



UNITED SAFETY AGENTS
F S V P
COMPLIANCE PLAN

ZIBA NUT CORPORATION

Name of FSVP Importer

KIRICI KURU MEYVA VE GIDA TEKSTIL TURZM SAN. TIC. A.Ş.

Name of Foreign Supplier

TURKISH WHOLE PITTED SUN DRIED APRICOTS (SULPHUR TREATED)

Name of Product

SEPTEMBER 19, 2021

Date of Initial Verification / Reverification

SEPTEMBER 20, 2022

Date of FSVP Plan Expiration

VERIFICATION COMPLETE | APPROVED FOR IMPORT

Status of Review

NUMBER 01

Version



– Confidential –



TABLE of CONTENTS

- I. **Overview of FSVP Plan** Pg. 03
 - Instructions for Client, Definitions, and Confidentiality & Term*
- II. **Foreign Supplier Verification Procedures** Pg. 04 to 06
- III. **Frequency of Verification Procedures** Pg. 06
- IV. **Use of Approved Suppliers Only**
- V. **Corrective Actions**
- VI. **Identification of FSVP Importer**
- VII. **Code of Federal Regulations (C.F.R.) Assessment** Pg. 07
- VIII. **21 C.F.R. §1.500-14 Assessment** Pg. 08
- IX. **Attestation of Client’s Review & Assessment** Pg. 09
- X. **Entity Information & Executive Summary of Review** Pg. 10
 - FSVP Importer, foreign Supplier, FSVP Qualified Individual(s)*
 - &/or FSVP Agent(s), and Summary of Assessment.*
- XI. **FSVP Documentation Checklist** Pg. 11
 - Hazard Analysis, On-site Audit, Sampling or Testing Results*
 - Other Food Safety Records, and Product Labeling.*
- XII. **Ongoing Document Requirements** Pg. 12
- XIII. **FDA Compliance Actions & Regulatory History** Pg. 13
- XIV. **Log of Revisions / Version Numbers** Pg. 14
- XV. **Analysis of Biological Hazard(s)** Pg. 15
- XVI. **Analysis of Chemical Hazard(s)** Pg. 16
- XVII. **Analysis of Allergenic Hazard(s)** Pg. 17
- XVIII. **Analysis of Environmental & Process Hazard(s)** Pg. 18
- XIX. **Analysis of Physical Hazard(s)** Pg. 19
- XX. **Assessment of Foreign Supplier** Pg. 20 to 21
 - Supplier Procedures, Processes & Practices, Performance–*
 - History, and Approval or Denial Notes.*
- XXI. **General Food Safety Information & Review** Pg. 22 to 23
- XXII. **Addendum** Pg. 24 to 26
- XXIII. **FSVP Agent’s Certifications & Qualifying Documents** Pg. 27 to 35
- XXIV. **Foreign Supplier’s Documentation** Pg. 36 ⇨

NOTICE of REDACTION



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

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

Please contact United Safety Agents with any questions or concerns.

Supplier: Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. Product: Apricots | for Industrial use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: August 23, 2021 Review End: Sept. 19, 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.

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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 Manufacturing 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.

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DESIGNATION of ROLES & SUMMARY of REVIEW

FOREIGN SUPPLIER VERIFICATION PROGRAM IMPORTER

Company Name: Ziba Nut Corporation FDA FEI: 3016047992

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

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

Mailing Address: 600 West Broadway, Suite 700

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

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

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

FOREIGN SUPPLIER &/OR MANUFACTURER as defined by §1.500

Company Name: Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. FDA FFR: 10415547782

Manufacturing Address: Organize San. Bölgesi 1 FDA FEI: Not Available

City: Cadde, 44200 Province/Territory: Malatya Country: Turkey

Office Address: Organize San. Bölgesi 1

City: Cadde, 44200 Province/Territory: Malatya Country: Turkey

Phone Number: +904222375501 Email Address: hasircioglu@kirici.com.tr

Name of Representative(s): Bayram Kirici Title: Commercial Rep.

QUALIFIED INDIVIDUAL(s) & AGENT(s)

Agent/QI Name: Claudio Innocenti Signature: 

Title: Partner & Preventive Controls Qualified Individual. Date: Sept 19, 2021

Agent/QI Name: William J. Barber Signature: 

Title: Preventive Controls Qualified Individual. Date: Sept. 19, 2021

SUMMARY of REVIEW

Details of Product(s)	Is foreign supplier expected to implement controls for			Comments
	Biological Hazards	Chemical Hazards	Physical Hazards	
Apricots, whole and diced. Bulk, PE bag in cardboard boxes and retail packs	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Undetermined	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Undetermined	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Undetermined	Verified & Approved.
	<input type="checkbox"/> FSVP Importer	<input type="checkbox"/> FSVP Importer	<input type="checkbox"/> FSVP Importer	
	<input type="checkbox"/> Disclosure	<input type="checkbox"/> Disclosure	<input type="checkbox"/> Disclosure	See Addendum.
	<input type="checkbox"/> Customer	<input type="checkbox"/> Customer	<input type="checkbox"/> 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)

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REGISTER of SUBSTANTIATING DOCUMENTS



HAZARD ANALYSIS

Requested Required Received Reviewed

NOTES Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. A.Ş.'s HACCP Plan received.
Dated: March 12, 2019.
Plan Entitled: SULPHURED DICED APRICOT HACCP PLAN
Version: No. 2.



ON-SITE AUDIT

Requested Required Received Reviewed

NOTES Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. A.Ş.'s Audit Report received.
Dated: March 11, 2021.
Re-audit Due Date: March 15, 2022
Audit Grade: A
Number of Minor Non-conformities: 10. w/ corresponding corrective actions.
Previous Audit Grade: A
Note: On-site audit report was not relied upon to approve this foreign supplier.



SAMPLING OR TESTING RESULTS

Requested Required Received Reviewed

NOTES Product Specifications / Certificate of Analysis received from supplier.
Product: Turkish Whole Pitted Sun Dried Apricots (Sulphur treated)
Dated: February 22, 2021
Tested for: All biological and chemical hazards
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 Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. A.Ş.'s Allergen Control Procedure received.
Dated: March 16, 2020.



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 mean 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.

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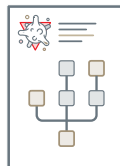
VERIFICATION FREQUENCY *for* UPDATED DOCUMENTS

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 recommended accord to their individually-marked time interval.



FACILITY FOOD SAFETY PLAN

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



RECALL 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: _____



PRODUCT LABEL

- 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: _____



QUALIFICATIONS

- 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: _____



IMPLEMENTATION RECORDS

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



FDA REGISTRATION

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



FSVP QUESTIONNAIRE

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



FACILITY LICENSE

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



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



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REVISION LOG for FSVP PLAN

Version No.	Date of Change	Description of Revision
No. 01	Sept. 19, 2021	Product and supplier underwent initial FSVP verification.

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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.

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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


Certificate # 31d8ad94

FSPCA
FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

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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


Certificate # 223faa17

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delivered by Lead Instructor

Bob Bauer
completed on
09/14/2018


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



 Gerald Wojtals, Executive Director
 International Food Protection Training Institute



 Joseph Corby, Executive Director
 Association of Food and Drug Officials


Certificate # d2e9c287



Produce Safety
ALLIANCE

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**


 ASSOCIATION OF FOOD
& DRUG OFFICIALS
SINCE 1898


 Joseph Corby
 Executive Director, AFDO


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

Class Number
NY-180712-GR

Grower ID Number
50447

Training Date and Location
7/12/2018-7/12/2018
Voorheesville, NY

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Gerald Wojtal, Executive Director
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INTERNATIONAL
FOOD PROTECTION
TRAINING INSTITUTE


Joseph Corby, Executive Director
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Certificate # d2e9c287


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Bob Bauer
completed on
09/14/2017


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ILLINOIS INSTITUTE OF TECHNOLOGY


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International Food Protection Training Institute

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Joseph Corby, Executive Director
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FSPCA PREVENTIVE CONTROLS FOR HUMAN FOOD
delivered by Lead Instructor
Amanda Evans
completed on
07/25/2017

 Robert Brackett, VP and Director Institute for Food Safety and Health	 Gerald Wojtals, Executive Director International Food Protection Training Institute	 Joseph Corby, Executive Director Association of Food and Drug Officials
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 IFSH INSTITUTE FOR FOOD SAFETY AND HEALTH <small>KUHN INSTITUTE OF TECHNOLOGY</small>	 INTERNATIONAL FOOD PROTECTION TRAINING INSTITUTE	 AFDO
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Certificate # 2d697331

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FOOD SAFETY PREVENTIVE CONTROLS ALLIANCE

CERTIFICATE OF TRAINING

is awarded to

WILLIAM BARBER

in recognition for having successfully completed
the Food Safety Preventive Controls Alliance course:
FSPCA Preventive Controls for Human Food
delivered by Lead Instructor
Mirasol Mohal
completed on
06/05/2019


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

INSTITUTE FOR
FOOD SAFETY
AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY


Gerald Wojtals, Executive Director
International Food Protection Training Institute

INTERNATIONAL
FOOD PROTECTION
TRAINING INSTITUTE
Certificate # ed6f0b58


Steve Mandernach, Executive Director
Association of Food and Drug Officials



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delivered by Lead Instructor
tina coil
completed on
06/13/2017


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

INSTITUTE FOR
FOOD SAFETY
AND HEALTH
ILLINOIS INSTITUTE OF TECHNOLOGY


Gerald Wojtals, Executive Director
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Certificate # 917b0241


Joseph Corby, Executive Director
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CERTIFICATIONS & QUALIFICATIONS of FSVP AGENT



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



Richard Burton

Richard Burton
Head of Qualifications



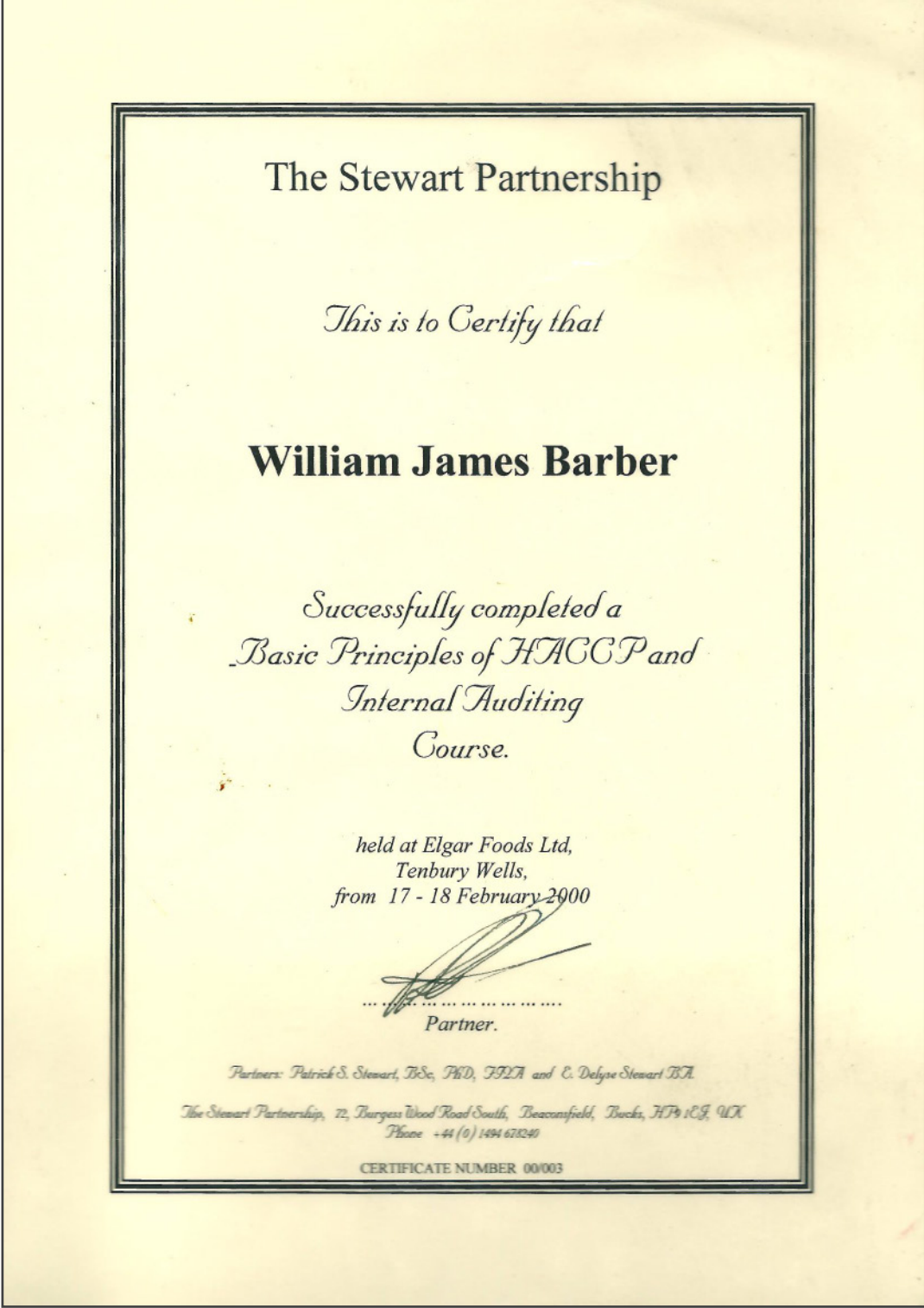
526405 101116 1107147



Supplier: Kirici Kuru Meyva Ve Gida Tekstil Turizm San. Tic. Product: Apricots | for Industrial use

Agent(s): Claudio Innocenti (PCQI Member, USA LLC) Review Start: August 23, 2021 Review End: Sept. 19, 2021


CERTIFICATIONS & QUALIFICATIONS of FSVP AGENT



Supplier: Kirici Kuru Meyva Ve Gida Tekstil Turizm San. Tic. Product: Apricots | for Industrial use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: August 23, 2021 Review End: Sept. 19, 2021

CERTIFICATIONS & QUALIFICATIONS of FSVP AGENT



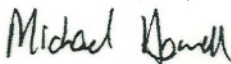
NATIONAL VOCATIONAL QUALIFICATION


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


Qualifications and Curriculum Authority





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

Supplier: Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. Product: Apricots | for Industrial use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: August 23, 2021 Review End: Sept. 19, 2021

CERTIFICATIONS & QUALIFICATIONS of FSVP AGENT



**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

Michael Howell

M Howell
Chairman
The City and Guilds of London Institute

C Humphries

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

801



The City and Guilds of London Institute founded 1878 and incorporated by Royal Charter 1900.
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Supplier: Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. Product: Apricots | for Industrial use

Agent(s): Claudio Innocenti (PCQI. Member, USA LLC) Review Start: August 23, 2021 Review End: Sept. 19, 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.



SULFURED APRICOTS HACCP PLAN

PL 03 / 01.11.2011 / Rev No: 03/12.03.2019

CCP no, Watching the parameters and what type of danger kept under control	Critical limits and tolerances (lower-upper limits)	Monitoring Procedure: (Method, Analysis and Monitoring Frequency of Name, Place of Measurement and Management)	Beyond the limit value and corrective actions to be taken after you exit the production line and the person responsible for the product:	To operate in this CCP: The validation procedure, the frequency and responsible	Procedure / Document Title	HACCP Records
<p>CCP 1 PRODUCT CONTROL (Chemical)</p> <p>In the absence of specified criteria, the SO2 is high or low</p>	<p>SO2:EU and Turkey: max 2000ppm Canada: max 2500ppm Other Country: max 3000ppm May change on customer's request.</p>	<p>By the Quality Manager to represent the whole of each batch of samples at the end of Sizing and SO2 analysis in the laboratory</p>	<p>In the absence of specified criteria, the SO2 is high, the rewashing process. In the absence of specified criteria, the SO2 is low, the SO2 treatment process. Responsibility of the quality manager</p>	<p>Results of the analysis, re-processing records,, Customer Complaints.</p>	<p>Instructions of SO2 Analyses, Washing Instructions, Specifications</p>	<p>Wash Quality Control Form</p>
<p>In the absence of specified criteria, the humidity is high</p>	<p>Moisture: max:25% May change on customer's request</p>	<p>By the Quality Manager to represent the whole of each batch of samples at the end of Sizing DFA method based on analysis of the humidity in the laboratory..</p>	<p>In the absence of specified criteria, the humidity is high, the drying process. Responsibility of the quality manager.</p>	<p>Results of the analysis, re-processing records,, Customer Complaints</p>	<p>Instructions of Moisture Analyses, Drying Instructions, Specifications</p>	<p>Wash Quality Control Form , Drying Quality Control Form</p>



SULFURED APRICOTS HACCP PLAN

PL 03 / 01.11.2011 / Rev No: 03/12.03.2019

CCP no, Watching the parameters and what type of danger kept under control	Critical limits and tolerances (lower-upper limits)	Monitoring Procedure: (Method, Analysis and Monitoring Frequency of Name, Place of Measurement and Management)	Beyond the limit value and corrective actions to be taken after you exit the production line and the person responsible for the product:	To operate in this CCP: The validation procedure, the frequency and responsible	Procedure / Document Title	HACCP Records
--	---	--	--	---	----------------------------	---------------

CCP 2 <u>FINAL SELECTION (Physical)</u> Allocated to foreign materials overlooked. (Stone, piece of plastic, metal, leaves, straw, trash,)	CLASS	EXTRA	FANCY	CHOICE	INDUSTRIAL	Selection and extraction is done by responsible and trained personnel. After the process, modeled on the quality of each batch is made by the director of product analysis. Approval of the director of Quality.	In case of foreign materials exceeds the set limit, the process of extracting the entire party is subject to choose again. Employees stimulated, re-training is deemed necessary.Y	Physical analysis results, customer complaints	Selectin Instructions	Selection Quality Control Forms
	Foreign Matter	0%	<1%	<1%	<1,5%					

ONAY



SULFURED APRICOTS HACCP PLAN

PL 03 / 01.11.2011 / Rev No: 03/12.03.2019

CCP no, Watching the parameters and what type of danger kept under control	Critical limits and tolerances (lower-upper limits)	Monitoring Procedure: (Method, Analysis and Monitoring Frequency of Name, Place of Measurement and Management)	Beyond the limit value and corrective actions to be taken after you exit the production line and the person responsible for the product:	To operate in this CCP: The validation procedure, the frequency and responsible	Procedure / Document Title	HACCP Records
<p>CCP 3 <u>Metal Detector</u> Metal detector may not work as an effective Metal part of the product.</p>	<p>Fe:2,5mm NoFe:3,0 mm inox:4mm Mavi Yara Bandi</p>	<p>Production managers by the metal kits every half an hour, passed in front of the detector, the result, registration is taken under the control.</p>	<p>Maintenance and repair operations to be performed is determined that the metal detector does not work. Production Responsible for all products evaluated in the last half-hour passed through the metal detector again. Cause breakdown of the machine are detected and prevented the repetition.</p>	<p>Metal detector control form records, customer complaints</p>	<p>Metal Detector intructions</p>	<p>Metal detector control form records,</p>

ALLERGEN REPORT FORM FOR FOOD SUPPLIERS AND MANUFACTURES

COMPANY NAME: KIRICI KURU MEYVA VE A.Ş
PRODUCT NAME: ORGANIC DRIED APRICOTS

Please fill the following table for each product. **Column I** indicates the allergens present in other products from addition or cross-contamination. **Column II** indicates the allergens present in other products that are run on same equipment at a different time. **Column III** indicates whether any allergens are present in your plant.

Please fill in each cell of the table with a YES or a NO and, when applicable, include the name of the ingredient.

Do not leave empty cells.

Component	Column I Present in the Product	Column II Present in other products manufactured on the same line	Column III Present in the same manufacturing plant
Peanut or its derivatives , e.g. Peanut-pieces, protein oil, butter, flour, and mandelona nuts (an almond flavoured peanut, product) etc. Peanut may also be known as ground nut.	NO	NO	NO
Tree Nuts (almonds, Brazil nuts, cashews, hazelnuts (fiberts), macadamia nuts, pecans, pine nuts, (pinyon pinon), pistachios and walnut or their derivatives, e.g., e.g., nut butter and oils etc.	NO	NO	NO
Sesame or its derivatives , e.g., paste and oil etc.	NO	NO	NO
Milk or its derivatives , e.g., milk caseinate, whey and yogurt powder etc.	NO	NO	NO
Eggs or its derivatives , e.g., frozen yoke, egg white powder and egg protein isolates etc.	NO	NO	NO
Fish or its derivatives , e.g., fish protein and extracts.	NO	NO	NO
Shellfish (including crab, crayfish, lobster, prawn and Molluscs (including snails, clams, mussels, oysters, cockie and scallops) or their derivative, e.g., extracts	NO	NO	NO
Soy or its derivatives , e.g., lecithin, oil protein isolates etc.	NO	NO	NO
Wheat or its derivatives , e.g., flour starches and brans etc.	NO	NO	NO
Sulphites , e.g., sulphur dioxide and sodium metabisulphites etc.	NO	NO	NO
Gluten: Any gluten protein from the grain of any of the following cereals or the grain of a hybridized strain produced from at least one of the following cereals: oat rye, triticale or wheat, including kamut or spelt.	NO	NO	NO

Do you have procedures to avoid cross-contamination of the product with the allergens not present in the product with the allergens not present in the product but noted in columns II and III? YES NO .

Please attach a finished product label to this form for each product. If, for any reason, there are any modifications in this product, you are responsible for updating your records including labels and specifications and notifying us immediately.

Supplier Contact: Hatice Özdil _____ Signature: _____ Date: _____ 3/16/2020

ALLERGEN REPORT FORM FOR FOOD SUPPLIERS AND MANUFACTURES

COMPANY NAME: KIRICI KURU MEYVA VE A.Ş
PRODUCT NAME: DRIED APRICOTS

Please fill the following table for each product. **Column I** indicates the allergens present in other products from addition or cross-contamination. **Column II** indicates the allergens present in other products that are run on same equipment at a different time. **Column III** indicates whether any allergens are present in your plant.

Please fill in each cell of the table with a YES or a NO and, when applicable, include the name of the ingredient.

Do not leave empty cells.

Component	Column I Present in the Product	Column II Present in other products manufactured on the same line	Column III Present in the same manufacturing plant
Peanut or its derivatives ,e.g. Peanut-pieces, protein oil, butter,flour, and mandelona nuts (an almond flavoured peanut, product) etc. Peanut may also be known as ground nut.	NO	NO	NO
Tree Nuts (almonds, Brazil nuts, cashews, hazelnuts (fiberts), macadamia nuts, pecans, pine nuts,(pinyon pinon), pistachios and walnut or their derivatives, e.g., e.g., nut butter and oils etc.	NO	NO	NO
Sesame or its derivatives , e.g., paste and oil etc.	NO	NO	NO
Milk or its derivatives , e.g., milk caseinate, whey and yogurt powder etc.	NO	NO	NO
Eggs or its derivatives , e.g., frozen yoke, egg white powder and egg protein isolates etc.	NO	NO	NO
Fish or its derivatives , e.g., fish protein and extracts.	NO	NO	NO
Shellfish (including crab, crayfish, lobster, prawn and Molluscs (including snails, clams, mussels, oysters, cockie and scallops) or their derivative, e.g., extracts	NO	NO	NO
Soy or its derivatives , e.g., lecithin, oil protein isolates etc.	NO	NO	NO
Wheat or its derivatives ,e.g., flour starches and brans etc.	NO	NO	NO
Sulphites , e.g., sulphur dioxide and sodium metabisulphites etc.	YES	NO	NO
Gluten: Any gluten protein from the grain of any of the following cereals or the grain of a hybridized strain produced from at least one of the following cereals: oat rye, triticale or wheat, including kamut or spelt.	NO	NO	NO

Do you have procedures to avoid cross-contamination of the product with the allergens not present in the product with the allergens not present in the product but noted in columns II and III? YES X NO

Please attach a finished product label to this form for each product. If, for any reason, there are any modifications in this product, you are responsible for updating your records including labels and specifications and notifying us immediately.

Supplier Contact:Hatice Özdil _____ Signature: _____ Date: _____ 3/16/2020





DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

1 Product Name	Turkish Whole Pitted Sun Dried Apricots (Sulphur treated)	
2 Country of Origin	Turkey	
3 Description	Sulphur treated sun dried apricots are washed, calibrated, selected, packed and metal detected.	
4 Ingredients	Apricot (% 99,8) , SO2 (%0,2) E220	
5 Packaging Info Net /Net Weight	In a corrugated carton boxes. Net weight 12,5 kg. each. Packaging can be changed according to the customer demand.	
6 Labelling/Printing Info	Product name, net weight, producer name, address, origin, lot number. Marking can be changed according to the customer demand.	
7 Organoleptical Requirements		
Colour	Yellow, orange-yellow, orange	
Taste	The fruit must have characteristic sweet flavor of Malatya apricots with no evidence of off flavors, including fermentation	
Smell	Typical Turkish apricot odour with slightly SO2 smell and without off odours, including fermentation	
Texture	Slightly soft, wholesome and faq of the season	
8 Physical Requirements		
Size	No	Count /kg
	1	81-100
	2	101-120
	3	121-140
	4	141-160
	5	161-180
	6	181-200
	7	201-220
	8	>220
Moisture	Max. 25 %	
Metal Detection Limits	2,5 mm ferrous 3,0 mm nonferrous 4 mm inox	

PHYSICAL PROPERTIES

CLASS	EXTRA	FANCY	CHOICE	INDUSTRIAL	TEST METHOD
Foreign Matter	<0,5%	<1%	<1%	<1,5%	Visual
Sunburn	<3,5%	<5%	<8%	N/A	Visual
Hail Damaged	<1,5%	<4%	<9%	N/A	Visual
Parts&Pieces	<2%	<4%	<7%	N/A	Visual
Spotted Fruits	<2%	<4%	<9%	N/A	Visual
Imbedded Dirt	<4%	<6%	<9%	<10%	Visual
Knife Cuts	<2%	<3%	<5%	N/A	Visual
Insect Damage	<1%	<1%	<2%	<4%	Visual
Total	<12%	<20%	<30%		

9 Chemical Requirements		10
SO2	Europe-	Max. 2000 ppm
	Canada-	Max. 2500 ppm
	USA-AU and others	Max. 3000 ppm
Aflatoxin	Max. 4 ppb	



DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

Pesticide Residue	In accordance with EU laws (Directives 90/642/EEC, 86/362/EEC, 86/363/EEC, 76/895/EEC and Commission directives which amend Directives 90/642/EEC, 86/362/EEC, 86/363/EEC, 76/895/EEC), Codex Alimentarius ,AU Food Laws and Turkish Food Codex (Directive no: 2004/42)
Heavy metals	In accordance with EU laws (Commission Regulation (EC) No 466/2001 and regulations which amend Regulation (EC) No 466/2001), Codex Alimentarius ,AU Food Laws and Turkish Food Codex (Directive no: 2002/63)
11. Microbiological Criteria	
Total Count	<10 000 cfu /g
Coliform	<100 cfu / g.
E. coli	<10 cfu /g.
Yeast	<1000 cfu /g
Mold	<1000 cfu /g
Salmonella /25 g.	Absent
Osmophillicyeast	<1000 cfu /g
Listeria monocytogenes	< 100 cfu /g
Campylobacter spp / 25g	Absent
Staphylococcus aureus	< 100 cfu /g
Bacillus Cereus	< 100 cfu /g
12. Storage Conditions	The product should be stored in a clean, dry and cool (recommended below 8 C) place.
13. Max. Shelf Life	15 months from the production date at above storage conditions
14. Transportation	Transported at ambient conditions in dry, clean, odourless containers.
15. Consumer profile	All ages(except babies) Suitable for vegeterians,ovo-lacto vegeterians and vegans
16. Allergens	Do not include any allergens except E220
17. Intended Use	Dried apricots are used in the confectionery and bakery industries, but are generally intended for direct consumption.
18. GMO Status	GMO free
19. Codex Amendments	Customer is responsible for informing any changes in relevant legislation of the country

20.Nutrient	Unit	1	1.0
		Value per 100.0g	cup 119g
Proximates			
Water	g	30,89	36,76
Energy	Kj	1009	1204
Protein	g	3,39	4,03
Total lipid (fat)	g	0,51	0,61
Carbohydrate, by difference	g	62,44	74,3
Fibre	g	7,3	8,7
Sugars	g	53,44	63,59
Minerals			
Calcium, Ca	mg	55	65,45



DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

Iron, Fe	mg	2,66	3,16
Magnesium, Mg	mg	32	38,1
Phosphorus, P	mg	71	84,49
Potassium, K	mg	1162	1383
Sodium, Na	mg	10	11,9
Zinc, Zn	mg	0,39	0,46
Vitamins			
Vitamin C, total ascorbic acid	mg	1,0	1,19
Thiamin	mg	0.015	0.051
Riboflavin	mg	0.074	0.176
Niacin	mg	2,589	4.260
Vitamin B-6	mg	0.143	0.619
Folate	µg	10	5
Vitamin B-12	µg	0.00	0.00
Vitamin A, RAE	mcg_RAE	633	753
Vitamin A, IU	IU	3604	15076
Vitamin D (D2 + D3)	µg	0.0	0.0
Vitamin D	IU	0	0
Lipids			
Fatty acids, total saturated	g	0.043	0.051
Fatty acids, total monounsaturated	g	0.268	0.319
Fatty acids, total polyunsaturated	g	0.121	0.144
Cholesterol	mg	0	0



DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

1 Product Name	Turkish Whole Pitted Sun Dried Apricots (Sulphur treated)	
2 Country of Origin	Turkey	
3 Description	Sulphur treated sun dried apricots are washed, calibrated, selected, packed and metal detected.	
4 Ingredients	Apricot (% 99,8) , SO2 (%0,2) E220	
5 Packaging Info Net /Net Weight	In a corrugated carton boxes. Net weight 12,5 kg. each. Packaging can be changed according to the customer demand.	
6 Labelling/Printing Info	Product name, net weight, producer name, address, origin, lot number. Marking can be changed according to the customer demand.	
7 Organoleptical Requirements		
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Smell	Typical Turkish apricot odour with slightly SO2 smell and without off odours, including fermentation	
Texture	Slightly soft, wholesome and faq of the season	
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	1	81-100
	2	101-120
	3	121-140
	4	141-160
	5	161-180
	6	181-200
	7	201-220
	8	>220
Moisture	Max. 25 %	
Metal Detection Limits	2,5 mm ferrous 3,0 mm nonferrous 4 mm inox	

PHYSICAL PROPERTIES

CLASS	EXTRA	FANCY	CHOICE	INDUSTRIAL	TEST METHOD
Foreign Matter	<0,5%	<1%	<1%	<1,5%	Visual
Sunburn	<3,5%	<5%	<8%	N/A	Visual
Hail Damaged	<1,5%	<4%	<9%	N/A	Visual
Parts&Pieces	<2%	<4%	<7%	N/A	Visual
Spotted Fruits	<2%	<4%	<9%	N/A	Visual
Imbedded Dirt	<4%	<6%	<9%	<10%	Visual
Knife Cuts	<2%	<3%	<5%	N/A	Visual
Insect Damage	<1%	<1%	<2%	<4%	Visual
Total	<12%	<20%	<30%		

9 Chemical Requirements		10
SO2	Europe-	Max. 2000 ppm
	Canada-	Max. 2500 ppm
	USA-AU and others	Max. 3000 ppm
Aflatoxin	Max. 4 ppb	



DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

Pesticide Residue	In accordance with EU laws (Directives 90/642/EEC, 86/362/EEC, 86/363/EEC, 76/895/EEC and Commission directives which amend Directives 90/642/EEC, 86/362/EEC, 86/363/EEC, 76/895/EEC), Codex Alimentarius ,AU Food Laws and Turkish Food Codex (Directive no: 2004/42)
Heavy metals	In accordance with EU laws (Commission Regulation (EC) No 466/2001 and regulations which amend Regulation (EC) No 466/2001), Codex Alimentarius ,AU Food Laws and Turkish Food Codex (Directive no: 2002/63)
11. Microbiological Criteria	
Total Count	<10 000 cfu /g
Coliform	<100 cfu / g.
E. coli	<10 cfu /g.
Yeast	<1000 cfu /g
Mold	<1000 cfu /g
Salmonella /25 g.	Absent
Osmophillicyeast	<1000 cfu /g
Listeria monocytogenes	< 100 cfu /g
Campylobacter spp / 25g	Absent
Staphylococcus aureus	< 100 cfu /g
Bacillus Cereus	< 100 cfu /g
12. Storage Conditions	The product should be stored in a clean, dry and cool (recommended below 8 C) place.
13. Max. Shelf Life	15 months from the production date at above storage conditions
14. Transportation	Transported at ambient conditions in dry, clean, odourless containers.
15. Consumer profile	All ages(except babies) Suitable for vegeterians,ovo-lacto vegeterians and vegans
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18. GMO Status	GMO free
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20.Nutrient	Unit	1	1.0
		Value per 100.0g	cup 119g
Proximates			
Water	g	30,89	36,76
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Carbohydrate, by difference	g	62,44	74,3
Fibre	g	7,3	8,7
Sugars	g	53,44	63,59
Minerals			
Calcium, Ca	mg	55	65,45



DRY APRICOTS WITH SO2 SPEKTS

ÜT01 / 01.01.2011 / Rev. No: 03 / 22.02.2021

Iron, Fe	mg	2,66	3,16
Magnesium, Mg	mg	32	38,1
Phosphorus, P	mg	71	84,49
Potassium, K	mg	1162	1383
Sodium, Na	mg	10	11,9
Zinc, Zn	mg	0,39	0,46
Vitamins			
Vitamin C, total ascorbic acid	mg	1,0	1,19
Thiamin	mg	0.015	0.051
Riboflavin	mg	0.074	0.176
Niacin	mg	2,589	4.260
Vitamin B-6	mg	0.143	0.619
Folate	µg	10	5
Vitamin B-12	µg	0.00	0.00
Vitamin A, RAE	mcg_RAE	633	753
Vitamin A, IU	IU	3604	15076
Vitamin D (D2 + D3)	µg	0.0	0.0
Vitamin D	IU	0	0
Lipids			
Fatty acids, total saturated	g	0.043	0.051
Fatty acids, total monounsaturated	g	0.268	0.319
Fatty acids, total polyunsaturated	g	0.121	0.144
Cholesterol	mg	0	0

ALLERGEN REPORT FORM FOR FOOD SUPPLIERS AND MANUFACTURES

COMPANY NAME: KIRICI KURU MEYVA VE A.Ş
PRODUCT NAME: ORGANIC DRIED APRICOTS

Please fill the following table for each product. **Column I** indicates the allergens present in other products from addition or cross-contamination. **Column II** indicates the allergens present in other products that are run on same equipment at a different time. **Column III** indicates whether any allergens are present in your plant.

Please fill in each cell of the table with a YES or a NO and, when applicable, include the name of the ingredient.

Do not leave empty cells.

Component	Column I Present in the Product	Column II Present in other products manufactured on the same line	Column III Present in the same manufacturing plant
Peanut or its derivatives , e.g. Peanut-pieces, protein oil, butter, flour, and mandelona nuts (an almond flavoured peanut, product) etc. Peanut may also be known as ground nut.	NO	NO	NO
Tree Nuts (almonds, Brazil nuts, cashews, hazelnuts (fiberts), macadamia nuts, pecans, pine nuts, (pinyon pinon), pistachios and walnut or their derivatives, e.g., e.g., nut butter and oils etc.	NO	NO	NO
Sesame or its derivatives , e.g., paste and oil etc.	NO	NO	NO
Milk or its derivatives , e.g., milk caseinate, whey and yogurt powder etc.	NO	NO	NO
Eggs or its derivatives , e.g., frozen yoke, egg white powder and egg protein isolates etc.	NO	NO	NO
Fish or its derivatives , e.g., fish protein and extracts.	NO	NO	NO
Shellfish (including crab, crayfish, lobster, prawn and Molluscs (including snails, clams, mussels, oysters, cockie and scallops) or their derivative, e.g., extracts	NO	NO	NO
Soy or its derivatives , e.g., lecithin, oil protein isolates etc.	NO	NO	NO
Wheat or its derivatives , e.g., flour starches and brans etc.	NO	NO	NO
Sulphites , e.g., sulphur dioxide and sodium metabisulphites etc.	NO	NO	NO
Gluten: Any gluten protein from the grain of any of the following cereals or the grain of a hybridized strain produced from at least one of the following cereals: oat rye, triticale or wheat, including kamut or spelt.	NO	NO	NO

Do you have procedures to avoid cross-contamination of the product with the allergens not present in the product with the allergens not present in the product but noted in columns II and III? YES X NO

Please attach a finished product label to this form for each product. If, for any reason, there are any modifications in this product, you are responsible for updating your records including labels and specifications and notifying us immediately.

Supplier Contact: Hatice Özdil _____ Signature: _____ Date: _____ 3/16/2020

ALLERGEN REPORT FORM FOR FOOD SUPPLIERS AND MANUFACTURES

COMPANY NAME: KIRICI KURU MEYVA VE A.Ş
PRODUCT NAME: DRIED APRICOTS

Please fill the following table for each product. **Column I** indicates the allergens present in other products from addition or cross-contamination. **Column II** indicates the allergens present in other products that are run on same equipment at a different time. **Column III** indicates whether any allergens are present in your plant.

Please fill in each cell of the table with a YES or a NO and, when applicable, include the name of the ingredient.

Do not leave empty cells.

Component	Column I Present in the Product	Column II Present in other products manufactured on the same line	Column III Present in the same manufacturing plant
Peanut or its derivatives , e.g. Peanut-pieces, protein oil, butter, flour, and mandelona nuts (an almond flavoured peanut, product) etc. Peanut may also be known as ground nut.	NO	NO	NO
Tree Nuts (almonds, Brazil nuts, cashews, hazelnuts (fiberts), macadamia nuts, pecans, pine nuts, (pinyon pinon), pistachios and walnut or their derivatives, e.g., e.g., nut butter and oils etc.	NO	NO	NO
Sesame or its derivatives , e.g., paste and oil etc.	NO	NO	NO
Milk or its derivatives , e.g., milk caseinate, whey and yogurt powder etc.	NO	NO	NO
Eggs or its derivatives , e.g., frozen yoke, egg white powder and egg protein isolates etc.	NO	NO	NO
Fish or its derivatives , e.g., fish protein and extracts.	NO	NO	NO
Shellfish (including crab, crayfish, lobster, prawn and Molluscs (including snails, clams, mussels, oysters, cockie and scallops) or their derivative, e.g., extracts	NO	NO	NO
Soy or its derivatives , e.g., lecithin, oil protein isolates etc.	NO	NO	NO
Wheat or its derivatives , e.g., flour starches and brans etc.	NO	NO	NO
Sulphites , e.g., sulphur dioxide and sodium metabisulphites etc.	YES	NO	NO
Gluten: Any gluten protein from the grain of any of the following cereals or the grain of a hybridized strain produced from at least one of the following cereals: oat rye, triticale or wheat, including kamut or spelt.	NO	NO	NO

Do you have procedures to avoid cross-contamination of the product with the allergens not present in the product with the allergens not present in the product but noted in columns II and III? YES X NO .

Please attach a finished product label to this form for each product. If, for any reason, there are any modifications in this product, you are responsible for updating your records including labels and specifications and notifying us immediately.

Supplier Contact: Hatice Özdil _____ Signature: _____ Date: _____ 3/16/2020



Audit Report

1. Audit Summary			
Company name	Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. A.Ş.	Site Code	3067471
Site name	Kirici Kuru Meyva Ve Gida Tekstil Turzm San. Tic. A.Ş.		
Scope of audit	Washing, sorting, grading, oven drying and packing of whole and diced sun-dried apricots into PE bag in cardboard boxes and retail packs		
Exclusions from scope	None		
Justification for exclusion	Not Applicable		
Audit Start Date	2021-03-11	Audit Finish Date	2021-03-12
Re-audit due date	2022-03-15	Head Office	No

Additional modules included			
Modules	Result	Scope	Exclusions from Scope

2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	A		Previous audit date	2020-03-16	
Certificate issue date	2021-04-22		Certificate expiry date	2022-04-26	
Number of non-conformities			Fundamental	0	
			Critical	0	
			Major	0	
			Minor	10	

3. Company Details			
Address	1. Organize San. Bölgesi 1. Cadde 44200 Malatya		
Country	Turkey	Site Telephone Number	+904222375501
Commercial representative Name	Bayram Kirici	Email	hasircioglu@kirici.com.tr
Technical representative Name	Haitce Ozdil	Email	lab@kirici.com.tr

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 1 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift Pattern	1 shift / 08:00-17:00 / 6 days				
Subcontracted processes	No				
Other certificates held	Organic, Kosher, Halal				
Regions exported to	Europe North America				
Company registration number	TR-44-K-000206				
Major changes since last BRCGS audit	No major changes since the last audit.				
<p>Company Description</p> <p>The company was established in 1967 by three brothers and they were one of the 3 companies of their sector in Malatya/Turkey. They started exporting in 1983 and now they are exporting almost 90% of production to many countries and rest for the industry. They also have 2 more companies which has been working on apricot and figs. There are 2 production lines in the factory. If one type of product is being processed in the facility, then the others are not accepted or processed. Up to 250 employees in this site. The company has 8000 sq. m closed area (cover production & storage area) in 25.000 sq. m total surface area. They moved this facility in 2011. The storage areas are sufficient, and all the equipment are stainless steel. They have a laboratory to do some analyses for the products and raw materials. Every year they have 2nd party customer audits regularly. The recall responsible is Export Manager. The annual production volume is about 9.000 m-tons. There were 124 employees during the audit. There were 3 HACCP Plans. There are 2 metal detectors, 1 X-Ray, 1 laser s in the site.</p>					

5. Product Characteristics					
Product categories	15 - Dried food and ingredients				
Finished product safety rationale	Water activity is between 0.70 to 0.60, Water content between 26% to 18% and sulphites for one type of dried apricots between 2000 to 3000 ppm				
High care	No	High risk	No	Ambient high care	No
Justification for area	Low risk areas only, justified because product does not support growth/survival of pathogens due to low water activity				
Allergens handled on site	Sulphur dioxide and Sulphites				
Product claims made e.g. IP, organic	Organic				
Product recalls in last 12 Months	No				
Products in production at the time of the audit	Dried Whole Apricots with SO2 packed in PE bags (12,5 kg) and in carton box.				

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 2 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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6.Audit Duration Details			
On-site duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	No deviation		
Next audit type selected	Announced		

Audit Duration per day			
Audit Day	Date	Start Time	Finish time
1	2021-03-11	08:00	18:30
2	2021-03-12	08:00	18:30

	Auditor number	Name	Role
Auditor Number	20684	Emrah Kosucu	Lead Auditor
Second Auditor Number	N/A	Mine Certug	Observer

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.11)				
Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr Bayram Kırıcı / General Manager	X			X
Ms Hatice Özdil / F.S Team Leader	X	X	X	X
Ms Dilara Durak /Production Engineer	X	X	X	X
Mr Mehmet Hasircioglu / Export Manager	X			X
Ms Nurhan Kırıcı / Production Manager	X	X	X	X

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced
2020-03-16	BRCGS Food Safety Issue 8	Announced

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 3 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Non-Conformity Summary Sheet

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

Critical			
No.	Clause	Detail	Ant. Re-audit date

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

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 4 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	2.7.1	It was observed that the hazards from washing water were not included in the hazard analysis.	Updating the hazard analysis.	PL - 14 HAZARD ANALYSIS FORM has been updated. (Rev no: 02 / 25.03.2021) Hazard analysis plan will be revised and dangers that may arise from washing water will be listed.	Information is not included in the document.	2021-04-09	Emrah Kosucu
2	3.9.2	An unlabelled pallet of raw materials was observed in the raw material warehouse.	Finding the batch to which the raw material belongs and making a definition.	F-26 TRAINING ATTENDANCE AND EVALUATION FORM (Dated 18.03.2021) F-26 TRAINING ATTENDANCE AND EVALUATION FORM (Dated 05.04.2021) Procedures and registration control forms will be reviewed. Relevant personnel will be trained.	Lack of staff information.	2021-04-09	Emrah Kosucu
3	4.4.1	Moisture and paint spillages were observed on the wall of the drying area.	Damaged areas will be maintained and maintained.	Wall control will be added to the annual maintenance - repair plans. Monthly factory controls will be made more carefully, and attention will be paid to damaged areas during controls.	Infrastructure sourced and control carelessness.	2021-04-09	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 5 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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CONFIDENTIAL TREATMENT REQUESTED



Minor							
				F-23 BROKEN - FAILURE - DAMAGE MAINTENANCE FORM registered. MAINTENANCE AND REPLACEMENT done.			
4	4.4.2	There were fractures on the floor in the washing area.	Damaged areas will be maintained and maintained.	Ground control will be added to the annual maintenance - repair plans. Monthly factory controls will be made more carefully, and attention will be paid to damaged areas during controls. F-23 BROKEN - FAILURE - DAMAGE MAINTENANCE FORM registered. MAINTENANCE AND REPLACEMENT done.	Infrastructure sourced and control carelessness	2021-04-09	Emrah Kosucu
5	4.4.4	Paint spillage was observed on the ceiling of the raw material warehouse.	Damaged areas will be maintained and maintained.	Ceiling control will be added to the annual maintenance - repair plans. Monthly factory controls will be made more carefully, and attention will be paid to damaged areas during controls. F-23 BROKEN - FAILURE - DAMAGE MAINTENANCE FORM registered.	Infrastructure sourced and control carelessness	2021-04-09	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020 Page 6 of 37 Rev. 30 Report No. BRC-FD-046-DG Auditor: Emrah Kosucu



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Minor							
				MAINTENANCE AND REPLACEMENT done.			
6	4.6.1	Reducer observed not shielded on the filling line.	A cover will be made under the reducer.	<p>During the annual maintenance - repair control, all gearboxes of the machines will be examined. There will be a cover under all reducers. Gearbox maintenance checks will be added during the monthly factory checks.</p> <p>F-23 BROKEN - FAILURE - DAMAGE MAINTENANCE FORM registered.</p> <p>MAINTENANCE AND REPLACEMENT done.</p>	Machine installation welded.	2021-04-09	Emrah Kosucu
7	4.7.1	It was observed that there was no laser in the annual maintenance plan.	Laser maintenance will be done annually.	<p>Annual maintenance plan will be updated. Laser maintenance will be arranged in March.</p> <p>F -48 ANNUAL CALIBRATION PLAN (Rev. No: 02/ 25.03.2021) and T-22 MEASUREMENT DEVICES CALIBRATION AND VERIFICATION INSTRUCTIONS (Rev. No: 01/ 25.03.2021) updated.</p> <p>LASER SERVICE REPORT attached.</p>	Lack of information in documentation and instructions.	2021-04-09	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 7 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED



Minor							
8	4.8.4	The tap of hand wash station in the cutting section was not hands free.	The faucet will be replaced.	The faucet should be changed in order to maintain the hygiene network. There should not be any contactless faucets in the facility. All taps must be non-contact. More attention will be paid to faucet maintenance checks during monthly factory checks. F-23 BROKEN - FAILURE - DAMAGE MAINTENANCE FORM registered. MAINTENANCE AND REPLACEMENT done.	Lack of control and attention.	2021-04-09	Emrah Kosucu
9	4.9.2.1	An uncontrolled blade was observed in the raw material receiving area.	Inappropriate and undefined substances will be removed from production and defined.	Unidentified foreign matter will not be kept in the enterprise. Relevant instructions will be updated. Warning text and visuals will be added to the business. Trainings for the staff will be renewed. T-03 HYGIENE AND WORKPLACE RULES INSTRUCTIONS (Rev. No: 01 / 16.03.2021) updated.	Lack of staff information. lack of documentation information.	2021-04-09	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 8 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Minor							
				F-26 TRAINING ATTENDANCE AND EVALUATION FORM registered.			
10	6.4.1	It was observed that the annual calibration of the magnet was not done.	Magnet calibration will be done.	<p>Measuring devices calibration and Magnet calibration measurements will be added by revising the verification instruction.</p> <p>Magnet annual maintenance has been completed.</p> <p>F -48 ANNUAL CALIBRATION PLAN (Rev. No: 02/ 25.03.2021) and T-22 MEASUREMENT DEVICES CALIBRATION AND VERIFICATION INSTRUCTIONS (Rev. No: 01/ 25.03.2021) updated.</p>	Lack of information in documentation and instructions.	2021-04-09	Emrah Kosucu

Comments on non-conformities

No Comments

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 9 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	Clause	Detail	Re-audit due date

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

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 10 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 11 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company has a documented food safety and quality policy issued 01-11-2011 signed by General Manager. It is communicated to the staff by posting with noticeboards and included on the trainings of work instructions (last training date is 20.04.2020). The policy states the intention of the site to produce safe, legal and authentic products within specified quality and its responsibility to its customers.

There are documented objectives for: - Reducing the product-borne foreign matter rate by 10%, -To repetitive corrective action rate to zero, -To start exporting to the Chinese market with at least 1 customer, -To reduce the metal foreign material problem rate to zero.

Objectives are measurable and include targets. These are communicated to staff via emails and monthly meetings and reviewed quarterly, latest on 03-02-2021.

Management review meetings are held annually, the last review was 08-03-2021 and was attended by Board Member, General Manager, FST Leader (QA Man.), Export Manager, Production Supervisor.

Records of the management review were available and included decisions and actions which are communicated to appropriate staff and completed within timescale.

There is adequate resource to maintain compliance to the Standard.

There are also regular meetings based on monthly (01-03-2021, 01-02-2021) including: quality standards, customer requirements, objectives, emergency and recall, customer complaints, social responsibilities and confidential reporting.

The company ensure that they are kept informed of scientific and technical developments, industry code of practices as applicable as well as new risks to authenticity of raw materials and relevant legislation by: email membership of the food engineers chamber and web sites of the Ministry of Agriculture and internationally EC-Eurlex and FSMA followed.

Food safety culture is the responsibility of the Senior Management (Board Member / FST Leader) who discussed these matters with the auditor.

Work so far includes establishing the procedures and setting the criteria (staff surveys, specific trainings and feedback process) and future work will entail reviewing the effectiveness and amend the program accordingly (PL.37R.00). Effectiveness has measured via staff survey and training evaluations and the results evaluated at the management meeting

Interviews with employees confirmed that they were aware that non-conforming product issues could be reported to GM for action.

The company has a confidential reporting system which works in the following manner: feedback collection system with a box which was at the locker room and planned to be reviewed by plant management weekly.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 12 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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A genuine copy of BRC standard was available. The organization remains updated on changes in the standard via BRCGS website and membership to the website.

The company have ensured certification is maintained, audit due date 2021.03.15.

The General Manager, FST Leader (QA Man.), Export Manager and QC Supervisors attended both the opening and closing meetings.

9 non-conformities were identified at previous audit against clauses 2.5.1, 4.2.1, 4.4.8, 4.8.4, 4.9.1.1, 4.9.6.1, 4.11.1, 6.1.2 and 7.4.3. Identified root cause analysis and provided actions seen to have been effectively addressed to prevent recurrence.

The logo is not used.

1.2 Organisational structure, responsibilities and management authority

The company have a clear organizational structure in place issued Organizational Chart on 01.09.2020. The person responsible for food safety, legality and quality is QA Manager who reports directly into General Manager. Deputization is documented on Job Descriptions, the organization ensures that employees are aware of their responsibilities by Job Descriptions and training. Seen Job Descriptions of Food Safety Team Leader and QC Engineer. Interviewed staff appeared to be aware of their responsibilities and documented work instructions are in place.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
1.1.13	BRC logo is not used

2 The Food Safety Plan – HACCP

The plan has been developed and maintained by a multidisciplinary team including:

Job Title	Experience	Qualifications / Training
QA Manager / Team Leader	3 years in the company	Food Engineer / HACCP Training on 12-12-2019
General Manager	41 years in the company	Internal HACCP training on 17.09.2020
Production Engineer	4 years in the dried apricot industry 1 year in the company	Internal HACCP training on 17.09.2020
Washing-Drying Specialist	20 years in the company	Internal HACCP training on 17.09.2020
Selection - Filling Specialist	17 years in the company	Internal HACCP training on 17.09.2020

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 13 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Maintenance - Repair Specialist	20 years in industry 1 year in the company	Internal HACCP training on 17.09.2020
Raw Material Warehouse Manager	1 year in the company	Internal HACCP training on 17.09.2020
Export Manager	30 years in the company	Internal HACCP training on 17.09.2020
Export Specialist	20 years in the company	Internal HACCP training on 17.09.2020
Cutting Department - Shipping Specialist	5 years in the company	Internal HACCP training on 17.09.2020

The company have a fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles. There are 3 HACCP studies which includes all products as for sun-dried whole apricots, sun-dried diced apricots and sun-dried organic whole apricots.

Each product or group of products includes a full description which includes all relevant information on food safety. The intended use of the product is identified as ready to eat and alternative uses as ingredient to bakery products and confectionery for consumer target group and vulnerable groups as allergen sensitivity for sulphurated dried apricots.

Pre-requisites are documented within PR Plan (PL-01/01.11.2011) and include housekeeping and hygiene, pest control, PPM, personal hygiene, staff training, purchasing, transportation arrangements, processes to prevent cross contamination and allergen controls. The pre-requisites are reviewed as part of the HACCP review (28.03.2020).

Flow diagrams are in place covering relevant inputs and outputs. The following is a list of existing diagrams:

Flow diagram	Issue date	Verification Method
Pitted Dried Whole Apricots with Sulphur - SM.02	01-09.2011	Physical verification on site by FS Team on 25-03-2020
Pitted Dried Whole Apricots - SM.03	01-09-2011	Physical verification on site by FS Team on 25-03-2020
Organic Pitted Dried Whole Apricots - SM.04	01-09-2011	Physical verification on site by FS Team on 24-03-2020
Diced Dried Apricots with Sulphur - SM.05	01-09-2011	Physical verification on site by FS Team on 25-03-2020
Diced Dried Apricots - SM.06	01-09-2011	Physical verification on site by FS Team on 25-03-2020
Organic Diced Dried Apricots - SM.07	01-09-2011	Physical verification on site by FS Team on 24-03-2020

Relevant information has been used to conduct the hazard analysis including all Ingredients (including packaging), raw materials, products and process steps.

Process steps summary: Reception – raw material storage – washing – sieving – grading – oven drying – manual sorting – dicing – laser sorter (diced apricots) – X-Ray Detector (diced apricots) – filling in box – metal detector – labelling – blast freezing (for organic products) – dispatch.

The HACCP team have identified and recorded potential hazards that are reasonably expected to occur at each step of the process, and this includes raw materials. Identified hazards were determined for

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 14 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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microbiological, chemical, physical and allergens. Auditor verified that the risk assessment was done in compliance with the standard.

Hazard Category	Specific Hazard	Risk Determination
Biological	Microbiological (Coliform, E. coli, yeast, mold, salmonella, TVC)	Low Risk - CP
Physical	Foreign Materials (Extraneous Vegetative Matter, Foreign Matter e.g. stone, metals, plastic)	Medium Risk - CCP
Chemical	Pesticides, Radiological	Low Risk - CP

A Hazard analyses (PL-09 / R:01-02-01-2020) has been conducted based on likelihood and severity risk methodology documented on the Hazard Analyses Instruction (T-25 / 02-01-2020). Control measures have been identified and documented within the HACCP plans.

Critical control points have been determined by using 5x5 risk matrix (1-9 low risk, 12 to 20 MR and 25 is HR while 5 is frequent and 1 is very rare for probability) and codex decision tree with 4 questions. Critical control points identified are:

CCP	Process Step	Critical Limit	Monitoring
1	Raw Material Receiving (organic apricots)	No Pesticides	Analytical tests at accredited ext. labs at RM acceptance Every batch
2	Packaging	Finished Product Water Content < 20%	Analytical test at accredited ext. labs and at least once every batch and continuous tests during production at internal lab.
3	Packaging	Finished Product Sulphur dioxide content < 2000 ppm (for TR & EU) < 2500 ppm (for Canada) < 3000 ppm (other countries)	Analytical test at accredited ext. labs and at least once every batch and continuous tests during production at internal lab.
4	Final Sorting	Zero Foreign Body	Start/Stop and at least once at every pallet
5	Metal Detection	2.5 mm Fe, 3.0 mm N-Fe, 4.0 mm SS-316	Start/Stop and hourly
6	X-RAY Detection (for diced products)	2.5 mm Glass, 3.5 mm SS 316 (ball)	Start/Stop and hourly

Documented procedures define corrective actions expected to be implemented if critical limits are exceeded. CCPs were validated as follows:

CCP	Means of Validation	Date of Last Validation
1	Analytical tests by external accredited lab. annually	Test report from SGS lab. (AB-0328-T) on 25.02.2021
2	Analytical tests by external accredited lab. annually	Test report from SGS lab. (AB-0328-T) on 15.01.2021

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 15 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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3	Analytical tests by external accredited lab. annually	Test report from SGS lab. (AB-0328-T) on 15.01.2021
4	Review of customer complaints, CARs and certificates of conformity reports.	24-03-2020
5	Continuous tests with specific test wands	19.01.2021 / 09.03.2021
6	Continuous tests with specific test wands	03.07.2020

CCP records are signed by operative and verified by QA Manager (Team Leader).

Verification of the HACCP plan is achieved by Food Safety team including internal audits, review of customer complaints and withdrawals or recalls. This information is made available to the HACCP Food Safety Team.

During the audit multiple records were sampled and considered to be properly documentation and kept.

The last HACCP review was conducted on 28.03.2020.

NC 2.7.1 In the hazard analysis, it was observed that the risks from washing water were not included in the analysis.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
	N/A

3. Food safety and quality management system

3.1 Food safety and quality manual

The company demonstrated a documented quality system manual based on the BRC requirements (issued on 12.02.2019). The manual or their parts are made available as needed to the staff by trainings. Verified procedures and work instructions were clearly legible and available in Turkish. During interviews and auditor observations these were considered to be properly understood by relevant staff.

3.2 Document Control

There is a document control procedure in place Document & Record Control Procedure (P01 / 01-11-2019). Documents are controlled by quality department and by Document Master List (LT01) including issue date, revision date and the reason for revision. A record of the reason for change is retained. A list with all controlled documents were provided and verified during the audit. Computer data is backed up monthly.

3.3 Record completion and maintenance

Records reviewed were legible and easily retrievable and are retained for 3 years which properly covers the product shelf life of 12 months plus one year.

3.4 Internal audits

There is a planned programme of internal audits based upon risk (PL30/01-03-2016) for which the organization considers the following criteria: the non-conformances from the last year results, nr of received

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 16 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com



complaints, impact to product safety. Schedule issued PL31 on 09-03-2020 demonstrates that all system requirements are covered throughout the year and that all activities are covered at least annually. The schedule is split into 8 different months in 2021.

Currently there are 2 available auditors to cover all aspects of the organization and ensure independence. Auditors were demonstrably competent and evidence for this included Internal Auditor Certificate. (12.01.2020- Aliment Certification/Training Company)

Audit reports include objective evidence of conformity as well as non-conformity and are reported to personnel responsible for the activity audited. Corrective actions and timescales are agreed, and completion of corrective actions is verified by QA Manager.

During the audit the results of the following audit activities conducted throughout the year were reviewed:

Date	Area / Requirement	No. NCs	Action plans Y/N	Implemented Y/N	Verified Y/N
19-10-2020	QC	1	Y	Y	Y
23-03-2020	Production	2	Y	Y	Y
21.09.2020	Production	1	Y	Y	Y
13-07-2020	Maintenance	2	Y	Y	Y

In addition to the internal audit program there is a program of planned inspections for hygiene and housekeeping as well as fabrication (F56-01.11.2011). The period has been determined monthly according to the risk analyses. Inspections are conducted by quality department; records seen for 01-03-2021, 01-02-2021 and cover all process areas. Deviations identified are reported on the Check List and Corrective Action Plan is generated, and implemented actions are verified by QA Manager.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

There is a documented supplier approval and monitoring system in place as P09 R.1 -12.03.2019 - Supplier Evaluation Procedure. This requires that the organization performs a risk assessment (PL32-R.1-01.03.2017) of each raw material/group of raw materials to identify potential risks to product safety, legality and quality including allergen contamination, foreign body risks, micro contamination, chemical contamination and substitution or fraud. Approved Supplier List (F.52) was issued on 08.03.2021.

Existing methods to accept raw materials are consistent with the reviewed risk assessment which includes the following means of control: production registration record, COA – certificate of Analysis and traceability system.

During the audit a sample of supplier assurance records was conducted:

Item	Risk Rating	Method of Assessment	Valid Until
Blue HDPE bag	High Risk	BRC Packaging	08.01.2022
Rice flour	High Risk	Auditing in place by using F93 (no GFSI benchmarked cert)	16.03.2021
Organic rice	High Risk	Auditing in place by using F93 (no GFSI benchmarked cert)	21.12.2022
Corrugated box	Low Risk	BRC Packaging	21.03.2021

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 17 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Evidence of raw material changes being communicated to goods in was provided via training of staff and controlled Quality Plan of Incoming Materials.

Exceptions to the supplier approval process include the following controls: requesting CoA, third party GFSI audit report and physical inspections according to the agreed specification.

No supply from Agent/broker.

3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Documented procedure Raw Material Control Instruction (T11) describes controls for acceptance of raw materials and packaging materials. A list of raw materials and requirements to be met for acceptance was available and observed to be followed. During the audit were sampled materials to ensure compliance with the defined requirements the results of the sample were as follows:

Material Description	Defined Means of Control	Evidence Provided	Comments
Dried Apricots	Physical inspection / SO2 & moisture content analyses	Incoming products report	Accepted by Raw Material Responsible/ QC
Rice Flour	Physical inspection / COA	Incoming products report / COA	Accepted by Quality Responsible
Organic Apricots	Pesticide Analysis report	Organic product certification Pesticide Analysis report (supplier) Pesticide analysis report (every lot-external lab.)	Accepted by Quality Responsible
Organic rice flour	Pesticide Analysis report	Organic product certification, Pesticide Analysis report (supplier), Pesticide analysis report (every final product external lab.)	Accepted by Quality Responsible
Blue PE bag	Physical inspection / COA	Incoming products report / COA	Accepted by Quality Responsible

Claims of authenticity are currently identified e.g. organic.

No live animals' reception.

3.5.3 Management of suppliers of services

P09 R.1 -12.03.2019 - Supplier Evaluation Procedure describes the means to approve and monitor service suppliers which includes maintenance, transport, lab, pest management and recycled waste. Contracts reviewed during the audit included safety and legality. This includes service expectations.

3.5.4 Management of Outsourced processing

Section considered not applicable. There are no process steps conducted by external organizations.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 18 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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3.6 Specifications

Specifications are in place for raw materials including packaging and finished product. When required specifications are formally agreed with customers/suppliers. Procedure includes the requirement to review specifications when product/materials change or at least every 3 years.

Sampling of specifications was conducted as part of site inspection and traceability with following results:

Type of Specification	Description	Specification	Last Review Date	Comments
Final Product	Sun Dried Whole Pitted Apricots with SO2	UT01 / r:02 / 12-03-2019	22.02.2021	Regular review No change
Final Product	Organic Whole Sun-Dried Apricots	UT03 / r:02 / 12-03-2019	22.02.2021	Regular review No change
Raw material	Rice Flour, Organic	HT 11/r:00/ 18-01-2019	22.02.2021	Regular review No change
Raw material	Organic Apricot	KR.SP.010/r.00/20.03.2015	22.02.2021	Regular review No change
Packaging material	PE bag	HT.03 /r:00/01.11.2011	22.02.2021	Regular review No change

3.7 Corrective and preventive actions

The organization provided evidence of documented procedure P10(R:00/01.11.2011). The company demonstrated that they use information from identified failures in the food safety, legality or quality of the products to make necessary corrections and prevent recurrence. The organization manages existing corrective and preventive actions via tracking on Corrective Action Log Sheet (F38/R.00/01.11.2011). Reviewed records were showed root cause analysis was effective.

Trend analysis showed totally 16 CAPA in 2020, and mainly foreign material and physical defects.

3.8 Control of non-conforming product

A non-conforming product procedure - P11/r:01/12.03.2019 is in place which includes controls and responsibilities for out-of-specification products/materials to avoid /prevent unauthorised release. Non-conforming materials/products are identified by directly labelling and placed on Quarantine to avoid accidental release.

A sample was conducted to verify that physically segregated materials/products matched with the ones reported in existing records. There wasn't any NC product recorded in 2020 till March 2021.

3.9 Traceability

A system is in place which allows the organization to trace all raw material product lots including primary packaging from their suppliers through all stages of their process until one step out of their responsibility and vice versa. The procedure dated 12.09.2018 (P.16.R.01) describes how items may be traced.

The organization provided evidence of internal traceability exercises across a range of products which included a review of the pertinent documentation and records as follows:

Product	Date of Production	Amount Produced	Amount Traced	Time Required / Comments

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 19 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

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Forward Trace 15.02.2021	Dried Apricot with SO2 KK-578	Receiving date: 15.10.2020	21.613 kg	All amount traced, no stocks, 21.613 kg	1 hour
Backward trace 15.02.2021	Whole Pitted Sun-dried Apricots (lot: 440020437-51-552)	05.12.2020	20009 kg	All amount traced, 20009 kg product	1,5 hours

An onsite traceability test was successfully conducted on:

	Product	Date Produced	BB Date	Mass Balance	Time Required
Backward Trace From Finished Product	Lot: 51-555 Diced apricot with SO2 12,5 kg	20.11.2020	20.11.2021	Completed	3 hours 20 min
Forward Trace From Raw Material	KK-780 Apricot with SO2	04.02.2020	24.010 kg	440020437-451-452-455-508-531-555 completed	3 hours 20 min

Rework is fully traced by the first lot numbers on the production records. Rework is applied to the out of spec products by re-sorting and lot nr of the product hasn't changed.

NC.3.9.2 An unlabelled pallet of raw materials was observed in the raw material warehouse.

3.10 Complaint-handling

There is a fully documented complaint handling procedure issued 01-11-2011 (Customer Communications Procedure - P03).

All complaints are recorded, and an investigation is conducted by Quality Manager. The organization demonstrates the means to analyse and trend complaints and in case of significant increase or serious complaint root cause is determined as part of the action plan.

Main cause of complaints are foreign material and quality defects and 6 were foreign bodies. During this year 16 complaints have been reported compared to 19 last year.

During the audit were reviewed records of existing complaints which demonstrates a proper documented and implemented system.

3.11 Management of incidents, product withdrawal and product recall

There is a documented crisis management procedure P.05 R.01/07.05.2018 and recall procedure P17 R.01/07.05.2018.

The crisis management team includes: GM, FSTL (QA Man), Production Engineer, Production Manager, Export Manager.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 20 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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The recall procedure is tested at least annually to ensure effective operation at both facility and company level. The test showed that the site's responsibilities (e.g. communication) were properly understood and capable of being promptly enacted. Last test:

Date	Product	Batch Traceability	Key Timings	Corrective Actions
22.02.2021	Whole pitted sun-dried Apricots with Sulphur	440020437-51-633	4 hours	none

The company has confidence in its out of hours protocol as evidenced by practice in the procedure, it is defined to test outside of the working hours. Last out of hours test date is 14.02.2021.

There have been no withdrawals / recalls in the last 12 months however the procedure states that in the event of a product recall the certification body should be informed within 3 working days of the decision to issue a recall.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
3.5.1.5	No supply from Agent/broker.
3.5.2.3	No live animals' reception.
3.5.4	No outsourced processing.

4. Site standards

4.1 External standards

The production site is situated in the industrial zone. A plant tour around the perimeter was conducted and no activities were observed which may have an adverse impact on product. External areas were observed to be well maintained. All areas around the building were observed with sufficient clear areas to discourage rodent burrowing. Roads around the plant were observed to be paved and in good condition. Waste containers are maintained far from plant entrance and kept closed to prevent pest harbourage.

Building fabric was in good condition. Docking doors were observed to close properly and without evidence of bird roosting sites. Walls and floors were in good condition; pipes, vents etc were adequately proofed.

4.2 Site security and food defence

Security systems are in place. A documented risk assessment has been conducted on Food Defense Plan (PL38-R01/02.02.2020). The system requires annual review – last conducted on 30-03-2020, as a consequence no changes were identified in the threat assessment plan.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page **21** of **37**

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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Visitor reporting system is in place.

No external storage tanks / silos evident. Packaging material storage and workshop are controlled with lock system. Locks are checked via monthly inspections and controls / results are discussed during management review meeting.

FDA register number is 10415547782 and valid until 31.12.2021.

Security procedures are part of the training program and personnel interviewed explained their responsibilities in that respect. The last training was dated 12.2.2021.

4.3 Layout, product flow and segregation

The factory layout (PL25. R.00/01.11.2011), process flow and movement of personnel appeared acceptable. Contractors and visitors are made aware of company procedures by visitor questionnaire. Contractors are under the supervision of relevant department responsible. According to the zone description of the standard the company has no high risk, high care or ambient high care area.

The site tour demonstrated that the plant has sufficient workspace and storage capacity to enable proper hygienic conditions.

No temporary structure is present.

Map provided by the plant and assessed by the auditor demonstrate the following areas:

Areas	Location	Level of control
Low risk	Raw Material Storage, Preparation area, Production Area	PRPs, GMPs
Enclosed product	Warehouse/dispatch area	General Cleaning and GMPs
Non-product	Maintenance, cafeteria, locker rooms, offices	General Cleaning

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Fabrication of site, buildings and facilities observed to be suitable for intended purpose:

Walls	Concrete walls are observed to be in well maintained conditions, no accumulation of dirt, condensation or mould. Concrete walls are included in the cleaning program. However; NC.4.4.1 Moisture and paint spillages were observed on the wall of the drying area.
Floors	Epoxy flooring was observed to be in well conditions, without cracks or evidence that does not resist process needs and observed in good cleaning conditions. However; NC.4.4.2 There were fractures on the floor in the washing area.
Drainage	Drainage Included in the cleaning program, properly covered to avoid pest entrance. Back flow prevention devices are installed and reported to be in good condition according to last report dated 01-03-2021.
Ceilings and overheads	Maintained in good condition, included in the cleaning program. There is no suspended ceilings and elevated walkways.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 22 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

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	NC.4.4.4 Paint spillage was observed on the ceiling of the raw material warehouse.
Windows, roof glazing and ventilation	Observed to be in good condition. Windows which open to the outside are properly screened to prevent the ingress of pests. Glass near production areas was observed to be protected against breakage. Natural and mechanical ventilation system was installed. No condensation or excessive dust observed.
Doors	Docking area doors were observed in good conditions, close fitting. Plant is observed generally properly sealed, no gaps between walls and/or floor.
Lights	Light seems to be adequate for process needs. Where located in process areas were observed properly protected and shatter proofed. Inspection areas observed with adequate light for proper performance of their operations.

4.5 Utilities – water, ice, air and other gases

The water distribution schematic diagram (PL28. R.0) dated 05.08.2020 was used as a basis for water sampling. All water is potable and provided by the industrial zone. Testing sample schedule is in place according to the risk analysis and requires in 6 months 1 microbiological and chemical quality tests conducted by external Laboratory on 02-02-2021, Malatya Public Health Directorate Lab. Satisfactory results for microbiological and chemical parameters seen.

Non-potable water is not used.

Compressed air is generated by oil free compressors. The organization has identified the steps in the process where compressed air is in contact with slice machine for cleaning. There is a 3 mm filter in the compressor air inlet. The filter is changed at least once a year and when necessary. Maintenance and cleaning are done every week.

The organization does not use CO2 / N2 for their production process. No steam is used.

4.6 Equipment

Food processing equipment observed to be industry standard. Key pieces of equipment include Stainless Steel and food grade plastic/conveyor belts. Equipment selection is based on impact to food safety. Equipment in direct contact with food including conveyors of sorting are food grade.

NC.4.6.1 Reducer observed not shielded on the filling line.

4.7 Maintenance

The organization plans, tracks and record their maintenance program based on paper files. System has controls in place to provide corrective/preventive/deductive maintenance based on defined routines. (PL.21-R0-01.11.2011)

Temporary repairs are controlled by recording on Repair Notification Form.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 23 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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Maintenance work is followed by documented hygiene clearance procedures described on the Maintenance Procedure (P08) and a hand over process to production is in place, evidence of compliance seen was supplier report for metal detector and dicing machine.

There is 1 maintenance team member supported by contractors as appropriate.

Start-up checks are completed by QC Supervisor

Food grade lubricants including allergen status were listed on Product Information Sheet of each lubricant with H1 registration (92553). Location, identification and clear determination on where permissible for use were evaluated and considered to be satisfactory.

Engineering workshop is situated at the heating area as segregated and was observed to be well controlled to prevent contamination into other areas.

During the audit were assessed maintenance routines for the following equipment:

Equipment	Routines verified	Period Reviewed	Comments
Metal detector	Annually - external	19.01.2021 / 09.03.2021	Completed according to defined routines and properly documented including details of who performed the routine
X-Ray	Annually – external	03.07.2020	Completed according to defined routines and properly documented including details of who performed the routine
Dicing machine	Annually – internal	19.02.2021	Completed according to defined routines and properly documented including details of who performed the routine
Washing Machine	Annually – internal	15.02.2021	Completed according to defined routines and properly documented including details of who performed the routine
Cooling System	Annually – external	09.07.2020	Completed according to defined routines and properly documented including details of who performed the routine
Filling Machine	Annually - internal	08.01.2021	Completed according to defined routines and properly documented including details of who performed the routine

There were no temporary repairs in the company.

NC.4.7.1 It was observed that there was no laser in the annual maintenance plan.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 24 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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4.8 Staff facilities

Suitable staff facilities are provided. Changing rooms are adequate for number of staff. Lockers allow for the segregation of personal items and production clothing. Clean and dirty production clothing are properly segregated.

Suitable handwashing facilities in place. Toilets are segregated. Adequate smoking facilities provided externally and include policies with respect to the use of electronic cigarettes.

Cafeteria is maintained well but no food is provided by the site. Food is also provided by the company in proper conditions.

A rest room is provided with appropriate stored and hygienic conditions including a fridge.

NC.4.8.4 The tap in the cutting section was not hands free.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Cleaning chemicals and lubricants are properly identified in the existing list of approved chemicals, properly contained and segregated with non-food grade chemicals in specified lockers located in chemicals storage room as locked.

Confirmation of suitability is conducted by Product Information Sheets (PIS) and SDS.

When in use chemicals are properly identified and employees are aware and trained on their proper use.

Safety Data Sheets are made available and used as part of existing training programs. Last training date is:

There is not strongly scented or taint forming material usage in the facility.

4.9.2 Metal control

Sharp metal implements are controlled according to policy of Metals documented on the Instruction of Glass, Brittle Plastics and Sharps (T02.R.1/12.03.2019). This requires that they be inspected, records from Knife Control Form for February and March 2021 were seen. Snap-off-blade knives were not observed and reported to be forbidden

The policy also confirms that packaging/ingredients which use staples is not permitted. Policies are in place to avoid the use of staples, paper clips etc.

NC.4.9.2.1 An uncontrolled blade was observed in the raw material receiving area.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass breakage procedure dated 01-11-2011 is in place (T02.R.1/12.03.2019). Instructions for breakages are included and recorded on F23.

Glass and other transparent brittle materials have been excluded wherever possible from open product areas.

The glass and hard plastic register (F02) were up to date. Checks are conducted on a daily frequency and records for the check conducted on Glass Material Control Form were reviewed dated March 2021.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 25 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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4.9.4 Products packed into glass or other brittle containers

The organization does not pack products in glass or brittle containers

4.9.5 Wood

Wood is not used in production areas.
Wood is only used in finished product and packaging material storages as pallets.
Wood use was in pallets only and these were controlled by limiting their use to the ends of lines only.

4.9.6 Other physical contaminants

When unpacking raw materials / ingredients care is taken to prevent cross contamination via dedicated scissors.
Writing implements comply with the standard – pens are metal detectable

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

A documented assessment dated 02.01.2020 (PL.09 Hazard Analysis Assessment) has been carried out to identify the potential use of equipment to detect or remove foreign body contamination.
Control measures for preventing foreign materials are implemented by means of sieves / metal detection / X-Ray Detection (for diced apricots) / visual inspection.

4.10.2 Filters and sieves

Sieves are located before and after the washing. The mesh is adequate to reduce of further contamination. /10 mm) Filters for water and sieves are inspected/tested daily based on available risk assessment. Records from March 2021 were reviewed.

4.10.3 Metal detectors and X-ray equipment

Metal detectors include a belt stop system with an alarm (audible and visual) which identify the location of the contaminant to allow effective segregation of the affected product. Rejected items are isolated in a secure location. The X-ray detector include an automatic rejection device which was diverting contaminated product to a secure unit.

Documented procedures of the detectors (T13-R.00-01.11.2011) as work instructions details controls for testing of the equipment including responsibilities, operating conditions including sensitivity; methods and frequency of checks and requirement to document the obtained results.
Test observed during site tour and conducted correctly.

4.10.4 Magnets

Magnets are located at raw material pre-cleaning and after the final sorting. Inspection of the magnets is conducted via Magnet Check Form (F89.R00/01.04.2014). Records reviewed on site provided details of test results.

4.10.5 Optical sorting equipment

Optical sorting equipment is checked according to manufacture instructions which are conducted daily and recorded on Foreign Body Form (F21.R00/01.11.2011).

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

Not in use at this facility.

4.11 Housekeeping and hygiene

A team of line workers clean the facility at the end of the production run under the supervise of the cleaning responsible. Pre-start checks and equipment cleanliness were verified during the audit. Site was maintained in appropriate level of cleanliness.

Written cleaning methods are in place, those for washing and dicing machines and filling machine were checked during the audit.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 26 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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Cleaning records are analysed, and trend analysis are available to instigate improvements where required.

Cleaning programs were validated visual inspection daily by QC responsible. Cleaning is verified via pre-start visual inspections. Records for February and March 2021 were reviewed Out of specification results have been defined and the corrective action is described in the procedure.

4.11.7 Cleaning in place (CIP)

There is no CIP Cleaning.

4.11.8 Environmental monitoring

The facility has developed a program which requires indicator organisms on quarterly basis according to risk assessment. The program identifies sampling protocol, sample locations, frequency, target organisms, test methods and evaluation results.

Acceptable limits have been defined for (Salmonella (should not be found), TPC and Coliform less than 10 cfu from food and non-food contact surfaces, and Mold/Yeasts less than 100 cfu from the process area air) and the procedure (PL36 dated 12.03.2019) requires that the following actions be taken when these limits are exceeded; re-clean and re-test the area, investigate the root cause and take the corrective action according to the root cause. Last analysis date is 08.03.2021.

The last review of the program was triggered by QA Manager which is annual review.

4.12 Waste

Waste was observed to be well managed. All waste is removed from production on a regular basis.

External waste collection containers/rooms housing waste are well managed. Containers are properly covered.

Waste is removed by licensed contractor. (Contract date: 25.10.2019) No unsafe product or trademarked waste is evident. Only recycle waste is collected by contractors.

4.13 Management of surplus food and products for animal feed

Organization has received detailed instructions by customer-branded products on how to dispose of surplus including not to sell to staff or not passed to other organizations. Current process includes opening the products and shredding the customer branded packaging materials.

No food for animal feed.

4.14 Pest management

The organization has a preventive control program in place to minimize risk of infestation which includes external service provided by TARBIL Company.

The following is a description of the existing program:

Contract or document that describe service	01.01.2021
License or permit	Issued by Malatya Directorate on 2015/08/04

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 27 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Pest covered	rodents, crawling and flying insects and birds. Loading/unloading areas are protected with strip curtains against birds.	rodents, c
No. of routine visits	monthly, latest on 2021/03/10	
Station map	2021/01/01 which matches with existing numbered pest control devices.	YYYY-MM existing n
Type of used pest control devices	Glue board traps in the plant, bait stations outside the plant, light traps for fly inside the plant	
In-depth pest control surveys	Annually by the licensed expert and the last survey was reported on 01.01.2021	How frequ
Controls in case of infestation	Hold suspect product and contact Pest Control Organization for remediation.	*****A minimize

The organization has a list of approved pest control products used including MSDS. Bait stations are robust and secured in place. Toxic rodent baits are not used in open product areas. EFKs and pheromone traps are correctly sited.

Inspection reports provide details of the inspections conducted, if any activity is reported inside or outside the facility, recommendations are provided, and actions are taken over such recommendations.

Reports are assessed every 3 months for trending which includes catch analysis existing information provide evidence to support that in the last 12 months there has not been infestation.

Interviewed employees understand the signs of pest activity and are aware of the steps to be followed to inform of pest activity to designated functions.

4.15 Storage facilities

Storage facilities observed to be satisfactory. Allergens segregated by different storage room (sulphites).

Temperature is controlled via manual monitoring every 4 hours. (Refrigerated rooms used for organic apricots). The system is alarmed and set at maximum to 10oC.

The temperature management system is manual and is monitored every 4 hours, this allows sufficient time to take action before the product exceeds defined limits.

Stock rotation is controlled by FIFO procedures. Program was observed properly followed.

Controlled atmosphere storage is not applicable.

Outside storage is not conducted.

4.16 Dispatch and transport

Dispatch observed to be satisfactory. Loads are inspected prior to dispatch which includes documented verification of seals, temperature, odours, visual conditions, debris, container conditions, and compatible materials.

Traceability is ensured by recording lot numbers of the products to Shipping Records and records were available for traceability exercise.

Vehicles are provided by mix of customers and third-party contractors.

Containers are not required to control temperature.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 28 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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The documented procedures for transportation include restrictions in the loads, security measures during transit, and instructions on case of breakdowns or accidents.

Approved third party contractors meet requirements which are described in contracts.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
4.2.2	It is not needed to take additional measures to mitigate risk to raw materials or product.
4.2.3	There is no external storage
4.3.5	No temporary structure on site
4.4.5	There is no suspended ceiling.
4.4.6	There is no elevated walkway.
4.5.3	There was no air and other gases used as ingredient or contact with products
4.7.3	There was no temporary repair in the company
4.9.1.2	No strongly scented or taint-forming materials in use
4.9.4	There is no glass or brittle containers for packaging
4.10.5	There is no optical sorting equipment
4.10.6	There is no rigid container as packaging
4.11.7	There is no CIP Cleaning.
4.13.2	No charity or donations available
4.13.3	No product for animal feed
4.14.3	No in-house pest management.
4.15.4	There is no controlled atmosphere storage.
4.15.5	There is no outside storage
4.16.3	Containers are not required to control temperature.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 29 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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5. Product control

5.1 Product design/development

Product development and design procedure is in place dated 01-11-2011 (P.18/R.00-01.11.2011). Procedure is applicable for new, modified products and includes HACCP review and production trials.

Shelf life tests are conducted following documented protocols which demonstrates compliance with relevant microbiological, chemical and organoleptic criteria.

Records for sun dried pitted whole apricots (batch code RÖ01-10.01.2020), Organic dried apricot (RÖ03-01.01.2020) products were reviewed.

There is not any new product design/development presently. Also new product development is not required so far because the plant is producing bulk to other manufacturers.

5.2 Product labelling

The company ensures that labels are legal for the country of use by label approval from the customers. Process is followed also in case of changes to recipe, raw materials (material, supplier or country of origin); legislation.

Evidence seen during the audit included dried whole apricots with SO2 12,5 Kg and lot number: 440020437-51-95.

Where claims are made these are verified through batch code and analysis certificate.

The organization confirms the in cases where the label information is the responsibility of their customer or a third party, they are responsible to provide the required information to maintain accuracy and adequacy.

No cooking instruction required.

5.3 Management of allergens

The company have an allergen control procedure (P.07.R.00-01.11.2011) in place as allergenic materials procedure which includes assessment of raw materials to establish the presence and likelihood of contamination by allergens.

A list of allergens containing raw materials, processing aids, intermediate and finished products is held and dated 02-01-2020. Allergens on site are Sulphur dioxide and Sulphites (it is an ingredient of the raw material, no usage of sulphites in the facility).

A risk assessment dated 02-01-2020 has been conducted to identify routes of contamination.

Allergen rework is controlled by Rework Tracking Form (FR.14) and Traceability Form (FR.018) to avoid cross contamination.

Warnings are in place on labelling as appropriate.

No claim made regarding a food for allergy or food sensitivity.

Cleaning methods have been validated:

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page **30** of **37**

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Allergen	Protein Specific Swab / Finished Product Testing etc	Date
Sulphites	Food contact surfaces testing	07.01.2021
Sulphites	Finished Product Testing (for naturel dried apricot)	15.01.2021 / SGS Lab.

Line start up checks are in place for product change over and changes in batches of packaging to ensure labels applied are correct for products packed. Records for February and March 2021 checked.

5.4 Product authenticity, claims and chain of custody

Company have access information on risks of adulteration or substitution of raw materials via trade associations / government sources/ private resource centres as reliable web sites.

A vulnerability risk assessment dated 25-03-2019 was made available to assess the potential of adulteration or substitution. According to the assessment the organization identified certain raw materials are not affected due to agricultural fruits (apricots). Suppliers are controlled also with their GFSI certification status, audits, CoAs.

The defined vulnerability was Organic status of the fruits and vegetables.

Product claims are in place. The status of each batch of raw materials is verified by laboratory analysis and records maintained.

The company has organic certification valid till 31-03-2022 from Ecocert.

Organic raw material purchases can be provided from other organic raw material certified projects. The seeding, harvesting and commercial circulation and sale of organic raw materials are subject to organic certification. And tested at external labs for pesticides residues, e.g. for sun dried pitted whole apricots on 18.12.2020 at Primors Lab. (acr: BELAC-057-T).

Evidence of Kosher and Halal certifications were demonstrated. Certificates valid to 31.01.2022 (Star-K) and 20-09-2021 (TSE) respectively. There is no risk of loss of identity due to all ingredients are Kosher and Halal certified.

The organization provided copy of the documented process flow for production of products with claims which identify potential areas for contamination or loss of identity identified and controls established.

The organic claim printed onto the carton boxes of the finished products as Organic Sun-dried Apricots and kosher & halal claims are not labelled onto finished products due to the products are dispatched as bulk to the other manufacturers.

The last traceability exercise to confirm this status was conducted on 06.10.2020 with satisfactory results, these are conducted every 6 months.

5.5 Product packaging

Purchasing of food contact packaging includes the need to provide particular characteristics of the food to ensure the provided material is suitable for the intended use. Evidence seen during the audit included Certificate of Conformity and migration test reports for blue PE bag of 21.08.2020.

Obsolete packaging is managed via labelled and segregated in a designated area of the storage which is kept secured and safe till next production.

PE Bags for work in progress were robust and blue coloured.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 31 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Test critical to confirm product safety, legality and quality are performed by organization and external laboratories.

Tests include mainly quality characteristics such as physical defects, Extranous Vegetative Matters and Foreign Matters. Tests include product (humidity, microbiological analysis – TVC, yeast & mold, coliforms and SO2), raw material (Ochratoxin, pesticide, aflatoxin, physical controls), swabs (hand, protective cloths, environment, surface). The regime does not properly consider risk. Results are recorded and reviewed regularly to identify trends

Test results are compared against product specifications or acceptability criteria to identify compliance and relevance of reported determinations, when deviations are identified the organization treat product as non-conformity or re-evaluate test results before actions are taken.

Results for micro, pesticides, heavy metals, aflatoxins, Ochratoxin A, water content and SO2 seen during audit (e.g. organic sun dried pitted whole apricots on 15.01.2021).

5.6.2 Laboratory testing

Laboratory testing is carried out by in-house laboratory which follows the principles of ISO 17025 (attending ring tests to justify the validation of the methods and also by external accredited laboratory SGS (AB-0328-T) and Primors Lab.-Belgium (acr: BELAC-057-T)for which the scope of services matches the tests conducted.

The reliability of in-house laboratory results includes recognized documented test methods, qualification of laboratory staff, and implementation of ring tests, inclusion of laboratory equipment in calibration and maintenance programs.

A schedule of testing is in place, satisfactory results were seen for:

Test	Frequency
Pesticides / heavy metals / Ochratoxin / Aflatoxins	Annually and quarterly / external laboratories
Finished product micro (TVC/ yeast/ mold/E. coli/ Coliform/ Salmonella)	Quarterly and by customer request / external lab
Analytical (water content / SO2)	Every batch / internal lab and annually / external lab

5.7 Product release

Product is released based on control plans which demonstrate criteria have been met. Control of non-conforming product includes the details. The products are not released until all the analyses and controls were completed and without positive release by designated quality department responsible by approving the Finished Product Control Forms as defined at the QC Manual.

5.8 Pet Food

The factory does not make pet food

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 32 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
5.2.3	No claims evident.
5.2.5	No cooking instruction required on the label.
5.3.7	No allergen free claims.
5.4.3	No material identified under risk by vulnerability assessment
5.4.4	No status of a raw material evident
5.8	The factory does not make pet food.

6. Process control

6.1 Control of operations

Process observed to be well controlled.

Documented process specifications / work instructions are available for key processes in production. Process specifications were assessed during the audit as well as part of the traceability study. Documents reviewed demonstrated that process specifications meet final product specifications.

Key process monitoring includes chemical and physical properties which are controlled manual. Records seen for diced dried apricots with SO2 (lot nr:440020437-51-108) and for organic dried apricots (lot nr.440020437-51-110).

Process conditions are not linked to critical safety or quality parameters of the product.

Equipment failure is covered by non-conformance procedure. Access to key pieces of equipment such as area authorization is controlled via production responsible.

6.2 Labelling and pack control

The company ensures that the correct labelling is available by approving initial label at start up and getting a copy of the label on the back side of packaging control form. Only the labels for the current product is available for use at the line.

Documented checks are conducted at the beginning, hourly and at the end of production. Records for Packaging Control Form were seen during the site tour (lot number 51-95) and traceability exercises. (lot number 51-555).

Due to scheduling no changeover observed during the audit. Only start-up observed which was satisfactorily done.

Online vision is not used.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 33 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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6.3 Quantity, weight, volume and number control

Products are checked for quantity by weight control. Controls are done using calibrated scales for each pack of product. Each pack is weighed whether it is retail pack or 12.5 kg bulk packages. Selected method meets legal and customer requirements.

No online checkweighers.
No bulk product on site governed by legislative requirements.

6.4 Calibration and control of measuring and monitoring devices

A list of equipment requiring calibration is held dated 02.01.2020 (F.48)

Equipment used to monitor CCPs, product safety or legality includes:

Item	Frequency	Valid until
Scale	annually	03.03.2022
DFA - Water content analyzer	annually	03.03.2022
sulfur measuring equipment (heater, flask joje)	annually	03.03.2022
Reference thermometer	annually	03.03.2022

Reference equipment is stored in the QC lab

Procedures for control of out of specification equipment are available which include documentation of actions taken.

NC.6.4.1 It was observed that the annual calibration of the magnet was not done.

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
6.1.5	Process conditions are not linked to critical safety or quality parameters of the product.
6.2.4	No online vision used to check labels
6.3.2	No bulk product on site governed by legislative requirements.
6.3.3	No online checkweigher in the site

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 34 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Relevant personnel, including agency-supplied staff, temporary staff and contractors are trained prior to commencing work. New employees are supervised for 15 days to evaluate adherence and compliance to defined rules.

Employees engaged in activities relating to critical control points are assessed for competency and training requirements. Training Plan 2020/2021 is reviewed. Records seen are

- CCP training dated 09.03.2021,
- HACCP training dated 06.07.2020,
- Hygiene training dated 18.05.2020

Labelling controls are trained out via Labelling Instruction and the last training was dated 20.04.2020.

Training records assessed provide the name of the trainer, confirmation of attendance, date and duration, title of the course, results of training effectiveness. Training is provided in a language, Turkish, that is understood by employees – B.K. and F.K.

During the audit the training and competency requirements were assessed for metal detector operator position which demonstrate compliance with the program requirements and expectations. (09.03.2021- last training date)

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Personal hygiene rules are documented in Personal Hygiene and Rules Instruction (T03) and compliance is checked by QC. During the audit these were observed to be properly followed.

Hand cleaning observed to be performed appropriately.

Blue metal detectable plasters are used; a sample of each batch of plasters is checked through metal detectors and recorded on metal detector check form at the intake checks. Where appropriate in addition to the plaster, a glove is worn.

Use and storage of medicines was described in Health Instruction (T08).

7.3 Medical screening

Employees are made aware of and know who to notify in the case of symptoms of infection, disease or condition which would prevent a person working with open food by Personnel Health Instruction (T08.R.0-01.11.2011).

Visitors and contractors are aware of conditions that prevents visiting areas with open food by Visitor Hygiene Instruction and Questionnaire (F35.R01.-10.03.2020) and require them to inform the organization if suffers of any identified conditions by getting approval from QA Manager.

Personal hygiene instructions describe actions to be taken in case of been in contact with an infectious disease.

7.4 Protective clothing: employees or visitors to production areas

The use of protective clothing is defined and documented in the Personal Hygiene and Rules Instruction (T03) dated 01.11.2011

Protective clothing includes uniforms and aprons and 2 sets are provided. Laundering is by inhouse laundry according to the Workwear Washing Instruction (T26). Cleaning verification is done monthly via swab tests.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 35 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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There is no use of gloves.

No items of personal protective clothing used unsuitable for laundering

Details of non-applicable clauses with justification

Clause/Section Ref	Justification
7.4.5	No gloves in use.
7.4.6	No items of personal protective clothing used unsuitable for laundering

Template control	Food	Version	1.0
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8. High-Risk, High-Care and Ambient High-Care Production Risk Zones

8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones

No high – risk, high care and ambient high care zones

8.2 Building fabric in high-risk and high-care zones

NA

8.3 Maintenance in high-risk and high-care zones

NA

8.4 Staff facilities for high-risk and high-care zones

NA

8.5 Housekeeping and hygiene in the high-risk high-care zones

NA

8.6 Waste/Waste disposal in high risk, high care zones

NA

8.7 Protective clothing in the high-risk high-care zones

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v9 27/11/2020

Page 36 of 37

Rev. 30 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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NA

Details of non-applicable clauses with justification	
Clause/Section Ref	Justification
8(all)	No high – risk, high care and ambient high care zones

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v9 27/11/2020	Page 37 of 37	Rev. 30 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Audit Report

Global Standard for Food Safety Issue 8: August 2018

1. Audit Summary			
Company name	Kirici Kuru Meyva Ve Gida	Site Code	3067471
Site name	Kirici Kuru Meyva Ve Gida		
Scope of audit	Washing, sorting, grading, oven drying and packing of whole and diced sun-dried apricots into PE bag in cardboard boxes and retail packs		
Exclusions from scope	None		
Justification for exclusion	N/A		
Audit Finish Date	2020-03-18		
Re-audit due date	2021-03-15		

Additional modules included			
Modules	Result	Scope	Exclusions from scope

Head Office	No
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2. Audit Results					
Audit result	Certificated	Audit grade	A	Audit type	Announced
Previous audit grade	A	Previous audit date	2019-03-18		
Certificate issue date	2020-04-25	Certificate expiry date	2021-04-26		

Number of non-conformities	Fundamental	0
	Critical	0
	Major	0
	Minor	9

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 1 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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3. Company Details			
Address	1. Organize San. Bölgesi 1. Cadde 44200 Malatya		
Country	Turkey	Site Telephone Number	0090422237501
Commercial representative Name	Bayram KIRICI	Email	hasircioglu@anet.net.tr
Technical representative Name	Hatice OZDIL	Email	laboratuvar@kirici.com

4. Company Profile					
Plant size (metres square)	<10K sq.m	No. of employees	51-500	No. of HACCP plans	1-3
Shift Pattern	1 shift / 08:00-17:00 / 6 days				
Subcontracted processes	No				
Other certificates held	Organic, Kosher, Halal				
Regions exported to	Europe North America				
Company registration number	TR-44-K-000206				
Major changes since last BRCGS audit	No major changes since the last audit.				
Company Description					
<p>The company was established in 1967 by three brothers and they were one of the 3 companies of their sector in Malatya/Turkey. They started exporting in 1983 and now they are exporting almost 90% of production to many countries and rest for the industry. They also have 2 more companies which has been working on apricot and figs. There are 2 production lines in the factory. If one type of product is being processed in the facility, then the others are not accepted or processed. Up to 250 employees in this site. The company has 8000 sq. m closed area in 25.000 sq. m total area. They moved this facility in 2011. The storage areas are sufficient, and all the equipment are stainless steel. They have a laboratory to do some analyses for the products and raw materials. Every year they have 2nd party customer audits regularly. The recall responsible is Export Manager. The annual production volume is about 9.000 m-tons. There were 130 employees during the audit. There were 3 HACCP Plans. Audit started on 16-03-2020 due to planning where audit due date was 15-03-2020.</p>					

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 2 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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5.Product Characteristics					
Product categories		15 - Dried food and ingredients			
Finished product safety rationale		Water activity is between 0.70 to 0.60, Water content between 26% to 18% and sulphites for one type of dried apricots between 2000 to 3000 ppm.			
High care	No	High risk	No	Ambient high care	No
Justification for area		Low risk areas only, justified because product does not support growth/survival of pathogens due to low water activity.			
Allergens handled on site		Sulphur dioxide and Sulphites			
Product claims made e.g. IP, organic		Organic			
Product recalls in last 12 Months		No			
Products in production at the time of the audit		Whole pitted sun-dried apricots with SO2, 12.50 kg in blue PE bag in cartons. And Diced sun-dried organic apricots, 12.50 kg in Blue PE bag in cartons.			

6.Audit Duration Details			
On-site duration	20 man hours	Duration of production facility inspection	10 man hours
Reasons for deviation from typical or expected audit duration	Conforms to the Standard		
Next audit type selected	Announced		

Audit Duration per day			
Audit Days	Audit Dates	Audit Start Time	Audit Finish Time
1 (start date)	2020-03-16	15:30	17:30
2	2020-03-17	08:00	17:30
3	2020-03-18	08:00	17:30

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 3 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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	Auditor(s) number	Name	Role
Auditor Number	173127	Emrah Kosucu	Lead Auditor

Present at audit				
Name / Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Mr Bayram Kırıcı / General Manager				X
Ms Hatice Özdil / F.S Team Leader	X	X	X	X
Ms Gulsah Cubuk / Facility Manager	X	X	X	X
Mr Mehmet Hasircioglu / Export Manager				X
Ms Nurhan Kırıcı / Production Manager	X	X	X	X

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 4 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Non-Conformity Summary Sheet

Critical or Major Non-Conformities Against Fundamental Requirements				
No.	Requirement ref.	Details of non-conformity	Critical or Major?	Anticipated re-audit date

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date

Major							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 5 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED



Minor							
No.	Requirement ref.	Details of non-conformity	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	2.5.1	The magnet at the end of the sorting line wasn't shown on the flow-chart of the organic sun-dried apricots.	The organic sun-dried apricots flow-chart (SM-07) has been revised by adding magnet.	Adding magnet holder to steps.	Misinterpretation of the standard requirement.	2020-03-15	Emrah Kosucu
2	4.2.1	The food defense plan wasn't reviewed for the past 1 year for the new circumstances and emerging any new risk.	The defense plan (PL-38) reviewed on 30.03.2020.	The defense plan has been added to the annual review form.	Misinterpretation of the standard requirement.	2020-03-15	Emrah Kosucu
3	4.4.8	It was observed there was some openings with the floor at the raw material door, not close-fitting. And there wasn't any protection for the pest ingress when the door opened.	Correction was made under the door and the doors are closed completely. And curtains were made to prevent pest entry.	Full closing of the door will be added to the field. The internal auditors will be retrained how the area inspections should be done.	It does not close completely because the floor decomposed under the door.	2020-03-15	Emrah Kosucu
4	4.8.4	The warm water cannot reach promptly to the hand-washing facilities in the production.	The heater repaired to get water with suitable temperature promptly.	Water suitability checks included on the daily cleaning control form.	Hot water is supplied by the solar energy system within the facility. The system that was	2020-03-15	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 6 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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					malfunctioning during the inspection.		
5	4.9.1.1	The chemicals for the maintenance purpose were not included on the approved chemicals list.	Approved chemical list (F-97) updated as covering the maintenance chemicals.	Review of approved chemical list annually. And each chemical taken will be checked and approved then included on the approved chemical list.	The maintenance chemicals didn't include on the list due to the standard requirement wasn't understood.	2020-03-15	Emrah Kosucu
6	4.9.6.1	The raw material sacks opened for sampling by cutting without any precaution of the physical contamination with the sack threads.	Sacks should be opened carefully during the raw material acceptance stage.	Care should be taken during the sampling phase of the raw material acceptance stage. Raw material will be corrected by specifying the way of sampling in the input control instruction (T-11) and the staff will be trained.	Misinterpretation of the new standard requirement by the staff.	2020-03-15	Emrah Kosucu
7	4.11.1	It was observed there were some burned apricots near the ventilation channels in the drying room	In the drying room, a detailed cleaning was carried out, All equipment and fans were cleaned.	Operation and hygiene inspections will be carried out together with the responsible staff in order to raise awareness about cleaning and hygiene. The lines have been cleaned and kept clean. The control form	Poor awareness of staff on cleaning and hygiene in the drying room.	2020-03-15	Emrah Kosucu

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 7 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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DOCUMENT REVIEWED AND ASSESSED BY CLAUDIO INNOCENTI (PARTNER & PCQI) ON OR ABOUT FSVP PLAN'S NOTED REVIEW START/END DATES

CONFIDENTIAL TREATMENT REQUESTED



				improved by covering the fans (F-06).			
8	6.1.2	No protecting system seen on the panel of the metal detector to prevent unauthorized access.	Access is restricted by enabling the lock setting.	Password system should be applied to metal detector device always and checked at every start-up. And included on the Defense Plan (PL-38) and hazard analyses.	The previous lock application in the system was not active due to lack of awareness.	2020-03-15	Emrah Kosucu
9	7.4.3	The Laundry operation conditions was not documented on the Laundry Instruction.	Laundry washing instruction (T-36) was updated.	The updated instruction hangs over the machines with the operation conditions to be met every time.	Lack of awareness due to responsible instructed for the operation conditions according to the equipment manual.	2020-03-15	Emrah Kosucu

Comments on non-conformities

No Comments

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 8 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Additional Modules / Head Office Non-Conformity Summary Sheet

Critical			
No.	Requirement ref.	Details of non-conformity	Anticipated re-audit date

Major							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Minor							
No.	Requirement ref.	Details of non-conformity	Corrective action taken	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999			
F834 English Food Template v5 28/01/2020	Page 9 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Detailed Audit Report

1. Senior management commitment

1.1 Senior management commitment and continual improvement

The company has a documented food safety and quality policy issued 01-11-2011 signed by General Manager. It is communicated to the staff by posting with noticeboards and included on the trainings of work instructions (on 22-04-2020). The policy states the intention of the site to produce safe, legal and authentic products within specified quality and its responsibility to its customers.

There are documented objectives for: - Decreasing Customer Complaints 50%, - Finalizing the evaluation of customer complaints in 1 working day, - Achieving grade AA from BRC FS audit, - Customer satisfaction surveys. Objectives are measurable and include targets. These are communicated to staff via emails and monthly meetings and reviewed quarterly, latest on 03-02-2020.

Management review meetings are held annually, the last review was 09-03-2020 and was attended by Board Member, General Manager, FST Leader (QA Man.), Export Manager, Production Supervisor.

Records of the management review were available and included decisions and actions which are communicated to appropriate staff and completed within timescale.

There is adequate resource to maintain compliance to the Standard.

There are also regular meetings based on monthly (02-03-2020, 03-02-2020) including: quality standards, customer requirements, objectives, emergency and recall, customer complaints, social responsibilities and confidential reporting.

The company ensure that they are kept informed of scientific and technical developments, industry code of practices as applicable as well as new risks to authenticity of raw materials and relevant legislation by: email membership of the food engineers chamber and web sites of the Ministry of Agriculture and internationally EC-Eurlex and FSMA followed.

Food safety culture is the responsibility of the Senior Management (Board Member / FST Leader) who discussed these matters with the auditor. Work so far includes establishing the procedures and setting the criteria (staff surveys, specific trainings and feedback process) and future work will entail reviewing the effectiveness and amend the program accordingly. Effectiveness has measured via staff survey and training evaluations and the results evaluated at the management meeting.

Interviews with employees confirmed that they were aware that non-conforming product issues could be reported to GM for action.

The company has a confidential reporting system which works in the following manner: feedback collection system with a box which was at the locker room and planned to be reviewed by plant management weekly.

A genuine copy of BRC standard was available. They organization remains updated on changes in the standard via BRCGS website and membership to the website.

The company have ensured certification is maintained; audit started on 16-03-2020 due to planning where audit due date was 15-03-2020.

The Assistant General Manager, FST Leader (QA Man.), Facility Manager and QC Supervisors attended both the opening and closing meetings. And GM & Export Manager attended closing meeting.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 10 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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8 minor non-conformities were identified at previous audit against clauses 1.1.2, 1.1.4, 2.7.1, 3.4.1, 3.9.3, 3.10.2, 4.4.8 and 4.11.8.1. Identified root cause analysis and provided actions seen to have been effectively addressed to prevent recurrence.

The logo is not used.

1.2 Organisational structure, responsibilities and management authority

The company have a clear organizational structure in place issued Organizational Chart on 10-10-2019. The person responsible for food safety, legality and quality is QA Manager who reports directly into General Manager. Deputisation is documented on Job Descriptions, the organization ensures that employees are aware of their responsibilities by Job Descriptions and training. Seen Job Descriptions of General Manager and Production Manager. Interviewed staff appeared to be aware of their responsibilities and documented work instructions are in place.

Details of non-applicable clauses with justification

Clause/Section reference	Justification
1.1.13	BRC logo is not used

2 The Food Safety Plan – HACCP

The plan has been developed and maintained by a multidisciplinary team including:

Job Title	Experience	Qualifications / Training
QA Manager / Team Leader	2 years in the company	Food Engineer / HACCP Training on 12-12-2019
General Manager	40 years in the company	Internal HACCP training on 25-02-2019
Facility Manager	6 months in the company	Food Engineer / HACCP Training on 12-12-2019
Production Responsible	30 years in the company	Internal HACCP training on 25-02-2019
Maintenance Responsible	4 years in the company	Internal HACCP training on 25-02-2019
Metal detector operator	4 years in the company	Internal HACCP training on 25-02-2019

The company have a fully implemented and effective food safety plan based on Codex Alimentarius HACCP principles. There are 3 HACCP studies which includes all products as for sun-dried whole apricots, sun-dried dice apricots and sun-dried organic whole apricots .

Each product or group of products includes a full description which includes all relevant information on food safety. The intended use of the product is identified as ready to eat and alternative uses as

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 11 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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ingredient to bakery products and confectionery for consumer target group and vulnerable groups as allergen sensitivity for sulphurized dried apricots.

Pre-requisites are documented within PR Plan (PL-01) and include housekeeping and hygiene, pest control, PPM, personal hygiene, staff training, purchasing, transportation arrangements, processes to prevent cross contamination and allergen controls. The pre-requisites are reviewed as part of the HACCP review (25-03-2019).

Relevant information has been used to conduct the hazard analysis including all Ingredients (including packaging), raw materials, products and process steps.

Flow diagrams are in place covering relevant inputs and outputs. The following is a list of existing diagrams:

Flow diagram	Issue date	Verification method
Pitted Dried Whole Apricots with Sulphur - SM.02	01-11-2011	Physical verification on site by FS Team on 25-03-2019
Pitted Dried Whole Apricots - SM.03	01-11-2011	Physical verification on site by FS Team on 25-03-2019
Organic Pitted Dried Whole Apricots - SM.04	01-11-2011	Physical verification on site by FS Team on 25-03-2019
Diced Dried Apricots with Sulphur - SM.05	01-11-2011	Physical verification on site by FS Team on 25-03-2019
Diced Dried Apricots - SM.06	01-11-2011	Physical verification on site by FS Team on 25-03-2019
Organic Diced Dried Apricots - SM.07	01-11-2011	Physical verification on site by FS Team on 25-03-2019

Process steps summary: Reception – raw material storage – washing – sieving – grading – oven drying – manual sorting – dicing – laser sorter (diced apricots) – X-Ray Detector (diced apricots) – filling in box – metal detector – labelling – fumigation (outsourced and only for conventional products) or blast freezing (for organic products) – dispatch

The HACCP team have identified and recorded potential hazards that are reasonably expected to occur at each step of the process, and this includes raw materials. Identified hazards were determined for microbiological (E. coli, Coliform, Salmonella, etc), chemical (pesticides, radiological etc), physical (Extraneous Vegetative Matter, Foreign Matter e.g. stone, metals, plastic), malicious adulteration and allergens. Auditor verified that the risk assessment was done in compliance with the standard.

Hazard Category	Specific Hazard	Risk Determination
Biological	Microbiological (Coliform, E.Coli)	Low Risk - CP
Physical	Foreign Materials (Metallic M. and Stones)	Medium Risk - CCP
Chemical	Pesticides, Radiological	Low Risk - CP

A Hazard analyses (PL-09 / 02-01-2020) has been conducted based on likelihood and severity risk methodology documented on the Hazard Analyses Instruction (T-25 / 02-01-2020). Control measures have been identified and documented within the HACCP plans.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 12 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Critical control points have been determined by using 5x5 risk matrix (1-9 low risk, 12 to 20 MR and 25 is HR while 5 is frequent and 1 is very rare for probability) and codex decision tree with 4 questions. Critical control points identified are:

CCP	Process Step	Critical Limit	Monitoring
1	Raw Material (organic apricots)	No Pesticides	Analytical tests at accredited ext. labs at RM acceptance
2	Packaging	Finished Product Water Content < 25%	Analytical test at accredited ext. labs and at least once every batch and continuous tests during production at internal lab.
3	Packaging	Finished Product Sulphur dioxide content < 2000 ppm (for TR & EU) < 2500 ppm (for Canada) < 3000 ppm (other countries)	Analytical test at accredited ext. labs and at least once every batch and continuous tests during production at internal lab.
4	Final Sorting	Zero Foreign Body	Start/Stop and at least once at every pallet
5	Metal Detection	2.5 mm Fe, 3.0 mm N-Fe, 4.0 mm SS-316	Start/Stop and hourly
6	X-RAY Detection (for diced products)	2.5 mm Glass, 3.5 mm SS 316 (ball)	Start/Stop and hourly

Documented procedures define corrective actions expected to be implemented if critical limits are exceeded. CCPs were validated as follows:

CCP	Means of validation	Date of last Validation
1	Analytical tests by external accredited lab. annually	Test report from Primors lab. (acr: BELAC-057-T) on 09-09-2019
2	Analytical tests by external accredited lab. annually	Test report from SGS lab. (acr: AB-0328-T) on 04-12-2019
3	Analytical tests by external accredited lab. annually	Test report from SGS lab. (acr: AB-0328-T) on 17-01-2020
4	Review of customer complaints, CARs and certificates of conformity reports.	25-03-2019
5	Continuous tests with specific test wands	25-03-2019
6	Continuous tests with specific test wands	25-03-2019

CCP records are signed by operative and verified by QA Manager (Team Leader). Verification of the HACCP plan is achieved by Food Safety team including internal audits, review of customer complaints and withdrawals or recalls. This information is made available to the HACCP Food Safety Team.

During the audit multiple records were sampled and most considered to be properly documentation and kept.

The HACCP review was conducted on 25-03-2019.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 13 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Claudio Innocenti

NC 2.5.1: The magnet at the end of the sorting line wasn't shown on the flow-chart of the organic sun-dried apricots.

Details of non-applicable clauses with justification

Clause/section reference	Justification

3. Food safety and quality management system

3.1 Food safety and quality manual

The company demonstrated a documented quality system manual based on the BRC requirements (issued on 01-11-2019). The manual or their parts are made available as needed to the staff by trainings. Verified procedures and work instructions were clearly legible and available in Turkish. During interviews and auditor observations these were considered to be properly understood by relevant staff.

3.2 Document Control

There is a document control procedure in place Document & Record Control Procedure (P01 / 01-11-2019). Documents are controlled by quality department and by Document Master List (LT01) including issue date, revision date and the reason for revision. A record of the reason for change is retained. A list with all controlled documents were provided and verified during the audit. Computer data is backed up monthly.

3.3 Record completion and maintenance

Records reviewed were legible and easily retrievable and are retained for 3 years which properly covers the product shelf life of 12 months plus one year.

3.4 Internal audits

There is a planned programme of internal audits based upon risk (PL30/01-03-2016) for which the organization considers the following criteria: the NCs from the last year results, nr of received complaints, impact to product safety. Schedule issued PL31 on 09-03-2020 demonstrates that all system requirements are covered throughout the year and that all activities are covered at least annually.

Currently there are 3 internal auditors to cover all aspects of the organization and ensure independence. Auditors were demonstrably competent and evidence for this included Internal Auditor Certificate.

Audit reports include objective evidence of conformity as well as non-conformity and are reported to personnel responsible for the activity audited. Corrective actions and timescales are agreed, and

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 14 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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completion of corrective actions is verified by QA Manager.

During the audit the results of the following audit activities conducted throughout the year were reviewed:

Date	Area / Requirement	No. NCs	Action plans Y/N	Implemented Y/N	Verified Y/N
21-10-2019	QC	0	--	--	--
23-09-2019	Production	0	--	--	--
17-06-2019	Upper Management	0	--	--	--
15-07-2019	Maintenance	0	--	--	--
10-02-2020	Sales	0	--	--	--

In addition to the internal audit program there is a program of planned inspections for hygiene and housekeeping as well as fabrication (F56). The period has been determined monthly according to the risk analyses. Inspections are conducted by quality department; records seen for 02-03-2020, 03-02-2020, 07-10-2019 and 04-11-2019 and cover all process areas. Deviations identified are reported on the Check List and Corrective Action Plan is generated, and implemented actions are verified by QA Manager.

3.5 Supplier and raw material approval and performance monitoring

3.5.1 Management of suppliers of raw material and packaging

There is a documented supplier approval and monitoring system in place as P09 - Supplier Evaluation Procedure. This requires that the organization performs a risk assessment (PL32) of each raw material/group of raw materials to identify potential risks to product safety, legality and quality including allergen contamination, foreign body risks, micro contamination, chemical contamination and substitution or fraud (25-03-2019). Approved Supplier List was issued on 25-03-2019.

Existing methods to accept raw materials are consistent with the reviewed risk assessment which includes the following means of control: production registration record, COA – certificate of Analysis and traceability system.

During the audit a sample of supplier assurance records was conducted:

Item	Risk rating	Method of assessment	Valid until
Blue HDPE bag (Atilim Amb)	High Risk	BRC Packaging	05-06-2020
Rice flour (Ata Tic.)	High Risk	Auditing in place by using F93 (no GFSI benchmarked cert)	13-03-2020
Carton box (Mondi)	Low Risk	BRC Packaging	21-04-2020

Exceptions to the supplier approval process include the following controls: requesting CoA, third party GFSI audit report and physical inspections according to the agreed specification.

NA: No supply from Agent/broker.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 15 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Documented procedure Raw Material Control Instruction (T11) describes controls for acceptance of all raw materials and packaging materials. The plans covers the aspects to be checked during incoming inspection.

During the audit the raw material of apricots and the packaging materials incoming inspection reports are checked. The COA analysis report has seen. Also, the physical defects were checked. During incoming inspection, the quality staff checks the quality defects from 1000 g of sample. The sample is also taken by the quality staff. For the packaging they had asked for migration test results and the dimensions of the package checked with the visual inspection.

Material description	Defined means of control	Evidence provided	Comments
Rice Flour	Physical inspection / COA	Incoming products report / COA	Accepted by Quality Responsible
Blue PE bag	Physical inspection / COA	Incoming products report / COA	Accepted by Quality Responsible
Dried Apricots	Physical inspection / SO2 & moisture content analyses	Incoming products report	Accepted by Raw Material Responsible/ QC

Evidence of raw material changes being communicated to goods in was provided via changing the input receiving records.

NA: No live animals reception.

3.5.3 Management of suppliers of services

Procedure P09 describes the means to approve and monitor service suppliers which includes maintenance, transport, lab, pest management (contracted since 01-07-2016 and renewed annually) and recycled waste (from 01-10-2019 for 1 year). Contracts reviewed during the audit included safety and legality. This includes service expectations.

3.5.4 Management of Out sourced processing

Section considered not applicable. There are no process steps conducted by external organizations.

3.6 Specifications

Specifications are in place for raw materials including packaging and finished product. When required specifications are formally agreed with customers/suppliers. Procedure includes the requirement to review specifications when product/materials change or at least every 3 years.

Sampling of specifications was conducted as part of site inspection and traceability with following results:

Type of Specification	Description	Specification	Last review date	Comments
Final Product	Sun Dried Whole Pitted Apricots with SO2	UT01 / r:02 / 12-03-2019	25-03-2019	Regular review No change

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 16 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Final Product	Organic diced Sun Dried Apricots	UT06 / r:02 / 12-03-2019	25-03-2019	Regular review No change
Raw material	Rice Flour, pasteurised	LS031/ 18-01-2019	25-03-2019	Regular review No change
Packaging material	HDPE Liner	TBF006 / 19-12-2011	25-03-2019	Regular review No change

3.7 Corrective and preventive actions

The organization provided evidence of documented procedure P10. The company demonstrated that they use information from identified failures in the food safety, legality or quality of the products to make necessary corrections and prevent recurrence. The organization manages existing corrective and preventive actions via tracking on Corrective Action Log Sheet (F38). Reviewed records was showed root cause analysis was effective.

Trend analysis showed totally 19 CAPA in 2019, and mainly worker mistakes and physical defects.

3.8 Control of non-conforming product

A non-conforming product procedure - P11 is in place which includes controls and responsibilities for out-of-specification products/materials to avoid /prevent unauthorised release.

Non-conforming materials/products are identified by directly labelling and placed on Quarantine to avoid accidental release. A sample was conducted to verify that physically segregated materials/products matched with the ones reported in existing records. There wasn't any NC product recorded in 2019 till March 2020.

3.9 Traceability

A system is in place which allows the organization to trace all raw material product lots including primary packaging from their suppliers through all stages of their process until one step out of their responsibility and vice versa. The procedure dated 01-11-2011 describes how items may be traced.

The organization provided evidence of internal traceability exercises across a range of products which included a review of the pertinent documentation and records as follows:

	Product	Date of production	Amount Produced	Amount traced	Time required / Comments
Forward trace Date: 21-02-2020	Whole pitted sun-dried Apricots with Sulphur, (RM lot:KK-479-694 / final prod. Lot: 51-600-607)	19-09 & 22-11-2019 (receival) / 14-18/11/2019 (production)	Delivered 40'656 kg RM Produced 40'640 kg	All amount traced, no stocks,	3 hours
Backward trace Date: 10-02-2020	Whole Pitted Sun-dried Apricots (lot: 51-590)	09-11/11/2019	3000 kg finished product	All amount traced, 3000 kg product from 16769 kg	3 hours

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 17 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Claudio Innocenti

				washed RM (lot: NK-67), 15 kg 2nd quality, 9 kg loss, 13745 rest.	
--	--	--	--	---	--

An onsite traceability test was successfully conducted on:

	Product	Date produced	BB date	Mass balance	Time required
Backward trace From finished product	Organic Diced Sun-dried Apricots, 12.7 kg Net in blue PE liners in boxes (lot: 51-513)	05-11-2019	05-11-2021	Completed – 100% (there was only retain sample in stocks, all 1400 boxes dispatched)	3 hours 15 mins
Forward trace From raw material	Organic whole pitted sun-dried Apricots, (lot: 12-RK-01)	06/08/2019 (receival)	1 year	Completed – 100% (46'500 kg received, 16'220 kg washed, 17'780 kg dispatched, 330 kg B quality, 12.7 kg retain sample, 53.3 kg loss)	1 hour 05 min

Rework is fully traced by the first lot nrs. on the production records. Rework is applied to the out of spec products by re-sorting and lot nr of the product hasn't changed.

3.10 Complaint-handling

There is a fully documented complaint handling procedure issued 01-11-2011 (Customer Communications Procedure - P03). All complaints are recorded and an investigation is conducted by Quality Manager. The organization demonstrates the means to analyse and trend complaints and in case of significant increase or serious complaint root cause is determined as part of the action plan.

Main cause of complaints are Physical / quality defects and 6 were foreign bodies. During this year 19 complaints have been reported compared to 23 last year.

During the audit were reviewed records of existing complaints which demonstrates a proper documented and implemented system.

3.11 Management of incidents, product withdrawal and product recall

There is documented procedures for the crisis management - P06 and Recall / Withdrawal. Procedure - P17. The crisis management team includes: GM, FSTL (QA Man), Facility Manager, Production Manager, Export Manager.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 18 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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The recall procedure is tested at least annually to ensure effective operation at both facility and company level. The test showed that the site's responsibilities (e.g. communication) were properly understood and capable of being promptly enacted. Last test:

Date	Product	Batch traceability	Key timings	Corrective actions
24-02-2020	Pitted whole sun-dried apricots	440020437-51-451	11:40 - 15:40	NA

There have been no withdrawals / recalls in the last 12 months however the procedure states that in the event of a product recall the certification body should be informed within 3 working days of the decision to issue a recall.

Details of non-applicable clauses with justification

Clause/section reference	Justification
3.5.1.5	No supply from Agent/broker.
3.5.2.3	No live animals reception.
3.5.4	No outsourced processing.

4. Site standards

4.1 External standards

The production site is situated in the industrial zone. A plant tour around the perimeter was conducted and no activities were observed which may have an adverse impact on product.

External areas were observed to be well maintained. All areas around the building were observed with sufficient clear areas to discourage rodent burrowing. Roads around the plant were observed to be paved and in good condition. Waste containers are maintained far from plant entrance and kept closed to prevent pest harbourage.

Building fabric was in good condition. Docking doors were observed to close properly and without evidence of bird roosting sites. Walls and floors were in good condition; pipes, vents etc were adequately proofed.

4.2 Site security and food defence

Security systems are in place. A documented risk assessment has been conducted on Food Defense Plan (PL24). The system requires annual review – last conducted on 25-03-2019, as a consequence no changes were identified in the threat assessment plan.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 19 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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Visitor reporting system is in place.

No external storage tanks / silos evident.

Storage areas are kept closed. Laboratory is side to the processing hall and kept the door closed when no one is inside and only authorized persons allowed to enter, there is no window.

Security procedures documented as Security Instruction (T09) and are part of the training program and personnel interviewed explained their responsibilities in that respect. Latest training was on 22-04-2019.

NC 4.2.1: The food defense plan wasn't reviewed for the past 1 year for the new circumstances and emerging any new risk.

4.3 Layout, product flow and segregation

The factory layout (PL25), process flow and movement of personnel appeared acceptable. Contractors and visitors are made aware of company procedures by visitor questionnaire. Contractors are under the supervision of relevant department responsible. According to the zone description of the standard the company has no high risk, high care or ambient high care area.

The site tour demonstrated that the plant has sufficient workspace and storage capacity to enable proper hygienic conditions.

No temporary structure is present.

Map provided by the plant and assessed by the auditor demonstrate the following areas:

Areas	Location	Level of control
Low-risk	Raw Material Storage, Preparation area, Production Area	PRPs, GMPs
Enclosed product	Warehouse/dispatch area	General Cleaning and GMPs
Non-product	Maintenance, cafeteria, locker rooms, offices	General Cleaning

4.4 Building fabric, raw material handling, preparation, processing, packing and storage areas

Fabrication of site, buildings and facilities observed to be suitable for intended purpose:

Walls	Observed to be in well maintained conditions, no accumulation of dirt, condensation or mould. Concrete walls are included in the cleaning program.
Floors	Epoxy flooring was observed to be in well conditions, without cracks or evidence that does not resist process needs and observed in good cleaning conditions.
Drainage	Included in the cleaning program, properly covered to avoid pest entrance. Back flow prevention devices are installed and reported to be in good condition according to last report dated 02-03-2020.
Ceilings and overheads	Maintained in good condition, included in the cleaning program. There is no suspended ceilings and elevated walkways.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 20 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com



Windows, roof glazing and ventilation	Observed to be in good condition. Windows which open to the outside are properly screened to prevent the ingress of pests. Glass near production areas was observed to be protected against breakage. Natural and mechanical ventilation system was installed. No condensation or excessive dust observed.
Doors	Docking area doors were observed in good conditions, close fitting. Plant is observed generally properly sealed, no gaps between walls and/or floor. However NC 4.4.8: It was observed there was some openings with the floor at the raw material door, not close-fitting. And there wasn't any protection for the pest ingress when the door opened.
Lights	Light seems to be adequate for process needs. Where located in process areas were observed properly protected and shatter proofed. Inspection areas observed with adequate light for proper performance of their operations.

4.5 Utilities – water, ice, air and other gases

The water distribution schematic diagram (PL28) dated 12-02-2016 was used as a basis for water sampling. All water is potable and provided by the industrial zone. Testing sample schedule is in place according to the risk analysis and requires yearly microbiological and chemical quality tests conducted by external Laboratory on 18-02-2020, Malatya Public Health Directorate Lab. Satisfactory results for microbiological and chemical parameters seen.

Non-potable water is not used.
No compressed air is used.
The organization does not use CO2 / N2 for their production process.

4.6 Equipment

Food processing equipment observed to be industry standard. Key pieces of equipment include Stainless Steel and food grade plastic/conveyor belts. Equipment selection is based on impact to food safety. Equipment in direct contact with food including conveyors of sorting are food grade.

4.7 Maintenance

The organization plans, tracks and records their maintenance program based on paper files. System has controls in place to provide corrective/preventive/deductive maintenance based on defined routines as documented Annual Maintenance Plan (PL21).
Temporary repairs are controlled by Maintenance Procedure (P08) and the procedure ensures that these types of repairs should not contribute to product contamination issues. No temporary repair was seen.

Maintenance work is followed by documented hygiene clearance procedures described on the Maintenance Procedure and a hand over process to production is in place, evidence of compliance seen was supplier report for metal detector and dicing machine.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 21 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
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There is 1 maintenance team member supported by contractors as appropriate.

Start-up checks are completed by QC Supervisor.

Food grade lubricants including allergen status were listed on Product Information Sheet of each lubricant with H1 registration (92553). Location, identification and clear determination on where permissible for use were evaluated and considered to be satisfactory.

Engineering workshop is situated at the loading area as segregated and was observed to be well controlled to prevent contamination into other areas.

During the audit were assessed maintenance routines for the following equipment:

Equipment	Routines verified	Period Reviewed	Comments
Metal Detector	Annually	26-12-2019	Completed through service report of Thermo Scientific with calibration report and released by QC Responsible (F65)
Dicing machine	Annually	1 -06-2020	Completed by maintenance responsible, released by QC Responsible (F65)

NA: There was no temporary repairs in the company

4.8 Staff facilities

Suitable staff facilities are provided. Changing rooms are adequate for number of staff. Lockers allow for the segregation of personal items and production clothing. Clean and dirty production clothing are properly segregated.

Suitable handwashing facilities in place. Toilets are segregated. Adequate smoking facilities provided externally and include policies with respect to the use of electronic cigarettes.

Catering facilities are provided. Food is also provided by the company in proper conditions.

A rest room is provided with appropriate stored and hygienic conditions.

NC 4.8.4: The warm water can't reach promptly to the hand-washing facilities in the production.

4.9 Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas

4.9.1 Chemical control

Cleaning chemicals and lubricants are properly identified in the existing list of approved chemicals, properly contained and segregated with non-food grade chemicals in specified lockers located in chemicals storage room as locked.

Confirmation of suitability is conducted by Product Information Sheets (PIS) and SDS.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 22 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

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When in use chemicals are properly identified and employees are aware and trained on their proper use on 13-12-2019.

Safety Data Sheets (SDS) are made available and used as part of existing training programs.

NA: There is not strongly scented or taint forming material usage in the facility.

NC 4.9.1.1: The chemicals for the maintenance purpose were not included on the approved chemicals list.

4.9.2 Metal control

Sharp metal implements are controlled according to policy of Metals documented on the Instruction of Glass, Brittle Plastics and Sharps (T02). This requires that they be inspected, records from Knife Control Form for February and March 2020 were seen. Snap-off-blade knives were not observed and reported to be forbidden.

The policy also confirms that packaging/ingredients which use staples is not permitted. Policies are in place to avoid the use of staples, paper clips etc.

4.9.3 Glass, brittle plastic, ceramics and similar materials

Glass breakage procedure dated 01-11-2011 is in place. Instructions for breakages are included and recorded on F23.

Glass and other transparent brittle materials have been excluded wherever possible from open product areas.

The glass and hard plastic register (F02) was up to date. Checks are conducted weekly/monthly according to the risks and records for the checks conducted on 02-03 and 03-02-2020 were reviewed.

4.9.4 Products packed into glass or other brittle containers

The organization does not pack products in glass or brittle containers.

4.9.5 Wood

Wood is not used in production areas.

Wood is only used in finished product and raw material / packaging material storages as pallets. Wood use was in pallets only and these were controlled by limiting their use to the ends of lines only. In such cases there are inspections of conditions to reduce risk of product contamination.

4.9.6 Other physical contaminants

The packaging material of raw materials for apricot is done opening sacks from sewing part and keep the ropes in a designated pot which is counted daily and not tearing the sacks.

Pens in open product areas are controlled by quality. Only one-piece blue pen was used.

However

NC-4.9.6.1: The raw material sacks opened for sampling at the storage by cutting without any precaution of the physical contamination with the sack threads.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 23 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

4.10 Foreign-body detection and removal equipment

4.10.1 Selection and operation of foreign-body detection and removal equipment

The company has ensured all necessary steps are taken to identify, avoid, eliminate or minimise the risks of metal or other foreign body contamination by Hazard Analyses Assessment. Control measures for preventing foreign materials are implemented by means of sieves / metal detection / X-Ray Detection (for diced apricots) / visual inspection.

4.10.2 Filters and sieves

Sieves are used to eliminate foreign bodies coming from the nature of raw material and located before and after the washing. The mesh is adequate to reduce of further contamination (10 mm). Filters for water and sieves are inspected/tested daily based on available risk assessment.

4.10.3 Metal detectors and X-ray equipment

One X-ray detector just before the packing for diced apricots and one metal detector after packing were present and used according to the customer requirements. Metal Detector include a belt stop system with an alarm (audible and visible). Rejected items (as packed in cartons) are isolated in a secure location. The X-ray detector include an automatic rejection device which was diverting contaminated product to a secure unit.

Documented procedures of the detectors (T13) as work instructions details controls for testing of the equipment including responsibilities, operating conditions including sensitivity; methods and frequency of checks and requirement to document the obtained results. Test observed during site tour and conducted correctly.

4.10.4 Magnets

Magnets are located at raw material pre-cleaning and after the final sorting. Inspection of the magnets is conducted via Magnet Check Form (F89). Records reviewed on site provided details of test results.

4.10.5 Optical sorting equipment

Optical sorting equipment is checked according to manufacture instructions which are conducted daily and recorded on Foreign Body Form (F21).

4.10.6 Container cleanliness – glass jars, cans and other rigid containers

NA - Not in use at this facility.

4.11 Housekeeping and hygiene

A team of line workers clean the facility at the end of the production run under the supervise of the cleaning responsible. Pre-start checks and equipment cleanliness were verified during the audit. Site was maintained in appropriate level of cleanliness.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 24 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com



Written cleaning methods are in place, those for washing and dicing machines and sorting conveyors were checked during the audit.

Cleaning records are analyzed, and trend analysis are available to instigate improvements where required.

Cleaning programs were validated visual inspection daily by QC responsible. Cleaning is verified via pre-start visual inspections. Records for February and March 2020 were reviewed. Not seen any out of specification results. If happens, the corrective action is described in the plan.

Cleaning equipment were hygienically designed and fit for purpose and used only for the floor and color coded for the segregation between the areas. The equipment has been cleaned with clothes.

N C 4.11.1: It was observed there were some burned apricots near the ventilation channels in the drying room

4.11.7 Cleaning in place (CIP)

There is no CIP Cleaning.

4.11.8 Environmental monitoring

The facility has developed a program which requires indicator organisms on annually basis according to risk assessment. The program identifies sampling protocol, sample locations, frequency, target organisms, test methods and evaluation results.

Acceptable limits have been defined for (TPC and Coliform less than 10 cfu from food and non-food contact surfaces, and Mold/Yeasts less than 100 cfu from the process area air) and the procedure (PL29 dated 01-08-2019) requires that the following actions be taken when these limits are exceeded; re-clean and re-test the area, investigate the root cause and take the corrective action according to the root cause.

The last review of the program was triggered by QA Manager which is annual review.

4.12 Waste

Waste was observed to be well managed. All waste is removed from production on a regular basis. External waste collection containers/rooms housing waste are well managed. Containers are properly covered.

Waste is removed by licensed contractor. Unsafe product or trademarked waste is disposed of by Government Agency and records retained.

4.13 Management of surplus food and products for animal feed

Organization has received detailed instructions by customer-branded products on how to dispose of surplus including not to sell to staff or not passed to other organizations. Current process includes opening the products and shredding the customer branded packaging materials.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 25 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
 If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS,
 please contact tel.brcgs.com

No surplus food for charity and no waste for animal feed.

4.14 Pest management

The organization has a preventive control program in place to minimize risk of infestation which includes external service provided by Tarbil.

The following is a description of the existing program

Contract or document that describe service	2019/07/01
License or permit	Issued by Malatya Directorate on 2015/
Pest covered	rodents, crawling and flying insects and birds. Loading/unloading areas are protected with strip curtains against birds.
No. of routine visits	monthly, latest on 2020/03/3
Station map	2016/07/01 which matches with existing numbered pest control devices.
Type of used pest control devices	Glue board traps in the plant, bait stations outside the plant, light traps for fly inside the plant
In-depth pest control surveys	Annually by the licensed expert and the last survey was reported on 2019/07/01
Controls in case of infestation	Hold suspect product and contact Pest Control Organization for remediation.

The organization has a list of approved pest control products used including MSDS. Bait stations are robust and secured in place. Toxic rodent baits are not used in open product areas. EFKs and pheromone traps are correctly sited.

Inspection reports provide details of the inspections conducted, if any activity is reported inside or outside the facility, recommendations are provided and actions are taken over such recommendations.

Reports are assessed monthly for trending (latest on 3-03-2020) which includes catch analysis existing information provide evidence to support that in the last 12 months there has not been infestation.

Interviewed employees understand the signs of pest activity and are aware of the steps to be followed to inform of pest activity to designated functions (training on 01-07-2019).

NA - No in-house pest management, outsourced.

4.15 Storage facilities

Storage facilities observed to be satisfactory. Allergens segregated by different storage room (sulphites).

Refrigerated rooms used for organic apricots where temperature is controlled via manual monitoring every 4 hours. Seen the records of February and March 2020. The system is alarmed and set at maximum to 10oC.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 26 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

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The temperature management system is manual and is monitored every 4 hours, this allows sufficient time to take action before the product exceeds defined limits.
 Stock rotation is controlled by FIFO procedures. Program was observed properly followed.

NA - Controlled atmosphere storage is not applicable.
 NA - Outside storage is not conducted.

4.16 Dispatch and transport

Dispatch observed to be satisfactory. Loads are inspected prior to dispatch which includes documented verification of seals, odors, visual conditions, debris, container conditions and compatible materials.

Traceability is ensured by recording lot numbers of the products to Shipping Records and records were available for traceability exercise.
 Vehicles are provided by mix of customers and third-party contractors.

The documented procedures for transportation include restrictions in the loads, security measures during transit and instructions on case of breakdowns or accidents.

Approved third party contractors meet requirements which are described in contracts.

NA - Containers are not required to control temperature.

Details of non-applicable clauses with justification

Clause/section reference	Justification
4.2.2	It is not needed to take additional measures to mitigate risk to raw materials or product.
4.2.3	There is no external storage
4.3.5	No temporary structure on site
4.4.5	There is no suspended ceiling.
4.4.6	There is no elevated walkway.
4.5.3	There was no air and other gases used as ingredient or contact with products
4.7.3	There was no temporary repair in the company
4.9.1.2	No strongly scented or taint-forming materials in use
4.9.4	There is no glass or brittle containers for packaging

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 27 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
 If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS,
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4.10.5	There is no optical sorting equipment
4.10.6	There is no rigid container as packaging
4.11.7	There is no CIP Cleaning.
4.13.1	No surplus customer branded by product available.
4.13.2	No charity or donations available
4.13.3	No product for animal feed
4.14.3	No in-house pest management, outsourced.
4.15.4	There is no controlled atmosphere storage.
4.15.5	There is no outside storage
4.16.3	Containers are not required to control temperature.

5. Product control

5.1 Product design/development

Product development procedure is in place dated 01-11-2011. Procedure is applicable for new, modified products and includes HACCP review and production trials.

Shelf life tests are conducted following documented protocols which demonstrates compliance with relevant microbiological, chemical and organoleptic criteria.

Records for sun dried pitted whole apricots product were reviewed.

There is no any new product design/development presently. Also new product development is not required so far because the plant is producing bulk to other manufacturers.

5.2 Product labelling

The company ensures that labels are legal for the country of use by label approval from the customers. Process is followed also in case of changes to recipe, raw materials (material, supplier or country of origin); legislation.

Evidence seen during the audit included diced dried apricots.

No claims evident.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 28 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

The organization confirms the in cases where the label information is the responsibility of their customer or a third party, they are responsible to provide the required information to maintain accuracy and adequacy.

NA - No cooking instruction required.

5.3 Management of allergens

The company have an allergen control procedure in place as allergenic materials procedure which includes assessment of raw materials to establish the presence and likelihood of contamination by allergens.

A list of allergens containing raw materials, processing aids, intermediate and finished products is held and dated 02-01-2020. Allergens on site are Sulphur dioxide and Sulphites (it is an ingredient of the raw material, no usage of sulphites in the facility).

A risk assessment dated 02-01-2020 has been conducted to identify routes of contamination.

Allergen rework is controlled by Rework Tracking Form (FR.101) and Hold/Release Form (FR.063).to avoid cross contamination.

Warnings are in place on labelling as appropriate.

No claim made regarding a food for allergy or food sensitivity.

Cleaning methods have been validated:

Allergen	Protein Specific Swab / Finished Product Testing etc	Date
Sulphites	Finished Product Testing and food contact surfaces testing	25-03-2019

Line start up checks are in place for product change over and changes in batches of packaging to ensure labels applied are correct for products packed. Records for February and March checked.

5.4 Product authenticity, claims and chain of custody

Company have access information on risks of adulteration or substitution of raw materials via trade associations / government sources/ private resource centres as reliable web sites.

A vulnerability risk assessment dated 25-03-2019 was made available to assess the potential of adulteration or substitution. According to the assessment the organization identified certain raw materials are not affected due to agricultural fruits (apricots). Suppliers are controlled also with their GFSI certification status, audits, CoAs.

The defined vulnerability was Organic status of the fruits and vegetables.

The company has organic certification valid till 31-01-2021 from Ecocert.

Organic raw material purchases can be provided from other organic raw material certified projects. The seeding, harvesting and commercial circulation and sale of organic raw materials are subject to organic certification. And tested at external labs for pesticides residues, e.g. for sun dried pitted whole apricots on 09-09-2019 at Primors Lab. (acr: BELAC-057-T).

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 29 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

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Evidence of Kosher and Halal certifications were demonstrated. Certificates valid to 31-01-2021 (Star-K) and 20-09-2021 (TSE) respectively. There is no risk of loss of identity due to all ingredients are Kosher and Halal certified.

The organization provided copy of the documented process flow for production of products with claims which identify potential areas for contamination or loss of identity identified and controls established.

The organic claim printed onto the carton boxes of the finished products as Organic Sun-dried Apricots and kosher & halal claims are not labelled onto finished products due to the products are dispatched as bulk to the other manufacturers.

The last traceability exercise to confirm this status was conducted on 24-02-2020 with satisfactory results, these are conducted every 6 months.

5.5 Product packaging

Purchasing of food contact packaging includes the need to provide particular characteristics of the food to ensure the provided material is suitable for the intended use. Evidence seen during the audit included Certificate of Conformity and migration test reports for blue PE bag of 26-02-2019.

Obsolete packaging is managed via labelled and segregated in a designated area of the storage which is kept secured and safe till next production.

PE Bags for work in progress were robust and blue coloured.

5.6 Product inspection and laboratory testing

5.6.1 Product inspection and testing

Test critical to confirm product safety, legality and quality are performed by organization and external laboratories.

Product inspections were mainly quality characteristics such as physical defects, EVM and FM. Tests include product (humidity, microbiological analysis – TVC, yeast & mold, coliforms and SO2), raw material (Ochratoxin, pesticide, aflatoxin, physical controls), swabs (hand, protective cloths, environment, surface). The regime does not properly consider risk. Results are recorded and reviewed regularly to identify trends.

Test results are compared against product specifications or acceptability criteria to identify compliance and relevance of reported determinations, when deviations are identified the organization treat product as non-conformity or re-evaluate test results before actions are taken.

Results for micro, pesticides, heavy metals, aflatoxins, Ochratoxin A, water content and SO2 seen during audit (e.g. organic sun dried pitted whole apricots on 09-09-2019).

5.6.2 Laboratory testing

Laboratory testing is carried out by in-house laboratory which follows the principles of ISO 17025 (attending ring tests to justify the validation of the methods and also by external accredited laboratory SGS

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 30 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com



(AB-0328-T) and Primors Lab.-Belgium (acr: BELAC-057-T) for which the scope of services matches the tests conducted.

The reliability of in-house laboratory results includes recognized documented test methods, qualification of laboratory staff, and implementation of ring tests, inclusion of laboratory equipment in calibration and maintenance programs.

A schedule of testing is in place, satisfactory results were seen for:

Test	Frequency
Pesticides / heavy metals / Ochratoxin / Aflatoxins	Annually and quarterly / external laboratories
Finished product micro (TVC/ yeast/ mold/E. coli/ Coliform/ Salmonella)	Monthly / external lab
Analytical (water content / SO2)	Every batch / internal lab and annually / external lab

5.7 Product release

Product is released based on control plans which demonstrate criteria have been met. Control of non-conforming product includes the details. The products are not released until all the analyses and controls were completed and without positive release by designated quality department responsible by approving the Finished Product Control Forms as defined at the QC Manual.

5.8 Pet Food

The factory does not make pet food

Details of non-applicable clauses with justification

Clause/section reference	Justification
5.2.3	No claims evident.
5.2.5	No cooking instruction required on the label.
5.3.7	No allergen free claims.
5.4.3	No material identified under risk by vulnerability assessment
5.4.4	No status of a raw material evident
5.8	The factory does not make pet food.

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 31 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



This report shall not be reproduced in part without the permission of AIB International
 If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

6. Process control

6.1 Control of operations

Process observed to be well controlled.
Documented process specifications / work instructions are available for key processes in production. Process specifications were assessed during the audit as well as part of the traceability study. Documents reviewed demonstrated that process specifications meet final product specifications.

Key process monitoring includes chemical and physical properties which are controlled by manually. Records seen for diced dried apricots with SO2 (lot nr: 7451883001) and for organic dried apricots (51-162).

Process conditions are not linked to critical safety or quality parameters of the product.

Equipment failure is covered by non-conformance procedure. Access to key pieces of equipment such as area authorization is controlled via production responsible.

NC 6.1.2: No protecting system seen on the panel of the metal detector to prevent unauthorized access.

6.2 Labelling and pack control

The company ensures that the correct labelling is available by approving initial label at start up and getting a copy of the label on the back side of packaging control form. Only the labels for the current product is available for use at the line.

Documented checks are conducted at the beginning, hourly and at the end of production. Records for Packaging Control Form for Organic Sun-dried pitted whole Apricots (51-86) and Sun-dried diced apricots (lot: 51-102) seen during the audit.

Due to scheduling no changeover observed during the audit. Only start-up observed which was satisfactorily done.

NA - Online vision is not used.

6.3 Quantity, weight, volume and number control

Products are checked for quantity by weight control. Controls are done using calibrated scales for each pack of product. Each pack is weighed whether it is retail pack or 12.5 kg bulk packages. Selected method meets legal and customer requirements.

N/A: No online checkweighers.

N/A: No bulk product on site governed by legislative requirements.

6.4 Calibration and control of measuring and monitoring devices

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 32 of 35

Rev. 26 Report No. BRC-FD-046-DG

Auditor: Emrah Kosucu



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A list of equipment requiring calibration is held on Calibration Plan covering calibration and accuracies. Equipment used to monitor CCP's, product safety or legality includes:

Item	Frequency	Calibration Date
Scale	annually	14-01-2020
Glassware lab equipments	annually	07-03-2020
DFA - Water content analyser	annually	05-03-2020
Magnet	annually	05-03-2020
Reference thermometer	annually	15-01-2020

Reference equipment is stored in the QC lab.

Procedures for control of out of specification equipment are available which include documentation of actions taken on Calibration Plan.

Details of non-applicable clauses with justification

Clause/section reference	Justification
6.1.5	Process conditions are not linked to critical safety or quality parameters of the product.
6.2.4	No online vision used to check labels
6.3.2	No bulk product on site governed by legislative requirements.
6.3.3	No online checkweigher in the site

7. Personnel

7.1 Training: raw material handling, preparation, processing, packing and storage areas

Relevant personnel are trained prior to commencing work (induction training). New employees are supervised for 15 days to evaluate adherence and compliance to defined rules. No temporary workers or sub-contracted workers present.

Employees engaged in activities relating to critical control points are assessed for competency and training requirements. Records for CCP responsible was seen on 26-12-2019 and 21-05-2019 and HACCP on 25-02-2019 seen. Labelling controls are trained according to Labelling Control Work Instruction on 22-04-2019.

Training records assessed provide the name of the trainer, confirmation of attendance, date and duration, title of the course, results of training effectiveness. Training is provided in Turkish because everyone in the site are Turkish.

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F834 English Food Template v5 28/01/2020

Page 33 of 35

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During the audit the training and competency requirements were assessed for housekeeping and sanitation supervisor position which demonstrate compliance with the program requirements and expectations for the training on 13-12-2019.

7.2 Personal hygiene: raw material handling, preparation, processing, packing and storage areas

Personal hygiene rules are documented in Personal Hygiene and Rules Instruction (T03) and compliance is checked by QC supervisor via daily personal hygiene checks by F07 and F95. During the audit these were observed to be properly followed. Personal hygiene training was done on 25-10-2019 through the instruction (T03).

Hand cleaning observed to be performed appropriately.

Blue metal detectable plasters are used; a sample of each batch of plasters is checked through metal detectors and recorded on metal detector check form at the intake checks. Where appropriate in addition to the plaster, a glove is worn.

Use and storage of medicines was described in Health Instruction (T08).

7.3 Medical screening

Employees are made aware of and know who to notify in the case of symptoms of infection, disease or condition which would prevent a person working with open food by Personnel Health Instruction (T08).

Visitors and contractors are aware of conditions that prevents visiting areas with open food by Visitor Hygiene Instruction and Questionnaire (F35) and require them to inform the organization if suffers of any identified conditions by getting approval from QA Manager.

Personal hygiene instructions describe actions to be taken in case of been in contact with an infectious disease.

7.4 Protective clothing: employees or visitors to production areas

The use of protective clothing is defined and documented in the Personal Hygiene and Rules Instruction (T03).

Protective clothing includes uniforms and aprons and 2 sets are provided.

Laundering is by inhouse laundry according to the Workwear Washing Instruction (T26). Cleaning verification is done monthly via swab tests.

There is no use of gloves.

N/A: No items of personal protective clothing used unsuitable for laundering

NC 7.4.3: The Laundry operation conditions was not documented on the Laundry Instruction.

Details of non-applicable clauses with justification

AIB International Certification Services, Inc. – 1213 Bakers Way, PO Box 3999, Manhattan, KS 66505-3999

F834 English Food Template v5 28/01/2020

Page 34 of 35

Rev. 26 Report No. BRC-FD-046-DG

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Clause/section reference	Justification
7.4.6	No items of personal protective clothing used unsuitable for laundering

8. High-Risk, High-Care and Ambient High-Care Production Risk Zones	
8.1 Layout product flow and segregation in high-risk, high-care and ambient high-care zones	
No high – risk, high care and ambient high care zones	
8.2 Building fabric in high-risk and high-care zones	
N/A	
8.3 Maintenance in high-risk and high-care zones	
N/A	
8.4 Staff facilities for high-risk and high-care zones	
N/A	
8.5 Housekeeping and hygiene in the high-risk high-care zones	
N/A	
8.6 Waste/Waste disposal in high risk, high care zones	
N/A	
8.7 Protective clothing in the high-risk high-care zones	
N/A	
Details of non-applicable clauses with justification	
Clause/section reference	Justification
8 (All)	No high – risk, high care and ambient high care zones

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F834 English Food Template v5 28/01/2020	Page 35 of 35	Rev. 26 Report No. BRC-FD-046-DG	Auditor: Emrah Kosucu



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Auditor number

20684

AIB International Certification Services, Inc., ANAB accredited Certification Body No. 173 certifies that, having conducted an audit

For the scope of activities: Washing, sorting, grading, oven drying and packing of whole and diced sun-dried apricots into PE bag in cardboard boxes and retail packs

Exclusions from scope: None

Product categories: 15 - Dried food and ingredients

Kirici Kuru Meyva Ve Gida Tekstil Turizm San. Tic. A.Ş.

Site Code 3067471

**1. Organize San. Bölgesi 1. Cadde
44200 Malatya
Turkey**

Has achieved Grade: A

Meets the requirements set out in the

**GLOBAL STANDARD for FOOD SAFETY
ISSUE 8: FEBRUARY 2019**

Audit program: Announced

Date(s) of audit: 11 and 12 March 2021

Certificate issue date: 22 April 2021

Certificate re-issue date: N/A

Re-audit due date: from 15 February 2022 to 15 March 2022

Certificate expiry date: 26 April 2022



Authorized by
Alfonso Capuchino – General Manager, Certification Services



AIB International Certification Services, Inc.

1213 Bakers Way, PO Box 3999

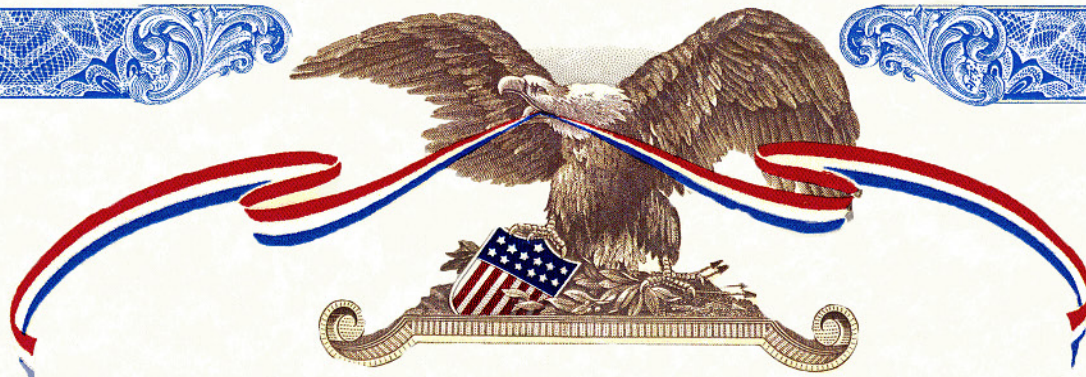
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Certificate traceability reference BRC-FD-046-DG

This certificate remains the property of AIB International Certification Services, Inc.



If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tel.brcgs.com. Visit brcdirectory.com to validate certificate authenticity.



2021

CERTIFICATE OF REGISTRATION

This certifies that:

Kirici Kuru Meyva ve Gida Tekstil Tur. San.Ve Tic. A.S.
1.Organize Sanayi Bol. 1 CAD. NO: 24
Malatya, Malatya TR-44100
Turkey

is registered with the U.S. Food and Drug Administration pursuant to the Federal Food Drug and Cosmetic Act, as amended by the Bioterrorism Act of 2002 and the FDA Food Safety Modernization Act, such registration having been verified as currently effective on the date hereof by Registrar Corp:

U.S. FDA Registration No.: **10415547782**
U.S. Agent for FDA **Registrar Corp**
Communications: 144 Research Drive, Hampton, Virginia, 23666, USA
Telephone: +1-757-224-0177 • Fax: +1-757-224-0179

This certificate affirms that the above stated facility is registered with the U.S. Food and Drug Administration pursuant to the Federal Food Drug and Cosmetic Act, as amended by the Bioterrorism Act of 2002 and the FDA Food Safety Modernization Act, such registration having been verified as effective by Registrar Corp as of the date hereof, and Registrar Corp will confirm that such registration remains effective upon request and presentation of this certificate until December 31, 2021, unless such registration has been terminated after issuance of this certificate. Registrar Corp makes no other representations or warranties, nor does this certificate make any representations or warranties to any person or entity other than the named certificate holder, for whose sole benefit it is issued. Registrar Corp assumes no liability to any person or entity in connection with the foregoing. The U.S. Food and Drug Administration does not issue a certificate of registration, nor does the U.S. Food and Drug Administration recognize a certificate of registration. Registrar Corp is not affiliated with the U.S. Food and Drug Administration.

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info@registrarcorp.com • www.registrarcorp.com

David Lennarz
Executive Director
Registrar Corp
Dated: October 26, 2020
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Claudio Innocenti

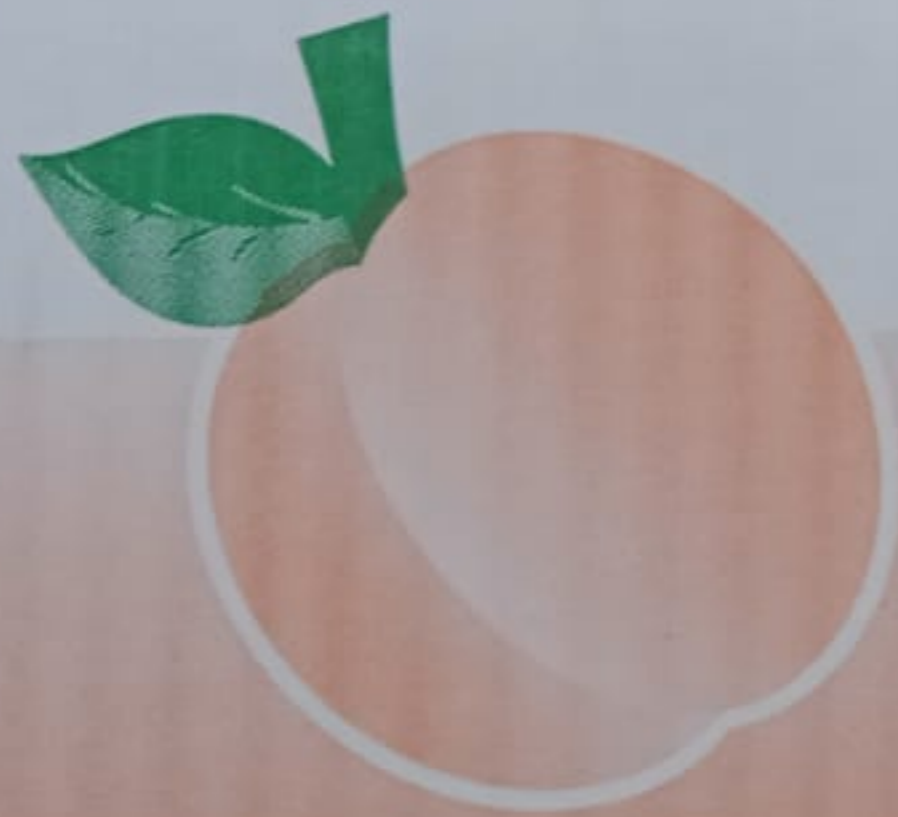


**DRIED APRICOTS
WHOLE PITTED
PRODUCE OF TURKEY**

**CONTAINS SULPHUR DIOXIDE
AS PRESERVATIVE TO PROMOTE
COLOR RETENTION.
INGREDIENTS : APRICOTS, SO₂**

SIZE	1
CLASS	EXTRA
LOT	440020437-51-338
CROP	2021
TS	485
NET weight	28 LBS

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Kinda

BRAND

FAMOUS TURKISH DRIED APRICOTS

Net Weight: 28 LBS

A handwritten signature in cursive script, reading "Claudio Innocenti", located in the bottom right corner of the page.



**DRIED APRICOTS
WHOLE PITTED**

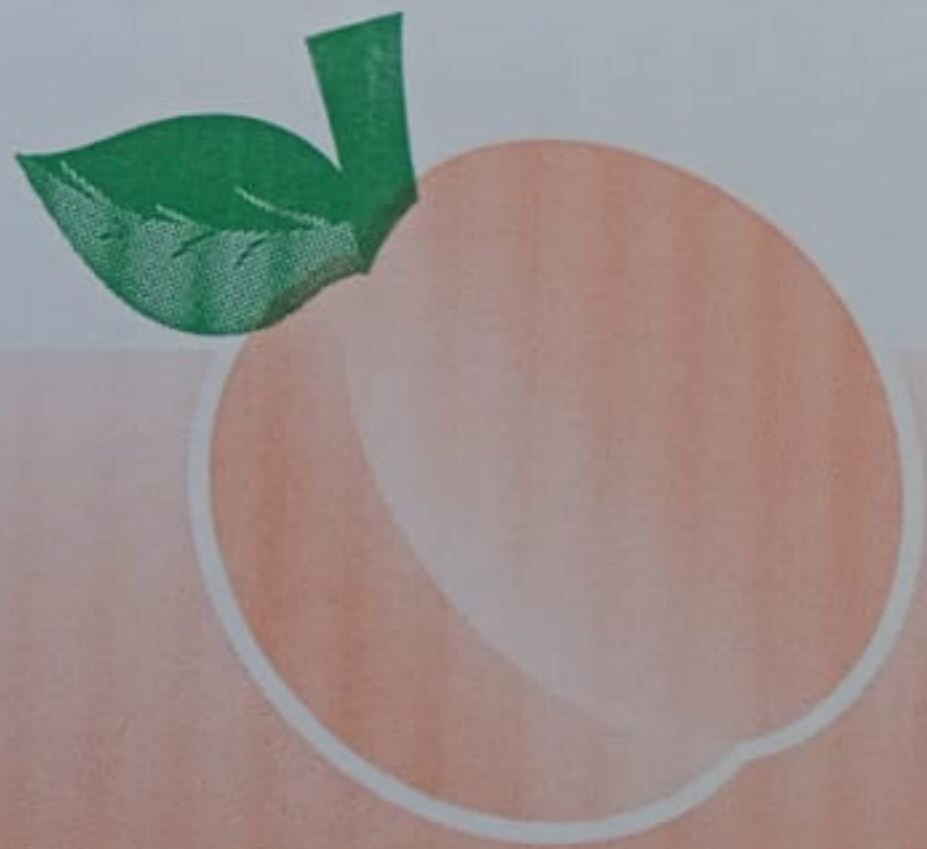
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SIZE	
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CROP	
TS	485
NET weight	28 LBS

A handwritten signature in cursive script that reads "Claudio Innocenti".



Kinda

BRAND

FAMOUS TURKISH DRIED APRICOTS

Net Weight: 28 LBS

A handwritten signature in black ink that reads "Claudio Innocenti". The signature is written in a cursive, flowing style.

PASSED
METAL
DETECTION

Claudio Innocenti



**DRIED APRICOTS
WHOLE PITTED**
PRODUCE OF TURKEY
CONTAINS SULPHUR DIOXIDE
AS PRESERVATIVE TO PROMOTE
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Net Weight: 28 LBS

**PASSED
METAL
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