calibration Laboratories" standard*

quale
*as*
**Laboratorio di Prova**
***Testing Laboratory***

L'accreditamento attesta la competenza tecnica del Laboratorio relativamente allo scopo riportato nelle schede allegate al presente certificato. Le schede possono variare nel tempo. I requisiti gestionali della ISO/IEC 17025:2005 (sezione 4) sono scritti in un linguaggio idoneo all'attività dei Laboratori di Prova, sono conformi ai principi della ISO 9001:2008 ed allineati con i suoi requisiti applicabili.
Il presente certificato non è da ritenersi valido se non accompagnato dalle schede allegate e può essere sospeso o revocato in qualsiasi momento nel caso di inadempienza accertata da parte di ACCREDIA.
La vigenza dell'accreditamento può essere verificata sul sito WEB (www.accredia.it) o richiesta direttamente ai singoli Dipartimenti .

*The accreditation certifies the technical competence of the laboratory limited to the scope detailed in the attached Enclosure. The scope may vary in the time. The management system requirements in ISO/IEC 17025:2005 (Section 4) are written in a language relevant to Testing Laboratories operations and meet the principles of ISO 9001:2008 and are aligned with its pertinent requirements.*
*The present certificate is valid only if associated to the annexed schedule, and can be suspended or withdrawn at any time in the event of non fulfilment as ascertained by ACCREDIA.*
*The in force status of the accreditation may be checked in the WEB site (www.accredia.it) or on direct request to appointed Department.*

Data di 1ª emissione
*1st issue date*
**2014-06-19**

Il Direttore Generale
*The General Director*
(Dr. Filippo Trifiletti)

Data di modifica
*Modification date*
**2014-06-19**

Il Direttore di Dipartimento
*Department Director*
(Dr.ssa Silvia Tramontin)

Data di scadenza
*Expiring date*
**2018-06-18**

Il Presidente
*The President*
(Cav. del Lav. Federico Grazioli)



ACCREDIA
*Sede operativa e legale:* Via Guglielmo Saliceto, 7/9 | 00161 Roma - Italy | Tel. +39 06 8440991 | Fax +39 06 8841199
info@accredia.it | www.accredia.it | Partita IVA - Codice Fiscale 10566361001

ACCREDIA
L'ENTE ITALIANO DI ACCREDITAMENTO

☐P ☐F ☒E ☐C

Data: 31/05/2018
Prot. n. L18039/18/ST/ar
Laboratorio di Prova: **1732 LABEC**
Processo:
Schema: **17025**

LAB&CO sas DI SCHILIRO' ALFINA & C.
Via Palermo, 27
95034 Bronte CT

Email: info@labetco.it

Att: Dr.ssa Daniela SCHILIRO'

**Oggetto: proroga validità certificato di accreditamento**

Con la presente si comunica che, in attesa del completamento dell'iter di valutazione conseguente alla visita di valutazione effettuata nei giorni 9 e 10 aprile 2018 e delle relative decisioni del Comitato Settoriale di Accreditamento di Accredia, la validità del certificato di accreditamento del Laboratorio in indirizzo è prorogata sino al 20 giugno 2018.

Distinti Saluti

Il Direttore
Dipartimento Laboratori di Prova
(Dr.ssa Silvia TRAMONTIN)



Via G. Saliceto, 7 - 00161 Roma - Tel. +39 06 8440991 Fax +39 06 8841199 - www.accredia.it info@accredia.it

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LAB&CO
LAB&CO s.a.s. Via Palermo, 27 - 95034 Bronte CT
Tel. /Fax 095 691602 - C. F. e P. IVA 04246670873
E-Mail: info@labetco.it - Sito Internet: www.labetco.it

ACCREDIA
L'ENTE ITALIANO DI ACCREDITAMENTO
LAB N° 1454

**Bronte, 30/05/2018**

CLIENT
**A RICCHIGIA SRL**
**VIA CARDINALE DE LUCA 115**
**BRONTE 95034 CT**

| SAMPLE **180455.02** | RECEPTION **28/05/2018** | START DATE **28/05/2018** | FINISH DATE **30/05/2018** | PAGE **1 of 1** |
|---|---|---|---|---|

## TEST REPORT n° 180455.02

Denomination: Dried Fruit
Description: PISTACCHIO VERDE DI BRONTE DOP. TIPO SGUSCIAT RACCOLTO 2017 L: 716 P17/01
Withdrawal date 28/05/2018
Withdrawal time 10:00am
Quantity 300gr
Temperature on arrival °C 11,3
Sampling by the customer (the information indicated on the sampling is provided by the client himself)
Sampling report / acceptance nr.: 533/18

| DESCRIPTION ANALYSIS | RESULT | UNCERTAINTY | U.M. | LOD | LOQ | LIMITS | METHOD | NOTE | R | PROCESSING DATE |
|---|---|---|---|---|---|---|---|---|---|---|
| **Aflatoxin** | | | | | | | | | | |
| Aflatoxin B1 | N.R. | | µg/Kg | 0,35 | 2 | | AOAC 994:08 1997 | | 92 | Start: 29/05/2018 End: 30/05/2018 |
| Aflatoxin B2 | N.R. | | µg/Kg | 0,35 | 2 | | AOAC 994:08 1997 | * | 92 | Start: 29/05/2018 End: 30/05/2018 |
| Aflatoxin G1 | N.R. | | µg/Kg | 0,35 | 2 | | AOAC 994:08 1997 | * | 92 | Start: 29/05/2018 End: 30/05/2018 |
| Aflatoxin G2 | N.R. | | µg/Kg | 0,35 | 2 | | AOAC 994:08 1997 | * | 92 | Start: 29/05/2018 End: 30/05/2018 |
| Total aflatoxins (B1+G1+B2+G2) | N.R. | | µg/Kg | 0,35 | 2 | | AOAC 994:08 1997 | | | Start: 29/05/2018 End: 30/05/2018 |

Note: N.R.: Not detectable experimentally
The proofs marked with an asterisk (*) do not fall within the Accredia accreditation of this Laboratory.

REVIEWED & ASSESSED
REVIEWED
UNITED SAFETY AGENTS
REVIEWED ON OR ABOUT June 13-26, 2019.
REVIEWED BY CLAUDIO INNOCENTI PCQI, Member.

LABORATORY MANAGER

Doctor DANIELA SCHILIRÒ
Enrolled in the Order of Food Technologists
of the Sicily and Sardinia Region at No. 80

This Test Report refers exclusively to the test sample. This Test Report may only be reproduced in its entirety. Partial reproduction must be authorized with written approval from our Laboratory.
The uncertainty is extensive and has been calculated with a coverage factor k = 2 corresponding to a 95% probability level or as a confidence interval calculated at a 95% probability level. LoD: limit of detection, identifies a confidence interval of zero at a probability level of 99%. -LoQ: limit of quantification; "N.r." : not detected, indicates a value lower than LoD; "traces (x)" indicates a value between LoD and LoQ, this value is purely indicative; "<x" or "> x" indicate a value lower or higher than the measuring range of the test, respectively.
If there is a specification (legal limits or customer specifications) with which the analytical results have been compared, the values shown in bold indicate a result out of this specification.
R = Recovery. Recovery was not used for result calculations.

***END OF TEST REPORT***

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Object: **Adaptation to the CE REGULATION 852/2004 and subsequent amendments and additions.**

With the entry into force of CE Regulation 852/04 and subsequent amendments and additions, all companies operating in the food sector must guarantee the safety and wholesomeness of their products, through the application of the self-control system based on the H.A.C.C.P. method.

The quality standard that has distinguished us in all these years, offering ourselves on the market for the quality of our products and services, and guaranteeing the health and safety for our consumers, has been achieved thanks, also, to the professionalism of the consulting firm to which we relied for the adjustments in question.

To this end, through this self-certification we declare that we are under self-control and therefore have already complied with the legislation in question.

Bronte, lì

Best regards

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REPUBBLICA ITALIANA
Regione Siciliana

Assessorato della Sanità

# ATTESTATO DI FORMAZIONE DEL PERSONALE ALIMENTARISTA

AI SENSI DEL DECRETO REGIONALE ASSESSORATO DELLA SANITÀ DELLA REGIONE SICILIA DEL 19.02.07, COME MODIFICATO DAL DECRETO DEL 31.05.07

*- Visti i regolamenti comunitari nn. 852/04 e 853/04;*
*- Visto il decreto regionale Assessorato della sanità del 19 febbraio 2007, come modificato dal decreto del 31.05.07*

## STUDIO ASSOCIATO PROFESSIONALE I.Q.A.


## DOTT. PIANA FRANCESCO - DOTT. SCALISI DAVIDE

***Soggetto organizzatore:*** *Studio Associato Professionale I.Q.A Dott. Piana Francesco & Dott. Scalisi Davide*
***Sede:*** *Paternò, via Liguria 11* ***Cell:*** *3890589536*
***Approvazione regionale Sicilia Prot. n. 30448 del 05/04/2012***
*Comunicazione preventiva alla realizzazione del corso alla AUSL competente per il tramite del SIAN, effettuata almeno 30 giorni prima dell'inizio del corso in data 25/01/2016 I. PEC n°* ***281.20160125182213.05984.01.1.63***

## *Si attesta che:*

**SCALA FABIO GIOVANNI** nato Bronte **(CT)** il **24/06/1988**
Codice fiscale **SCLFGV88H24B202V**

**Ha frequentato** con profitto il corso di formazione di **APPROFONDIMENTO** di n. 12 ore svolto il 27/02/2016 dalle ore 17:00 alle ore 21:00, il 28/02/2016 dalle ore 9:00 alle ore 13:00 e il 28/02/2016 dalle ore 17:00 alle ore 21:00 con sede in Via Liguria, 11, Paternò (CT).

**Emesso in 28/02/2016 scadenza 28/02/2019 registrato al Corso n° 2-16 con I. PEC del 25/01/2016**

***La presente attestazione ha validità di tre anni dalla data di rilascio ed è efficace limitatamente alla attività di categoria A***

**Programma svolto:**
- accenni sulle principali norme in materia di alimenti;
- tracciabilità e rintracciabilità degli alimenti;
- analisi del rischio: il rischio alimentare, le proprietà dei microrganismi, meccanismi di contaminazione biologica degli alimenti, microrganismi patogeni;
- comportamenti del personale: igiene della persona, procedure specifiche;
- igiene del processo: diagrammi di flusso (ricevimento, stoccaggio, preparazione, cottura, conservazione a freddo e a caldo, riscaldamento, raffreddamento, ecc);
- igiene ambientale: monitoraggio e lotta agli infestanti, smaltimento rifiuti, sanificazione, ecc;
- procedure di autocontrollo: nomina del responsabile, analisi dei rischi e individuazione dei punti critici di controllo, analisi specifica delle problematiche proprie delle varie aziende alimentari, analisi delle strutture edilizie ed attrezzature;
- procedure di gestione del sistema: procedura di verifica delle non conformità, delle emergenze, procedura di revisione del sistema stesso.

Test di valutazione: test a risposta multipla

**Direttore del corso: Dott. Scalisi Davide**

**Data 28/02/2016**

LAB&CO

# Attestato di formazione del personale alimentarista

*(ai sensi del decreto regionale Assessorato della sanità del 19 febbraio 2007, come modificato dal decreto del 31 maggio 2007)*

Soggetto organizzatore: LAB&CO s.a.s.;
Sede: Via Palermo 27 (95034 - Bronte);
Estremi approvazione regionale prot. D.I.R.S./1/00309 DEL 29/01/2008;
Estremi nota di comunicazione preventiva alla realizzazione del corso alla ASP competente per il tramite del SIAN, effettuata il 05/05/2016 Prot. 03/16;
Visti i regolamenti comunitari nn. 852/04 e 853/04;
Visto il decreto regionale Assessorato della sanità del 19 febbraio 2007, come modificato dal decreto 31 maggio 2007;

Si attesta

Che il Sig. MAVICA VINCENZO
Nato a BRONTE il 11/10/1982
codice fiscale MVCVCN82R11B202U
ha frequentato con profitto il corso di formazione di approfondimento della durata di dodici ore tenutosi a Bronte in data 06-07-08/06/2016 .
La presente attestazione ha validità di tre anni dalla data di rilascio ed è efficace per le attività di categoria A.

Bronte, 10/06/2016

Il direttore del corso

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A. RICCHIGIA

EXCELLENZE SICILIANE

A. RICCHIGIA SRL
VIA CARLO DA LUCE, 115 - BRONTE -
WWW.ARICCHIGIA.COM
E-mail gestione@arricchigia.com
Tel. 095/7723325

**PASTA DI PISTACCHIO BRONTE DOP PURA 100%**
**100% PURE BRONTE DOP PISTACHIO PASTE**

TIPO: RAFFINATA
TYPE:REFINED



**Ingredienti : "Pistacchio Verde di Bronte D.O.P."**
**Ingredients: "Bronte D.O.P. Green Pistachio"**

**ALLERGENI:PISTACCHIO**
**ALLERGEN:PISTACHIO**

**PESO NETTO KG. 5.00**
**NET WEIGHT 11 LB**

**PESO LORDO KG. 5.140**
**GROSS WEIGHT 11.33 LB**

**LOTTO DOP17-27 120619**

**CONSUMARE PREFERIBILMENTE ENTRO FINE: 08/2021 ***

*** IN CONFEZIONAMENTO INTEGRO E A TEMPERATURA CONTROLLATA DI 10°**
**AL RIPARO DALLA LUCE DIRETTADEL SOLE E DA FONTI DI CALORE**